

Attachment A –
Conflict of Interest Code -
Clean

Conflict of Interest Code:

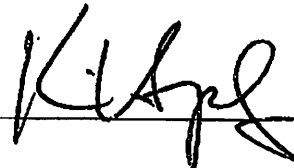
Guajome Learning Centers

**GUAJOME LEARNING CENTERS
CONFLICT-OF-INTEREST CODE**

The Political Reform Act (Govt. Code § 81000, *et seq.*) requires state and local government agencies to adopt and promulgate conflict-of-interest codes. The Fair Political Practices Commission (FPPC) has adopted a regulation (2 CCR § 18730) that contains the terms of a standard conflict-of-interest code, which can be incorporated by reference in an agency's code. After public notice and hearing, the standard code may be amended by the FPPC to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations § 18730 and any amendments to it duly adopted by the FPPC are hereby incorporated by reference. This regulation and the attached Exhibits A and B, designating positions and establishing disclosure categories, shall constitute the conflict-of-interest code of Guajome Learning Centers, which operates Guajome Learning Centers (or "Charter School").

Individuals holding designated positions shall file their Form 700 Statements of Economic Interests with the Charter School, which will make the statements available for public inspection and reproduction. (Govt. Code § 81008.) All statements will be retained by the Charter School.

APPROVED AND ADOPTED by the Board of Directors of Guajome Learning Centers on the 10th day of December 2024.



Guajome Learning Centers Superintendent

I, the undersigned, do hereby certify:

1. That I am the Secretary of the Guajome Learning Centers Board of Directors; and
2. That the foregoing Conflict-of-Interest Code constitutes the Conflict-of-Interest Code of said school as duly adopted by the school's Board of Directors on September 8, 2020.

Secretary Name Dawn Voss
Secretary Signature Dawn Voss

Guajome Learning Centers Board of Directors

EXHIBIT A
DESIGNATED POSITIONS

<u>Designated Position</u>	<u>Assigned Disclosure Category</u>
Members of the Governing Board	I
Charter School Superintendent	I
General Counsel	I
Consultants	*

*Consultants are included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitation:

The Superintendent may determine in writing that a particular consultant, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements in this section. Such written determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The Superintendent's determination is a public record and shall be retained for public inspection in the same manner and location as this conflict-of-interest code. (Govt. Code § 81008.)

EXHIBIT B

DISCLOSURE CATEGORIES

Category I

Designated positions assigned to this category must report:

- a. Interests in real property which are located in whole or in part within the boundaries (and a two mile radius) of any county in which the Charter School operates.
- b. Investments in, income, including gifts, loans, and travel payments, from, and business positions in any business entity of the type which engages in, the manufacture, sale, repair, rental or distribution of school supplies, books, materials, school furnishings or equipment utilized by the Charter School, its parents, teachers and students for educational purposes. This includes, but is not limited to, educational supplies, textbooks and items used for extra-curricular courses.
- c. Investments in, income, including gifts, loans, and travel payments, from, sources which are engaged in the performance of work or services of the type to be utilized by the Charter School, its parents, teachers and students for educational purposes. This includes, but is not limited to, student services commonly provided in public schools such as speech therapists and counselors.

Category II

Designated positions assigned to this category must report:

Investments in, income, including gifts, loans, and travel payments, from, and business positions in any business entity of the type which engages in the manufacture, sale, repair, rental or distribution of school supplies, books, materials, school furnishings or equipment to be utilized by the Charter School, its parents, teachers and students for educational purposes. This includes, but is not limited to, educational supplies, textbooks and items used for extra curricular courses.

Category III

Designated positions assigned to this category must report:

Investments in, income, including gifts, loans, and travel payments, from, sources which are engaged in the performance of work or services of the type to be utilized by the Charter School, its parents, teachers and students for educational purposes. This includes, but is not limited to, student services commonly provided in public schools such as speech therapists and counselors.

Conflict of Interest Code:

**MiraCosta Community College
District**

COUNTY OF **MIRACOSTA COMMUNITY COLLEGE DISTRICT OF THE COUNTY OF SAN DIEGO**

2020 MAR -4 PM 8:49

CLERK OF THE BOARD OF SUPERVISORS

The Political Reform Act, Government Code section 81000 et seq., requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation, 2 Cal. Code of Regulations section 18730, which contains the terms of a standard conflict of interest code. It can be incorporated by reference and may be amended by the Fair Political Practices Commission after public notice and hearings to conform to amendments in the Political Reform Act. Therefore, the terms of 2 Cal. Code of Regulations section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference, and along with the attached appendix in which members and employees are designated and disclosure categories are set forth, constitute the conflict of interest code of the MiraCosta Community College District. Designated employees shall file statements of economic interests with the agency, which will make the statements available for public inspection and reproduction. (Government Code section 81008). Upon receipt of the statements of the MiraCosta Community College District Board of Trustees and chief executive officer, the agency shall make and retain a copy and forward the original of these statements to the Clerk of the Board of Supervisors. Statements for all other designated employees will be retained by the agency.

CATEGORIES OF REPORTABLE ECONOMIC INTERESTS

Category 1. All-Inclusive Reportable Investments

A designated employee in this category shall disclose all reportable investments (worth more than \$1,000):

- (a) Owned by the designated employee, his or her spouse, or dependent child.
- (b) Owned by an agent on behalf of the designated employee.
- (c) Owned by any business entity controlled by the designated employee (i.e., any business entity in which the designated employee, his or her agents, spouse, and dependent children hold more than a 50-percent ownership interest).
- (d) Owned by a trust in which the designated employee has a substantial interest (i.e., a trust in which the designated employee, his or her spouse, and dependent children have a present or future interest worth more than \$1,000).
- (e) Representing the pro rata share (worth more than \$1,000) of the designated employee, his or her spouse, and dependent children of investments of any business entity or trust in which the designated employee, his or her spouse, and dependent children own, directly or indirectly or beneficially, a 10-percent interest or greater.

Category 2. All-Inclusive Reportable Interests in Real Property

A designated employee in this category shall disclose all interests (worth more than \$1,000) in real property located within the jurisdiction if the interests are:

- (a) Held or owned by the designated employee, his or her spouse, and dependent child
- (b) The pro rata share (worth more than \$1,000) of interests in real property of any business entity or trust in which the designated employee or spouse owns, directly, indirectly, or beneficially a 10-percent interest or greater.

Category 3. All-Inclusive Reportable Income

A designated employee in this category shall disclose all income of the designated employee from any MiraCosta Community College District-related source aggregating \$250 or more (or \$25 or more in the case of gifts) during the reporting period.

Category 4. Less-Inclusive Reportable Investments

A designated employee in this category shall disclose only investments (worth more than \$1,000) in any business entity that within the last two years has contracted with or in the future foreseeably may contract with MiraCosta Community College District to provide services, supplies, machinery, or equipment:

- (a) To the MiraCosta Community College District.
- (b) Of the type utilized by the agency adopting this code and associated with the job assignment of the designated employee.

Category 5. Less-Inclusive Reportable Interests in Real Property

A designated employee in this category shall disclose all reportable interests in real property worth more than \$1,000 located in the unincorporated area of the MiraCosta Community College District, or not more than two miles outside the boundaries of the unincorporated area, or within two miles of any land owned or used by the MiraCosta Community College District.

Category 6. Less-Inclusive Reportable Income

A designated employee in this category shall disclose only that reportable income (\$250 or more during reporting period; \$25 or more in the case of gifts) that is derived from a source that within the last two years has contracted with the MiraCosta Community College District or in the future foreseeably may contract to provide services, supplies, materials, machinery, or equipment:

- (a) To the MiraCosta Community College District.
- (b) Of the type utilized by the agency adopting this code and associated with the job assignment of the designated employee.

Revised
Board of Supervisors of the County of San Diego
Date: 6/20/17 Minutes Order No. 27

Approved and/or authorized by the
Board of Supervisors of the County of San Diego
Date: 12/15/98 Minutes Order No. 28
THOMAS J. PASTUSZKA
Clerk of the Board of Supervisors

**MIRACOSTA COMMUNITY COLLEGE DISTRICT
ONE BARNARD DRIVE
OCEANSIDE, CA 92056**

COSD CLERK OF THE BOARD
2024 NOV 26 AM 11:11

AP 2712: CONFLICT OF INTEREST CODE

APPENDIX 1

Designated Positions	Reportable Economic Interests from Categories of Reportable Economic Interests
A. Board Members	Categories 1, 2, 3
B. Superintendent/President	Categories 1, 2, 3
C. Assistant Superintendent/Vice President, Administrative Services	Categories 1, 2, 3
D. Assistant Superintendent/Vice President, Human Resources	Categories 1, 2, 3
E. Assistant Superintendent/Vice President, Instructional Services	Categories 1, 2, 3
F. Assistant Superintendent/Vice President, Student Services	Categories 1, 2, 3
G. Vice President, Institutional Advancement	Categories 1, 2, 3
H. Other Budget Managers Dean, Admissions and Student Support Dean, Arts and International Languages Dean, Career Education Dean, Continuing and Community Education Dean, Counseling and Student Development Dean, Instructional Services Dean, Letters, Humanities, and Communication Studies Dean, Mathematics and Sciences Dean, Nursing, Health and Wellness Dean, Office of Research, Planning, and Institutional Effectiveness Dean, Student Affairs Director, Facilities Director, Fiscal Services Director, HR Director, Purchasing and Material Management Director, Technology Career Institute Manager, Risk Management and Safety Associate Vice President, Information Technology Services Chief Inclusion, Diversity, Equity, Accessibility Officer Chief of Police	Categories 4, 6

Conflict of Interest Code:

San Elijo Joint Powers Authority

**SAN ELIJO JOINT POWERS AUTHORITY
CONFLICT OF INTEREST CODE**

The Political Reform Act of 1974 (Government Code Sections 81000 et. Seq.) requires local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission (FPCC) has adopted 2 Cal. Code of Regs. (hereinafter, "Regulation") Section 18730 that contains the terms of a standard conflict of interest code and may be incorporated by reference in an agency's code. After public notice and hearing, Regulation 18730 may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act.

Therefore, the terms of Regulation 18730 and any amendments to it duly adopted by the FPCC are hereby incorporated by reference. This incorporation page, Regulation 18730 and the attached Appendix designating positions and establishing disclosure requirements shall constitute the Conflict of Interest Code for the San Elijo Joint Powers Authority (the "Agency").

Government Code Section 87306.5 also requires every local government agency to review its Conflict of Interest Code biennially to determine if it is accurate or if the code must be amended. Once the determinations have been made, a notice must be submitted to the code reviewing body pursuant to the biennial review.

Individuals holding designated positions and non-designated positions identified in Government Code section 87200 shall file their statement of economic interests with the Agency's Clerk of the Board, who will make the statements available for public inspection and reproduction (Gov. Code section 81008). The Agency will retain all such statements for individuals in designated positions. The Agency will retain copies of all such statements for individuals in non-designated positions and will forward the originals to the Clerk of the Board of Supervisors of San Diego County (Gov. Code section 87500(k)).

APPENDIX A

Disclosure Categories

Individuals holding designated positions must report their interests according to the following disclosure category(ies) to which their position has been assigned.

Category 1: All Sources

Interests in real property (not including primary residence) located within the Agency Service Area (ASA) or within two miles of the ASA; and the investments and business positions in the business entities, and income, including loans, gifts, and travel payments from all sources.

Category 2: Agency Specific

Interests in real property (not including primary residence) located within the ASA or within two miles of the ASA; investments and business positions in business entities doing business within the ASA and/or located in San Diego County; and income, including but not limited to loans, gifts, and travel payments, from sources in San Diego County, and/or from sources outside the County whose economic position may be affected by decisions or recommendations made by the agency at all levels. 4

Category 3: Department Specific

Interests in real property (not including primary residence) located within the Agency Service Area (ASA) or within two miles of the ASA; investments and business positions in business entities located in San Diego County; and income, including loans, gifts, and travel payments from sources whose economic position may be affected by the decisions or recommendations made by the department to which the filer is assigned duties.

Category 4: Property/Facilities Entitlement

Interests in real property (not including primary residence) located within the Agency Service Area (ASA) or within two miles of the ASA; investments and business positions in business entities located in San Diego County; and income, including loans, gifts, and travel payments from sources that are of the type to request an entitlement to use agency property or facilities, including, but not limited to: a license; a facilities use permit; or a vendor permit.

Category 5: Consultant Specific

Where the broadest disclosure is not necessary, the agency may set an interim disclosure that is more tailored to consulting positions with a limited range of duties.

As used herein, "Agency Service Area" is defined as the jurisdictional boundaries of the Agency's member agencies and those areas served by the Agency's wastewater and recycled water services.

The following designated positions, when active, file according to the assigned categories associated with their title.

Designated Positions

Disclosure Categories

I. San Elijo Joint Powers Authority Staff:

Director of Operations.....	2
<u>Director of Infrastructure and Sustainability.....</u>	<u>2</u>
General Counsel.....	2
Chief Plant Operator.....	3
Mechanical Systems Manager.....	3
<u>Laboratory Manager.....</u>	<u>3</u>
<u>Recycled Water Supervisor.....</u>	<u>3</u>
SCADA Manager.....	3
Senior Project Manager/Project Manager	3

II. Consultants: Consultants shall be included in the list of designated positions and shall disclose in accordance with Category 1, except as otherwise provided, if the consultant, pursuant to a contact does either of the following (Reg. 18700.3):

1. Make a governmental decision whether to:
 - Approve a rate, rule or regulation;
 - Adopt or enforce a law;
 - Issue, deny, suspend, or revoke a permit, license application, certificate, approval, order, or similar authorization or entitlement;
 - Authorize the agency to enter into, modify, or renew a contract provided it is the type of contract which requires agency approval;
 - Grant agency approval to a contract which requires agency approval and in which the agency is a party, or to the specifications for such a contract;
 - Grant agency approval to a plan, design, report study, or similar item;
 - Adopt, or grant agency approval of, policies, standards, or guideline for the agency, or for any subdivision of the agency; or
2. Serves in a staff capacity and in that capacity participates in making governmental decisions as defined in Regulation 18704(a) and (b); or performs substantially all the same duties for the agency that would otherwise be performed by and holding a position specified in the agency's Conflict of Interest Code.

The General Manager, with the approval of the Agency's General Counsel, may determine in writing that a particular consultant, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements described in this paragraph. The written determination shall include a description of the consultant's duties and based upon that description, a statement of the extent of disclosure requirements. The written determination is a public record and shall be retained for public inspection in the office of the Agency's Clerk of the Board.

Non-Designated Positions

The following positions are not designated because individuals holding these positions must file the statement of economic interest under Government Code Section 87200. These positions are listed for informational purposes only:

- Board Members
- General Manager
- Director of Finance and Administration
- Consultants involved in the investment of public funds*

*Pursuant to 2 California Code of Regulations section 18700.3(b)(1). "Other public officials who manage public investments" means, members of the board and commissions, including pension and retirement boards or commissions, or of committees who exercise the responsibility for the management of public investments; high level officers and employees who exercise primary responsibility for the management of public investments, such as chief or principal investment officers or chief financial managers (this category shall not include officers and employees who work under the supervision of the chief or principal investment officers or the chief financial managers); and individuals who pursuant to a contract with a state or local government agency, perform the same or substantially all the same functions that would otherwise be performed by the high-level officers and employees who exercise primary responsibility for the management of public investments.

Conflict of Interest Code:

World Trade Center San Diego

**CONFLICT OF INTEREST CODE
OF THE
WORLD TRADE CENTER SAN DIEGO, INC.**

The Political Reform Act, Government Code Sections 81000, et seq., requires State and local government agencies to adopt and promulgate Conflict of Interest Codes. The Fair Political Practices Commission has adopted 2 Cal. Adm. Code Section 18730, which contains the standard model Conflict of Interest Code, which can be incorporated by reference, and which may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act after public notice and hearings. Therefore, the provisions of 2 Cal. Adm. Code Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission along with the attached Appendix A, in which officials are designated, and Appendix B and Appendix C, in which disclosure categories are set forth, are hereby incorporated by reference and constitute the Conflict of Interest Code of the World Trade Center San Diego, Inc. (WTCSD). Designated filers listed in Appendix A of the Conflict of Interest Code of WTCSD shall disclose those financial interests which are within the categories represented by the numbers following the listed position as described in Appendix B and Appendix C. Designated employees shall file Statements of Economic Interests pursuant to 2 Cal. Adm. Code Section 18730 and this Code.

Individuals holding designated positions shall file their statements of economic interests (statements) with the San County Clerk of San Diego, which will make the statements available for public inspection and reproduction in accordance with Government Code Section 81008. The District Clerk shall make and retain copies in accordance with Government Code Section 87500.

**World Trade Center San Diego, Inc.
Conflict of Interest Code**

**Appendix A:
List of Designated Directors, Officers, and Employees**

The following individuals must file Statements of Economic Interests pursuant Fair Political Practices Commission (FPPC) regulations:

World Trade Center San Diego, Inc. - Chair, Secretary and Treasurer (or other Officers if designated)

World Trade Center San Diego, Inc. - Directors

An individual holding one of the above listed positions may contact the Fair Political Practices Commission for assistance of written advice regarding their filing obligations if they believe that their position has been categorized incorrectly.

**World Trade Center San Diego, Inc.
Conflict of Interest Code**

**Appendix B:
Disclosure Categories for Designated Positions**

Category I

All sources of income, interests in real property and investments and business positions in business entities located in or doing business in San Diego County.

**World Trade Center San Diego, Inc.
Conflict of Interest Code**

Appendix C

Consultant Disclosure

Definition: Fair Political Practices Commission regulation [2 Cal. Code of Regulations Section 18700] defines "consultant" as an individual who, pursuant to a contract with a state or local governmental agency:

- (a) Makes a governmental decision whether to:
 - (1) Approve a rate, rule or regulation;
 - (2) Adopt or enforce a law;
 - (3) Issue, deny, suspend, or revoke a permit, license, application, certificate, approval, order, or similar authorization or entitlement;
 - (4) Authorize the agency to enter into, modify, or renew a contract provided it is the type of contract which requires agency approval;
 - (5) Grant agency approval to a contract which requires agency approval and in which the agency is a party or to the specifications for such a contract;
 - (6) Grant agency approval to a plan, design, report, study, or similar item;
 - (7) Adopt, or grant agency approval of, policies, standards, or guidelines for the agency, or for any subdivision of the agency; or

- (b) Serves in an ongoing staff capacity with the agency and in that capacity performs the same or substantially all the same duties for the agency that would otherwise be performed by an individual holding a position specified in the agency's local conflict of interest code.

"Consultant" does not serve in an ongoing staff capacity when:

- (1) Conducting research and arriving at conclusions with respect to his or her rendition of information, advice, recommendation, or counsel independent of the control and direction of the agency or of any agency official, other than normal contract monitoring; and
- (2) He or she possesses no authority with respect to any agency decision beyond the rendition of information, advice, recommendation, or counsel and only provides services on a sporadic basis.

Disclosure requirements for Sections (a) & (b) above:

Section (a): Investments and business positions in business entities and sources of income, which provide the type of services utilized by the agency.

Section (b): Consultants who serve in a staff capacity shall disclose those financial interests listed in the assigned disclosure category for the corresponding staff position listed in Appendix A.

The WTCSD Chair may determine in writing that a particular consultant, although a "designated position", is hired to perform a range of duties that is limited in scope and thus is not required to comply fully with the disclosure requirements described in this section. Such determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The Chair's determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interest code.

RESOLUTION NO. 2024-001

**RESOLUTION AMENDING THE WORLD TRADE CENTER
CONFLICT OF INTEREST CODE**

WHEREAS, the World Trade Center San Diego ("WTC") Board of Directors adopted a Conflict of Interest Code in 2016; and

WHEREAS, the Conflict of Interest Code indicated that Fair Political Practices ("FPPC") Statements of Economic Interest would be filed with the County of San Diego ("County"); and

WHEREAS, at the time, the County indicated they should not be filed at the County, but rather one of the license holders should internally file the Statements of Economic Interest; and

WHEREAS, the San Diego Unified Port District ("Port") took on this responsibility, and has been receiving the Board's annual, assuming and leaving office filings since that time; and

WHEREAS, in due diligence, Port staff contacted the County in late 2023 to confirm their opinion that the WTC should continue to file Statements of Economic Interest with the Port and not with the County; and

WHEREAS, County Clerk staff tentatively affirmed that opinion but recommended contacting the FPPC for confirmation; and

WHEREAS, Port staff contacted the FPPC who advised that Statements of Economic Interest should be filed with the County; and

WHEREAS, to implement the advice of the FPPC and as a matter of best practice, staff recommended various amendments to the WTC Conflict of Interest Code summarized as follows:

- 1) Remove references to employees. The World Trade Center San Diego does not have any employees.
- 2) Correct the filing office for Statements of Economic Interest to the County of San Diego.
- 3) Remove reference to 87200 filers. Although World Trade Center San Diego filers may be 87200 filers, they are not in this role as Board member; and

WHEREAS, the above-summarized amendments are more precisely reflected in the Attachment A, which is incorporated herein by reference.

NOW, THEREFORE, BE IT RESOLVED, that the Board hereby approves and adopts the amendments to the Conflict-of-Interest Code reflected in Attachment A.

PASSED, ADOPTED, AND APPROVED by the Board of Directors of the World Trade Center San Diego, Inc., this 25th day of July 2024, by the following vote:

AYES: Board Members: Bibler, Sly, Moore

NOES: Board Members:

ABSENT: Board Members:

ATTEST:



James Sly (Sep 11, 2024 16:11 PDT)

JAMES SLY, CHAIR
WORLD TRADE CENTER SAN DIEGO, INC.
BOARD OF DIRECTORS

APPROVED AS TO FORM:



ANNETTE FAGAN ORTIZ, MBA, CMC
SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY CLERK