

Attachment A –

Conflict of Interest Code for:

Literacy First Charter Schools

**LITERACY FIRST CHARTER SCHOOLS
CONFLICT OF INTEREST POLICY**

**ARTICLE I
PURPOSE**

Section 1. **PURPOSE.** The purpose of this conflict of interest policy (“Policy”) is to protect the Patriot Legacy Education Foundation’s (“Organization”) interests when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of the Organization or might result in a possible excess benefit transaction. This Policy is intended to supplement but not replace any applicable state and federal laws governing conflicts of interest applicable to nonprofit and charitable organizations. This Policy adopts FPPC 18730 (2 CCR 18730) and any future amendments. FPPC 18730 and the following Articles II-IX constitute this Policy.

**ARTICLE II
DEFINITIONS**

Section 1. **INTERESTED PERSON.** Any director, officer, or member of a committee with Board-delegated powers, who has a direct or indirect financial interest, as defined below, is an interested person.

Section 2. **FINANCIAL INTEREST.** A person has a financial interest if the person has, directly or indirectly, through business, investment or family:

- a) An ownership or investment interest in any entity with which the Organization has a transaction or arrangement;
- b) A compensation arrangement with the Organization or with any entity or individual with which the Organization has a transaction or arrangement; or
- c) A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Organization is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial. A financial interest is not necessarily a conflict of interest. Under Article III, Section 2, a person who has a financial interest may have a conflict of interest only if the appropriate governing board or committee decides that a conflict of interest exists.

**ARTICLE III
PROCEDURES**

Section 1. **DUTY TO DISCLOSE.** In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the directors considering the proposed transaction or arrangement.

Section 2. DETERMINING WHETHER A CONFLICT EXISTS. After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall recuse him/herself, and leave the Board meeting while the determination of a conflict of interest is discussed and voted upon. The remaining financially disinterested Board members shall decide if a conflict of interest exists.

Section 3. PROCEDURES FOR ADDRESSING THE CONFLICT. The procedures for addressing the conflict of interest are:

- a) An interested person may make a presentation at the Board meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.
- b) The Board President shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
- c) After exercising due diligence, the Board shall determine whether the Organization can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
- d) If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Board shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in the Organization's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, it shall make its decision as to whether to enter into the transaction or arrangement.

Section 4. VIOLATIONS OF THE POLICY. Violations of the conflict of interest policy include:

- a) If the Board has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
- b) If, after hearing the member's response and after making further investigation as warranted by the circumstances, the Board determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

ARTICLE IV RECORDS OF PROCEEDINGS

Section 1. RECORDS OF PROCEEDINGS. The minutes of the Board shall contain:

- a) The names of persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the Board's decision as to whether a conflict of interest in fact existed.

- b) The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

ARTICLE V COMPENSATION

Section 1. COMPENSATION.

- a) A member of the Board who receives compensation, directly or indirectly, from the Organization for services is precluded from voting on matters pertaining to that member's compensation.
- b) No voting member of the Board or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Organization, either individually or collectively, is prohibited from providing information regarding compensation.

ARTICLE VI ANNUAL STATEMENTS

Section 1. ANNUAL STATEMENTS. Each director, officer and member of a committee with governing board delegated powers shall annually sign a statement which affirms such person:

- a) Has received a copy of this Policy.
- b) Has read and understands the Policy.
- c) Has agreed to comply with the Policy.
- d) Understands the Organization is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

ARTICLE VII PERIODIC REVIEWS

Section 1. PERIODIC REVIEWS. To ensure the Organization operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

- a) Whether compensation arrangements and benefits are reasonable, based on competent survey information and the result of arm's length bargaining.
- b) Whether partnerships, joint ventures, and arrangements with management organizations conform to the Organization's written policies, are properly recorded,

reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit or in an excess benefit transaction.

**ARTICLE VIII
USE OF OUTSIDE EXPERTS**

Section 1. USE OF OUTSIDE EXPERTS. When conducting the periodic reviews as provided for in Article VII, the Organization may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the Board of its responsibility for ensuring periodic reviews are conducted.

**ARTICLE IX
PERSONS REQUIRED TO FILE A FORM 700**

Section 1. PERSONS REQUIRED TO FILE A FORM 700 with the Clerk of the San Diego County Board of Supervisors and with the San Diego County Office of Education

Executive Director
Chief Business Officer
Members of the LFCS Board of Trustees

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The Literacy First Charter Schools Board of Trustees hereby adopts this Conflict of Interest Policy, which shall apply to all Board members, officers, candidates for membership and office on the Board, and committee members with governing Board delegated powers.

DATE: 6.11.24

Signature
Board Secretary

Conflict of Interest Code for:

North County Transit District

NORTH COUNTY TRANSIT

SAN DIEGO RAILROAD

Board Policy No. 8 **Conflict of Interest Code**

Summary

This policy establishes the NCTD Conflict of Interest Code pursuant to the Political Reform Act (Government Code § 81000, et seq.).

Purpose

The Political Reform Act (Government 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 2 Cal. Code of Regulations (hereinafter, “Regulation”) § 18730 which 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, Regulation 18730 may be amended by the FPPC to conform to amendments in the Political Reform Act. Therefore, the terms of Regulation 18730 and any amendments to it duly adopted by the FPPC are hereby incorporated by reference. This incorporation page, Regulation 18730 and the attached Appendix designating positions and establishing disclosure categories, shall constitute the conflict of interest code of the North County Transit – San Diego Railroad (NCTD).

Government Code § 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.

All officials set forth in Government Code § 87200 and designated positions shall file their Statement of Economic Interest, also known as the Form 700, with NCTD via the e-file web portal managed by the County of San Diego. Digital copies of such statements are maintained by the Clerk of the County of San Diego Board of Supervisors. The Clerk of the Board will make all digital statements and electronic filings available for public inspection and reproduction during regular business hours (Gov. Code § 81008.)

Officials Who Manage Public Investments

NCTD officials who manage public investments, as defined by 2 Cal. Code of Regs. § 18700.3(b), are not subject to the NCTD’s Code, but must file disclosure statements under Government Code § 87200, et seq. (Regs. 18730(b)(3)) These positions are listed here for informational purposes only.

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It has been determined that the positions listed below are officials who manage public investments. (Note: Individuals holding one of the below-listed positions may contact the FPPC for assistance or written advice regarding their filing obligations if they believe that their position has been categorized incorrectly. The FPPC makes the final determination whether a position is covered by 87200):

Board Members and Alternates
Chief Executive Officer/Executive Director
Chief Financial Officer
Financial Consultants

In October 2025, Governor Newsom signed into law Senate Bill 852 (SB852) amending Section 87500 of the Political Reform Act, which establishes California's campaign finance and disclosure laws for designated public officials via a Statement of Economic Interest, or Form 700. Under SB852, "public officials who manage public investments" on behalf of their agency, must now file their Form 700s with the Fair Political Practices Commission (FPPC) using the FPPC's electronic filing system, rather than with the County of San Diego. SB852 will take effect on January 1, 2026.

Disclosure Requirements

- A. Public Officials and employees holding positions designated in this Conflict of Interest Code are required to file the initial, annual, and leaving office Statement of Economic Interest for the types of interests in the categories set forth in the applicable Disclosure Categories. It has been determined that these persons make or participate in making decisions, which foreseeably may have a material effect on such financial interests.
- B. Where the Disclosure Category requires disclosure of interests in real property, the designated employee is only required to disclose real property which is located in whole or in part within or not more than two miles outside the boundaries of the jurisdiction or within two miles of any land owned or used by NCTD.
- C. Where the Disclosure Category requires disclosure of investments or sources of income, the designated employee is only required to disclose investments in business entities and sources of income that do business in the jurisdiction, plan to do business in the jurisdiction, or have done business in the jurisdiction within the past two years. In addition to other activities, a business entity is doing business within the jurisdiction if it owns real property within the jurisdiction.
- D. Where the Disclosure Category requires disclosure of business positions, the designated employee is only required to disclose positions of director, officer, partner, employee, or any position of management in organizations or enterprises operated for profit.

Designated Positions Governed by the Conflict of Interest Code

DESIGNATED EMPLOYEES' TITLE OR FUNCTION	DISCLOSURE CATEGORIES ASSIGNED
Accountant (All)	5
Accounting Technician	1
Analyst (All)	5

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DESIGNATED EMPLOYEES' TITLE OR FUNCTION	DISCLOSURE CATEGORIES ASSIGNED
Architect (All)	2, 3, 5
Asset Administrator (All)	5
Chief General Counsel	1, 2, 3, 4
Chief Development Officer	1, 2
Chief Executive Officer	1, 2, 3, 4, 5, 6
Chief Financial Officer	1, 2, 3, 4, 5, 6
Chief Operating Officer	1, 2
Chief People Officer	1, 2
Chief of Staff	1, 2
Contract Officer (All)	1, 2
Controller	1, 2
Deputy Director/Chief (All)	1, 2
Deputy Chief Executive Officer/Chief General Counsel	1, 2, 3, 4, 5, 6
Deputy Chief General Counsel	1, 2, 3, 4
Director (All)	1, 2
Drug & Alcohol Program Administrator	5
Engineer (All)	5
Engineering Technician	5
Executive Assistant/Deputy Clerk	5
Fare Revenue Specialist	4
Human Resources Business Partner (ALL)	5
Human Resources Specialist	5
Labor Relations Specialist	5
Maintenance-of-Way Supervisor	5, 6
Management Analyst (All)	5
Manager (All)	5
Marketing and Communications Associate (All)	5
Operations Supervisor (All)	5
Paralegal	5
Planner (All)	2, 5
Program Manager (All)	5
Project Analyst (All)	5
Project Administrator	5
Project Manager (All)	5
Project Specialist	5
Quality Control Supervisor (All)	5
Rail Technologies (All)	5

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DESIGNATED EMPLOYEES' TITLE OR FUNCTION

DISCLOSURE CATEGORIES ASSIGNED

Recruiter	5
Real Estate Administrator	6
Risk Manager (All)	1, 2, 4
Senior Administrative Assistant/Deputy Clerk	5
Senior Graphic Communications Designer	5
Senior Legal Counsel (All)	1, 2, 3, 4
Senior Right-of-Way Coordinator	6
Staff Attorney (All)	1, 2, 3, 4
System Safety Specialist (All)	5
Telecommunications Engineer	5
Trainer/Instructor (All)	5
Consultants and New Positions	Individuals providing services as a Consultant defined in Regulation 18700.3, or in a new position created since this Code was last approved that makes or participates in making decisions shall disclose pursuant to the broadest disclosure category in this Code subject to the following limitation:

The Chief Executive Officer may determine that due to the range of duties or contractual obligations, it is more appropriate to assign a limited disclosure requirement. A clear explanation of the duties and a statement of the extent of the disclosure requirements must be in a written document. (Gov. Code §82019; Regulations 18219 and 18734). The Chief Executive Officer'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. (Gov. Code §81008.)

Disclosure Categories

The disclosure categories listed below identify the types of economic interests that the Designated Position must disclose for each disclosure category to which they are assigned. (Note: This Conflict of Interest Code does not require the reporting of gifts from outside NCTD's jurisdiction if

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DATE	REVISION NO.	RESOLUTION No.	COMMENTS
10/18/2012	ADOPTED	12-10	
10/17/2013	1	13-07	2013 REVISION
10/16/2014	2	14-04	2014 REVISION
11/19/2015	3	15-08	2015 REVISION
10/20/2016	4	16-10	2016 REVISION
10/19/2017	5	17-10	2017 REVISION
10/18/2018	6	18-09	2018 REVISION
10/17/2019	7	19-06	2019 REVISION
10/15/2020	8	20-08	2020 REVISION
10/21/2021	9	21-05	2021 REVISION
05/21/2022	10	22-08	2022 REVISION
10/20/2022	11	22-18	2022 REVISION
10/19/2023	12	23-06	2023 REVISION – UPDATE TO POSITION TITLES
06/20/2024	13	24-04	2024 REVISION – UPDATE TO POSITION TITLES
10/17/2024	14	24-08	2024 REVISION – UPDATE TO POSITION TITLES
03/20/2025	15	25-02	2025 REVISIONS – UPDATE TO TITLES, STREAMLINE, AND INCLUDE BUS
10/23/2025	16	25-06	UPDATES TO RETENTION PROCESS FOR DIGITAL FILINGS AND ADDITIONS AND REMOVALS OF POSITIONS SUBJECT TO DISCLOSURE

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01/15/2026	17	26-01	ADDITION OF SENATE BILL 852 REQUIREMENTS EFFECTIVE JANUARY 1, 2026
03/19/2026	18	26-03	UPDATES TO POSITION TITLES

Conflict of Interest Code for:

San Diego Association of
Governments (SANDAG)



Conflict of Interest Code

The Political Reform Act, Government Code Sections 81000, et seq., requires SANDAG to adopt and promulgate a Conflict of Interest Code. The Fair Political Practices Commission has adopted a regulation, 2 Cal. Code of Regs. Section 18730, which contains the terms of a 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 terms of 2 Cal. Code of Regs. Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission along with the attached Appendices in which officials, consultants and employees are designated and disclosure categories are set forth, are hereby incorporated by reference and constitute the Conflict of Interest Code of SANDAG.

The persons holding positions listed in the Appendix are designated employees, consultants, or officials. It has been determined that these persons make or participate in the making of decisions that may foreseeably have a material effect on financial interests. Designated persons in Table 1 shall file statements of economic interests with SANDAG through the County of San Diego's efile system when assuming or leaving their position and annually while holding the position; designated persons holding positions listed in Table 3 shall file statement of economic interests with the Fair Political Practices Commission (FPPC). SANDAG will make the statements available for public inspection and reproduction (Gov. Code Section 81008).

**Appendix A
Table 1**

Designated Positions	Disclosure Categories (see Appendix B)
Members and alternate members of the Board of Directors	1, 2, 4
Members and alternate members of the Policy Advisory Committees	1, 2, 4
Members and alternate members of committees and/or working groups making decisions influencing expenditure of public funds	1, 2, 4
Account Executive (I, II, Associate)	3, 4
Accountant (I, II, Associate, Senior)	3, 4
Administrative Analyst (I, II, Associate, Senior)	3, 4
Administrative Office Specialist	3, 4
AI Architect	1, 2, 4
Borders Program Manager	3, 4
Budget Manager	2, 4
Business Analyst (I, II, Associate, Senior, Principal)	3, 4
Business Services Supervisor	2, 4
Business Services Manager	1, 2, 4
Capital Development Project Manager	1, 3, 4
Capital Program Manager	1, 2, 4
Capital Project Manager (Associate I, Associate II, Senior)	1, 2, 4
Chief Executive Officer	1, 2, 4
Chief Financial Officer	1, 2, 4
Clerk of the Board (Deputy Clerk)	1, 2, 4
Communications Manager	3, 4
Contracts and Procurement Analyst (I, II, Associate, Senior)	1, 2, 4
Counsel (Legal I, II; Associate Legal; Senior Legal; Deputy General)	1, 2, 4
Customer Service Manager	3, 4
Data Scientist (I, II, Associate, Senior, Principal)	3, 4
Deputy Director	1, 2, 4
Deputy Independent Performance Auditor	1, 2, 4

Designated Positions	Disclosure Categories (see Appendix B)
Director	1, 2, 4
Director (I, II)	1, 2, 4
Director of Accounting and Finance	1, 2, 4
Director of Financial Planning, Budgets, and Grants	1, 2, 4
Document Processing Specialist III	3, 4
Economic Research Analyst (I, II, Associate, Senior, Principal)	3, 4
Engineer (I, II, Associate, Senior, Principal)	1, 3, 4
Executive Assistant (I, II, Senior)	1, 2, 4
Executive Office Manager	1, 2, 4
Facilities/Maintenance Coordinator	3, 4
Finance Manager	1, 2, 4
Financial Analyst (I, II, Associate)	3, 4
General Counsel	1, 2, 4
GIS Analyst (I, II, Associate, Senior)	3, 4
Government Relations Analyst (I, II, Associate, Senior)	1, 2, 4
Grants Program Analyst (I, II, Associate, Senior)	1, 2, 4
Grants Program Manager	1, 2, 4
Graphic Designer (I, II, Associate, Senior)	3, 4
Human Resources Analyst (I, II, Associate, Senior, Principal)	3, 4
Human Resources Coordinator	3, 4
Independent Auditor (I, II, Associate, Senior, Principal)	1, 2, 4
Independent Performance Auditor	1, 2, 4
Information Systems Manager	3, 4
Information Systems Analyst (I, II, Associate, Senior)	3, 4
Information Systems Specialist (I, II, III)	3, 4
Landscape Maintenance Supervisor	3, 4
Maintenance and Facilities Supervisor	3, 4
Maintenance Field Technician (Senior)	3, 4

Designated Positions	Disclosure Categories (see Appendix B)
Manager of Business Administration and Operations	1, 2, 4
Manager of Contracts and Procurement Services	1, 2, 4
Manager of Data Science	3, 4
Manager of Financial Programming and Project Control	1, 2, 4
Manager of Governments Relations	1, 2, 4
Manager of Human Resources	1, 2, 4
Manager of Learning and Development	3, 4
Manager of Regional Information Services	3, 4
Manager of Regional Models	3, 4
Manager of Revenue and Project Control	1, 2, 4
Marketing Analyst (I, II, Associate, Senior)	3, 4
Office Services Specialist (II, III)	3, 4
Principal Technology Program Manager	3, 4
Programmer Analyst (I, II, Associate, Senior)	3, 4
Project Coordinator	3, 4
Project Development Program Manager	1, 2, 4
Public Communications Officer (I, II, Associate, Senior)	3, 4
Regional Planner (I, II, Associate, Senior, Principal)	1, 3, 4
Regional Planning Program Manager	1, 3, 4
Research Analyst (I, II, Associate, Senior, Principal)	3, 4
Researcher and Modeler (I, II, Associate, Senior, Principal)	3, 4
Right of Way Agent (Associate, Senior)	1, 2, 4
Senior AI Engineer	1, 2, 4
Senior Budget Program Analyst	2, 4
Senior Director	1, 2, 4
Senior Financial Programming and Project Control Analyst	1, 2, 4
Software Engineer (I, II, Associate, Senior, Principal)	3, 4
Systems Engineer (I, II, Associate, Senior)	3, 4

Designated Positions	Disclosure Categories (see Appendix B)
Technology Program Analyst (I, II, Associate, Senior)	3, 4
Toll Operations Supervisor	3, 4
TransNet Program Manager	1, 2, 4
UX Designer (Associate, Senior)	3, 4

Pursuant to California Government Code Section 82019, SANDAG consultants who pursuant to a contract with SANDAG, perform the same functions that would otherwise be performed by the persons designated in Table 1 of this document; who manage public investments; who grant agency approval to a contract or to the specifications for such a contract; or who decide whether the policies, standards, or guidelines for SANDAG have been met, also are required to fill out and submit a disclosure of financial interests. Those consultants are required to report in accordance with the disclosure categories shown in Table 2. Consultants will be designated and informed of their obligation to file disclosures whenever any person who, in the opinion of SANDAG, may reasonably be expected to make, participate in making, or in any way attempt to use his/her position as a “consultant” to influence a governmental decision in which the person might reasonably be expected to have a financial interest or perform services that entail the making or participation in the making of decisions that may foreseeably have a material effect on any financial interest.

Table 2

Type of Consultant	Designated Position Title	Disclosure Categories (see Appendix B)
Bond Counsel	Consultant	2, 4
Disclosure Counsel	Consultant	2, 4
Lobbying	Consultant	1, 2, 4
Project Oversight	Consultant	1, 2, 4
Disadvantaged Business Enterprise Advisor	Consultant	2, 4
Labor Compliance Advisor	Consultant	2, 4
Financial Management Advisor	Consultant	1, 2, 4
Auditor	Consultant	1, 2, 4

Public Officials Who Manage Public Investments

The following positions also are listed below because the individuals holding these positions shall file statement of economic interests with the Fair Political Practices Commission (FPPC) under Government Code Section 87200 as they are involved in the investment of public funds. These positions are listed here for informational purposes only:

Table 3

Public Official Description
Members and alternate members of the Board of Directors
Members and alternate members of the Policy Advisory Committees
Chief Executive Officer
Senior Director
General Counsel
Chief Financial Officer
Director of Accounting and Finance
Director of Financial Planning, Budgets, and Grants

Appendix B

When a designated person is required to disclose investment and sources of income, he or she need to disclose investments in business entities and sources of income that do business in SANDAG's jurisdiction, plan to do business in the jurisdiction, or have done business in the jurisdiction in the past two years. In addition to other activities, a business entity is doing business within the jurisdiction if it owns real property within the jurisdiction. Persons designated in Appendix A shall disclose their financial interests pursuant to the appropriate disclosure categories described in the table below.

Table 4

Disclosure Category	Description
1	Interests in real property located within the jurisdiction or within two miles of the boundaries of the jurisdiction or within two miles of any land owned or used by SANDAG.
2	Investments and business positions in business entities, and income, including loans, gifts,* and travel payments, from sources that provide services, supplies, materials, machinery, or equipment of the type utilized by SANDAG.
3	Investments and business positions in business entities, and income, including loans, gifts,* and travel payments, from sources that provide services, supplies, materials, machinery, or equipment of the type utilized by the department or division to which the filer is assigned duties.
4	Investments and business positions in business entities, and income, including loans, gifts,* and travel payments, from sources that have filed a claim against SANDAG in the previous two years, or have a claim pending.

* Gifts with a value of less than \$50 aggregate per year are not reportable financial interests at SANDAG

Amended January 2010

Amended March 2012

Amended December 2013

Amended March 2015

Amended January 2016

Amended September 2016

Amended March 2018

Amended July 2019

Amended September 2019

Amended June 2020

Amended August 2022

Amended June 2023

Amended January 2024

Amended July 2024

Amended September 2025

Amended February 2026