

Attachment B -

Conflict of Interest Code

Supporting Documents for:

Literacy First Charter Schools

Literacy
First
Charter
Schools



"The tree of knowledge begins with literacy."

COSD CLERK OF THE BOARD
2026 APR 23 PM4:31

March 13, 2026

Received April 17, 2026

San Diego County Board of Supervisors,

Literacy First Charter Schools requests that the San Diego County Board of Supervisors review and approve our Conflict of Interest Policy.

Please direct all correspondence regarding this matter to the following:

Steve Robinson

Cell: 619.316.5839

Email: steve.robinson@LFCSINC.ORG

Mail : Literacy First Charter Schools
c/o Steve Robinson
698 W Main Street
El Cajon, CA 92020

Sincerely,

Steve Robinson

Steve Robinson
CBO, Literacy First Charter Schools

APPROVED



Literacy First Charter Schools

Minutes

Literacy First Charter School Board of Trustees

Regular Board Meeting

Date and Time

Tuesday June 11, 2024 at 5:30 PM

Location

To attend this meeting in person go to:

698 W Main Street
El Cajon, CA 92020

To attend this meeting remotely:

Join Zoom Meeting

<https://us02web.zoom.us/j/86918447922?pwd=N3p0U0FKdnA0eDN6aHM2WFVkV0YzZz09>

Meeting ID: 869 1844 7922

Passcode: wr7Eqb

Literacy First Charter Schools exists to nurture the whole child from kindergarten through high school graduation by igniting a passion for comprehensive Literacy and equipping our students to wholeheartedly participate in their community.

Trustees Present

B. Johnson, J. Lewis, K. Evans, M. Simone, P. Schreiber

Trustees Absent

None

Guests Present

D. Beyer, L. Amorteguy, S. Robinson

I. Opening Items

A. Record Attendance

B. Call the Meeting to Order

P. Schreiber called a meeting of the board of trustees of Literacy First Charter Schools to order on Tuesday Jun 11, 2024 at 5:34 PM.

C. Flag Salute

D. Approve the Minutes from the May 15, 2024 Regular Board Meeting

B. Johnson made a motion to approve the minutes from May 15th 2024 Literacy First Charter School Board of Trustees on 05-15-24.

J. Lewis seconded the motion.

The board **VOTED** unanimously to approve the motion.

E. Approve Current Agenda

M. Simone made a motion to Approve Current Agenda for June 11th 2024.

K. Evans seconded the motion.

The board **VOTED** unanimously to approve the motion.

F. Public Comment on Agenda Items

None

G. Public Comment on Non-Agenda Items

None

II. Executive Director's Report

A. School Events, Program, and Staffing Updates

Debbie Beyer, Executive Director, shared the results of the Lottery for 2024/25 school year, current enrollment for the 2024/25 school year, current attendance numbers. She shared information on Graduation and Moving Up Ceremonies.

Debbie Beyer introduced Danny Sanchez and Nichole Allen who shared graduation data on the Class of 2024.

B. 2023-24 LFCS LCAP Annual Update

Gail Stroben, Assistant Principal, reported on the 2023-24 LFCS LCAP Annual Update.

LFCS Administration recommends the board approve the 2023-24 LFCS LCAP Annual Update.

K. Evans made a motion to Approve the 2023-24 LFCS LCAP Annual Update.

M. Simone seconded the motion.

The board **VOTED** unanimously to approve the motion.

C. 2023-24 LFCS LCAP Local Indicators

Gail Stroben, Assistant Principal, reported on the 2024-25 LFCS LCAP Local Indicators.

The LFCS 2024-25 LCAP Local Indicators were read aloud during the meeting and LFCS Administration recommends the board approve them.

K. Evans made a motion to Approve the LFCS 2024-25 Local Indicators.

M. Simone seconded the motion.

The board **VOTED** unanimously to approve the motion.

D. 2024-25 LFCS LCAP

Gail Stroben, Assistant Principal, reported on the 2024-25 LFCS LCAP. LFCS

Administration recommends the board approve the 2024-25 LFCS LCAP.

M. Simone made a motion to Approve the 2024-25 LFCS LCAP.

K. Evans seconded the motion.

The board **VOTED** unanimously to approve the motion.

E. 2024-25 LFCS LCAP Budget Overview for Parents

Steve Robinson, CBO, presented the 2024-25 LFCS LCAP Budget Overview for Parents.

LFCS Administration recommends the board approve the 2024-25 LFCS LCAP Budget Overview for Parents.

M. Simone made a motion to Approve 2024-25 LFCS LCAP Budget Overview for Parents.

K. Evans seconded the motion.

The board **VOTED** unanimously to approve the motion.

F. 2024-25 LFCS LCAP Federal Addendum

Steve Robinson, CBO, presented the 2024-25 LFCS LCAP Federal Addendum. LFCS

Administration recommends the board approve the 2024-25 LFCS LCAP Federal Addendum.

K. Evans made a motion to Approve 2024-25 LFCS LCAP Federal Addendum.

J. Lewis seconded the motion.

The board **VOTED** unanimously to approve the motion.

III. Chief Business Officer's Report

A. Current Financial Report

Steve Robinson, CFO, shared LFCS financials as of 5/31/24

B. Contracts and Large Purchases Notifications

Steve Robinson, CFO, presented the following large purchases:

Wright Brothers: Ceiling repair, mural protection, touch up painting at the PA: \$8,225.

C. Facilities Report

Steve Robinson, CFO, presented the following facilities report:

LCHS Alpine: Solar production up considerably since 4.28.24 according to SDGE report. One panel still needs to be replaced and the online monitoring system set up. Plumbing sweeps installed during Easter Break. Diagnosis of pipes is the next step to fix the plumbing issues. Preliminary work continuing on a plan to add two relocatable classrooms to LCHS for use as a weight room and another needed classroom. Roof work and carpet replacement scheduled for summer 2024.

Junior Academy: We submitted the permit for the installation of the left hand turn lane and "no blocking" signs on Bradley per the new CUP. The ADA work at Freedom House will now be done summer 2025. Replacement of the retaining wall at the Freedom House as well as installation of the slab to house a new storage shed scheduled to being in early July. Tile to replace carpet in science classrooms should be installed this summer. Carpet replacement prioritized for this summer as well.

Primary Academy: Fence behind playground equipment being replaced and is in permitting with El Cajon. Negotiations for a new lease has begun. Playground equipment and carpet replacement may need to wait until summer 2025 once new lease is finalized. Student bathroom upgrades in the portable classrooms being planned for summer 2024 as well as awning replacements and some ceiling repair.

Liberty Academy: Waiting on construction of the wall between this campus and 203 N

Johnson to start however considerable demolition has occurred on the property to make room for the wall and the containers of batteries. Roof to be resealed, some carpet to be replaced, and the parking lot improved in summer 2024. ELO-P and Camp Ketchup will run out of this campus June 24 - July 26.

D. Legal Issues

LFCS is waiting on responses from SOS to settlement offers.

E.

Approve the updated LFCS Conflict of Interest Policy

Steve Robinson, CBO recommended the board approve the updated LFCS Conflict of Interest

Policy. The only change is listing the current people within the organization who are required to file the Form 700.

K. Evans made a motion to Approve the updated LFCS Conflict of Interest Policy.

M. Simone seconded the motion.

The board **VOTED** unanimously to approve the motion.

F. 2024-25 LFCS Budget

Steve Robinson, CBO, presented the 2024-25 LFCS Budget for a public hearing.

G. 2024-25 LFCS Salary Schedules

Steve Robinson, CBO, recommended the board approve the 2024-25 LFCS Salary Schedules.

K. Evans made a motion to Approve 2024-25 Salary Schedules.

J. Lewis seconded the motion.

The board **VOTED** unanimously to approve the motion.

H. La Mesa Flooring bid for additional LCHS carpet installation

Steve Robinson, CBO, recommended the board approve the bid from La Mesa Flooring for additional LCHS carpet installation in the conference room building.

M. Simone made a motion to Approve La Mesa Floor bid for LCHS Carpet Installation.

J. Lewis seconded the motion.

The board **VOTED** unanimously to approve the motion.

I. AML bid for PA bathroom remodels

Steve Robinson, CBO, recommended the board approve the AML bid for repairing and remodeling 8 student bathrooms at the Primary Academy, \$28,000 for 8 bathrooms.

K. Evans made a motion to Approve AML bid for PA bathroom remodels.

M. Simone seconded the motion.

The board **VOTED** unanimously to approve the motion.

IV. Closed Session

A. Enter Closed Session

K. Evans made a motion to Enter Closed Session at 6:59 pm.

J. Lewis seconded the motion.

The board **VOTED** unanimously to approve the motion.

B.

**Save Our Students - Safety Over Sorry, et. al. v County of San Diego, et. al.
Settlement Agreement**

No action taken.

C. Conference with Legal Counsel- Anticipated Litigation

By a unanimous vote, the board approved a confidential settlement agreement to resolve potential litigation involving special education student prior to due process filing.

D. Adjourn Closed Session

K. Evans made a motion to Adjourn Closed Session 7:14 pm.

M. Simone seconded the motion.

The board **VOTED** unanimously to approve the motion.

V. Closing Items

A. Adjourn Meeting

B. Johnson made a motion to Adjourn meeting at 7:45 pm.

M. Simone seconded the motion.

The board **VOTED** unanimously to approve the motion.

There being no further business to be transacted, and upon motion duly made, seconded and approved, the meeting was adjourned at 7:45 PM.

Respectfully Submitted,

S. Robinson

**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

* * * * *

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
Supporting Documents for:

North County Transit District

NORTH COUNTY TRANSIT
SAN DIEGO RAILROAD

April 10, 2026

Clerk of the Board
Board of Supervisors
County of San Diego
1600 Pacific Highway, Room 402
San Diego, CA 92101
Sent Via Electronic Mail: form700@sdcounty.ca.gov
(Electronically Transmitted - No hard copy will follow)

COSD CLERK OF THE BOARD
2026 APR 23 PM4:31

Received April 10, 2026

Re: Updated NCTD Conflict of Interest Code

To Whom It May Concern:

This is a formal request to update NCTD's Conflict of Interest (COI) Code. On March 19, 2026, NCTD's Board of Directors approved the updates to its COI Code to include updates to positions that are subject to the COI Code.

Enclosed are the following:

1. Conflict of Interest Code – blackline changes
2. Conflict of Interest Code – clean version
3. Approved Staff Report and Resolution No. 26-04 for COI Code, approved by the Board of Directors on March 19, 2026

Please notify me once the County has updated and approved NCTD's amended COI.

Should you have any questions or need further information, I can be reached at srodriguez@nctd.org or (760) 966-6696.

Sincerely,



Suhail Rodriguez
Director of Administration

Enclosures

cc: Lori A. Winfree, Deputy Chief Executive Officer/Chief General Counsel, NCTD
Mary Dover, Chief of Staff, NCTD
Adrienne Johnson, Deputy Chief People Officer, NCTD

One Community - Advancing Opportunities



810 Mission Avenue
Oceanside, CA 92054



(760) 966-6500
(760) 967-2001 (fax)



GoNCTD.com

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.

Board Policy No. 8 – Conflict of Interest Code

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
<u>Accounting Technician</u>	<u>1</u>
Analyst (All)	5

Board Policy No. 8 – Conflict of Interest Code

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

Board Policy No. 8 – Conflict of Interest Code

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

Board Policy No. 8 – Conflict of Interest Code

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

Board Policy No. 8 – Conflict of Interest Code

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

NORTH COUNTY TRANSIT

SAN DIEGO RAILROAD

Agenda
Item #
10

STAFF REPORT

ADOPT RESOLUTION NO. 26-04 APPROVING MODIFICATIONS TO BOARD POLICY NO. 8 – CONFLICT OF INTEREST CODE

Time Sensitive: Consent:

STAFF RECOMMENDATION:

Adopt Resolution No. 26-04 approving North County Transit – San Diego Railroad Board Policy No. 8 – *Conflict of Interest Code*.

BACKGROUND INFORMATION:

Pursuant to Board Policy No. 1 - *General Provisions*, "At least annually, staff will review and suggest revisions to existing North County Transit – San Diego Railroad (NCTD) Board of Directors (Board) Policies, as appropriate, and bring new Board Policies, if appropriate, to the Board for consideration and approval."

Since the Board's last review of Board Policies in October 2025, certain position(s) have been added, and several job title(s) have been updated to reflect operational needs. Accordingly, Board Policy No. 8 – *Conflict of Interest Code* must be updated to reflect those additions and changes.

Staff recommends that the Board adopt Resolution No. 26-04 approving the modifications to Board Policy No. 8 – *Conflict of Interest Code*. If the Board adopts Resolution No. 26-04, Board Policy No. 8 shall supersede all prior policies previously adopted by the Board and will be effective immediately upon adoption.

ATTACHMENT:

10A – Draft Resolution No. 26-04 Approving NCTD Board Policy No. 8
10B – Blacklines of Board Policy No. 8 – *Conflict of Interest Code*
10C – Clean version of Board Policy No. 8 – *Conflict of Interest Code*

FISCAL IMPACT:

This staff report has no fiscal impact.

STAFF CONTACT:

Suheil Rodriguez, Director of Administration/Clerk of the Board
E-mail: srodriguez@nctd.org Phone: 760-966-6696



NORTH COUNTY TRANSIT
SAN DIEGO RAILROAD

RESOLUTION NO. 26-04
RESOLUTION OF THE BOARD OF DIRECTORS OF THE
NORTH COUNTY TRANSIT – SAN DIEGO RAILROAD APPROVING
MODIFICATIONS TO BOARD POLICY NO. 8 – CONFLICT OF INTEREST CODE

WHEREAS, the North County Transit – San Diego Railroad (“NCTD”) Board of Directors (“Board”) has adopted Board Policies 1 through 34 to guide the daily operations of NCTD; and

WHEREAS, Board Policy No. 1 states that at least annually, the Board will review such Board Policies as previously adopted; and

WHEREAS, due to certain positions being added, and several job titles that have been updated to reflect operational needs, modifications to Board Policy No. 8 – *Conflict of Interest Code* are required; and

WHEREAS, the Board has reviewed the proposed modifications to this Board Policy, as identified in Exhibit A to this Resolution and set forth in full in Exhibit B to this Resolution.

NOW, THEREFORE, BE IT RESOLVED that the Board of NCTD hereby approves the revised Board Policy No. 8 – *Conflict of Interest Code* set forth in full in Exhibit B to this Resolution.

BE IT FURTHER RESOLVED that insofar as the provisions of any Ordinance, Resolution, document or previous action of the Board and/or the Chief Executive Officer, prior to the date of this Resolution, are inconsistent with the provisions of this Resolution or the policy adopted by this Resolution, this Resolution and the Board Policy adopted herein shall control.

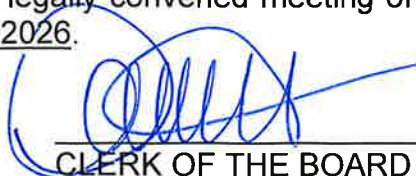
PASSED, APPROVED AND ADOPTED at the Regular Meeting of the Board of Directors of NCTD this 19th day of March 2026.



BOARD CHAIR
North County Transit – San Diego Railroad

CERTIFICATION

I, Suheil Rodriguez, duly appointed and qualified, Clerk of the Board of NCTD, do hereby certify that the above is a true and correct copy of a resolution passed and approved by the Board of Directors of the NCTD adopted at a legally convened meeting of the Board of Directors of the NCTD held on the 19th day of March 2026.



CLERK OF THE BOARD
North County Transit – San Diego Railroad

Conflict of Interest Code
Supporting Documents for:

San Diego Association of
Governments (SANDAG)



COSD CLERK OF THE BOARD
2026 APR 23 PM4:31

April 10, 2026

Received April 10, 2026

Clerk of the Board of Supervisors
Attn: Conflict of Interest Code Update
1600 Pacific Highway Rm 402
San Diego, CA 92101

Dear Clerk of the Board of Supervisors:

Subject: SANDAG Conflict of Interest Code Amendment – February 2026

At its February 27, 2026, meeting, the SANDAG Board of Directors approved amendments to our Conflict of Interest (COI) Code. I have attached a copy of the staff report, voting slide, meeting minutes, final COI Code, and redlined COI Code.

This letter is a request to process and approve SANDAG's recent COI Code amendment.

Thank you for your time, and please let me know if you require additional information.

Sincerely,

Michael Garcia

MICHAEL GARCIA
Clerk of the Board

MGAR/ais

Attachments:

1. Board Agenda and Staff Report, February 27, 2026
2. Board Vote Slide for March 27, 2026
3. Board Minutes for February 27, 2026
4. Final COI Code Amended February 27, 2026
5. Redline COI Code Amended February 27, 2026





Board of Directors Agenda

Friday, February 27, 2026, 9 a.m. - 12:30 p.m.

SANDAG Boardroom

1011 Union Street, First Floor

San Diego, CA 92101

At SANDAG, we strive to make our meetings, events, and documents accessible to all. SANDAG Board of Directors, Policy Advisory Committee, and working group meetings are open to the public in person and/or virtually in accordance with the Ralph M. Brown Act. Many accommodations are automatically available at our public meetings.

Visit [SANDAG.org/meetingassistance](https://sandag.org/meetingassistance) for more information. For a printed version of the information on that web page, contact clerkoftheboard@sandag.org.

Attendees are subject to metal detector screening for weapons prohibited from the meeting per California Penal Code §171b. Review the SANDAG [Public Meeting Screening Policy](#) and meeting conduct at [SANDAG.org/meetingassistance](https://sandag.org/meetingassistance) before attending. SANDAG offices are transit accessible. Public bike racks are available on the west side of the building.

Participate virtually via [Zoom](#). Webinar ID: 856 4117 8468
Telephone: Dial 1 (669) 444-9171

Public comments can be made in person or virtually or submitted online. Visit [SANDAG.org/meetingassistance](https://sandag.org/meetingassistance) for instructions.

Agendas and Meeting Materials

Access agendas and materials from the [SANDAG.org/calendar](https://sandag.org/calendar) event page for each meeting. An asterisk (*) next to an agenda item indicates that the Board of Directors also is acting as the San Diego County Regional Transportation Commission for that item. Printed agendas are available for review at the SANDAG Customer Service Center, 1129 La Media Road, San Diego, CA 92154. A limited number of printed agenda materials are provided at Board and committee meetings.

Language and Accessibility Services

Interpretation: Meetings are conducted in English, and simultaneous interpretation is provided in Spanish. Interpretation devices are provided at the meeting. SANDAG will provide simultaneous or consecutive interpretation in another language, including ASL, during public meetings or events upon request. Email languageassistance@sandag.org at least 72 business hours before the meeting or event.

Esta reunión se llevará a cabo en inglés, y se ofrecerá interpretación simultánea en español.

[Free Language Assistance](#) | [Ayuda gratuita con el idioma](#) | [Libreng Tulong sa Wika](#) | [Hỗ trợ ngôn ngữ miễn phí](#) | [انگلیز نایز کمک](#) | [Бесплатная языковая помощь](#) | [Assistència lingüística gratuïta](#) | [Assistance linguistique gratuite](#) | [Kaalmada Luqadda ee Bilaashka ah](#) | [Безкоштовна мовна допомога](#) | [SANDAG.org/languageassistance](https://sandag.org/languageassistance) | 619.699.1900

Closed captioning: Closed captioning is available via Zoom's Show Captions "CC" icon.

Other accommodations: For other ADA accommodations or alternative formats, contact clerkoftheboard@sandag.org or 619.699.1900 at least 72 business hours before the meeting. For TTY services, dial 711.

Legal Notices

Notice of nondiscrimination: SANDAG complies with Title VI of the Civil Rights Act, ensuring no discrimination based on race, color, or national origin. For complaints or inquiries, contact SANDAG's compliance officer at 619.699.1900, or file with the Federal Transit Administration or Federal Highway Administration. See Discrimination Complaint Procedures in SANDAG Board Policy No. 009.

[SANDAG.org/nondiscrimination: SANDAG Notice of Nondiscrimination | Aviso de no discriminación de SANDAG | Abiso sa Hindi Pandiskrimina ng SANDAG | Thông cáo Không phân biệt đối xử của SANDAG | SANDAG | SANDAG: زي ميتلا مدع راعش!](#)

Compensation: Per Government Code §54952.3, legislative body members receive the following compensation for simultaneous or serial meetings attended: \$100 for Executive Committee, \$100 for Borders Committee, and \$150 for Board of Directors, pursuant to the SANDAG Bylaws; \$100 for Regional Transportation Commission pursuant to state law.

1. Call to Order

2. Non-Agenda Public Comments/Member Comments

Members of the public shall have the opportunity to address the Board of Directors on any issue within the jurisdiction of SANDAG that is not on this agenda. Public speakers are limited to three minutes or less per person. Public comments under this agenda item will be limited to eight public speakers. If the number of public comments under this agenda item exceeds eight, additional public comments will be taken at the end of the agenda. Board members and SANDAG staff also may present brief updates and announcements under this agenda item.

3. Consent

3.1 Approval of Meeting Minutes

Michael Garcia, SANDAG

ACTION: APPROVE

The Board of Directors is asked to approve the minutes from its February 13, 2026, meeting.

3.2 Policy Advisory Committee Actions

Francesca Webb, SANDAG

ACTION: APPROVE

The Board of Directors is asked to ratify the actions taken by the Policy Advisory Committees as noted in the report.

3.3 Chief Executive Officer Delegated Actions and Other Reportable Actions*

Jennie Sharp, SANDAG

ACTION: INFORMATION

In accordance with various Board Policies, this report summarizes delegated and reportable actions taken by the Chief Executive Officer.

3.4 Authorization to Utilize AB 3090 Financing for the San Dieguito Lagoon Double-Track Project*

Adrian Paniagua, Michelle Smith, SANDAG

ACTION: APPROVE

The Transportation Committee recommends that the Board of Directors approve the use of Assembly Bill 3090 (1992) financing authority to advance up to \$62 million in TransNet Major Corridor funds for the San Dieguito Lagoon Double Track Project and authorize staff to pursue the required State Transportation Improvement Program amendment and AB 3090 reimbursement agreement with the California Transportation Commission.

3.5 Revised FY 2026 and FY 2027 to FY 2031 TransNet Program and Transit-Related Revenues*

Susan Huntington, SANDAG

ACTION: APPROVE

The Transportation Committee recommends that the Board of Directors approve:

1. The proposed revision to the FY 2026 TransNet and Transportation Development Act (TDA) program estimates; and
2. The FY2027 to FY 2031 estimates and apportionments for TDA, Federal Transit Administration, and TransNet funds.

3.6 Overview of Developments in the Financial Markets, Quarterly Finance Report as of December 31, 2025*

Kimberly Trammel, SANDAG

ACTION: INFORMATION

This report provides an update on the latest developments in the financial markets, economy, sales tax revenues, and strategies being explored and implemented to minimize possible impacts to the TransNet Program.

3.7 Conflict of Interest Code Updates

Michael Garcia, SANDAG

ACTION: APPROVE

The Board of Directors is asked to approve the updated SANDAG Conflict of Interest Code.

3.8 TransNet Regional Transportation Congestion Improvement Program Proposed Fee Adjustment*

Saba Fadhil, Naomi Young, SANDAG

ACTION: APPROVE

The Board of Directors is asked to approve a 2% adjustment to the Regional Transportation Congestion Improvement Program, raising the fee from \$3,047.57 to \$3,109.88 beginning July 1, 2026.

3.9 Proposed 2025 Program Budget Amendment: Payment of Award

Dawn Vettese, Amberlynn Deaton, SANDAG

ACTION: APPROVE

The Board of Directors is asked to approve the allocation of up to \$4,216,250 from the Contingency Reserve in FY 2026 to fund costs associated with an arbitration judgement regarding a personnel concern.

3.10 Proposed Updates to Board Policies

Mayor Pro Tem Jack Fisher, Audit Committee Chair

ACTION: APPROVE

The Executive Committee recommends that the Board of Directors approve the proposed amendments to Board Policy No. 039, the deletion of Board Policy No. 042, and the creation of a new Board Policy No. 043.

4. Tolling Back Office System Cooperative Agreement and Project Budget Amendment

Alex Estrella, SANDAG

ACTION: APPROVE

The Board of Directors is asked to:

1. Authorize the Chief Executive Officer to execute a Cooperative Agreement with the Transportation Corridor Agencies (TCA) for back-office system tolling services for the Interstate 15 (I-15) and State Route 125 (SR 125) toll facilities.
2. Approve the proposed amendments to the FY 2026 Program Budget for the new Regional Back Office System project (Capital Improvement Project Nos. 1400412 and 1400413).

5. Flexible Fleets Pilot Grant Program Call for Projects

Jenny Russo, SANDAG

ACTION: APPROVE

The Transportation Committee recommends that the Board of Directors approve the release of the Flexible Fleets Pilot Grant Program Call for Projects

6. Adjournment

The next Board of Directors meeting is scheduled for March 13, 2026 at 9 a.m.

Conflict of Interest Code Updates

Overview

The California Political Reform Act requires every state and local agency to adopt a Conflict of Interest Code (COI) that identifies all officials and employees within the agency who make or influence governmental decisions within the scope of the position they hold in their agency. The individuals in these positions must disclose their financial interests as specified in the agency's COI. Every two years, or as-needed, based upon modifications to positions in the Board of Directors-approved budget, staff reviews the COI to determine if updates are needed.

Action: **Approve**

The Board of Directors is asked to approve the updated SANDAG Conflict of Interest Code.

Fiscal Impact:

None.

Schedule/Scope Impact:

None.

Key Considerations

In October 2025, Governor Newsom signed Senate Bill 852, which updated Statement of Economic Interest (Form 700) filing requirements that "public officials who manage public investments" e-file a Form 700 directly with the California Fair Political Practices Commission (FPPC) (not their local agency), via the FPPC's e-filing system. Staff reviewed the positions listed in its COI and are proposing updates to comply with SB 852, recent changes to [Board Policy No. 003](#), and administrative edits suggested by the County of San Diego.

The proposed amendments to the COI are reflected in Attachment 1. These revisions are consistent with the adopted FY 2026 Program Budget and the updates to the FY 2026 Position Classification and Salary Range Table approved on December 12, 2025. The Board most recently approved amendments to its COI in September 2025.

Next Steps

The proposed amendments will implement updates to the list of designated employee and consultant positions subject to filing annual economic disclosure statements. Impacted positions will receive future filing communications from the FPPC.

Robyn Wapner, Senior Director of Administration and Public Affairs

Attachment: 1. Conflict of Interest Code with Proposed Amendments in Red Line

JURISDICTION	VOTE	TALLY
Carlsbad	Yes	1
Chula Vista	Yes	1
City of SD (A)	Yes	1
Coronado	Yes	1
County of SD (A)	Yes	1
Del Mar	Yes	1
El Cajon	Yes	1
Encinitas	Yes	1
Escondido	Yes	1
Imperial Beach	Yes	1
La Mesa		
Lemon Grove	Yes	1
National City	Yes	1
Oceanside	No	
Poway	Yes	1
San Marcos	Yes	1
Santee	No	
Solana Beach	Yes	1
Vista	Yes	1

**Consent Agenda
Items 3.1.1 - 3.7**

Action: APPROVE

Pass

	TALLY
	16
% Yes	88.89%
% No	11.11%





Board of Directors

Meeting Minutes

**February 27, 2026, 9 a.m.
SANDAG Boardroom
1011 Union Street, First Floor
San Diego, CA 92101**

Voting Members Present: Chair Lesa Heebner (Solana Beach)
First Vice Chair Joe LaCava (City of San Diego - Seat A)
Second Vice Chair John Minto (Santee)
Councilmember Kevin Shin (Carlsbad)
Deputy Mayor Cesar Fernandez (Chula Vista)
Mayor John Duncan (Coronado)
Councilmember Terry Gaasterland (Del Mar)
Mayor Bill Wells (El Cajon)
Mayor Bruce Ehlers (Encinitas)
Mayor Dane White (Escondido)
Mayor Pro Tem Jack Fisher (Imperial Beach)
Vice Mayor Lauren Cazares (La Mesa)
Mayor Alysson Snow (Lemon Grove)
Vice Mayor Luz Molina (National City)
Mayor Esther Sanchez (Oceanside)
Councilmember Christopher Pikus (Poway)
Councilmember Vivian Moreno (City of San Diego - Seat B)
Mayor Rebecca Jones (San Marcos)
Councilmember Corinna Contreras (Vista)
Supervisor Joel Anderson (County of San Diego)

Others Present: Robin Joy Maxson (Association of Planning Groups)
Ann Fox (Caltrans District 11)
Councilmember Matthew Leyba-Gonzalez (Metropolitan Transit System)
Councilmember Jewel Edson (North County Transit District)
Anna Shepherd (U.S. Department of Defense)

[Meeting Video](#)

1. Call to Order

Chair Heebner called the meeting to order at 9 a.m.

2. Non-Agenda Public Comments/Member Comments

Chief Executive Officer Mario Orso presented an update on agency activities.

Public Comment: Shirli Weiss, Purita Javier, Cesar Javier, Leif Gensert, Andrea Ebbing, Blair Beekman, Truth, The Original Dra, Marco Espinosa, Paul the Bold, Consuelo.

Member Comments: Chair Heebner, Mayor Jones, Councilmember Shin.

3. Consent

Public Comments: Camilla Rang, Amy Cheshire, Shirli Weiss, Cesar Javier, Purita Javier, Dustin Fuller, Blair Beekman, Truth, The Original Dra, Consuelo, Andrea Ebbing, Leif Gensert.

Motioned by: Mayor Sanchez

Seconded by: Councilmember Shin

to approve Consent Agenda Item Nos. 3.1 - 3.10.

For (17): Chair Heebner, First Vice Chair LaCava, Second Vice Chair Minto, Councilmember Shin, Deputy Mayor Fernandez, Mayor Duncan, Councilmember Gaasterland, Mayor Wells, Mayor Ehlers, Mayor White, Mayor Pro Tem Fisher, Vice Mayor Molina, Mayor Sanchez, Councilmember Pikus, Mayor Jones, Councilmember Contreras, and Supervisor Anderson

Absent (2): Vice Mayor Cazares, Mayor Snow

The motion passed. (17 to 0)

3.1 Approval of Meeting Minutes

Approved the minutes from its February 13, 2026, meeting.

3.2 Policy Advisory Committee Actions

Ratified the actions taken by the Policy Advisory Committees as noted in the report.

3.3 Chief Executive Officer Delegated Actions and Other Reportable Actions

In accordance with various Board Policies, this report summarized delegated and reportable actions taken by the Chief Executive Officer. This item was provided for information only.

3.4 Authorization to Utilize AB 3090 Financing for the San Dieguito Lagoon Double-Track Project*

Approved the use of Assembly Bill 3090 (1992) financing authority to advance up to \$62 million in TransNet Major Corridor funds for the San Dieguito Lagoon Double Track Project and authorize staff to pursue the required State Transportation Improvement Program amendment and AB 3090 reimbursement agreement with the California Transportation Commission.

3.5 Revised FY 2026 and FY 2027 to FY 2031 TransNet Program and Transit-Related Revenues

Approved:

1. The proposed revision to the FY 2026 TransNet and Transportation Development Act (TDA) program estimates; and
2. The FY2027 to FY 2031 estimates and apportionments for TDA, Federal Transit Administration, and TransNet funds.

3.6 Overview of Developments in the Financial Markets, Quarterly Finance Report as of December 31, 2025

This report provided an update on the latest developments in the financial markets, economy, sales tax revenues, and strategies being explored and implemented to minimize possible impacts to the TransNet Program. This item was provided for information only.

3.7 Conflict of Interest Code Updates

Approved the updated SANDAG Conflict of Interest Code.

3.8 TransNet Regional Transportation Congestion Improvement Program Proposed Fee Adjustment

Approved a 2% adjustment to the Regional Transportation Congestion Improvement Program, raising the fee from \$3,047.57 to \$3,109.88 beginning July 1, 2026.

3.9 Proposed 2025 Program Budget Amendment: Payment of Award

Approved the allocation of up to \$4,216,250 from the Contingency Reserve in FY 2026 to fund costs associated with an arbitration judgement regarding a personnel concern.

3.10 Proposed Updates to Board Policies

Approved the proposed amendments to Board Policy No. 039, the deletion of Board Policy No. 042, and the creation of a new Board Policy No. 043.

4. Tolling Back Office System Cooperative Agreement and Project Budget Amendment

Director of Regional Transportation Services Alex Estrella and Principal Economic Research Analyst Naomi Young presented the item.

Public Comment: Cesar Javier, Blair Beekman, Paul the Bold, Andrea Ebbing, Marco Espinosa, Truth, Consuelo, The Original Dra, Gambler.

Motioned by: Councilmember Moreno

Seconded by: Councilmember Gaasterland

to authorize the Chief Executive Officer to execute a Cooperative Agreement with the Transportation Corridor Agencies (TCA) for back-office system tolling services for the Interstate 15 (I-15) and State Route 125 (SR 125) toll facilities. and approve the proposed amendments to the FY 2026 Program Budget for the new Regional Back Office System project (Capital Improvement Project Nos. 1400412 and 1400413).

For (18): Chair Heebner, First Vice Chair LaCava, Second Vice Chair Minto, Councilmember Shin, Mayor Duncan, Councilmember Gaasterland, Mayor Wells, Mayor Ehlers, Mayor White, Mayor Pro Tem Fisher, Vice Mayor Cazares, Mayor Snow, Vice Mayor Molina, Mayor Sanchez, Councilmember Pikus, Mayor Jones, Councilmember Contreras, and Supervisor Anderson

Absent (1): Deputy Mayor Fernandez

The motion passed. (18 to 0)

5. Flexible Fleets Pilot Grant Program Call for Projects

Grants Program Manager Jenny Russo presented the item.

Public Comments: Cesar Javier, Paul the Bold, Blair Beekman, The Original Dra, Truth, Consuelo, Gambler.

Motioned by: Mayor Sanchez

Seconded by: Mayor Jones

to extend the meeting end time to 1 p.m.

For (14): Chair Heebner, Second Vice Chair Minto, Councilmember Shin, Mayor Duncan, Councilmember Gaasterland, Mayor Wells, Mayor Ehlers, Mayor Pro Tem Fisher, Vice Mayor Cazares, Vice Mayor Molina, Mayor Sanchez, Councilmember Pikus, Mayor Jones, and Councilmember Contreras

Against (2): Mayor Snow and Supervisor Anderson

Absent (3): First Vice Chair LaCava, Deputy Mayor Fernandez, Mayor White,

The motion passed. (14 to 2)

Motioned by: Mayor Sanchez

Seconded by: Second Vice Chair Minto

to approve the release of the Flexible Fleets Pilot Grant Program Call for Projects.

For (12): Chair Heebner, Second Vice Chair Minto, Councilmember Shin, Mayor Duncan, Councilmember Gaasterland, Mayor Ehlers, Mayor Pro Tem Fisher, Mayor Snow, Vice Mayor Molina, Mayor Sanchez, Mayor Jones, and Councilmember Contreras

Against (1): Councilmember Pikus

Absent (6): First Vice Chair LaCava, Deputy Mayor Fernandez, Mayor Wells, Mayor White, Vice Mayor Cazares, and Supervisor Anderson

The motion passed. (12 to 1)

6. Adjournment

Chair Heebner adjourned the meeting at 12:57 p.m.

The next Board of Directors meeting is scheduled for March 13, 2026, at 9 a.m.



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). ~~Statements for all designated employees will be retained by SANDAG and provided to the Code Reviewing Body, the County of San Diego.~~

**Appendix A
Table 1**

Designated Positions	Disclosure Categories (see Appendix B)
Members, alternates, and/or advisory members of the Board of Directors; and/or Policy Advisory Committees; and/or committees and/or working groups making decisions influencing expenditure of public funds	1, 2, 4
<u>Members and alternate members of the Board of Directors</u>	<u>1, 2, 4</u>
<u>Members and alternate members of the Policy Advisory Committees</u>	<u>1, 2, 4</u>
<u>Members and alternate members of committees and/or working groups making decisions influencing expenditure of public funds</u>	<u>1, 2, 4</u>
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 of Staff	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; General)	1, 2, 4
Customer Service Manager	3, 4
Data Scientist (I, II, Associate, Senior, Principal)	3, 4

Designated Positions	Disclosure Categories (see Appendix B)
Deputy Director	1, 2, 4
Deputy Independent Performance Auditor	1, 2, 4
<u>Director</u>	<u>1, 2, 4</u>
Director (I, II, Senior)	1, 2, 4
<u>Director of Accounting and Finance</u>	<u>1, 2, 4</u>
<u>Director of Financial Planning, Budgets, and Grants</u>	<u>1, 2, 4</u>
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
<u>General Counsel</u>	<u>1, 2, 4</u>
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

Designated Positions	Disclosure Categories (see Appendix B)
Maintenance and Facilities Supervisor	3, 4
Maintenance Field Technician (Senior)	3, 4
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
<u>Senior Director</u>	<u>1, 2, 4</u>
Senior Financial Programming and Project Control Analyst	1, 2, 4

Designated Positions	Disclosure Categories (see Appendix B)
Software Engineer (I, II, Associate, Senior, Principal)	3, 4
Systems Engineer (I, II, Associate, Senior)	3, 4
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 ~~must~~ 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
Members and alternate members of committees or working groups making decisions influencing expenditure of public funds
Executive Director
<u>Chief Executive Officer</u>
Chief Deputy Executive Director
<u>Senior Director</u>
General Counsel
Chief Financial Officer
Director of Finance
<u>Director of Accounting and Finance-Director</u>
<u>Director of Financial Planning, Budgets, and Grants-Director</u>
Financial Management Consultant, Project Managers

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](#)