COUNTY OF SAN DIEGO

CONFLICT OF INTEREST CODE
OF
EPIPHANY PREP CHARTER SCHOOL OF SAN DIEGO, INC.

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CLERK OF THE BOARD OF SUPERVISORS

1. Standard Code of FPPC

The Political Reform Act of 1974 (Gov. Code 81000 *et seq.*) requires each state and local government agency to adopt and promulgate a conflict of interest code. As a local government agency, Epiphany Prep Charter School of San Diego, Inc. ("Epiphany Prep" or "Corporation") is therefore required to adopt such a code. The Fair Political Practices Commission ("FPPC") has adopted a regulation (Title 2 Cal. Code of Regs. 18730) which contains the terms of a model conflict of interest code, which can be incorporated by reference as an agency's code. After public notice and hearing, the regulation may be amended by the FPPC to conform to amendments in the Political Reform Act.

2. Adoption of Standard Code of FPPC

The terms of Title 2 Cal. Code of Regs. 18730 and any future amendments to it duly adopted by the FPPC are hereby adopted and incorporated herein by reference. This regulation and the Appendix attached hereto designating officials and employees and establishing disclosure categories shall constitute the Conflict of Interest Code of Epiphany Prep. This code shall take effect when approved by the Board of Supervisors for the County of San Diego, and shall thereupon supersede all prior codes adopted by Epiphany Prep.

3. Filing of Statements of Economic Interests

Pursuant to Section 4 of the model code set forth in Title 2 of the Cal. Code of Regs. 18730(b), designated employees set forth in the Appendix shall file statements of economic interests (Form 700) with the Secretary of Epiphany Prep. Upon receipt of the statements of the members of the Board of Trustees of Epiphany Prep, the Secretary shall make and retain copies and forward the originals of these statements to the Clerk of the Board of Supervisors for the County of San Diego. Statements for all other designated employees shall be retained by the Secretary.

APPROVED AND ADOPTED by the Board of Trustees of Epiphany Prep on the 14th day of November, 2013.

Chair, Board of Trustees
Epiphany Prep

ATTEST:

Connie M. Burke
Secretary, Board of Trustees
Epiphany Prep

Approved and/or authorized by the Board of Supervisors of the County of San Diego.
Meeting Date: 3/11/14 Minute Order No. 18
By: _____ Date: 3/14/14
Deputy Clerk of the Board Supervisors

APPENDIX TO
CONFLICT OF INTEREST CODE OF
EPIPHANY PREP CHARTER SCHOOL OF SAN DIEGO, INC.

Preamble

Any person designated in Section I of this Appendix who is unsure of any right or obligation arising under this Code may request a formal opinion or letter of advice from the FPPC or an opinion from Epiphany Prep's general counsel. (Gov. Code § 83114; Title 2 Cal. Code of Regs. § 18730(b)(11).) A person who acts in good faith in reliance on an opinion issued to him or her by the FPPC shall not be subject to criminal or civil penalties for so acting, provided that all material facts are stated in the opinion request. (Gov. Code § 83114(a).)

Opinions rendered by general counsel do not provide any statutory defense to an alleged violation of conflict of interest statutes or regulations. The prosecuting agency may, but is not required to, consider a requesting party's reliance on general counsel's opinion as evidence of good faith. In addition, Epiphany Prep may consider whether such reliance should constitute a mitigating factor to any disciplinary action that Epiphany Prep may bring against the requesting party under Government Code § 91003.5.

I.

Designated Employees

Designated Employees	Categories Disclosed
Members of Epiphany Prep's Board of Trustees	4 through 6
President	1 through 6
CFO/Treasurer	1 though 6
Principal	1 through 6
Office Manager	1 through 6
General Counsel	4 though 6
Consultants [1]	--

[1] With respect to consultants, the President may determine in writing that a particular consultant, although a "designated employee," is hired to perform a range of duties that is limited in scope and thus is not required to comply with the written disclosure requirements described in these categories. 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 President's determination is a public record and shall be retained for public inspection by the Epiphany Prep, in the same manner as this Conflict of Interest Code. Nothing herein excuses any such consultant from any other provisions of this Conflict of Interests Code.

II.

Disclosure Categories

Category 1. Reportable Investments

A designated employee in this category shall report all reportable investments, as defined in Government Code § 82034, in business entities located in, doing business in, planning to do business in, or having done business in the previous two (2) years in San Diego County in which the Corporation's school is located, which business entities operate or provide facilities, goods, supplies, equipment and/or machinery, vehicles, personnel or services of a type utilized by the Corporation or its school.

Category 2. Reportable Interests in Real Property

A designated employee in this category shall disclose all interests in real property, as defined in Government Code §§ 82033 and 82035, that are within two (2) miles of any facility or real property owned or used by Epiphany Prep.

Category 3. Reportable Income

A designated employee in this category shall disclose all income as defined in Government Code § 82030 of the designated employee from business entities or other sources located in, doing business in, planning to do business in, or having done business in the previous two (2) years in San Diego County during the reporting period which business entities operate or provide facilities, goods, supplies, equipment and/or machinery, vehicles, personnel or services of a type utilized by the Corporation or its school.

Category 4. Less-Inclusive Reportable Investments

A designated employee in this category shall disclose only investments as defined in Government Code § 82034 in any business entity, which within the last two (2) years has contracted with or in the future foreseeably may contract with Epiphany Prep to provide personnel, services, supplies, material, machinery or equipment:

(a) to Epiphany Prep of the type utilized by Epiphany Prep which is located in or doing business in San Diego County, and associated with the job assignment or position of the designated employee; or

(b) to any entity which has contracted with Epiphany Prep within the last two (2) years or which in the future foreseeably may contract with Epiphany Prep to provide services, supplies, materials, machinery or equipment associated with the job assignment or position of the designated employee.

Category 5. Less-Inclusive Reportable Income

A designated employee in this category shall disclose only that reportable income as defined in Government Code § 82030 which is derived from a source which within the last two (2) years has contracted with Epiphany Prep or in the future foreseeably may contract with Epiphany Prep to provide personnel, services, supplies, materials, machinery or equipment:

(a) to Epiphany Prep, of the type utilized by Epiphany Prep which is located in or doing business in San Diego County, and associated with the job assignment or position of the designated employee; or

(b) to any entity which has contracted with Epiphany Prep within the last two (2) years or which in the future foreseeably may contract with Epiphany Prep to provide personnel, services, supplies, materials, machinery or equipment associated with the job assignment or position of the designated employee.

Category 6. Business Positions

A designated employee in this category shall disclose by completing Form 700, Schedule C. A designated employee shall list, with respect to any business entity which operates or provides facilities, goods, supplies, equipment and/or machinery, vehicles, personnel or services of a type utilized by the Corporation or its school:

(a) the name and address of each business entity in which he or she is a director, officer, partner, trustee, employee, or in which he or she holds any position of management;

(b) a description of the business activity in which the business entity is engaged; and

(c) the designated employee's position with the business entity.

Descriptions of Positions and Offices with Explanation of Reasons for Employees and Consultants to Epiphany Prep Being "Designated Employees"

Members of Epiphany Prep's Board of Trustees

The Members of the Board of Trustees of Epiphany Prep or its operating Corporation formulate general policy and programs of Epiphany Prep/Corporation, and each member of the Board of Trustees therefore is designated.

President

The President is an officer of the Corporation, and participates in the formulation of general policy and programs of Epiphany Prep/Corporation, and implements policy on behalf of the Board of Trustees. He/she therefore is designated.

CFO/Treasurer

The CFO/Treasurer is an officer of the Corporation, and participates in the formulation of general policy and programs in the areas of finance and general office administration of Epiphany Prep/Corporation. He/she therefore is designated.

Principal

The Principal, an employee of Epiphany Prep/Corporation, participates in the formulation of Epiphany Prep/Corporation's general policies and programs in the areas of finance and general school and office administration. He/she therefore is designated.

Office Manager

The Office Manager, an employee of Epiphany Prep/Corporation, participates in the formulation of Epiphany Prep/Corporation's general policies and programs in the areas of finance and general office administration. He/she therefore is designated.

General Counsel

Legal counsel is hired on a contract basis and advises Epiphany Prep/Corporation on its day-to-day activities, including its relationships with the independent contractors who provide services to the charter school/Corporation, and compliance with applicable laws and regulations. Because general counsel participates in the formulation and implementation of the policies and programs of Epiphany Prep/Corporation, the primary contact of the firm retained is designated.