# CONFLICT OF INTEREST CODE
# OF THE
# KEILLER LEADERSHIP ACADEMY

1. Standard Code of FPPC

The Political Reform Act of 1974 (Government 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, Keiller Leadership Academy, a California charter school, is therefore required to adopt such a code. The Fair Political Practices Commission ("FPPC") has adopted a regulation (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 2 California Code of Regulations Section 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 the Keiller Leadership Academy. This code shall take effect when approved by the Board of Supervisors of the County of San Diego.

3. Filing of Statements of Economic Interests

Pursuant to Section 4 of the model code set forth in 2 California Code of Regulations Section 18730(b), designated employees set forth in the Appendix shall file statements of economic interests (Form 700) with the Secretary of Keiller Leadership Academy. Upon receipt of the statements of the members of the Board of Directors of Keiller Leadership Academy and the Executive Director, the Secretary shall make and retain copies and forward the originals of these statements to the Clerk of the Board of Supervisors of the County of San Diego. Statements for all other designated employees shall be retained by the Secretary.

APPROVED AND ADOPTED by the Board of Directors of Keiller Leadership Academy on the 2 day of Nov., 2005.

Paulat Gideiro

Chair of the Board of Directors

Paulat Gideiro

ATTEST:

Lea Hubbard

Secretary to the Board of Directors

Lea Hubbard

Approved and/or authorized by the Board of Supervisors of the County of San Diego
Date 02-27-07 Minute Order No. 12
THOMAS J. PASTUSZKA
Clerk of the Board of Supervisors
By [signature]
Deputy Clerk

COUNTY OF SAN DIEGO
BOARD OF SUPERVISORS
2001 FEB -9 A 10: 39

# APPENDIX TO
# CONFLICT OF INTEREST CODE OF
# KEILLER LEADERSHIP ACADEMY

## 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 Keiller Leadership Academy's General Counsel. (Gov. Code § 83114; 2 Cal. Code of Regs. § 18730(b)(ii).) 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, Keiller Leadership Academy may consider whether such reliance should constitute a mitigating factor to any disciplinary action that Keiller Leadership Academy may bring against the requesting party under Government Code section 91003.5.

## I.

## Designated Employees

| Designated Employees | Categories Disclosed |
|---|---|
| Members of the Board of Directors | All |
| Executive Director | All |
| General Counsel | All |
| Chief Financial Officer/Treasurer | All |
| *[Business Manager]* | *[All]* |
| *[Assistant Superintendent for Educational Services]* | *[2]* |
| *[Director of Information Systems]* | *[2]* |
| Consultants[1] | -- |

[1] With respect to consultants, Keiller Leadership Academy's Executive Director 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 determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The Executive Director shall forward a copy of this determination to the San Diego County Board of Supervisors. Nothing herein excuses any such consultant from any other provision of this Conflict of Interest Code.

## II.

## Disclosure Categories

Category 1.

A designated employee in this category shall report all interests in real property, and investments in, and income from business entities of the type to operate or provide any of the following:

Accounting or auditing services
Banks and savings and loans
Computer hardware or software, or computer services or consultants
Communications equipment or services
Educational services, supplies and materials
Entities or persons who have filed claims against Keiller Leadership Academy or have claims pending against Keiller Leadership Academy
Insurance brokers and agencies
Insurance adjusting, claims auditing or administration, or underwriting services
Office equipment or supplies
Personnel and employment companies and services
Printing or reproduction services, publications, and distribution
Securities, investment or financial services companies
Title insurance and escrow

Category 2.

A designated employee in this category shall disclose all business positions in, investments in, and income from any business of the type to provide personnel, services, supplies, material, machinery, or equipment to Keiller Leadership Academy and is associated with the job assignment or position of the designated employee.