CONFLICT OF INTERERST CODE
OF
THERESA HESSLING CHARTER SCHOOL PROJECT

COUNTY OF SAN DIEGO
BOARD OF SUPERVISORS
2013 APR 25 PM 3 15
THOMAS J. PASTUSZKA
CLERK OF THE BOARD
OF SUPERVISORS

1. **Standard Code of Fair Political Practices Commission**

The Political Reform Act of 1974 (Gov. Code § 81000 *et seq.*) requires each state and local government to adopt and promulgate a conflict of interest code. As a local government agency, Theresa Hessling Charter School Project, ("THCSP" 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. § 8730 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 Theresa Hessling Charter School Project. This code will take effect when approved by the Board of Supervisors of the County of San Diego, and shall thereupon supersede all prior codes adopted by Theresa Hessling Charter School Project.

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 interest (Form 700) with the Secretary of Theresa Hessling Charter School Project. Upon receipt of the statements of the members of the Board of Directors of Theresa Hessling Charter School Project, 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 Directors on the 19th day of FEBRUARY, 2013.

President of the Board of Directors
Theresa Hessling Charter School Project

ATTEST:

Secretary of the Board of Directors
Theresa Hessling Charter School Project

Approved and/or authorized by the
Board of Supervisors of the County of San Diego.
Meeting Date: 6/18/13 Minute Order No. 24
By: Nancy Vincent Date: 6/26/13
Deputy Clerk of the Board Supervisors

APPENDIX TO
CONFLICT OF INTEREST CODE OF
THERESA HESSLNG CHARTER SCHOOL PROJECT
Preamble

Any person designated in Section 1 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. (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).)

I.

Designated Employees

Designated Employees	Categories Disclosed
Members of Theresa Hessling Charter School Project's Board of Directors	4 through 6
President of the Board of Directors	1 through 6
Vice President of the Board of Directors	1 through 6
Treasurer and Director	1 through 6
Secretary of the Board of Directors	1 through 6
Chief Executive Officer/Principal (if only one school)	1 through 6
Chief Financial Officer	1 through 6
Chief Operating Officer	1 through 6
Chief Administrative Officer	1 through 6
Business Manager	1 through 6

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 schools are 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 schools.

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 the Corporation or its schools.

Category 3. Reportable Income

A designated employee in this category shall disclose all income as defined in the 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 schools.

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 past two (2) years has contracted with or in the future foreseeably may contract with the Corporation or its schools to provide personnel, services, supplies, material, machinery or equipment.

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 the Corporation's schools or in the future foreseeably may contract with the Corporation's schools to provide personnel, services, supplies, materials, machinery or equipment.

Category 6. Business Positions

A designated employee in this category shall disclose by completing Form 700 Schedule C, 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 Corporation or its schools:

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

Descriptions of Positions and Offices with Explanation of Reasons for Employee or Board Member Being a Designated Employee

Members of the Board of Directors

Directors of the Corporation formulate general policy and programs of the Corporation and its schools, and each and all Directors are therefore designated.

President of the Board of Directors

The President of the Board of Directors is an Officer of the Corporation and participates in the formulation of the Corporation's and its school's general policies and programs and in operation and oversight of Corporation's academic and administrative operations. He/she therefore is designated.

Vice-President of the Board of Directors

The Vice-President of the Board of Directors is an Officer of the Corporation and participates in the formulation of the Corporation's and its school's general policies and programs and in operation and oversight of Corporation's academic and administrative operations. He/she therefore is designated.

Treasurer and Director

The Treasurer and Director is an Officer of the Corporation and participates in the formulation of the Corporation's and its school's general policies and programs and in operation and oversight of Corporation's academic and administrative operations. He/she therefore is designated.

Secretary of the Board of Directors

The Secretary of the Board of Directors is an Officer of the Corporation and participates in the formulation of the Corporation's and its school's general policies and programs and in operation and oversight of Corporation's academic and administrative operations. He/she therefore is designated.

Chief Executive Officer/Principal (if only one school)

The Chief Executive Officer, or if the Corporation is operating only one school, the Principal of that school, is an Officer of the Corporation and participates in the formulation of the Corporation's and its school's general policies and programs and in operation and oversight of Corporation's academic and administrative operations. He/she therefore is designated.

The Chief Financial Officer

The Chief Financial Officer is an Officer of the Corporation and participates in the formulation of the Corporation's and its school's general policies and programs and in operation and oversight of Corporation's academic and administrative operations. He/she therefore is designated.

The Chief Operating Officer

The Chief Operating Officer is an Officer of the Corporation and participates in the formulation of the Corporation's and its school's general policies and programs and in operation and oversight of Corporation's academic and administrative operations. He/she therefore is designated.

Chief Administrative Officer

The Chief Administrative Officer is an Officer of the Corporation and participates in the formulation of the Corporation's and its school's general policies and programs and in operation and oversight of Corporation's academic and administrative operations. He/she therefore is designated.

Business Manager

The Business Manager is a key administrator of the Corporation and participates in the formulation of the Corporation's and its school's general policies and programs and in operation and oversight of Corporation's academic and administrative operations. He/she therefore is designated.

SAN DIEGO COOPERATIVE CHARTER SCHOOL **KEN ROCHELLS – BUSINESS MANAGER & CFO**
7260 LINDA VISTA ROAD, SAN DIEGO, CA 92111 858-496-1613 F: 858-467-9741 krochells@sdccs.org

April 24, 2013

Clerk of the Board of Supervisors for the County of San Diego
1600 Pacific Highway, Room 402
San Diego, California 92101

RE: Conflict of Interest Code and 2012 Forms 700 for the Theresa Hessling Charter School Project dba San Diego Cooperative Charter School

Dear Sir or Madam:

At the direction of the San Diego Unified School District under whose supervision our charter school is operated, we are proving the County of San Diego with the documents described above. The Theresa Hessling Charter School Project is a 501 (c) (3) not-for-profit public benefit corporation created to operate public charter schools.

Please do not hesitate to contact me if you have any questions or require additional documentation.

Sincerely,

K. A. Rochells

Ken Rochells
Business Manage & CFO