COLEMAN TECH CHARTER SCHOOLS, INC.

CONFLICT OF INTEREST CODE

I. ADOPTION

In compliance with the Political Reform Act of 1974, California Government Code Section 87100, et seq., Coleman Tech Charter Schools, Inc., a California Nonprofit Public Benefit Corporation, hereby adopts this Conflict of Interest Code ("Code"), which shall apply to all Board members and all other designated employees of Coleman Tech Charter High School ("Charter School"), as specifically required by California Government Code Section 87300.

II. DEFINITION OF TERMS

As applicable to a California public charter school, the definitions contained in the Political Reform Act of 1974, the regulations of the Fair Political Practices Commission, specifically California Code of Regulations Section 18730, and any amendments or modifications to the Act and regulations are incorporated by reference to this Code.

III. DESIGNATED REPORTERS

Designated Reporters of this Charter School include Board members and certain employees who hold positions that involve the making or participation in the making of decisions that may foreseeably have a material effect on any financial interest ("Designated Reporters"). The Designated Reporters are listed in "Exhibit A" attached to this policy and incorporated by reference herein.

IV. STATEMENT OF ECONOMIC INTERESTS: FILING

Each Designated Reporter shall file a Statement of Economic Interest ("Form 700" or "Statement") at the time and manner prescribed below, disclosing reportable investments, interests in real property, business positions, and income required to be reported under the category or categories to which the Designated Reporter's position is assigned in "Exhibit A."

An investment, interest in real property or income shall be reportable, if the business entity in which the investment is held, the interest in real property, the business position, or source of income may foreseeably be affected materially by a decision made or participated in by the Designated Reporter by virtue of his or her position. The specific disclosure responsibilities assigned to each position are set forth in "Exhibit B."

Statements Filed With the Charter School. All Statements shall be supplied by the Charter School. All Statements shall be collected by the Charter School and the Charter School's filing officer shall make and retain a copy of the Statement and forward the original to the San Diego County Board of Supervisors.

Approved and/or authorized by the Board of Supervisors of the County of San Diego
Date 10/6/11 Minute Order No. 1
THOMAS J. PASTUSZKA
Clerk of the Board of Supervisors
By Deputy Clerk

V. DISQUALIFICATION

No Designated Reporter shall make, participate in making, or try to use his/her official position to influence any Charter School decision which he/she knows or has reason to know will have a reasonably foreseeable material financial effect, distinguishable from its effect on the public generally, on the official or a member of his or her immediate family.

VI. MANNER OF DISQUALIFICATION

A. Non-Board Member Designated Reporter

When a non-Board member Designated Reporter determines that he/she should not make a decision because of a disqualifying interest, he/she should submit a written disclosure of the disqualifying interest to his/her immediate supervisor. The supervisor shall immediately reassign the matter to another employee and shall forward the disclosure notice to the Charter School Executive Director, who shall record the employee's disqualification. In the case of a Designated Reporter who is head of an agency, this determination and disclosure shall be made in writing to his/her appointing authority.

B. Board Member Designated Reporter

Board members shall disclose a disqualifying interest at the meeting during which consideration of the decision takes place. This disclosure shall be made part of the Board's official record. The Board member shall refrain from participating in the decision in any way (i.e., the Board member with the disqualifying interest shall refrain from voting on the matter and shall leave the room during Board discussion and when the final vote is taken) and comply with any applicable provisions of the Charter School bylaws.

EXHIBIT A

Designated Positions

I. Persons occupying the following positions are designated employees and must disclose financial interests in all categories defined in "Exhibit B" (i.e., categories 1, 2, and 3).

A. Members of the Board of Directors
B. Corporate Officers (CEO/President, CFO/Treasurer, Secretary)
C. Executive Director of Charter School
D. Assistant Principal
E. Consultants[1]

[1] The Executive Director may determine, in writing, that a particular consultant, although a "designated position," is hired to perform a range of duties that is limited in scope and thus not required to fully comply with the disclosure requirements in this section. 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 Executive Director's determination is a public record and shall be retained for public inspection in the same manner and location of interest code.

EXHIBIT B

Disclosure Categories

Category 1 Reporting:

A. Interest in real property which is located in whole or in part either within the boundaries or within two miles of the boundaries of the District, including any leasehold, beneficial or ownership interests or option to acquire such interest in real property.

(Interests in real property include a business entity's share of interest in real property of any business entity or trust in which the Designated Reporter or spouse owns, directly, indirectly, or beneficially, a 10% interest or greater. Excludes personal residence.)

B. Investments in or income from persons or business entities which are contractors or sub-contractors which are or have been within the previous two-year period engaged in the performance of building construction or design within the District.

C. Investments in or income from persons or business entities engaged in the acquisition or disposal of real property within the District.

(Investment includes any financial interest in or security issued by a business entity, including but not limited to common stock, preferred stock, rights, warrants, options, debt instruments and any partnership interest or other ownership interests.)

(Investments of any individual include a pro rata share of investments of any business entity or trust in which the Designated Reporter or spouse owns, directly, indirectly or beneficially, a 10% interest or greater.)

(Investment does not include a time or demand deposit in a financial institution, shares in a credit union, any insurance policy, or any bond or other debt instrument issued by any government or government agency.)

Category 2 Reporting:

A. Investments in or income from business entities which manufacture or sell supplies, books, machinery or equipment of the type utilized by the Charter School. Investments include interests described in Category 1.

Category 3 Reporting:

A. Investments in or income from business entities which are contractors or sub-contractors engaged in the performance of work or services of the type utilized by the department for which the Designated Reporter is Manager or Executive Director. Investments include the interests described in Category 1.