

**CONFLICT OF INTEREST CODE**  
**SAN DIEGO COUNTY EMPLOYEES RETIREMENT ASSOCIATION (SDCERA)**  
October 4, 2022


The Political Reform Act, Government Code Section 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 a regulation, California Code of Regulations, Title 2, Division 6, Section 18730 (hereinafter "CCR 18730"), which contains the terms of a standard conflict of interest code. It can be incorporated by reference and may be amended by the FPPC after public notice and hearings to conform to amendments in the Political Reform Act. Therefore, the terms of CCR 18730 and any amendments to it duly adopted by the FPPC are hereby incorporated by reference and along with the attached Appendix A and Appendix B in which members, officials, consultants, and employees are designated and disclosure categories are set forth constitute the conflict of interest code of San Diego County Employees Retirement Association (SDCERA).

The persons holding positions listed in the Appendix A are designated members, officials, consultants, or employees who manage investment funds and/or participate in the making of decisions that may foreseeably have a material effect on financial interests.

Pursuant to California Code of Regulations, Title 2, Division 6, Section 18730 (4), designated employees shall file statements of economic interests with the agency or with the code reviewing body. All designated positions listed in SDCERA's Appendix A will file disclosure statements (Form 700) with the San Diego County Clerk of the Board of Supervisors code reviewing body. Any disclosure statements received by our agency will be forwarded to the Clerk of the Board of Supervisors.



Tracy M. Sandoval  
Chief Executive Officer  
San Diego County Employees Retirement Assn.

Approved and/or authorized by the Board of Supervisors of the County of San Diego	
Meeting Date: 11/15/22	Minute Order No. 23
By: 	Date: 11/15/22
Deputy Clerk of the Board Supervisors	

## APPENDIX A

San Diego County Employees Retirement Association  
Designated Positions and Disclosure CategoriesCOSO CLERK OF THE BOARD  
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The positions listed below manage public investments and will file a statement of economic interest pursuant to Government Code Section 87200:

<b>Designated Positions</b>	<b>Disclosure Category</b>
Trustee - Member of the Board of Retirement	1
Retirement Chief Executive Officer	1
Retirement Chief Investment Officer	1
Retirement Deputy Chief Investment Officer	1
Retirement Investment Officer	1
Public Member of the Audit Committee	1

The positions listed below will file a statement of economic interest pursuant to Government Code Section 81000 et seq.:

<b>Designated Positions</b>	<b>Disclosure Category</b>
Retirement Assistant Administrator	2
Retirement Assistant Director Member Services	2
Retirement Assistant General Counsel	2
Retirement General Counsel	2
Retirement Internal Audit Director	2
Retirement Information Technology Director	2
Retirement Business Systems Director	2
Retirement Member Services Manager	2
Retirement Services Manager	2
Consultant – Outside Fiduciary Counsel	2
Consultant – Outside Investment Counsel	2
Consultant – Outside Tax Counsel	2

## APPENDIX B

### San Diego County Employees Retirement Association Designated Employees Disclosure Categories

- Category 1: All-Inclusive Reportable Investments including all disclosures required by California Government Code section 87200.
- Category 2: Investments and business positions in any business entity that supplies goods or services to SDCERA, and in any security which was or is held by any fund administered by the Board of Retirement wherein the reporting party's interest in said security amounts to 1% or more of the issue of that security.

Income and gifts from any person or business entity that supplies goods or services to SDCERA.

Interests in real property.

For the purpose of this Appendix, "goods and services" means goods or services supplied by any actuarial, accounting, banking, financial, legal, investments, or consulting firm.

For the purpose of this Appendix, an "interest in real property" is any real property located in or within two miles of the County of San Diego, or within two miles of any land owned by SDCERA as set forth in the Attachment to this Appendix, which list the real properties owned by SDCERA in its Direct and Co-Investment Real Estate Portfolio. A copy of this Attachment is also on file in SDCERA's office.

**ATTACHMENT TO APPENDIX B**

**San Diego County Employees Retirement Association  
Real Estate Properties**

Clifton Commons, Clifton, New Jersey  
The Ryan Building, Phoenix, Arizona  
Commerce Park, Costa Mesa, California  
Rio San Diego Plaza II, San Diego, California  
Highlands Ranch, Flower Mound, Texas  
105 & 140 Terry Drive, Newtown, Pennsylvania  
Hills of Corona, Corona, California  
Gateway Commerce I & II, Irving, Texas  
Bothell 405 Business Park, Bothell, Washington  
Stratford Station, Centennial, Colorado  
Shops of Heatherfield, Glenview, Illinois  
101 Post Street, San Francisco, California  
La Grange Crossing, La Grange, Illinois  
45 Milk Street, Boston, Massachusetts  
Tustin Executive Center, Tustin, California  
2121 Belmont, Portland, Oregon  
SFS Logistics Center, Santa Fe Springs, California  
SALT Tempe, Arizona  
Derby South Lake Union, Seattle, Washington  
Derby Slabtown, Portland, Oregon  
5990 Sepulveda, Van Nuys, California  
Apex, Charlotte, North Carolina  
Derby Capitol Hill, Seattle, Washington  
Westside Plaza, Doral, Florida