San Diego County Tobacco Asset Securitization Corporation (Attachment A)

CONFLICT OF INTEREST CODE

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San Diego County Tobacco Asset Securitization Corporation 1600 Pacific Highway, Room 076 San Diego, CA 92101

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 for a standard conflict of interest code. 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, in which members and employees are designated and disclosure categories are set forth, constitute the conflict of interest code of San Diego County Tobacco Asset Securitization Corporation (Corporation).

Designated employees shall file statements of economic interests directly with the County of San Diego Clerk of the Board of Supervisors.

APPENDIX A

CONFLICT OF INTEREST CODE OF THE SAN DIEGO COUNTY TOBACCO ASET SECURITIZATION CORPORATION

DESIGNATED POSITIONS GOVERNED BY THE CONFLICT OF INTEREST CODE

DESIGNATED EMPLOYEES' TITLE OR FUNCTION	٠	DISCLOSURE SCHEDULES
Members of the Board		A1, A2, B, C, D, E
Debt Finance Manager		A1, A2, B, C, D, E
General Counsel		A1, A2, B, C, D, E
Consultants ¹		A1, A2, B, C, D, E

¹ Consultant includes, but is not limited to, Corporation employees and contracted staff who perform work that is compensated by the Corporation. Consultants are required to disclose pursuant to the broadest category in the code, subject to the following limitation: the General Counsel may determine, in writing, that a particular consultant, although a "designated position," is hired to perform a range of duties that are limited in scope and thus is not required to fully comply with the disclosure requirements described 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 the disclosure requirements. The General Counsel's determination is a public record and shall be retained for public inspection in the same manner and location as this Conflict of Interest Code.