THE CLASSICAL ACADEMY, INC.

CONFLICT OF INTEREST CODE

COUNTY OF SAN DIEGO
2019 APR 17 AM 10: 30
CLERK OF THE BOARD
OF SUPERVISORS

I. ADOPTION

In compliance with the Political Reform Act of 1974, California Government Code Section 87100, et seq., The Classical Academy, Inc. ("Charter School") hereby adopts this Conflict of Interest Code ("Code"), which shall apply to all governing board members and all other designated employees of 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 EMPLOYEES

Employees of this Charter School, including governing board members, 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, shall be "designated employees." The designated positions are listed in "Exhibit A" attached to this policy and incorporated by reference herein.

IV. STATEMENT OF ECONOMIC INTERESTS: FILING

Each designated employee, including governing board members, shall file a Statement of Economic Interest ("Statement") at the time and manner prescribed by California Code of Regulations, title 2, section 18730, disclosing reportable investments, interests in real property, business positions, and income required to be reported under the category or categories to which the employee'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 employee 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 filed with the Charter School. The Charter School's filing official shall make and retain a copy of the Statement and forward the original to the County Board of Supervisors.

Approved and/or authorized by the
Board of Supervisors of the County of San Diego.
Meeting Date: 5/21/2019 Minute Order No. 15
By: [signature] Date: 5/23/2019
Deputy Clerk of the Board Supervisors

V. DISQUALIFICATION

No designated employee 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-Governing Board Member Designated Employees

When a non-Governing Board member designated employee 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 Executive Director, who shall record the employee's disqualification. In the case of a designated employee who is head of an agency, this determination and disclosure shall be made in writing to his/her appointing authority.

B. Governing Board Member Designated Employees

The Corporation shall not enter into a contract or transaction in which a director directly or indirectly has a material financial interest (nor shall the Corporation enter into any contract or transaction with any other corporation, firm, association, or other entity in which one or more of the Corporation's directors are directors and have a material financial interest).

EXHIBIT A

Designated Positions

Designated Position	Assigned Disclosure Category
Members of the Governing Board	1, 2, 3
Executive Director	1, 2, 3
Director of Finance	1, 2, 3
Director of Technology	1, 2, 3
Director of Operations	1, 2, 3
Facilities Manager	1, 2, 3
Director of Special Education	1, 2, 3
Director of Communications	1, 2, 3
Director of Strategic Partnerships	1, 2, 3
Director of Administration	1, 2, 3
Director of Instructional Leaders	1, 2, 3
Director of Human Resources	1, 2, 3
Director of Safety and Security	1, 2, 3
Director of Instructional Leaders	1, 2, 3
Director of Curriculum	1, 2, 3
Principal	1, 2, 3
Assistant Principal	1, 2, 3
Consultants/New Positions	*

*Consultants/New Positions shall be included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitation:

The Executive Director may determine in writing that a particular consultant or new position, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements in this section. Such written determination shall include a description of the consultant's or new position'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 as this conflict of interest code (Government Code § 81008).

EXHIBIT B

Disclosure Categories

Category 1

Designated positions assigned to this category must report:

a) Interests in real property that are located in whole or in part within a two-mile radius:

- of any school district that has authorized a The Classical Academy charter school, or
- of any facility utilized by The Classical Academy charter schools, or
- of a proposed site for a The Classical Academy facility.

b) Investments and business positions in business entities, and sources of income (including gifts, loans, and travel payments) of the type that engage in the purchase or sale of real property or are engaged in building construction or design.

Category 2

Designated positions assigned to this category must report:

a. Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) that are contractors engaged in the performance of work or services, or sources that manufacture, sell, repair, rent or distribute school supplies, books, materials, school furnishings or equipment of the type to be utilized by The Classical Academy.

Category 3

Designated positions assigned to this category must report:

a. Investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) that are contractors engaged in the performance of work or services, or sources that manufacture, sell, repair, rent or distribute school supplies, books, materials, school furnishings or equipment of the type to be utilized by the designated position's department.