CONFLICT OF INTEREST CODE FOR THE SAN DIEGO COUNTY EMPLOYEES RETIREMENT ASSOCIATION

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 has adopted a regulation, 2 Cal. Code of Regs. Section 18730, which contains the terms of a standard conflict of interest code. It can be incorporated by reference and may be amended by the Fair Political Practices Commission after public notice and hearings to conform to amendments in the Political Reform Act. Therefore, the terms of 2 Cal. Code of Regs. Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference and, along with the attached Appendix in which members and employees are designated and disclosure categories are set forth, constitute the conflict of interest code of the San Diego County Employees Retirement Association.

Designated employees shall file statements of economic interests with the agency who will make the statements available for public inspection and reproduction. (Gov. Code Section 81800.) Upon receipt of the statements of the San Diego County Employees Retirement Association, the agency shall make and retain a copy and forward the original of these statements to the Clerk of the Board of Supervisors. Statements for all other designated employees will be retained by the agency.

Retirement Chief Executive Officer

APPENDIX A

San Diego County Employees Retirement Association
Designated Positions and Disclosure Categories

It has been determined that the positions listed below will file a statement of economic interest pursuant to Government Code Section 81000 et seq.:

Designated Positions	Disclosure Category
Retirement Assistant Administrator, Director Member Services	1,2,3
Retirement Assistant Administrator, Chief Operating Officer	1,2,3
Retirement Assistant Director, Member Services	1,2,3
Retirement Member Services Manager	1,2,3
Retirement Business Systems Director	1,2,3
Retirement Administrative Services Manager	1,2,3
Retirement Performance Auditor	1,2,3

Consultants are included in the list of designated employees and are required to disclose pursuant to the broadest disclosure category in the code, subject to the following limitation:

The Retirement Chief Executive Officer 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 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 disclosure requirements. The Retirement Chief Executive Officer'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.

Note Regarding Officials Who Manage Public Investments

It has been determined that the positions listed below manage public investments and will file a statement of economic interest pursuant to Government Code Section 87200:

Members of Board of Retirement
Retirement Chief Executive Officer
Retirement Chief Investment Officer
Retirement Assistant Chief Investment Officer
Retirement Investment Officer

APPENDIX B

San Diego County Employees Retirement Association
Designated Employees Disclosure Categories

Category 1: All-Inclusive Reportable Investments

Category 2: All-Inclusive Reportable Interests in Real Property

Category 3: All-Inclusive Reportable Income

Category 4: Less-Inclusive Reportable Investments
Investments in any business entity which contracts, with the County or local government agency governed by the Board of Supervisors, to provide services, supplies, materials or equipment of the type utilized by the agency adopting this Code and associated with the position of the designated employee.

Category 5: Less-Inclusive Reportable Income
Income from a source which contracts, with the County or local government agency governed by the Board of Supervisors, to provide services, supplies, materials or equipment of the type utilized by the Agency adopting this Code and associated with the position of the designated employee.

Category 6: Less-Inclusive Reportable Interests in Real Property
Interests in real property located in the unincorporated area of the County, or not more than two miles outside the boundaries of the unincorporated area, or within two miles of any land owned by the County.

Category 7: Less-Inclusive Reportable Investments, Unincorporated Area
Investments in any business entity with interests in real property located in the unincorporated area of the County, or not more than two miles outside the boundaries of the unincorporated area.

Category 8. Less-Inclusive Reportable Income, Unincorporated Area
Income from a source which resides in the unincorporated area of the County, or not more than two miles outside the boundaries of the unincorporated area.