COUNTY OF SAN DIEGO
BOARD OF SUPERVISORS
2013 FEB 5 PM 3 57
CLERK OF THE BOARD
OF SUPERVISORS

Arroyo Paseo Charter High School
CONFLICT OF INTEREST POLICY

I. ADOPTION

In compliance with the Political Reform Act of 1974, California Government Code Section 87100, et seq., the **Arroyo Paseo Charter High School** hereby adopts this Conflict of Interest Code (—Code‖), which shall apply to all governing board members, candidates for member of the governing board, and all other designated employees of **Arroyo Paseo 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. Under AB 1233, a —director‖ (or governing board member) must be a person who has been elected, designated or appointed (per the nonprofit's bylaws) to act as a member of the board and to vote on actions and decisions taken by the board. Ex officio directors have all the same rights and duties, including voting rights, as all other board members. They also have the same restrictions under conflicts of interest law. Arroyo Paseo Charter High School will comply with all applicable conflict of interest laws.

III. DESIGNATED EMPLOYEES

Employees of this Charter School, including governing board members and candidates for election and/or appointment to the governing board, 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 and candidates for election and/or appointment to the governing board, shall file a Statement of Economic Interest (—Statement‖) at the time and manner prescribed below, disclosing reportable investments, interests in real property, business positions, and income required to be

Approved and/or authorized by the
Board of Supervisors of the County of San Diego.
Meeting Date: 4/9/13 Minute Order No. 16
By: [signature] Date: 4/12/13
Deputy Clerk of the Board Supervisors

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 (using Form 700), 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 participate 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.‖ All Statements shall be supplied by the Charter School. All Statements shall be filed with the Charter School. The Charter School's filing officer shall make and retain a copy of the Statements.

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 Charter School 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

Governing 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 Governing Board and their alternates (if applicable)
   B. Candidates for Member of the Governing Board
   C. Corporate Officers (e.g., CEO/President, CFO/Treasurer, Secretary, etc.)
   D. Director of Charter School
   E. Principal of Charter School
   F. Assistant Principals
   G. Chief Business Officer
   H. Director Personnel Services
   I. Assistant Director of Personnel Services
   J. Consultants

II. Persons occupying the following positions are designated employees and must disclose financial interests defined in Category 1 of Exhibit B.
   A. Purchasing Manager
   B. Assistant Business Officer

III. Persons occupying the following positions are designated employees and must disclose financial interests defined in Categories 2 and 3 of Exhibit B.
   A. Information Systems Technician
   B. Contractor

The Charter School 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 Charter School Director's determination is a public record and shall be retained for public inspection in the same manner and location of interest code.

ARROYO PASEO CHARTER HIGH SCHOOL

COUNTY OF SAN DIEGO
BOARD OF SUPERVISORS
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THE
CLERK OF THE BOARD
OF SUPERVISORS

February 4, 2013

Clerk of San Diego County Board of Supervisors
1600 Pacific Highway, Room 402
San Diego, California 92101

Dear County Board of Supervisors Clerk:

Enclosed please find an original copy of the Conflict of Interest Policy for Arroyo Paseo Charter High School signed by our Board President, Dr. Jose Morachis. Per our phone conversation last week, I understand that after the Board of Supervisors approves our policy I will be asked to send in copies of our Form 700 from all applicable individuals within our organization.

Thank you for your assistance with this matter and please contact me if you have any questions.

Sincerely,

Brian Thurman, Ed.D.
Executive Director/Principal
Arroyo Paseo Charter High School

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Accredited through the Western Association of Schools and Colleges Accrediting Commission for Schools (WASC)