CITY HEIGHTS PREP

CHARTER SCHOOL OF SAN DIEGO

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March 20, 2013

Via U.S. Mail

San Diego County
Clerk of the Board of Supervisors
Conflict of Interest Code and Filings
1600 Pacific Highway, Room 402
San Diego, CA 92101-2471

RE: Conflict of Interest Code and Form 700 Statements of Economic Interest
City Heights Preparatory Charter School

Dear Clerk of the Board:

Enclosed for approval of the San Diego County Board of Supervisors ("Board of Supervisors"), please find a copy of the conflict of interest code for City Heights Preparatory Charter School ("City Heights Prep"). The enclosed conflict of interest code has been internally approved by the City Heights Prep Board of Directors, pending final approval by the Board of Supervisors.

City Heights Prep is a California public charter school located in San Diego, and operating solely within San Diego County. As such, it is our understanding that under the Political Reform Act, the Board of Supervisors is the appropriate code-reviewing body for City Heights Prep.

We also enclose for your files the original Form 700 Statements of Economic Interest ("Statements") for the City Heights Prep Board of Directors and other designated employees (as memorialized in Exhibit A to the conflict of interest code). Copies of the Forms 700 have also been retained at the school site.

Should you have any questions regarding this filing, or require any additional information from City Heights Prep, please let me know.

Sincerely,

Marnie Nair

Marnie Nair
School Director/Principal
City Heights Preparatory Charter School

Approved and/or authorized by the
Board of Supervisors of the County of San Diego.
Meeting Date: 6/18/13 Minute Order No. 24
By: Nancy Vincenza Date: 6/26/13
Deputy Clerk of the Board of Supervisors

CITY HEIGHTS PREP
CHARTER SCHOOL

CONFLICT OF INTEREST CODE

I. ADOPTION

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

Governing Board members and designated employees 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 Positions."

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 Position shall file a Form 700 Statement of Economic Interests ("Form 700") 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." The specific disclosure responsibilities assigned to each position are set forth in "Exhibit B."

Form 700 Filing. All completed Forms 700 shall be returned to the Charter School. The Charter School's filing officer shall make and retain a copy of the Form 700 and forward the original to the San Diego County Board of Supervisors.

V. DISQUALIFICATION

No person 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 Members

When a non-Governing Board member 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/Principal, who shall record the employee's disqualification. In the case of a conflict involving the Charter School Director/Principal, this determination and disclosure shall be made in writing to his/her appointing authority (the Governing Board).

B. Governing Board Members

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 or any other Board policies regarding conflicts of interest.

EXHIBIT A

Designated Position	Assigned Disclosure Category
Members of the Governing Board	1, 2, 3
Charter School Director/Principal	1, 2, 3
Consultants	*

*Consultants are 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 Charter School Director/Principal 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 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/Principal'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. (Govt. Code § 81008.)

EXHIBIT B

DISCLOSURE CATEGORIES

Category 1

Designated positions assigned to this category must report:

a. Interests in real property which are located in whole or in part within the boundaries (and a two mile radius) of the School District in which the Charter School operates.

b. Investments in, income (including gifts, loans, and travel payments), from, and business positions in any business entity of the type which engages in the acquisition or disposal of real property or are engaged in building construction or design.

Category 2

Designated positions assigned to this category must report:

Investments in, income (including gifts, loans, and travel payments), from, and business positions in any business entity of the type which engages in the manufacture, sale, repair, rental or distribution of school supplies, books, materials, school furnishings or equipment to be utilized by the Charter School, its parents, teachers and students for educational purposes. This includes, but is not limited to, educational supplies, textbooks and items used for extracurricular courses.

Category 3

Designated positions assigned to this category must report:

Investments in, income (including gifts, loans, and travel payments), from sources which are engaged in the performance of work or services of the type to be utilized by the Charter School, its parents, teachers and students for educational purposes. This includes, but is not limited to, student services commonly provided in public schools such as speech therapists and counselors.