CONFLICT OF INTEREST CODE
OF THE
SAN DIEGO POOLED INSURANCE PROGRAM AUTHORITY

Preamble

Any person designated in Section I or II of this Code who is unsure of any right or obligation arising under this Code may request a formal opinion or letter of advice from the FPPC or an opinion from the Authority's General Counsel. (Gov. Code Section 83114; 2 Cal. Code of Regs., Section 18730(b)(11).) A person who acts in good faith in reliance on an opinion issued to him or her by the FPPC shall not be subject to criminal or civil penalties for so acting, provided that all material facts are stated in the opinion request. (Gov. Code Section 83114, Subdivision (a).)

If General Counsel renders an opinion stating in full the facts and the law upon which the opinion is based, compliance by the requesting party with such an opinion shall be evidence of good faith in any civil or criminal proceeding. Compliance with the opinion of General Counsel shall also act as a complete defense to any disciplinary action that the Authority may bring under Government Code Section 91003.5.

Designated Employees

Designated Employees	Categories Disclosed
Members of the Board of Directors, including alternates	All
Risk Manager	All
*Consultants	—
General Counsel	All
Insurance Broker	1,3,4,5
Treasurer	All
Investment Advisor	All

* With respect to consultants, the Risk Manager may determine in writing that a particular consultant, although a "designated employee" is hired to perform a range of duties that are limited in scope and thus is not required to comply with the written disclosure requirements described in these categories. Such determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The Risk Manager's determination is a public record and shall be retained for public inspection by the Authority in the same manner as this Conflict of Interest Code. Nothing herein excuses any such consultant from any other provision of this Conflict of Interest Code.

Personnel Who Manage Public Investments

The Authority has determined that Directors who are members of the Investment Committee, and the Treasurer of the Authority, "manage public investments" within the meaning of Government Code Section 87200 and Title 2, California Code of Regulations, Section 18701, subdivision (b), and shall file FPPC Form 720 statement of economic interests.

Disclosure Categories

Category 1. All-Inclusive Reportable Investments (Gov. Code Section 82034)

A designated employee in this category shall report all reportable investments, worth more than $2,000, in business entities related to the Authority enumerated in this category, located in or doing business in the County of San Diego, which:

(a) are owned by the designated employee, or his or her spouse or dependent child;

(b) are owned by an agent on behalf of the designated employee;

(c) are owned by any business entity controlled by the designated employee (i.e. any business entity in which the designated employee, and/or his or her agents, spouse, or dependent children hold more than a 50% ownership interest);

(d) are owned by a trust in which the designated employee has a substantial interest (i.e. a trust in which the designated employee, and/or his or her spouse, or dependent children have a present or future interest worth more that $2,000);

(e) represent the pro rata share (worth more than $2,000) of the designated employee, and/or his or her spouse or dependent children, of investments of any business entity or trust in which the designated employee, and/or his or her spouse or dependent children own, directly, indirectly, or beneficially, a 10% interest or greater.

Business entities located in or doing business in the County of San Diego applicable to this category are those which operate or provide any of the following:

Accounting or auditing services
Banks and savings and loans
Computer hardware or software, or computer services or consultants
Communications equipment or services
Data processing companies or consultants

Entities or persons who have filed claims against the Authority within the last three (3) years which are in a "closed" status , or have claims pending against the Authority
Employment agencies
Financial audit services
Insurance brokers and agencies
Insurance adjusting, claims auditing or administration, or underwriting services
Newspapers, printing and reproduction services
Office equipment or supplies
Personnel and employment companies and services
Printing or reproduction services, publications, and distribution
Safety equipment and supplies
Securities, investment or financial services companies
Title insurance and escrow

Category 2. Reportable Interests in Real Property (Gov. Code Sections 82033, 82035)

A designated employee in this category shall disclose all interests in real property:

a. within, or not more than two (2) miles outside, the boundaries of the County of San Diego, that has situated on it any business entity named in category no. 1, above; or

b. within the County of San Diego that is involved in any plan for the expansion of the Authority's facilities; or

c. within one-half (½) mile of any facility or real property owned or leased by the Authority,

if the interest in real property is either: (1) held or owned by the designated employee, or his or her spouse, or dependent child, or (2) the pro rata share (worth more than $2,000) of interests in real property of any business entity or trust in which the designated employee and/or his or her spouse or dependant child owns, directly or beneficially, a 10% interest or greater.

Category 3. Reportable Income (Gov. Code Section 82030)

A designated employee in this category shall disclose all income of the designated employee from the below-listed sources located in or doing business in the County of San Diego aggregating $500 or more (or $50 or more in the case of gifts) during the reporting period.

Accounting or auditing services
Banks and savings and loans
Computer hardware or software, or computer services or consultants

Communications equipment or services
Data processing companies or consultants
Entities or person(s) who have filed claims against the Authority within the last three (3) years which are in a "closed" status, or have claims pending against the Authority
Employment agencies
Financial audit services
Insurance brokers and agencies
Insurance adjusting, claims auditing or administration, or underwriting services
Newspapers, printing or reproduction services, publications, and distribution
Safety equipment and supplied
Personnel and employment companies and services
Printing or reproduction services, publications, and distribution
Safety equipment and supplies
Securities, investment or financial services companies
Title insurance and escrow

Category 4. Less-Inclusive Reportable Income (Gov. Code Section 82030)

A designated employee in this category shall disclose only that reportable income ($500, or more during reporting period; $50 or more in the case of gifts) which is derived from a source which within the last two years has contracted with the Authority or in the foreseeable future may contract with the Authority to provide personnel, services, supplies, materials, or equipment:

a. to the Authority, of the type utilized by the Authority which is located in or doing business in the County of San Diego, and associated with the job assignment or position of the designated employee; or

b. to any entity which has contracted with the Authority within the last two years or which in the foreseeable future may contract with the Authority to provide personnel services, supplies materials, machinery or equipment associated with the job assignment or position of the designated employee.

Category 5. Business Positions

Disclosure shall be made completing Form 700, schedule "C."