COUNTY OF SAN DIEGO
BOARD OF SUPERVISORS
2009 MAY 12 PM 2 31
THOMAS J. PASTUSZKA
CLERK OF THE BOARD
OF SUPERVISORS

CONFLICT OF INTEREST CODE
OF
URBAN DISCOVERY ACADEMY, INC.

1. Standard Code of FPPC

The Political Reform Act of 1974 (Government Code § 81000 *et seq.*) requires each state and local government agency to adopt and promulgate a conflict of interest code. As a local government agency, Urban Discovery Academy is therefore required to adopt such a code. The Fair Political Practices Commission ("FPPC") has adopted a regulation (2 Cal. Code of Regs. § 18730) which contains the terms of a model conflict of interest code, which can be incorporated by reference as an agency's code. After public notice and hearing, the regulation may be amended by the FPPC to conform to amendments in the Political Reform Act.

2. Adoption of Standard Code of FPPC

The terms of 2 Cal. Code of Regs. § 8730 and any future amendments to it duly adopted by the FPPC are hereby adopted and incorporated herein by reference. This regulation and the Appendix attached hereto designating officials and employees and establishing disclosure categories shall constitute the Conflict of Interest Code of Urban Discovery Academy, Inc. This code shall take effect when approved by the Board of Supervisors for the County of San Diego, and shall thereupon supersede any and all prior codes adopted by Urban Discovery Academy

3. Filing of Statements of Economic Interests

Pursuant to Section 4 of the model code set forth in 2 Cal. Code of Regs. § 18730(b), designated employees set forth in the Appendix shall file statements of economic interests (Form 700) with the Secretary of Urban Discovery Academy, Inc. Upon receipt of the statements of the members of the Board of Trustees, the Secretary shall make and retain copies and forward the originals of these statements to the Clerk of the Board of Supervisors for the County of San Diego. Statements for all other designated employees shall be retained by the Secretary.

APPROVED AND ADOPTED by the Board of Trustees of Urban Discovery Academy, Inc. on the 26 day of March, 2009.

President, Urban Discovery Academy, Inc.

ATTEST: Esther M. LaPorta

Secretary, Urban Discovery Academy, Inc.

Approved and/or authorized by the Board of Supervisors of the County of San Diego
Date 7/21/09 Minute Order No. 14
THOMAS J. PASTUSZKA
Clerk of the Board of Supervisors
By Nancy Vinyard
Deputy Clerk

APPENDIX TO
CONFLICT OF INTEREST CODE OF
URBAN DISCOVERY ACADEMY, INC.

Preamble

Any person designated in Section I of this Appendix 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 Urban Discovery Academy, Inc.'s General Counsel. (Gov. Code § 83114; 2 Cal. Code of Regs. § 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 § 83114(a).)

Opinions rendered by General Counsel do not provide any statutory defense to an alleged violation of conflict of interest statutes or regulations. The prosecuting agency may, but is not required to, consider a requesting party's reliance on General Counsel's opinion as evidence of good faith. In addition, Urban Discovery Academy may consider whether such reliance should constitute a mitigating factor to any disciplinary action that Urban Discovery Academy, Inc. may bring against the requesting party under Gov. Code § 91003.5.

I.

Designated Employees

Designated Employees	Categories Disclosed
Members of the Board of Trustees	All
Principal, Urban Discovery Academy, Inc.	All
President, Urban Discovery Academy, Inc.	All
Secretary, Urban Discovery Academy, Inc.	All
CFO/Treasurer, Urban Discovery Academy, Inc.	All
General Counsel	All
Consultants[1]	--

[1] With respect to consultants, the President may determine in writing that a particular consultant, although a "designated employee" is hired to perform a range of duties that is limited in scope and thus is not required to comply with the written disclosure requirements described in these categories. 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 President's determination is a public record and shall be retained for public inspection by Urban Discovery Academy, Inc. 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.

II. Disclosure Categories

Category 1. All-Inclusive Reportable Investments

A designated employee in this category shall report all reportable investments, as defined in Gov. Code § 82034, in business entities located in, doing business in, planning to do business in, or having done business in the previous two (2) years in San Diego County 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
Educational services, supplies and materials
Entities or persons who have filed claims against Urban Discovery Academy, Inc. or have claims pending against Urban Discovery Academy, Inc.
Insurance brokers and agencies
Insurance adjusting, claims auditing or administration, or underwriting services
Office equipment or supplies
Personnel and employment companies and services
Printing or reproduction services, publications, and distribution
Securities, investment or financial services companies
Title insurance and escrow

Category 2. Reportable Interests in Real Property

A designated employee in this category shall disclose all interests in real property, as defined in Gov. Code §§ 82033 and 82035, that is

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

(b) within two (2) miles of any facility or real property owned or used by Urban Discovery Academy, Inc.

Category 3. Reportable Income

A designated employee in this category shall disclose all income as defined in Government Code § 82030 of the designated employee from the below-listed sources located in, doing business in, planning to do business in, or having done business in the previous two (2) years in San Diego County 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
Educational services, supplies and materials

Entities or persons who have filed claims against Urban Discovery Academy, Inc. or have claims pending against Urban Discovery Academy, Inc.
Insurance brokers and agencies
Insurance adjusting, claims auditing or administration, or underwriting services
Office equipment or supplies
Personnel and employment companies and services
Printing or reproduction services, publications, and distribution
Securities, investment or financial services companies
Title insurance and escrow

Category 4. Less-Inclusive Reportable Investments

A designated employee in this category shall disclose only investments as defined in Gov. Code § 82034 in any business entity, which within the last two years has contracted with or in the future foreseeably may contract with Urban Discovery Academy, Inc. to provide personnel, services, supplies, material, machinery or equipment:

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

(b) to any entity which has contracted with Urban Discovery Academy, Inc. within the last two years or which in the future foreseeably may contract with Urban Discovery Academy, Inc. to provide services, supplies, materials, machinery or equipment associated with the job assignment or position of the designated employee.

Category 5. Less-Inclusive Reportable Income

A designated employee in this category shall disclose only that reportable income as defined in Gov. Code § 82030 which is derived from a source which within the last two years has contracted with Urban Discovery Academy, Inc. or in the future foreseeably may contract with Urban Discovery Academy, Inc. to provide personnel, services, supplies, materials, machinery or equipment:

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

(b) to any entity which has contracted with the Urban Discovery Academy, Inc. within the last two years or which in the future foreseeably may contract with Urban Discovery Academy, Inc. to provide personnel, services, supplies, materials, machinery or equipment associated with the job assignment or position of the designated employee.

Category 6. Business Positions

A designated employee in this category shall disclose by completing Form 700, Schedule "C." A designated employee shall list:

(a) the name and address of each business entity in which he or she is a director, officer, partner, trustee, employee, or in which he or she holds any position of management;

(b) a description of the business activity in which the business entity is engaged; and

(c) the designated employee's position with the business entity.