



BOARD GOVERNANCE

BOARD POLICY: Conflict of Interest Code BP # 9270 (previously 06-15)

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 California Code of Regulations Section 18730) that contains the terms of a standard conflict of interest code, which can be incorporated by reference in an agency's code. After public notice and hearing, the standard code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of 2 California Code of Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the attached Appendices, designating positions and establishing disclosure categories, shall constitute the conflict of interest code for the Gateway Community Charters. (GCC)

Individuals holding designated positions shall file statements of economic interests with the GCC, which will make the statements available for public inspection and reproduction (Government Code Section 81008). All statements will be retained by GCC.

APPENDIX A
DESIGNATED POSITIONS

<u>Designated Positions</u> <u>Category</u>	<u>Disclosure</u>
Members of the Governing Board and Alternates	1, 2
Corporate Officers (e.g. President, Secretary, Treasurer, etc.)	1, 2
Superintendent/CEO	1, 2
Chief Business Official	1, 2
Deputy Superintendent	1, 2
Assistant Superintendent	1, 2
Executive Director, Educational Programs	1, 2
Director of Business Services	2
Chief Communications & Strategy Officer	3
Director of Academics	3
Director of Special Education and Student Services	3
Director of School, Parent and Governmental Relations	3
Director of Human Resources	3
Director of College & Career Readiness	3
Vocational Academies Director	3
Site Directors	3
Principal (Principal II)	3
Consultants/New Positions	*

*Consultants/New Positions shall be 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 GCC Superintendent/CEO may determine in writing that a particular consultant or new position, 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 or new position’s duties and, based upon that description, a statement of the extent of disclosure requirements. The Superintendent/CEO’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 (Government Code § 81008).

APPENDIX 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 any facility utilized by GCC charter school or are of the type that could be acquired by GCC as well as real property within two miles of the used or potential site.
- b. Investments and business positions in business entities and income, including gifts, loans, and travel payments, from sources of the type that engage in the acquisition or disposal of real property or are engaged in building construction or design within the boundaries of any county in which GCC operates.

Category 2

Designated positions assigned to this category must report:

Investments and business positions in business entities and income, including gifts, loans, and travel payments, from sources of the type that engage in the performance of work or services or sources which manufacture, sale, repair, rental or distribution of school supplies, books, materials, school furnishings or equipment to be utilized by GCC.

Category 3

Designated positions assigned to this category must report:

Investments and business positions in business entities and income, including gifts, loans, and travel payments, from sources of the type that engage in the performance of work or services or sources which manufacture, sale, repair, rental or distribution of school supplies, books, materials, school furnishings or equipment to be utilized by the designated position's department or division.

This is the last page of the conflict of interest code for **Gateway Community Charters**.



CERTIFICATION OF FPPC APPROVAL

Pursuant to Government Code Section 87303, the conflict of interest code for **Gateway Community Charters** was approved on August 29, 2023. This code will become effective on August 29, 2023.

Brian G. Lau
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Fair Political Practices Commission