

Exhibit A

CONFLICT OF INTEREST CODE OF CAMINO NUEVO CHARTER ACADEMY



1. Standard Code of FPPC

Camino Nuevo Charter Academy shall comply with Government Code Section 1090. The Political Reform Act of 1974 (Gov. 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, Camino Nuevo Charter Academy, a California nonprofit public benefit corporation (“Corporation”) is therefore required to adopt such a code. The Fair Political Practices Commission (“FPPC”) has adopted a regulation (Cal. Code of Regs., tit. 2, § 18730) that contains the terms of a model conflict of interest code (“Model 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 California Code of Regulations, title 2, section 18730 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 Corporation. This Code shall take effect when approved by the FPPC, and shall thereupon supersede any and all prior conflict of interest codes adopted by Corporation.

3. Filing of Statements of Economic Interests

Pursuant to Section 4 of the Model Code set forth in California Code of Regulations, title 2, section 18730, subdivision (b), each designated employee set forth in the Appendix shall file a Statement of Economic Interests (“Form 700”) with the Secretary of Corporation, which will make the statements available for public inspection and reproduction. Upon receipt of the statements of the designated employees, the Secretary shall retain the originals of these statements, and forward copies to the FPPC upon request.

**APPENDIX TO
CONFLICT OF INTEREST CODE OF
CAMINO NUEVO CHARTER ACADEMY**

Preamble

Any person designated in Section I of this Appendix who is unsure of any right or obligation arising under this conflict of interest code (“Code”) may request a formal opinion or letter of advice from the Fair Political Practices Commission (“FPPC”) or an opinion from legal counsel to Camino Nuevo Charter Academy, a California nonprofit public benefit corporation (“Corporation”). (Gov. Code, § 83114; Cal. Code of Regs., tit. 2, § 18730, subd. (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, subd. (a).)

Opinions rendered by legal counsel to Corporation do not provide a 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 such legal counsel’s opinion as evidence of good faith. In addition, Corporation may consider whether such reliance should constitute a mitigating factor to any disciplinary action that Corporation may bring against the requesting party under Government Code section 91003.5.

I.

Designated Employees

<u>Designated Positions</u>	<u>Disclosure Categories</u>
Members of the Board	4
Members of the Board Executive Committee	1, 2
Chief Executive Officer	1, 2
Chief Academic Officer	1, 2
Vice President Facilities & Operations	1, 2
Vice President of Human Resources & Compliance	3
Principals	3
Consultants/New Positions	*

II.

Disclosure Categories

Category 1

Designated positions assigned to this category must report:

Interests in real property which are located in whole or in part within two (2) miles of any facility utilized by a Corporation charter school, including any leasehold, beneficial or ownership interest or option to acquire such interest in real property.

Investments and business positions in business entities or income (including gifts, loans, and travel payments) from sources that engage in the acquisition or disposal of real property or are engaged in building construction or design of a type utilized by Corporation.

Category 2

Designated positions assigned to this category must report:

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

Category 3

Designated positions assigned to this category must report:

Investments and business positions in business entities or income (including gifts, loans, and travel payments) from sources that are contractors engaged in the performance of work or services or sources that are the manufacture, sale, repair, rental or distribution of school supplies, books, materials, school furnishings or equipment of the type to be utilized by the designated position's department. For the purpose of this category a Principal's department is his or her entire school.

Category 4

Designated positions assigned to this category must report:

Investments and business positions in business entities or income (including gifts, loans, and travel payments) from sources that are financial audit or legal services providers.

* 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 Chief Executive Officer or designee may determine in writing that a particular consultant/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/new position's duties and, based upon that description, a statement of the extent of disclosure

requirements. The Chief Executive Officer or designee's determination is a public record and shall be retained for public inspection in the same manner and location as this Code.