


<p>Bridges Charter School</p> 	<p>Board Policy</p> <p style="text-align: center;"><b>Conflict of Interest</b></p>	
<p>Policy Number:</p> <p style="text-align: center;"><b>9270</b></p>	<p>Adopted:</p> <p style="text-align: center;"><b>07/11/11</b></p>	<p>Revised:</p> <p style="text-align: center;"><b>11/07/16, 12/05/16, 10/14/19 01/13/20, 10/10/22</b></p>

**PURPOSE:**

**Bridges Charter School** Board desires to maintain the highest ethical standards and help ensure that decisions are made in the best interest of the school and the public. In accordance with law, Board members and designated employees shall disclose any conflict of interest and, as necessary, shall abstain from participating in the decision.

**SCOPE**

This policy applies to all **Bridges Charter School** Board members and their applicable actions.

**GENEAL POLICY STATEMENT:**

**Adoption**

In compliance with the Political Reform Act of 1974, California Government Code Section 87100, et seq., **Bridges Charter School** hereby adopts the attached Conflict of Interest Code (“Code”), which shall apply to all corporate officers, governing board members, candidates for member of the governing board, and designated employees of **Bridges Charter School** (“Charter School”), as specifically required by California Government Code Section 87300.

**POLICY DETAILS:**

**1.1. Designated Reporters**

1.1.1. Employees of the Charter School, as well as corporate officers, governing board members and candidates for election and/or appointment to the governing board, 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 a “designated reporter”. A complete list of the Designated Reporter positions are listed in “Exhibit A” attached to this policy and incorporated by reference herein.

**1.2. Statement of Economic Interests: Filing**

1.2.1. Each Designated Reporter shall file a Statement of Economic Interest (Statement) at the time and manner prescribed below, disclosing reportable investments, interest in real property, business positions, and income required to be reported under the category or categories to which the position is assigned in “Exhibit A”. An investment, interest in real property or income shall be reportable, if the business entity in which the investment is held, the interest in real property, the business position, or source of

income may foreseeably be affected materially by a decision made or participated in by the Designated Reporter by virtue of his or her position. The specific disclosure responsibilities assigned to each position are set forth in Exhibit B. All statements shall be filed with Clerk of the Ventura County Board of Supervisors.

### **1.3. Disqualification**

1.3.1. No Designated Reporter 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.

### **1.4. MANNER OF DISQUALIFICATION**

#### **1.4.1 Non-Governing Board Member Designated Employees**

1.4.1.1 When a non-Governing Board Member Designated Employee 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 BRIDGES Executive Director, who shall record the employee's disqualification. In the case of a Designated Employee who is head of an agency, this determination and disclosure shall be made in writing to his/her appointing authority.

#### **1.4.2 Governing Board Member Designated Employees**

1.4.2.1 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 BRIDGES' bylaws.

### **NON-COMPLIANCE TO POLICY:**

Violations of this policy may result in the Board Member or employee being subject to Disciplinary action in accordance with Board disciplinary policy and administrative regulations.

## **CONFLICT OF INTEREST CODE**

### **Bridges Charter School**

The Political Reform Act, Government Code section 81000 et seq., requires local government agencies to adopt and promulgate Conflict of Interest Codes. The Fair Political Practices Commission has adopted a regulation (2 Cal. Code Regs., § 18730) which contains the terms of a standard Conflict of Interest Code, which may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act after public notice and hearings.

The terms of California Code of Regulations, Title 2, Section 18730, and any amendment to it duly adopted by the Fair Political Practices Commission, are hereby incorporated by reference as the Conflict of Interest Code for Bridges Charter School, and along with the attached Exhibit A, which designates positions requiring disclosure and Exhibit B, which sets forth disclosure

categories for each designated position, constitute the Conflict of Interest Code of Bridges Charter School]. Persons holding positions designated in Exhibit A shall file Form 700 Statements of Economic Interests with the Clerk of the Ventura County Board of Supervisors. Form 700 must be filed annually and within 30 days of assuming or leaving office.

**IN PREPARING THE FORM 700, DESIGNATED FILERS NEED ONLY DISCLOSE THOSE FINANCIAL INTERESTS FALLING WITHIN THE DISCLOSURE CATEGORIES DESIGNATED FOR THAT FILER’S POSITION AS STATED IN EXHIBITS A AND B.**

**APPROVED AND ADOPTED** October 20, 2022

By: \_\_\_\_\_  
Print Name: Michael Louderback  
Title: Board President

## **EXHIBIT A**

### Designated Positions

- I. Persons occupying the following positions, as applicable, are designated employees and must disclose financial interests in category 1, defined in “Exhibit B.”
    - A. Members of the Governing Board (5)
    - B. Candidates for Member of the Governing Board
    - C. Executive Director of Charter School (1)
    - D. Assistant Director of Charter School (1)
    - E. Consultants<sup>1</sup>
    - F. Assistant Business Officer
  
  - II. Persons occupying the following positions are designated employees and must disclose financial interests defined in Category 4 of “Exhibit B.”
    - A. Purchasing Manager
  
  - III. Persons occupying the following positions are designated employees and must disclose financial interests defined in Categories 4, 5 and 6 of “Exhibit B.”
    - A. Information Systems Technician
    - B. Contractor
- 

<sup>1</sup> The Director 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 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 Director’s determination is a public record and shall be retained for public inspection in the same manner and location of interest code.

## **EXHIBIT B – DISCLOSURE CATEGORIES**

The terms *italicized* below have specific meaning under the Political Reform Act. In addition, the financial interests of a spouse, domestic partner and dependent children of the public official holding the designated position may require reporting. Consult the instructions and reference pamphlet of the Form 700 for explanation.

### **Category 1 – BROADEST DISCLOSURE**

[SEE FORM 700 SCHEDULES A-1, A-2, B, C, D and E]

- (1) All sources of *income, gifts, loans and travel payments*;
- (2) All *interests in real property*; and
- (3) All *investments and business positions in business entities*.

### **Category 2 – REAL PROPERTY**

[SEE FORM 700 SCHEDULE B]

All interests in real property, including interests in real property held by business entities and trusts in which the public official holds a business position or has an investment or other financial interest.

### **Category 3 – LAND DEVELOPMENT, CONSTRUCTION AND TRANSACTION**

[SEE FORM 700 SCHEDULES A-1, A-2, C, D and E]

All investments, business positions and sources of income, gifts, loans and travel payments, from sources which engage in land development, construction, or real property acquisition or sale.

### **Category 4 – PROCUREMENT**

[SEE FORM 700 SCHEDULES A-1, A-2, C, D and E]

All investments, business positions and sources of income, gifts, loans and travel payments, from sources which provide services, supplies, materials, machinery or equipment which the designated position procures or assists in procuring on behalf of their agency or department.

### **Category 5 – REGULATION AND PERMITTING**

[SEE FORM 700 SCHEDULES A-1, A-2, C, D and E]

All investments, business positions and sources of income, gifts, loans and travel payments, from sources which are subject to the regulatory, permitting or licensing authority of, or have an application or license pending before, the designated position's agency or department.

### **Category 6 – FUNDING**

[SEE FORM 700 SCHEDULES A-1, A-2, C, D and E]

All investments, business positions and sources of income, gifts, loans and travel payments, from sources which receive grants or other funding from or through the designated position's agency or department.

**APPENDIX - DESIGNATING OFFICIALS WHO  
MANAGE PUBLIC INVESTMENTS**

Pursuant to Government Code section 87200 et seq., certain city and county officials, as well as all “other officials who manage public investments,” are required to disclose their economic interests in accordance with the Political Reform Act. This Appendix provides the relevant definitions for determining which public officials qualify as “other officials who manage public investments,” designates the agency’s positions which qualify as such, and states the Filing Officer for each designated position.

**APPLICABLE DEFINITIONS**

As set forth in 2 California Code of Regulations section 18701, the following definitions apply for the purposes of Government Code section 87200:

(1) “Other public officials who manage public investments” means:

(A) Members of boards and commissions, including pension and retirement boards or commissions, or of committees thereof, who exercise responsibility for the management of public investments;

(B) High-level officers and employees of public agencies who exercise primary responsibility for the management of public investments, such as chief or principal investment officers or chief financial managers. This category shall not include officers and employees who work under the supervision of the chief or principal investment officers or the chief financial managers; and

(C) Individuals who, pursuant to a contract with a state or local government agency, perform the same or substantially all the same functions that would otherwise be performed by the public officials described in subdivision (1)(B) above.

(2) “Public investments” means the investment of public moneys in real estate, securities, or other economic interests for the production of revenue or other financial return.

(3) “Public moneys” means all moneys belonging to, received by, or held by, the state, or any city, county, town, district, or public agency therein, or by an officer thereof acting in his or her official capacity, and includes the proceeds of all bonds and other evidences of indebtedness, trust funds held by public pension and retirement systems, deferred compensation funds held for investment by public agencies, and public moneys held by a financial institution under a trust indenture to which a public agency is a party.

(4) “Management of public investments” means the following non-ministerial functions: directing the investment of public moneys; formulating or approving investment policies; approving or establishing guidelines for asset allocations; or approving investment transactions.