

LAW OFFICES OF  
BEST BEST & KRIEGER LLP

**CONFLICT OF INTEREST CODE FOR THE**  
**SANTA FE IRRIGATION DISTRICT**  
**(Amended September 19, 2024)<sup>1</sup>**

The Political Reform Act (Gov. Code § 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 Cal. Code of Regs. § 18730) which 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 it 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 incorporation page, Regulation 18730 and the attached Appendix designating positions and establishing disclosure categories, shall constitute the conflict of interest code of the **Santa Fe Irrigation District** (the "**District**").

All officials and designated positions required to submit a statement of economic interests shall file their statements with the **Executive Assistant/Board Secretary** as the District's Filing Officer. The **Executive Assistant/Board Secretary** shall make and retain a copy of all statements filed by Members of the Board of Directors and the General Manager, and forward the originals of such statements to the Clerk of the Board of Supervisors of the County of San Diego. The **Executive Assistant/Board Secretary** shall retain the originals of the statements filed by all other officials and designated employees and make all statements available for public inspection and reproduction during regular business hours. (Gov. Code § 81008.)

<sup>1</sup> Code revised in September of 2024 to include new positions, revises title of existing positions and deletion of titles that have been abolished.

BBK – August 2024

Approved and/or authorized by the Board of Supervisors of the County of San Diego.	
Meeting Date: 10/22/24	Minute Order No. 18
By: <i>[Signature]</i>	Date: 10/27/24
Deputy Clerk of the Board Supervisors	

# APPENDIX

CONFLICT OF INTEREST CODE  
OF THE  
SANTA FE IRRIGATION DISTRICT  
(Amended September 19, 2024)

## PART "A"

### OFFICIALS WHO MANAGE PUBLIC INVESTMENTS

District Officials who manage public investments, as defined by 2 Cal. Code of Regs. § 18700.3, are NOT subject to the District's Code but must file disclosure statements under Gov. Code Section 87200 et seq. [Regs. § 18730(b)(3)]

### OFFICIALS WHO MANAGE PUBLIC INVESTMENTS

It has been determined that the positions listed below are officials who manage public investments<sup>2</sup>: These positions are listed here for informational purposes only.

Members of the Board of Directors

General Manager

Financial Consultants

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<sup>2</sup> Individuals holding one of the above-listed positions may contact the Fair Political Practices Commission for assistance or written advice regarding their filing obligations if they believe that their position has been categorized incorrectly. The Fair Political Practices Commission makes the final determination whether a position is covered by § 87200.

**DESIGNATED POSITIONS**

**GOVERNED BY THE CONFLICT OF INTEREST CODE**

<b><u>DESIGNATED POSITIONS'</u> <u>TITLE OR FUNCTION</u></b>	<b><u>DISCLOSURE CATEGORIES</u> <u>ASSIGNED</u></b>
Associate Civil Engineer	2, 3, 5
Chief Water Treatment Operator	5
Director of Administrative Services	1, 2
Director of Distribution System Services	2, 5
Director of Engineering Services	2, 3, 5
Director of Water Treatment Plant	5
Distribution Construction Supervisor	5
Distribution Operations Supervisor	5
Environmental Health and Safety Officer	5
Executive Assistant/Board Secretary	4
Facilities & Fleet Maintenance Coordinator	5
Facilities Locator/Construction Inspector	3, 5
General Counsel	1, 2
Human Resources Manager	5
Information Technology Manager	5
Management Analyst	5
Network & Systems Administrator	5
Public Communications Officer	5
Purchasing & Contracts Coordinator	5

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<b><u>DESIGNATED POSITIONS'</u> <u>TITLE OR FUNCTION</u></b>	<b><u>DISCLOSURE CATEGORIES</u> <u>ASSIGNED</u></b>
Senior Electrical & Instrumentation Technician	5
Senior Engineer	2, 3, 5
System Maintenance Supervisor	5
Water Quality Laboratory Analyst	5

**Consultant and New Positions<sup>3</sup>**

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<sup>3</sup> Individuals serving as a consultant as defined in FPPC Reg 18700.3(a) or in a new position created since this Code was last approved that makes or participates in making decisions must file under the broadest disclosure set forth in this Code subject to the following limitation:

The General Manager may determine that, due to the range of duties or contractual obligations, it is more appropriate to designate a limited disclosure requirement. A clear explanation of the duties and a statement of the extent of the disclosure requirements must be in a written document (Gov. Code Sec. 82019; FPPC Regulations 18219 and 18734). The General Manager'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 (Gov. Code Sec. 81008).

## **PART "B"**

### **DISCLOSURE CATEGORIES**

The disclosure categories listed below identify the types of economic interests that the designated position must disclose for each disclosure category to which the designated is assigned.<sup>4</sup> "Investment" means financial interest in any business entity (including a consulting business or other independent contracting business) and are reportable if they are either located in or doing business in the jurisdiction, are planning to do business in the jurisdiction, or have done business during the previous two years in the jurisdiction of the District.

**Category 1:** All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, that are located in, that do business in or own real property within the jurisdiction of the District.

**Category 2:** All interests in real property which is located in whole or in part within, or not more than two (2) miles outside, the jurisdiction of the District, including any leasehold, beneficial or ownership interest or option to acquire property.

**Category 3:** All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, that are engaged in land development, construction or the acquisition or sale of real property within the jurisdiction of the District.

**Category 4:** All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, that provide services, products, materials, machinery, vehicles or equipment of a type purchased or leased by the District.

**Category 5:** All investments and business positions in business entities, and sources of income, including gifts, loans and travel payments, that provide services, products, materials, machinery, vehicles or equipment of a type purchased or leased by the designated position's department, unit or division.

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<sup>4</sup> This Conflict of Interest Code does not require the reporting of gifts from outside this agency's jurisdiction if the source does not have some connection with or bearing upon the functions or duties of the position. (Reg. 18730.1)