

**CONFLICT OF INTEREST CODE
OF THE
WORLD TRADE CENTER SAN DIEGO, INC.**

The Political Reform Act, Government Code Sections 81000, et seq., requires State and local government agencies to adopt and promulgate Conflict of Interest Codes. The Fair Political Practices Commission has adopted 2 Cal. Adm. Code Section 18730, which contains the standard model Conflict of Interest Code, which can be incorporated by reference, and which may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act after public notice and hearings. Therefore, the provisions of 2 Cal. Adm. Code Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission along with the attached Appendix A, in which officials are designated, and Appendix B and Appendix C, in which disclosure categories are set forth, are hereby incorporated by reference and constitute the Conflict of Interest Code of the World Trade Center San Diego, Inc. (WTCSA). Designated filers listed in Appendix A of the Conflict of Interest Code of WTCSA shall disclose those financial interests which are within the categories represented by the numbers following the listed position as described in Appendix B and Appendix C. Designated employees shall file Statements of Economic Interests pursuant to 2 Cal. Adm. Code Section 18730 and this Code.

Individuals holding designated positions shall file their statements of economic interests (statements) with the San County Clerk of San Diego, which will make the statements available for public inspection and reproduction in accordance with Government Code Section 81008. The District Clerk shall make and retain copies in accordance with Government Code Section 87500.

Approved and/or authorized by the Board of Supervisors of the County of San Diego.	
Meeting Date: 12/28/25	Minute Order No.
By: <i>[Signature]</i>	Date: 2/4/25
Deputy Clerk of the Board Supervisors	

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**Appendix A:
List of Designated Directors, Officers, and Employees**

The following individuals must file Statements of Economic Interests pursuant Fair Political Practices Commission (FPPC) regulations:

World Trade Center San Diego, Inc. - Chair, Secretary and Treasurer (or other Officers if designated)

World Trade Center San Diego, Inc. - Directors

An individual holding one of the above listed positions may contact the Fair Political Practices Commission for assistance of written advice regarding their filing obligations if they believe that their position has been categorized incorrectly.

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**Appendix B:
Disclosure Categories for Designated Positions**

Category I

All sources of income, interests in real property and investments and business positions in business entities located in or doing business in San Diego County.

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Appendix C

Consultant Disclosure

Definition: Fair Political Practices Commission regulation [2 Cal. Code of Regulations Section 18700] defines "consultant" as an individual who, pursuant to a contract with a state or local governmental agency:

(a) Makes a governmental decision whether to:

- (1) Approve a rate, rule or regulation;
- (2) Adopt or enforce a law;
- (3) Issue, deny, suspend, or revoke a permit, license, application, certificate, approval, order, or similar authorization or entitlement;
- (4) Authorize the agency to enter into, modify, or renew a contract provided it is the type of contract which requires agency approval;
- (5) Grant agency approval to a contract which requires agency approval and in which the agency is a party or to the specifications for such a contract;
- (6) Grant agency approval to a plan, design, report, study, or similar item;
- (7) Adopt, or grant agency approval of, policies, standards, or guidelines for the agency, or for any subdivision of the agency; or

(b) Serves in an ongoing staff capacity with the agency and in that capacity performs the same or substantially all the same duties for the agency that would otherwise be performed by an individual holding a position specified in the agency's local conflict of interest code.

"Consultant" does not serve in an ongoing staff capacity when:

- (1) Conducting research and arriving at conclusions with respect to his or her rendition of information, advice, recommendation, or counsel independent of the control and direction of the agency or of any agency official, other than normal contract monitoring; and
- (2) He or she possesses no authority with respect to any agency decision beyond the rendition of information, advice, recommendation, or counsel and only provides services on a sporadic basis.

Disclosure requirements for Sections (a) & (b) above:

Section (a): Investments and business positions in business entities and sources of income, which provide the type of services utilized by the agency.

Section (b): Consultants who serve in a staff capacity shall disclose those financial interests listed in the assigned disclosure category for the corresponding staff position listed in Appendix A.

The WTCSD Chair 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 is not required to comply fully with the disclosure requirements described in this section. Such determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The Chair'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.

RESOLUTION NO. 2024-001

**RESOLUTION AMENDING THE WORLD TRADE CENTER
CONFLICT OF INTEREST CODE**

WHEREAS, the World Trade Center San Diego ("WTC") Board of Directors adopted a Conflict of Interest Code in 2016; and

WHEREAS, the Conflict of Interest Code indicated that Fair Political Practices ("FPPC") Statements of Economic Interest would be filed with the County of San Diego ("County"); and

WHEREAS, at the time, the County indicated they should not be filed at the County, but rather one of the license holders should internally file the Statements of Economic Interest; and

WHEREAS, the San Diego Unified Port District ("Port") took on this responsibility, and has been receiving the Board's annual, assuming and leaving office filings since that time; and

WHEREAS, in due diligence, Port staff contacted the County in late 2023 to confirm their opinion that the WTC should continue to file Statements of Economic Interest with the Port and not with the County; and

WHEREAS, County Clerk staff tentatively affirmed that opinion but recommended contacting the FPPC for confirmation; and

WHEREAS, Port staff contacted the FPPC who advised that Statements of Economic Interest should be filed with the County; and

WHEREAS, to implement the advice of the FPPC and as a matter of best practice, staff recommended various amendments to the WTC Conflict of Interest Code summarized as follows:

- 1) Remove references to employees. The World Trade Center San Diego does not have any employees.
- 2) Correct the filing office for Statements of Economic Interest to the County of San Diego.
- 3) Remove reference to 87200 filers. Although World Trade Center San Diego filers may be 87200 filers, they are not in this role as Board member; and

WHEREAS, the above-summarized amendments are more precisely reflected in the Attachment A, which is incorporated herein by reference.

NOW, THEREFORE, BE IT RESOLVED, that the Board hereby approves and adopts the amendments to the Conflict-of-Interest Code reflected in Attachment A.


PASSED, ADOPTED, AND APPROVED by the Board of Directors of the World Trade Center San Diego, Inc., this 25th day of July 2024, by the following vote:

AYES: Board Members: Bibler, Sly, Moore

NOES: Board Members:

ABSENT: Board Members:

ATTEST:



James Sly (Sep 11, 2024 16:11 PDT)

JAMES SLY, CHAIR
WORLD TRADE CENTER SAN DIEGO, INC.
BOARD OF DIRECTORS

APPROVED AS TO FORM:



ANNETTE FAGAN ORTIZ, MBA, CMC
SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY CLERK