

# **CONFLICT OF INTEREST CODE OF THE**

## **BEVERLY HILLS UNIFIED SCHOOL DISTRICT**

### **Incorporation of FPPC Regulation 18730**

The Political Reform Act (Government Code Section 8100, *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. Code of Regs. section 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 Section 18730 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 Appendix designating officials and employees and establishing disclosure categories shall constitute the conflict of interest code of the Beverly Hills Unified School District (the "District").

### **Place of Filing of Statements of Economic Interests**

All officials and designated employees required to submit a statement of economic interests shall file their statements with the Administrative Assistant of the Superintendent as the District's Filing Officer. The Filing Officer shall make and retain a copy of all statements filed by Members of the School Board and the Superintendent and forward the originals of such statements to the Executive Office of the Board of Supervisors of Los Angeles County.

The Filing Officer shall retain the originals of the statements of all other officials and designated employees. The Filing Officer will make all retained statements, original or copied, available for public inspection and reproduction during regular business hours. (Gov. Code Section 81008).

**APPENDIX**  
**CONFLICT OF INTEREST CODE**  
**OF THE**  
**BEVERLY HILLS UNIFIED SCHOOL DISTRICT**  
**EXHIBIT "A"**  
**OFFICIALS WHO MANAGE PUBLIC INVESTMENTS**

District Officials who manage public investments, as defined by 2 Cal. Code of Regs. §18701(b), are NOT subject to the District's Code, but are subject to the disclosure requirements of the Act which provides for full, unlimited disclosure of all investments, interest in real property and income. (Government Code Section 87200 et seq.). [Regs. §18730(b)(3)] These positions are listed here for informational purposes only.

It has been determined that the positions listed below are officials who manage public investments <sup>1</sup>.

Member, Board of Education  
Superintendent

**DESIGNATED POSITIONS  
GOVERNED BY THE CONFLICT OF INTEREST CODE  
BEVERLY HILLS UNIFIED SCHOOL DISTRICT**

<u>DESIGNATED POSITIONS</u> <u>TITLE OR FUNCTION</u>	<u>DISCLOSURE CATEGORIES</u> <u>ASSIGNED</u>
Assistant Superintendent, Business Services	1, 2
Assistant Superintendent, Education Services	5
Assistant Superintendent, Student Services	5
Executive Director, Human Resources	6
Executive Director Construction and Facilities	1, 2
Principal - All	5
Director, Fiscal Services	1, 2
Director, Facilities Planning, Construction	2, 3, 5
Director, Technology	5
Director, School Safety	5
Maintenance Operations Manager	5
Director, Purchasing	4
Director of Food Services	5

**DESIGNATED POSITIONS**  
**GOVERNED BY THE CONFLICT OF INTEREST CODE**  
**BEVERLY HILLS UNIFIED SCHOOL DISTRICT**  
**(Cont'd)**

DESIGNATED POSITIONS  
TITLE OR FUNCTION

DISCLOSURE CATEGORIES  
ASSIGNED

**MEMBERS OF BOARDS,**  
**COMMITTEES & COMMISSIONS**

Citizens' Bond Oversight Committee	1, 2
Finance Committee	1, 2
Consultants, and New Positions <sup>2*</sup>	

---

<sup>2 \*</sup>

Individuals providing services as a Consultant defined in Regulation 18701 or in a new position created since this Code was last approved that makes or participates in making decisions shall disclose pursuant to the broadest disclosure category in this Code subject to the following limitations:

The Superintendent may determine that, due to the range of duties or contractual obligations, it is more appropriate to assign 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 Superintendent'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.).

Individuals who perform under contract the duties of any designated position shall be required to file Statements of Economic Interests disclosing reportable interests in the categories assigned to that designated position.

**BEVERLY HILLS UNIFIED SCHOOL DISTRICT**  
**EXHIBIT “B”**  
**DISCLOSURE CATEGORIES**

The disclosure categories listed below identify the types of investments, business entities, sources of income, including gifts, loans and travel payments, or real property which the Designated Position must disclose for each disclosure to which he or she is assigned.

**CATEGORY 1**

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

**CATEGORY 2**

All interest 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.

Persons are not required to disclose a residence, such as a home or vacation cabin, used exclusively as a personal residence; however, a residence in which a person rents out a room or for which a person claims a business deduction may be reportable.

**CATEGORY 3**

All investments and business positions in business entities, and income, including gifts, loans and travel payments, from sources 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, INCOME including gifts, loans and travel payments, from sources 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 income, including gifts, loans and travel payments, from sources that provide services, products, materials, machinery, vehicles or equipment of a type purchased or leased by the Designated Position's department, unit or division.

**CATEGORY 6**

Designated persons in this category shall disclose all income (including gifts, loans and travel payments) from, investments in, and business positions with any district employee, any agent or employee association representing any such employee and business positions with, investments in or income (including gifts, loans and travel payments) from any entity owned or controlled by such employee or any such employee's spouse or other financial dependent.

**EFFECTIVE: 4/1/2020**