



CONFLICT OF INTEREST CODE

The Political Reform Act (Government Code Section 81000, et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission (FPPC) has adopted a regulation (2 California Code of Regulations §18730) that 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, the standard code 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 adopted and incorporated by reference. This regulation and the attached Appendices, designating positions and establishing disclosure categories, shall constitute the conflict of interest code for John Adams Academies, Inc. ("JAA"). This code shall take effect when approved by the FPPC, and shall thereupon supersede any and all prior such codes adopted by JAA, but shall supplement any conflict of interest policies adopted in compliance with the laws governing nonprofit corporations.

Individuals holding designated positions shall file statements of economic interests with JAA, which will make the statements available for public inspection and reproduction (Government Code § 81008). All statements will be retained by JAA.



APPENDIX A

<u>Designated Positions</u>	<u>Disclosure Category</u>
Members of the Governing Board and their alternates (if applicable)	1, 2
Executive Director	1, 2
Headmaster(s)	1, 2
Dean(s)	3
Director of Finance	1, 2
Director of Human Resources	3
Consultants/New Positions ¹	1, 2

¹ The Headmaster may determine, in writing, that a particular consultant or new position, although a “designated position,” is hired to perform a range of duties that with a sufficient range in scope and thus required to fully comply with the disclosure requirements in this section. Such written determination shall include a description of the consultant’s or new position’s duties and, based upon that description, a statement of the extent of disclosure requirements. The Headmaster’s determination is a public record and shall be retained for public inspection in the same manner and location of interest code.



APPENDIX B

Disclosure Categories

Category 1 Reporting:

Designated positions assigned to this category must report:

Interests in real property located in whole or in part within two (2) miles of any facility utilized by a JAA charter school.

Category 2 Reporting:

Designated positions assigned to this category must report:

Investments and business positions in business entities or sources of income (including receipt of gifts, loans, and travel payments) from sources that are contractors engaged in the performance of work or services, or sources that manufacture, sell, repair, rent, or distribute school supplies, books, materials, school furnishings, or equipment of the type to be utilized by John Adams Academies, Inc.

Category 3 Reporting:

Designated positions assigned to this category must report:

Investments and business positions in business entities or sources of income (including receipt of gifts, loans, and travel payments) from sources that are engaged in the performance of work or services, or sources that manufacture, sell, repair, rent, or distribute school supplies, books, materials, school furnishings, or equipment of the type to be utilized by the designated person's department. For the purposes of this category, a Dean's department is his or her entire school.