

2010 CONFLICT OF INTEREST CODE BIENNIAL REVIEW REPLY FORM

COUNTY OF SAN DIEGO BOARD OF SUPERVISORS 2009 AUG 19 AM 11 55

Contact Person: Teresa Greenhagh Telephone Number: (619) 669-2841

THOMAS J. PASTUSZKA CLERK OF THE BOARD OF SUPERVISORS

Name of Agency: Steele Canyon High School

Mailing Address: 12440 Campo Road, Spring Valley, CA 91978-2331

This agency has reviewed its conflict of interest code and has determined that:

[X] Amendments are necessary: (Attach Amended Code) (Check all that apply)

- [X] Include new positions (including consultants) which must be designated
[X] Revise the titles of existing positions
[X] Delete titles of positions that have been abolished
[ ] Delete positions that manage public investments
[ ] Revise disclosure categories

[X] Other The CFO/Treasurer and Secretary are Board members Business/Facilities manager was a former Board member legal name of school is Steele Canyon High School - see copy of Articles of Inc.

[ ] No amendments are necessary. Our agency's code accurately designates all positions which make or participate in the making of governmental decisions; the disclosure assigned to those positions accurately requires the disclosure of all investments, business positions, interests in real property and sources of income which may foresee-ably be affected materially by the decision made by those designated positions; and the code includes all other provisions required by Government Code Section 87302.

Signature of Chief Executive Officer: [Signature] Date: 8/2/10

You must complete this report regardless of how recently your code was approved or amended. Please return this report no later than August 31, 2010 to:

Clerk of the Board of Supervisors (Conflict of Interest Code) 1600 Pacific Highway, Room 402 San Diego, CA 92101

(Rev 5/12/2010)

Approved and/or authorized by the Board of Supervisors of the County of San Diego Date: 8/2/10 Minute Order No. 9 THOMAS J. PASTUSZKA Clerk of the Board of Supervisors Deputy Clerk

**CONFLICT OF INTEREST CODE  
OF  
STEELE CANYON CHARTER-HIGH SCHOOL**

1. Standard Code of FPPC

The Political Reform Act of 1974 (Government Code § 81000 *et seq.*) requires each state and local government agency to adopt and promulgate a conflict of interest code. As a local government agency, Steele Canyon Charter-High School is therefore required to adopt such a code. The Fair Political Practices Commission ("FPPC") has adopted a regulation (2 Cal. Code of Regs. § 18730) which contains the terms of a model conflict of interest code, which can be incorporated by reference as an agency's code. After public notice and hearing, the regulation may be amended by the FPPC to conform to amendments in the Political Reform Act.

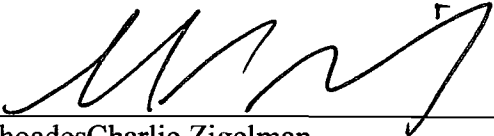
2. Adoption of Standard Code of FPPC

The terms of 2 Cal. Code of Regs. § 8730 and any future amendments to it duly adopted by the FPPC are hereby adopted and incorporated herein by reference. This regulation and the Appendix attached hereto designating officials and employees and establishing disclosure categories shall constitute the Conflict of Interest Code of Steele Canyon Charter-High School. This code shall take effect when approved by the Board of Supervisors for the County of San Diego, and shall thereupon supersede any and all prior codes adopted by Steele Canyon Charter-High School


3. Filing of Statements of Economic Interests

Pursuant to Section 4 of the model code set forth in 2 Cal. Code of Regs. § 18730(b), designated employees set forth in the Appendix shall file statements of economic interests (Form 700) with the Secretary of Steele Canyon Charter-High School. Upon receipt of the statements of the members of the Board of Directors, the Secretary shall make and retain copies and forward the originals of these statements to the Clerk of the Board of Supervisors for the County of San Diego. Statements for all other designated employees shall be retained by the Secretary.

APPROVED AND ADOPTED by the Board of Directors of Steele Canyon Charter-High School on the 18 day of may, 2007/2010.

  
\_\_\_\_\_  
Jim Rhoades Charlie Zigelman  
President Chairman, Steele Canyon Charter-High  
School

ATTEST:

  
\_\_\_\_\_  
Secretary, Steele Canyon Charter-High School

**APPENDIX TO  
CONFLICT OF INTEREST CODE OF  
STEELE CANYON ~~CHARTER~~-HIGH SCHOOL**

**Preamble**

Any person designated in Section I of this Appendix who is unsure of any right or obligation arising under this Code may request a formal opinion or letter of advice from the FPPC or an opinion from Steele Canyon ~~Charter~~-High School' General Counsel. (Gov. Code § 83114; 2 Cal. Code of Regs. § 18730(b)(11).) A person who acts in good faith in reliance on an opinion issued to him or her by the FPPC shall not be subject to criminal or civil penalties for so acting, provided that all material facts are stated in the opinion request. (Gov. Code § 83114(a).)

Opinions rendered by General Counsel do not provide any statutory defense to an alleged violation of conflict of interest statutes or regulations. The prosecuting agency may, but is not required to, consider a requesting party's reliance on General Counsel's opinion as evidence of good faith. In addition, Steele Canyon ~~Charter~~-High School may consider whether such reliance should constitute a mitigating factor to any disciplinary action that Steele Canyon ~~Charter~~-High School may bring against the requesting party under Gov. Code § 91003.5.

**I.**

**Designated Employees**

<u>Designated Employees</u>	<u>Categories Disclosed</u>
Members of the Board of Directors	All
<u>CEO/Principal, Steele Canyon <del>Charter</del>-High School</u>	All
<u>Secretary, Steele Canyon <del>Charter</del>-High School</u>	All
<u>CFO/Treasurer/Business/Facilities Manager, Steele Canyon <del>Charter</del>-High School</u>	All
General Counsel	All
Consultants <sup>1</sup>	--

**II.**

<sup>1</sup> With respect to consultants, the ~~President~~-~~Chairman~~ may determine in writing that a particular consultant, although a "designated employee," is hired to perform a range of duties that is limited in scope and thus is not required to comply with the written disclosure requirements described in these categories. 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 ~~President's~~ ~~Chairman's~~ determination is a public record and shall be retained for public inspection by Steele Canyon ~~Charter~~-High School in the same manner as this Conflict of Interest Code. Nothing herein excuses any such consultant from any other provision of this Conflict of Interest Code.

## **Disclosure Categories**

### **Category 1. All-Inclusive Reportable Investments**

A designated employee in this category shall report all reportable investments, as defined in Gov. Code § 82034, in business entities located in, doing business in, planning to do business in, or having done business in the previous two (2) years in San Diego County which operate or provide any of the following:

- Accounting or auditing services
- Banks and savings and loans
- Computer hardware or software, or computer services or consultants
- Communications equipment or services
- Educational services, supplies and materials
- Entities or persons who have filed claims against Steele Canyon ~~Charter~~-High School or have claims pending against Steele Canyon ~~Charter~~-High School
- Insurance brokers and agencies
- Insurance adjusting, claims auditing or administration, or underwriting services
- Office equipment or supplies
- Personnel and employment companies and services
- Printing or reproduction services, publications, and distribution
- Securities, investment or financial services companies
- Title insurance and escrow

### **Category 2. Reportable Interests in Real Property**

A designated employee in this category shall disclose all interests in real property, as defined in Gov. Code §§ 82033 and 82035, that is

(a) within or not more than two (2) miles outside the boundaries of San Diego County that has situated on it any business entity named in category no. 1 above; or

(b) within two (2) miles of any facility or real property owned or used by Steele Canyon ~~Charter~~-High School.

### **Category 3. Reportable Income**

A designated employee in this category shall disclose all income as defined in Government Code § 82030 of the designated employee from the below-listed sources located in, doing business in, planning to do business in, or having done business in the previous two (2) years in San Diego County during the reporting period.

- Accounting or auditing services
- Banks and savings and loans
- Computer hardware or software, or computer services or consultants
- Communications equipment or services
- Educational services, supplies and materials

Entities or persons who have filed claims against Steele Canyon Charter-High School or have claims pending against Steele Canyon Charter-High School  
Insurance brokers and agencies  
Insurance adjusting, claims auditing or administration, or underwriting services  
Office equipment or supplies  
Personnel and employment companies and services  
Printing or reproduction services, publications, and distribution  
Securities, investment or financial services companies  
Title insurance and escrow

#### Category 4. Less-Inclusive Reportable Investments

A designated employee in this category shall disclose only investments as defined in Gov. Code § 82034 in any business entity, which within the last two (2) years has contracted with or in the future ~~foreseeably~~foresee ably may contract with Steele Canyon Charter-High School to provide personnel, services, supplies, material, machinery or equipment:

(a) to Steele Canyon Charter-High School, of the type utilized by Steele Canyon Charter-High School which is located in or doing business in San Diego County, and associated with the job assignment or position of the designated employee; or

(b) to any entity which has contracted with Steele Canyon Charter-High School within the last two (2) years or which in the future ~~foreseeably~~foresee ably may contract with Steele Canyon Charter-High School to provide services, supplies, materials, machinery or equipment associated with the job assignment or position of the designated employee.

#### Category 5. Less-Inclusive Reportable Income

A designated employee in this category shall disclose only that reportable income as defined in Gov. Code § 82030 which is derived from a source which within the last two (2) years has contracted with Steele Canyon Charter-High School or in the future ~~foreseeably~~foresee ably may contract with Steele Canyon Charter-High School to provide personnel, services, supplies, materials, machinery or equipment:

(a) to Steele Canyon Charter-High School, of the type utilized by Steele Canyon Charter-High School which is located in or doing business in San Diego County, and associated with the job assignment or position of the designated employee; or

(b) to any entity which has contracted with the Steele Canyon Charter-High School within the last two (2) years or which in the future ~~foreseeably~~foresee ably may contract with Steele Canyon Charter-High School to provide personnel, services, supplies, materials, machinery or equipment associated with the job assignment or position of the designated employee.

#### Category 6. Business Positions

A designated employee in this category shall disclose by completing Form 700, Schedule "C." A designated employee shall list:

(a) the name and address of each business entity in which he or she is a director, officer, partner, trustee, employee, or in which he or she holds any position of management;

(b) a description of the business activity in which the business entity is engaged; and

(c) the designated employee's position with the business entity.

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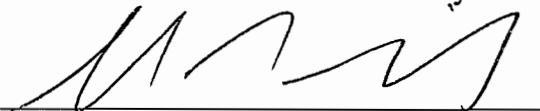
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APPROVED AND ADOPTED by the Board of Directors of Steele Canyon High School on the 18<sup>th</sup> day of May, 2010.

  
\_\_\_\_\_  
Charlie Zigelman  
Chairman, Steele Canyon High School

ATTEST:  
  
Secretary, Steele Canyon High School

**Approved By The Governing  
Board of Steele Canyon HS**

On 05/18/10

By 

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CONFLICT OF INTEREST CODE OF  
STEELE CANYON HIGH SCHOOL**

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<sup>1</sup> With respect to consultants, the Chairman may determine in writing that a particular consultant, although a "designated employee," is hired to perform a range of duties that is limited in scope and thus is not required to comply with the written disclosure requirements described in these categories. 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 Chairman's determination is a public record and shall be retained for public inspection by Steele Canyon High School in the same manner as this Conflict of Interest Code. Nothing herein excuses any such consultant from any other provision of this Conflict of Interest Code.

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(b) a description of the business activity in which the business entity is engaged; and

(c) the designated employee's position with the business entity.

2597905



**State of California**  
**Secretary of State**

I, BRUCE McPHERSON, Secretary of State of the State of California, hereby certify:

That the attached transcript of 2 page(s) has been compared with the record on file in this office, of which it purports to be a copy, and that it is full, true and correct.



IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this day of

NOV 16 2006

A handwritten signature in cursive script, appearing to read "Bruce McPherson".

BRUCE McPHERSON  
Secretary of State

2597905

ENDORSED - FILED  
in the office of the Secretary of State  
of the State of California

NOV 14 2006

**ARTICLES OF INCORPORATION  
OF  
STEELE CANYON HIGH SCHOOL  
A California Nonprofit Public Benefit Corporation**

**I. CORPORATE NAME**

The name of this corporation is Steele Canyon High School.

**II. CORPORATE PURPOSES**

A. This corporation is a nonprofit public benefit corporation and is not organized for the private gain of any person. It is organized under the Nonprofit Public Benefit Corporation Law for public purposes.

B. The specific purposes of this corporation are:

(1) to manage, operate, guide, direct and promote Steele Canyon High School, a California public charter school, and

(2) to perform and undertake any and all activities and functions, including soliciting contributions of money and property from the general public, as may be proper in connection with this corporation's general and specific purposes.

**III. INITIAL AGENT FOR SERVICE OF PROCESS**

The name and address in the State of California of this corporation's initial agent for service of process is:

Jason Lee  
12440 Campo Road  
Spring Valley, CA 91978

**IV. LIMITATION ON CORPORATE ACTIVITIES**

A. This corporation is organized and operated exclusively for charitable and public purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code of 1986, as amended.

B. No substantial part of the activities of this corporation shall consist of carrying on propaganda, or otherwise attempting to influence legislation, and this corporation shall not participate or intervene in any political campaign (including publishing or distribution of statements) on behalf of any candidate for public office.

C. Notwithstanding any other provision of these Articles, the corporation shall not carry on any other activities not permitted to be carried on by: (a) a corporation exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code, as amended; or (b) a corporation contributions to which are deductible under Section 170(c)(2) of the Internal Revenue Code, as amended.

## V. DEDICATION AND DISSOLUTION

A. The property of this corporation is irrevocably dedicated to public and charitable purposes and no part of the net income or assets of this corporation shall ever inure to the benefit of any director, officer or member hereof or to the benefit of any private person.

B. Upon dissolution or winding up of this corporation, after paying or adequately providing for the corporation's debts and obligations, its remaining assets shall be distributed to a California public entity engaged in education and/or to a nonprofit fund, foundation or corporation which is organized and operated exclusively for charitable purposes, and which has established its tax-exempt status under Section 501(c)(3) of the Internal Revenue Code of 1986, as amended, and under Section 23701d of the California Revenue and Taxation Code, as amended.

Dated: November 13, 2006



Mary K. Norvell, Incorporator

