GRIFFIN TECHNOLOGY ACADEMIES

CONFLICT OF INTEREST CODE

I. ADOPTION

In compliance with the Political Reform Act of 1974, California Government Code Section 87100, et seq., Griffin Technology Academies, a California nonprofit public benefit corporation, hereby adopts this Conflict of Interest Code ("Code"), which shall apply to all governing board members and all other designated employees of Griffin Technology Academies ("Charter School"), as specifically required by California Government Code Section 87300.

II. DEFINITION OF TERMS

As applicable to a California public charter school, the definitions contained in the Political Reform Act of 1974, the regulations of the Fair Political Practices Commission, specifically California Code of Regulations Section 18730, and any amendments or modifications to the Act and regulations are incorporated by reference to this Code.

III. DESIGNATED EMPLOYEES

Employees of this Charter School, including governing board members, who hold positions that involve the making or participation in the making, of decisions that may foreseeably have a material effect on any financial interest, shall be "Designated Employees." The designated positions are listed in "Exhibit A" attached to this Code and incorporated by reference herein.

IV. STATEMENT OF ECONOMIC INTERESTS: FILING

Each Designated Employee, including governing board members, shall file a Statement of Economic Interest ("Statement") at the time and manner prescribed by California Code of Regulations, title 2, section 18730, disclosing reportable investments, interests in real property, business positions, and income required to be reported under the category or categories to which the Designated Employee's position is assigned in "Exhibit A."

An investment, interest in real property or income shall be reportable, if the business entity in which the investment is held, the interest in real property, the business position, or source of income may foreseeably be affected materially by a decision made or participated in by the Designated Employee by virtue of his or her position. The specific disclosure responsibilities assigned to each position are set forth in "Exhibit B."

Statements Filed With the Charter School. All Statements shall be supplied by the Charter

School. All Statements shall be filed with the Charter School. The Charter School's filing official shall make and retain a copy of the Statement and forward the original to the County Board of Supervisors.

V. DISQUALIFICATION

No Designated Employee shall make, participate in making, or try to use his/her official position to influence any Charter School decision which he/she knows or has reason to know will have a reasonably foreseeable material financial effect on the official or a member of his or her immediate family.

VI. MANNER OF DISQUALIFICATION

A. Non-Governing Board Member Designated Employees

When a non-Governing Board member Designated Employee determines that he/she should not make a decision because of a disqualifying interest, he/she should submit a written disclosure of the disqualifying interest to his/her immediate supervisor. The supervisor shall immediately reassign the matter to another employee and shall forward the disclosure notice to the Superintendent, who shall record the disqualification. In the case of the Superintendent, this determination and disclosure shall be made in writing to the Board of Directors.

B. Governing Board Member Designated Employees

The Charter School shall not enter into a contract or transaction in which a director directly or indirectly has a material financial interest (nor shall the Charter School enter into any contract or transaction with any other corporation, firm, association, or other entity in which one or more of the Charter School's directors are directors and have a material financial interest).

EXHIBIT A
Designated Employee Positions

Designated Position	Assigned Disclosure Category
Members of the Governing Board	1, 2
Superintendent	1, 2
	2
Chief Talent and Operations Officer	
Chief Academic Officer	2
Director of Learning	3
Director of MIT Academy High School	3
Director of Griffin Academy High School & Middle School	3
Director of Mare Island Tech Academy Middle School	3
HR Director	3
Director of Information Technology	3
Athletic Director	3
Director of Family and Community Engagement	3
Consultants/New Positions	*

*Consultants/New Positions shall be included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the Code, subject to the following limitation:

The Superintendent may determine in writing that a particular consultant or new position, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not 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 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 (Govt. Code § 81008).

EXHIBIT B

Disclosure Categories

Category 1 Reporting:

Designated positions assigned to this category must report all interests in real property which are located in whole or in part within two (2) miles of any facility utilized by Griffin Technology Academies, including any leasehold, beneficial or ownership interest or option to acquire such interest in real property.

Category 2 Reporting:

Designated positions assigned to this category must report investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) 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 utilized by Griffin Technology Academies.

Category 3 Reporting:

Designated positions assigned to this category must report investments and business positions in business entities and sources of income (including receipt of gifts, loans, and travel payments) 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 the Designated Employee's department.

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