

Municipal Pooling Authority

CONFLICT OF INTEREST CODE

Municipal Pooling Authority

Pursuant to the provision of Government Code Sections 87300, et. seq. Municipal Pooling Authority adopts this Conflict of Interest Code. This Conflict of Interest Code and any amendments thereto become effective upon approval by Municipal Pooling Authority's (MPA) Board of Directors. (Government Code Sections 87303 and 82011(b).)

Designated Position and Employees

The positions listed in Appendix A attached hereto are "designated positions". Every person holding any designated position is deemed to make, or participate in the making of, decisions which could affect his or her personal economic interests. Designated positions are assigned the disclosure categories set forth in Appendix A. Each person holding any designated position shall file an annual statement of economic interest disclosing that person's interest in investments, business positions, real property and income designated as reportable under the category to which the employee's position is assigned.

Incorporation of FPPC Regulation 18730

The California Fair Political Practices Commission (FPPC) has adopted Regulation 18730, which contains the terms of a standard conflict of interest code. (2 Cal. Code of Regs. 18730.) Regulation 18730 may be amended from time to time. The terms of Regulation 18730, and any amendments to it duly adopted by the FPPC, are hereby incorporated.

FPPC Form 700 – Statement of Economic Interest

Disclosure statements shall be made on FPPC Form 700 – Statement of Economic Interest. The Form 700 is published annually by the FPPC, available on the FPPC website at fppc.ca.gov and supplied by MPA. The place and time of filing shall be as follows:

- (a) Every person holding any designated position listed in Appendix A shall file the original of his or her statement of financial interests with MPA. If the designated position listed in Appendix A is a position of which the incumbent's primary employer is not MPA, they must provide a signed original copy of their Form 700 to MPA that list the designated positions participation with MPA.
- (b) All Form 700 filers must file the Form 700 at the times prescribed by law. Failure to file statements on time may result in penalties including but not limited to late fines.

Position	Category
Chief Administrative Officer	Categories 1 and 2
Liability Claims Manager	Category 3
Workers' Compensation Claims Manager	Category 3
Finance Manager	Categories 2 and 3
Administrative Services Supervisor	Category 3
Board of Directors (Primary and Alternate)	Category 1 and 2
Treasurer	Categories 1 and 2

It has been determined that the positions listed manage public investments and must file a statement of economic interests pursuant to Government Code Section 87200 (Form 700)

INTEREST TO BE DISCLOSED

All interest in real property, investments and business positions in business entities, and sources of income from:

Category 1

Employee(s) designated shall complete Form 700. Any investment, interest in real property, or income is reportable if the business entity in which the investment is held, the interest in real property, or the income or source of income may foreseeably be affected materially by any decision made or participated in by the designated employee by virtue of the employee's position.

Category 2

Employee(s) designated shall complete all schedules of Form 700, unless there are no reportable interests for that schedule. A "reportable interest" shall be any business entity or source of income of a type in which the Board is authorized to invest.

Category 3

Employee(s) designated shall complete Form 700, unless there are no reportable interests for a schedule. A "reportable interest" shall be any business entity or source of income which, within the filing period has contracted, or in the foreseeable future may contract with Municipal Pooling Authority to provide products or services.

With respect to consultants/contractors, the Chief Administrative Officer may make a finding and determination, although a "designated position" is hired to perform a range of duties that are limited in scope and thus is not required to fully comply with the disclosure requirements. Such written determination shall include a description of the consultant/contractor's duties and, based upon that description, a statement of the extent of disclosure requirements. The Chief Administrative Officer's determination is a public record and shall be retained for public inspection in the same manner and location of this conflict of interest code.