

**Resolution of the Altus Schools Southern California Board of Directors  
Amending a Conflict-of-Interest Code**

WHEREAS, Altus Schools Southern California (“Corporation”) operates the following California public charter schools: Audeo Charter School II, Audeo Charter School III, Audeo Valley Charter School, Altus Schools East County, Mirus Secondary and Altus Schools South Bay;

WHEREAS, pursuant to Education Code section 47604.1 (b)(4)(A) a charter school and an entity managing a charter school must comply with the Political Reform Act and adopt a conflict of interest code;

WHEREAS, the charter schools operated by the Corporation are authorized by chartering authorities located in San Diego County, Riverside County and San Bernadino County and therefore the Corporation is a Multi-County Local Agency as it has jurisdiction in more than one county;

WHEREAS, the Code Reviewing Body for a Multi-County Local Agency is the Fair Political Practices Commission (“FPPC”) (Govt. Code § 82011.);

THEREFORE, the Corporation must submit its approved Conflict of Interest Code to FPPC for approval;

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Corporation that:

1. A Conflict of Interest Code, in the form attached as Exhibit A, is approved;
2. The Superintendent Schools Services and Founder is hereby directed and authorized to submit a copy to the FPPC for preliminary approval pursuant to Title 2 Cal. Code of Regs. § 18750.

APPROVED AND ADOPTED this 28<sup>th</sup> day of February, 2024.

AYES: Members Gordon, Herr, Myers, Stevens

NOES: --

ABSENT: --

ABSTAIN:--

DocuSigned by:

*Wayland Myers*

Chairman, Board of Directors  
Altus Schools Southern California

ATTEST:

DocuSigned by:

*Lynne N. O'Brien*

Secretary, Board of Directors  
Altus Schools Southern California

**ALTUS SCHOOLS SOUTHERN CALIFORNIA  
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 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 incorporated by reference. This regulation and the attached Appendices, designating positions and establishing disclosure categories, shall constitute the conflict of interest code for Altus Schools Southern California (ASSC).

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

**APPENDIX A**  
**DESIGNATED POSITIONS**

<u>Designated Positions</u>	<u>Disclosure Category</u>
Members of the Board of Directors	1, 2
Superintendent School Services and Founder	1, 2
Secretary	2
Deputy Superintendent School Services	2
Finance Administrator	2
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 School Services and Founder or designee 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 School Services and Founder or designee’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 (Government Code § 81008).

**Public Officials Who Manage Public Investments**

The following positions are not covered by the code because the positions manage public investments. Individuals holding such positions must file under Government Code Section 87200 and are listed for informational purposes only. Section 87200 requires disclosure of all investments and business positions in business entities, all income, including gifts, loans and travel payments, and real property.

Chief Financial Officer/Treasurer

**APPENDIX B**  
**DISCLOSURE CATEGORIES**

Category 1

Designated positions assigned to this category must report:

- a) Interests in real property that are located in whole or in part within a two-mile radius:
  - of any school district or county office of education that has authorized a **ASSC** charter school, or
  - of any facility utilized by **ASSC**'s charter schools, or
  - of a proposed site for an **ASSC** facility.
  
- b) Investments and business positions in business entities, and sources of income (including gifts, loans, and travel payments) of the type that engage in the purchase or sale of real property or are engaged in building construction or design.

Category 2

Designated positions assigned to this category must report:

- a. 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 **ASSC**.

This is the last page of the conflict of interest code for the Altus Schools Southern California



## CERTIFICATION OF FPPC APPROVAL

Pursuant to Government Code Section 87303, the conflict of interest code for the  
Altus Schools Southern California was approved on 6/14/24

This code will become effective on 7/14/24

**Sukhdip Brar**

Digitally signed by Sukhdip  
Brar  
Date: 2024.06.14 14:33:45  
-07'00'

Sukhi K. Brar

Assistant Chief Counsel

Fair Political Practices Commission