



Conflict of Interest Code

The Political Reform Act, Government Code Sections 81000, et seq., requires SANDAG to adopt and promulgate a Conflict of Interest Code. The Fair Political Practices Commission has adopted a regulation, 2 Cal. Code of Regs. Section 18730, which contains the terms of a standard model Conflict of Interest Code, which can be incorporated by reference, and which may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act after public notice and hearings. Therefore, the terms of 2 Cal. Code of Regs. Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission along with the attached Appendices in which officials, consultants and employees are designated and disclosure categories are set forth, are hereby incorporated by reference and constitute the Conflict of Interest Code of SANDAG.

The persons holding positions listed in the Appendix are designated employees, consultants, or officials. It has been determined that these persons make or participate in the making of decisions that may foreseeably have a material effect on financial interests. Designated persons in Table 1 shall file statements of economic interests with SANDAG through the County of San Diego's efile system when assuming or leaving their position and annually while holding the position; designated persons holding positions listed in Table 3 shall file statement of economic interests with the Fair Political Practices Commission (FPPC). SANDAG will make the statements available for public inspection and reproduction (Gov. Code Section 81008). ~~Statements for all designated employees will be retained by SANDAG and provided to the Code Reviewing Body, the County of San Diego.~~

**Appendix A
Table 1**

Designated Positions	Disclosure Categories (see Appendix B)
Members, alternates, and/or advisory members of the Board of Directors; and/or Policy Advisory Committees; and/or committees and/or working groups making decisions influencing expenditure of public funds	1, 2, 4
Members and alternate members of the Board of Directors	1, 2, 4
Members and alternate members of the Policy Advisory Committees	1, 2, 4
Members and alternate members of committees and/or working groups making decisions influencing expenditure of public funds	1, 2, 4
Account Executive (I, II, Associate)	3, 4
Accountant (I, II, Associate, Senior)	3, 4
Administrative Analyst (I, II, Associate, Senior)	3, 4
Administrative Office Specialist	3, 4
AI Architect	1, 2, 4
Borders Program Manager	3, 4
Budget Manager	2, 4
Business Analyst (I, II, Associate, Senior, Principal)	3, 4
Business Services Supervisor	2, 4
Business Services Manager	1, 2, 4
Capital Development Project Manager	1, 3, 4
Capital Program Manager	1, 2, 4
Capital Project Manager (Associate I, Associate II, Senior)	1, 2, 4
Chief of Staff	1, 2, 4
Chief Executive Officer	1, 2, 4
Chief Financial Officer	1, 2, 4
Clerk of the Board (Deputy Clerk)	1, 2, 4
Communications Manager	3, 4
Contracts and Procurement Analyst (I, II, Associate, Senior)	1, 2, 4
Counsel (Legal I, II; Associate Legal; Senior Legal; Deputy General; General)	1, 2, 4
Customer Service Manager	3, 4
Data Scientist (I, II, Associate, Senior, Principal)	3, 4

Designated Positions	Disclosure Categories (see Appendix B)
Deputy Director	1, 2, 4
Deputy Independent Performance Auditor	1, 2, 4
<u>Director</u>	<u>1, 2, 4</u>
Director (I, II, Senior)	1, 2, 4
<u>Director of Accounting and Finance</u>	<u>1, 2, 4</u>
<u>Director of Financial Planning, Budgets, and Grants</u>	<u>1, 2, 4</u>
Document Processing Specialist III	3, 4
Economic Research Analyst (I, II, Associate, Senior, Principal)	3, 4
Engineer (I, II, Associate, Senior, Principal)	1, 3, 4
Executive Assistant (I, II, Senior)	1, 2, 4
Executive Office Manager	1, 2, 4
Facilities/Maintenance Coordinator	3, 4
Finance Manager	1, 2, 4
Financial Analyst (I, II, Associate)	3, 4
<u>General Counsel</u>	<u>1, 2, 4</u>
GIS Analyst (I, II, Associate, Senior)	3, 4
Government Relations Analyst (I, II, Associate, Senior)	1, 2, 4
Grants Program Analyst (I, II, Associate, Senior)	1, 2, 4
Grants Program Manager	1, 2, 4
Graphic Designer (I, II, Associate, Senior)	3, 4
Human Resources Analyst (I, II, Associate, Senior, Principal)	3, 4
Human Resources Coordinator	3, 4
Independent Auditor (I, II, Associate, Senior, Principal)	1, 2, 4
Independent Performance Auditor	1, 2, 4
Information Systems Manager	3, 4
Information Systems Analyst (I, II, Associate, Senior)	3, 4
Information Systems Specialist (I, II, III)	3, 4
Landscape Maintenance Supervisor	3, 4

Designated Positions	Disclosure Categories (see Appendix B)
Maintenance and Facilities Supervisor	3, 4
Maintenance Field Technician (Senior)	3, 4
Manager of Business Administration and Operations	1, 2, 4
Manager of Contracts and Procurement Services	1, 2, 4
Manager of Data Science	3, 4
Manager of Financial Programming and Project Control	1, 2, 4
Manager of Governments Relations	1, 2, 4
Manager of Human Resources	1, 2, 4
Manager of Learning and Development	3, 4
Manager of Regional Information Services	3, 4
Manager of Regional Models	3, 4
Manager of Revenue and Project Control	1, 2, 4
Marketing Analyst (I, II, Associate, Senior)	3, 4
Office Services Specialist (II, III)	3, 4
Principal Technology Program Manager	3, 4
Programmer Analyst (I, II, Associate, Senior)	3, 4
Project Coordinator	3, 4
Project Development Program Manager	1, 2, 4
Public Communications Officer (I, II, Associate, Senior)	3, 4
Regional Planner (I, II, Associate, Senior, Principal)	1, 3, 4
Regional Planning Program Manager	1, 3, 4
Research Analyst (I, II, Associate, Senior, Principal)	3, 4
Researcher and Modeler (I, II, Associate, Senior, Principal)	3, 4
Right of Way Agent (Associate, Senior)	1, 2, 4
Senior AI Engineer	1, 2, 4
Senior Budget Program Analyst	2, 4
<u>Senior Director</u>	<u>1, 2, 4</u>
Senior Financial Programming and Project Control Analyst	1, 2, 4

Designated Positions	Disclosure Categories (see Appendix B)
Software Engineer (I, II, Associate, Senior, Principal)	3, 4
Systems Engineer (I, II, Associate, Senior)	3, 4
Technology Program Analyst (I, II, Associate, Senior)	3, 4
Toll Operations Supervisor	3, 4
TransNet Program Manager	1, 2, 4
UX Designer (Associate, Senior)	3, 4

Pursuant to California Government Code Section 82019, SANDAG consultants who pursuant to a contract with SANDAG, perform the same functions that would otherwise be performed by the persons designated in Table 1 of this document; who manage public investments; who grant agency approval to a contract or to the specifications for such a contract; or who decide whether the policies, standards, or guidelines for SANDAG have been met, also are required to fill out and submit a disclosure of financial interests. Those consultants are required to report in accordance with the disclosure categories shown in Table 2. Consultants will be designated and informed of their obligation to file disclosures whenever any person who, in the opinion of SANDAG, may reasonably be expected to make, participate in making, or in any way attempt to use his/her position as a “consultant” to influence a governmental decision in which the person might reasonably be expected to have a financial interest or perform services that entail the making or participation in the making of decisions that may foreseeably have a material effect on any financial interest.

Table 2

Type of Consultant	Designated Position Title	Disclosure Categories (see Appendix B)
Bond Counsel	Consultant	2, 4
Disclosure Counsel	Consultant	2, 4
Lobbying	Consultant	1, 2, 4
Project Oversight	Consultant	1, 2, 4
Disadvantaged Business Enterprise Advisor	Consultant	2, 4
Labor Compliance Advisor	Consultant	2, 4
Financial Management Advisor	Consultant	1, 2, 4
Auditor	Consultant	1, 2, 4

Public Officials Who Manage Public Investments

The following positions also are listed below because the individuals holding these positions ~~must~~ shall file statement of economic interests with the Fair Political Practices Commission (FPPC) under Government Code Section 87200 as they are involved in the investment of public funds. These positions are listed here for informational purposes only:

Table 3

Public Official Description
Members and alternate members of the Board of Directors
Members and alternate members of the Policy Advisory Committees
Members and alternate members of committees or working groups making decisions influencing expenditure of public funds
Executive Director
<u>Chief Executive Officer</u>
Chief Deputy Executive Director
<u>Senior Director</u>
General Counsel
Chief Financial Officer
Director of Finance
<u>Director of Accounting and Finance-Director</u>
<u>Director of Financial Planning, Budgets, and Grants-Director</u>
Financial Management Consultant, Project Managers

Appendix B

When a designated person is required to disclose investment and sources of income, he or she need to disclose investments in business entities and sources of income that do business in SANDAG's jurisdiction, plan to do business in the jurisdiction, or have done business in the jurisdiction in the past two years. In addition to other activities, a business entity is doing business within the jurisdiction if it owns real property within the jurisdiction. Persons designated in Appendix A shall disclose their financial interests pursuant to the appropriate disclosure categories described in the table below.

Table 4

Disclosure Category	Description
1	Interests in real property located within the jurisdiction or within two miles of the boundaries of the jurisdiction or within two miles of any land owned or used by SANDAG.
2	Investments and business positions in business entities, and income, including loans, gifts,* and travel payments, from sources that provide services, supplies, materials, machinery, or equipment of the type utilized by SANDAG.
3	Investments and business positions in business entities, and income, including loans, gifts,* and travel payments, from sources that provide services, supplies, materials, machinery, or equipment of the type utilized by the department or division to which the filer is assigned duties.
4	Investments and business positions in business entities, and income, including loans, gifts,* and travel payments, from sources that have filed a claim against SANDAG in the previous two years, or have a claim pending.

* Gifts with a value of less than \$50 aggregate per year are not reportable financial interests at SANDAG

Amended January 2010

Amended March 2012

Amended December 2013

Amended March 2015

Amended January 2016

Amended September 2016

Amended March 2018

Amended July 2019

Amended September 2019

Amended June 2020

Amended August 2022

Amended June 2023

Amended January 2024

Amended July 2024

Amended September 2025

Amended February 2026