

**CONFLICT OF INTEREST CODE FOR THE  
ASPIRE PUBLIC SCHOOLS**

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 Section 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 of the **Aspire Public Schools** ("Aspire").

**Members of the Board** must file their statements of economic interests electronically with the **Fair Political Practices Commission**. All other individuals holding designated positions must file their statements with **Aspire**. All statements must be made available for public inspection and reproduction under Government Code Section 81008.

**CONFLICT OF INTEREST CODE FOR THE  
ASPIRE PUBLIC SCHOOLS  
APPENDIX A  
DESIGNATED POSITIONS**

<b><u>Designated Positions</u></b>	<b><u>Disclosure Categories</u></b>
General Counsel	1, 2
Executive Director	1, 3
Managing Director	3
Superintendent	3
Director of Finance	2
Regional Finance Director	2
Executive Director, Aspire Foundation and Home Office	2
Director of Human Resources	3
Head of Human Resources	3
Senior Director of Technology	3
VP Data and Technology	2
Director of Operations	1, 2
Vice President, Strategy & Program Supports	3
Financial Analyst	2
Finance Manager	3
Director of Built Environment & Space Planning	3
Business Manager	3
Principals	3
Consultants/New Positions	*

\*Consultants/new positions shall be included in the list of designated positions and shall disclose pursuant to the broadest disclosure requirements in this conflict of interest code subject to the following limitation:

The General Counsel may determine in writing that a particular consultant/new position, although a “designated position,” is hired to perform a range of duties that are limited in scope and thus is not required to comply fully with the disclosure requirements described 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 General Counsel’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 (Gov. Code Sec. 81008).

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The following positions are NOT covered by the code because they must file under Government Code Section 87200 and, therefore, are listed for informational purposes only:

- Members of the Governing Board
- Chief Financial Officer
- Controller

An individual holding one of the above listed positions may contact the Fair Political Practices Commission for assistance or written advice regarding their filing obligations if they believe that their position has been incorrectly categorized. The Fair Political Practices Commission makes the final determination whether a position is covered by Government Code Section 87200.

**CONFLICT OF INTEREST CODE FOR THE  
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APPENDIX B  
DISCLOSURE CATEGORIES**

**Category 1:** Interests in real property of the type and legal designation that can be utilized for public school use within the jurisdiction or located within two miles of an existing school.

**Category 2:** Investments and business positions in business entities and income (including receipt of gifts, loans, and travel payments) from sources that are engaged in the performance of work, training, consulting or services, or sources that manufacture or sell supplies, instructional materials, machinery, equipment or vehicles, of the type utilized by Aspire.

**Category 3:** Investments and business positions in business entities and income (including receipt of gifts, loans, and travel payments) from sources that are engaged in the performance of work, training, consulting or services, or sources that manufacture or sell supplies, instructional materials, machinery, equipment or vehicles, of the type utilized by the designated position's department. For the purposes of this category, the term department refers to the specific area of responsibility for the following positions: Executive Director; Managing Director; Superintendent; Director of Human Resources; Head of Human Resources; Senior Director of Technology; VP Data and Technology, Vice President, Strategy & Program Supports; Finance Manager; Director of Built Environment & Space Planning; and Business Manager. For the purposes of this category, a Principal's department is their entire school.

This is the last page of the conflict of interest code for the Aspire Public Schools



## **CERTIFICATION OF FPPC APPROVAL**

Pursuant to Government Code Section 87303, the conflict of interest code for the  
Aspire Public Schools was approved on 8/26/25

This code will become effective on 9/25/25

Digitally signed by Sukhdip K  
Brar  
Date: 2025.08.26 13:18:11  
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Sukhi K. Brar  
Assistant Chief Counsel  
Fair Political Practices Commission