

**CONFLICT OF INTEREST CODE
OF THE
SAN DIEGO UNIFIED PORT DISTRICT**



The Political Reform Act, Government Code Sections 81000, et seq., requires State and local government agencies to adopt and promulgate Conflict of Interest Codes. The Fair Political Practices Commission has adopted 2 Cal. Adm. Code Section 18730, which contains the 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 provisions of 2 Cal. Adm. Code Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission along with the attached Appendix A, in which officials and employees are designated, and Appendix B and Appendix C, in which disclosure categories are set forth, are hereby incorporated by reference and constitute the Conflict of Interest Code of the San Diego Unified Port District (District). Designated employees listed in Appendix A of the Conflict of Interest Code of San Diego Unified Port District shall disclose those financial interests which are within the categories represented by the numbers following the listed position as described in Appendix B and Appendix C. Designated employees shall file Statements of Economic Interests pursuant to 2 Cal. Adm. Code Section 18730 and this Code.

Individuals holding designated positions shall file their statements of economic interests (statements) with the Office of the District Clerk (District Clerk), which will make the statements available for public inspection and reproduction in accordance with Government Code Section 81008. Upon receipt of the statements for the Members of the Board of Port Commissioners, the District Clerk shall make and retain copies and forward the originals to the Clerk of the San Diego County Board of Supervisors in accordance with Government Code Section 87500. All other statements will be retained by the District Clerk. Staff Form 700 filers may utilize electronic signatures in accordance with Fair Political Practices Commission guidelines and instructions from the District Clerk.

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**Appendix A:
List of Designated Employees**

Class No.	Class Title	Assigned Disclosure Categories
B243-CN21	Accountant	IV
B254-UE03	Accounting Supervisor	IV
<u>B210-UE03</u>	<u>Applications Developer</u>	<u>VII</u>
B300-CE03	Architect	I
<u>B821-UE03</u>	<u>Area Real Estate Manager</u>	<u>I</u>
B279-UE03	Asset Manager	I
B230-CN03	Assistant Asset Manager	I
A2013-UE11	Assistant Chief of Harbor Police/ <u>Public Safety</u>	I
<u>A2075-UE24</u>	<u>Assistant Director of Development Services</u>	<u>I</u>
A2075-UE22	Assistant Director, Engineering-Construction	I
A2030-UE15	Assistant Director, General Services	I
<u>A2076-UE24</u>	<u>Assistant Director of People Services</u>	<u>I</u>
A2001-UE20	Assistant Director, Real Estate	I
B206-CN03	Assistant Engineer	I
B315-CN15	Assistant Environmental Specialist	I
Appointee holds same class number as current class	Assistant Executive Director/Acting President/Acting Chief Executive Officer – Board Appointee	I
A1010-UE 1403	Assistant General Counsel	I
B917-UE16	Assistant Parking Manager	I
B320-CN16	Assistant Planner	I
B221-UE16	Assistant Port Auditor	I
B263-CN16	Assistant Procurement Analyst	III
A2058-UE16	Assistant Vice President	I
A1381-UE03	Assistant Vice President, Administrative Services	I
<u>A2076-UE23</u>	<u>Assistant Vice President, General Services</u>	
A1035-UE08	Assistant Vice President, Government Relations & Communication	I
A1220-UE03	Assistant Vice President, Operations	I
B205-CE 2103	Associate Engineer	I
B310-CE17	Associate Environmental Specialist	I
B306-CE17	Associate Planner	I
	Audit Committee	I
<u>B246-UE15</u>	<u>Benefit Analyst</u>	<u>VI</u>

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**Appendix A:
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Class No.	Class Title	Assigned Disclosure Categories
B600-UE15	Benefits and Compensation Manager	VII
F693-CNR07	Building Maintenance Coordinator	II
B248-UE11	Business Intelligence Analyst	VII
B843-UE08	Business Intelligence Supervisor	VII
B884-UE20	Business Partner, People & Organizational Development	II
B232-UE15	Business Systems Analyst	VII
B225-UE14	Business Systems Supervisor	VII
A1150-UE03	CFO/Treasurer	I
B214-UE21	Capital Project Manager	I
A1201-UE03	Chief Engineer/ Engineering Construction	I
A2067-UE17	Chief Information Security Officer	VII
A2057-UE16	Chief Technology Officer	VII
	<u>Chula Vista Bayfront Facilities Financing Authority Port filers (Per JEPA Bylaws)</u>	I
C313-CN03	Civil Designer	I
B958-CE24	Civilian Unit Manager	II
B177-UN 2103	Commissioner Services Assistant	VIII
C314-CN15	Construction Inspector	II
C312-CN05	Construction Inspector Supervisor	II
	Consultants	Appendix C
B619-UE07	Database Administrator	VII
B809-UE03	Department Administrative Manager	II
B810-UE08	Department Business Manager	II
B907-UE18	Department Manager, Development Services	I
B877-UE15	Department Manager, Financial Services	I
B874-UE17	Department Manager, Real Estate	I
B660-UE21	Deputy District Clerk/Docket Coordinator	I
B655-UE21	Deputy District Clerk/Records Manager	I
A2043-UE14	Deputy General Counsel I	I
A2044-UE14	Deputy General Counsel II	I
A2045-UE14	Deputy General Counsel III	I
A2046-UE14	Deputy General Counsel IV	I
A2060-UE16	Deputy General Counsel V	I
B240-UE16	Deputy Port Auditor I	I
B208-UE17	Deputy Port Auditor II	I
A1155-UE15	Deputy Treasurer	I

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**Appendix A:
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Class No.	Class Title	Assigned Disclosure Categories
B951-UE22	Development Manager	I
A2064-UE17	Director, Development Services	I
A2068-UE18	Director, Environmental Conservation	I
A2063-UE17	Director, Environmental Protection	I
A1350-UE15	Director, Financial Services	I
A1396-UE15	Director, General Services	I
A2056-UE21	Director, Guest Experiences	I
A1400-UE15	Director, Human Resources	II
A1900-UE19	Director, Information Technology	VII
A1700-UE15	Director, Maritime	I
A1395-UE16	Director, Marketing & Communications	VII
A2066-UE21	Director, Parks & Recreation	I
A14002048-UE230	Director, People Services & Organizational Development	I
A2065-UE17	Director, Planning	I
A2056-UE16	Director, Guest Experiences (moved to alphabetical order)	I
A2047-UE15	Director, Procurement/Chief Procurement Officer	I
A1225-UE17	Director, Real Estate	I
A2066-UE21	Director, Parks & Recreation (moved to alphabetical order)	I
A2074-UE22	Director, Safety	I
A1365-UE03	District Clerk	I
B234-UE21	Diversity, Equity, & Inclusion Analyst	II
B945-UE21	Diversity, Equity, & Inclusion Business & Community Partner	VI
B942-UE18	Enterprise Architect	VII
B927-UE17	Enterprise Operations Manager	VII
C329-CN14	Environmental Compliance Inspector	II
A1000-UE03	Executive Director (President/CEO) – Board Appointee	I
A1165-UE21	Executive Vice President/Chief of Staff	I
B949-UE21	External Community Relations Partner	I
B623-UE 2205	Facility Security Officer	I
B135-UN 03 <u>15</u>	Financial Analyst	IV
A1005-UE14	General Counsel – Board Appointee	I
B937-UE17	Geographic Information Systems Analyst III	VII
B894-UE17	Geographic Information Systems Supervisor	VII

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Class No.	Class Title	Assigned Disclosure Categories
B802-UE03	Grants Coordinator	I
A2011-UE17	Harbor Police Captain	I
B285-UE 2205	Homeland Security Program Manager	I
B239-UE03	Human Resources Analyst	II
B940-UE18	Human Resources Business Partner	VII
B926-UE19	Human Resources Recruiter	VII
B898-UE16	IT Infrastructure Engineer III	VII
B899-UE16	IT Infrastructure Engineer IV	VII
B908-UE16	IT Project Manager	VII
B932-UE17	IT Systems Engineer III	VII
B933-UE17	IT Systems Engineer IV	VII
B929-UE17	Information Technology Business Partner	VII
B200-UE15	Information Technology Security Analyst	VII
B226-UE 144	Infrastructure Supervisor	VII
B950-UE21	Labor Relations Analyst	II
B272-CN 2116	Land Surveyor	X
B925-CN17	Lead Mapping and Outreach	VII
B850-UE16	Legislative Policy Administrator	V
B954-UE22	Legislative Policy Analyst	V
F605-CER03	Maintenance Supervisor	II
C310-CER19	Maintenance Support Supervisor	II
B303-UE 2103	Management Analyst	I
B833-UE 134	Manager, Business Development & Recreation Services	I
B865-UE 2112	Manager, Commissioner & Executive Services	VIII
B155-UE17	Manager, Distribution & Storage	III
B831-UE21	Manager, Diversity, Equity, & Inclusion	II
B827-UE 1503	Manager, Engineering-Construction	I
B805-UE03	Manager, Financial Services	IV
B881-UE15	Manager, Grants and Policy	II
B811-UE03	Manager, Human Resources	II
B928-UE17	Manager, Information Technology Business Partner	VII
B808-UE12	Manager, Maintenance System	III
B878-UE15	Manager, Maritime Commercial Trade and Properties	I
B815-UE15	Manager, Maritime Operations	II
B816-UE06	Manager, Maritime Trade Development	I

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**Appendix A:
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Class No.	Class Title	Assigned Disclosure Categories
B862-UE12	Manager, Marketing & Communications	V
B400-UE22	Manager, Office of General Counsel Administration	I
B807-UE03	Manager, Operations & Maintenance	II
B811921-UE230	Manager, People Services & Organizational Development	II
B820-UE06	Manager, Procurement Services	III
B227-CNR03	Marine Terminal Supervisor	II
B920-CER 0316	Marine Terminal Supervisor (Exempt)	II
B236- CEN 03	Marketing/Public Relations Representative	V
B219-UE 1503	Network Systems Analyst	VII
B405-UN14	Paralegal	I
B952-UE22	Paralegal/Assistant Manager, Office of General Counsel Administration	I
B260-CN03	Park Permit Coordinator	II
B901-UE16	Parking Manager	I
A1009-UE19	Port Auditor – Board Appointee	I
B626-UE 2248	Port Security Manager	IX
B960-CE24	Principal Biologist	I
B238-UE03	Principal Marketing/Public Relations Representative	V
B956-UE23	Principal Outreach Specialist	I
B938-UE18	Principal, Economics and Policy	I
B880-UE16	Principal, Maritime Business Development	I
B902-UE16	Principal, Maritime Business Retention	I
B957-UE23	Principal, Social Media	V
B867-UE14	Principal, Special Projects	I
B948-UE21	Principal, Strategic Planning	I
B266-CN 1503	Procurement Analyst I	III
B265-CE 1503	Procurement Analyst II	III
B269-UE 1508	Procurement Supervisor	III
B886-UE20	Program Director	III
B282-UE21	Program Manager	I
B885-UE16	Program Manager, Aquaculture & Blue Tech	I
B891-UE16	Program Manager, Energy & Sustainability	II
B883-UE16	Program Manager, Engineering-Construction	I
B887-UE21	Program Manager, Planning & -Environment	I
B875-UE15	Program Manager, Real Estate	I
B959-UE24	Project Labor and Compliance Administrator	VI

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**Appendix A:
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Class No.	Class Title	Assigned Disclosure Categories
B209-UE21	Project Manager ₇	II
B903-UE16	Project Review Associate	I
B865-UE18	Public Information Officer	V
B939-UE18	Retirement Programs Administrator	VII
B650-UE14	Risk and Safety Manager	I
B617-UE03	Risk Management Administrator	I
B615-UE03	Risk Management Analyst	II
B607-CN14	Safety Specialist II	III
B245-CE21	Senior Accountant	IV
B281-UE03	Senior Applications Developer	VII
B229-UE03	Senior Asset Manager	I
B918-UE16	Senior Benefits & Compensation Analyst	VII
B844-UE 1509	Senior Business Intelligence Analyst	VII
B9444-UE21	Senior Business Partner, People & Organizational Development	II
B231-UE 105	Senior Business Systems Analyst	VII
C311-CN15	Senior Construction Inspector	II
A2061-UE17	Senior Deputy General Counsel	I
B286-UE21	Senior Diversity, Equity, & Inclusion Analyst	II
B204-CE03	Senior Engineer	I
B309-UE17	Senior Environmental Specialist	I
B276-UE 1503	Senior Financial Analyst	IV
B247-UE03	Senior Human Resources Analyst	II
B616-UE03	Senior IT Auditor	VII
B946-CE21	Senior Land Surveyor	X
B201-UE 1503	Senior Management Analyst	I
B941-CN18	Senior Multi-Media Specialist	V
B9444-UE23	Senior People Services Analyst	II
B259-UE17	Senior Planner	I
B819-UE 241	Senior Policy Administrator	II
B646-UE03	Senior Project Architect	I
B100-UE21	Senior Project Manager ₇	I
B817-UE03	Senior Project Office Administrator	I
B871-UE15	Senior Systems Administrator	VII
B622-UE03	Senior Trade Account Representative	I
B962-UE24	Small Business Enterprise Administrator	II

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Class No.	Class Title	Assigned Disclosure Categories
B237- CEN 03	Special Events Associate	V
B953-UE22	Special Projects Manager	I
B879-UE15	Systems Administration Supervisor	VII
B870-UE15	Systems Administrator	VII
B700-UE03	Systems Support Supervisor	VII
B179-CN03	Travel Services Coordinator	VIII
A1037-UE16	Vice President	I
A1025-UE03	Vice President, Administration/ CAO	I
A1015-UE21	Vice President, Business Operations <u>Real Estate</u>	I
A2072-UE21	Vice President, Facilities & Engineering	I
A2069-UE-19	Vice President, Maritime	I
A2070-UE-19	Vice President, Marketing & Communications	I
A2071-UE21	Vice President, Planning & Environment	I
A1500-UE03	Vice President, Public Safety/Chief of Harbor Police	I
A1026-UE21	Vice President, Strategy & Policy	I
A1500-UE03	Vice President, Public Safety/Chief of Harbor Police	I
<u>B961-UE24</u>	<u>Workforce Partnership Administrator</u>	<u>II</u>

The following individuals must file Statements of Economic Interests pursuant to Government Code Section 87200 and are listed below for informational purposes only:

Port Commissioner

Chief Engineer

District Clerk

Executive Director

Port Attorney

Port Auditor

Treasurer (CFO/Treasurer)

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

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**Appendix B:
Disclosure Categories for Designated Positions**

Category I

All sources of income, interests in real property and investments and business positions in business entities located in or doing business in member cities and unincorporated parts of San Diego County plus 2 miles.

Category II

All sources of income, investments and business positions in business entities located in or doing business in member cities and unincorporated parts of San Diego County plus 2 miles.

Category III

Investments and business positions in business entities and sources of income, which provide services, supplies, materials, machinery or equipment of the type utilized by the agency.

Category IV

Investments and business positions in business entities and sources of income, which provide financial services of the type utilized by the agency.

Category V

Investments and business positions in business entities and sources of income, which provide marketing services or communication services of the type utilized by the agency.

Category VI

Investments and business positions in business entities and income from sources which are providers of health care services, including but not limited to pharmacies, physicians, etc.

Investments and business positions in business entities and/or nonprofit corporations and income from sources which may be the recipient of patient referrals for the delivery of health care services or supplies by the employee's hospitals.

Investments and business positions in business entities and income from sources which are providers and/or the deliverers of pension and benefit services.

Investments and business positions in business entities or nonprofit corporations and income from sources which are of the type which provide consultant services to any business entity or nonprofit corporation made reportable by this disclosure category.

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**Appendix B:
Disclosure Categories for Designated Positions**

Category VII

Investments and business positions in business entities and sources of income which provide data processing or computer services, supplies, materials, machinery or equipment of the type utilized by the agency.

Category VIII

Investments and business positions in business entities and sources of income, which provide travel services of the type utilized by the agency.

Category IX

Investments and business positions in business entities and sources of income, which provide Port/Seaport security or related Homeland Security services of the types utilized by the agency.

Category X

Investments and business positions in business entities and sources of income, which provide land surveying services of the type utilized by the agency.

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Appendix C

Consultant Disclosure

Definition: Fair Political Practices Commission regulation [2 Cal. Code of Regs. Section 18700] defines “consultant” as an individual who, pursuant to a contract with a state or local governmental agency:

- (a) Makes a governmental decision whether to:
- (1) Approve a rate, rule or regulation;
 - (2) Adopt or enforce a law;
 - (3) Issue, deny, suspend, or revoke a permit, license, application, certificate, approval, order, or similar authorization or entitlement;
 - (4) Authorize the agency to enter into, modify, or renew a contract provided it is the type of contract which requires agency approval;
 - (5) Grant agency approval to a contract which requires agency approval and in which the agency is a party or to the specifications for such a contract;
 - (6) Grant agency approval to a plan, design, report, study, or similar item;
 - (7) Adopt, or grant agency approval of, policies, standards, or guidelines for the agency, or for any subdivision of the agency; or
- (b) Serves in an ongoing staff capacity with the agency and in that capacity performs the same or substantially all the same duties for the agency that would otherwise be performed by an individual holding a position specified in the agency’s local conflict of interest code.

“Consultant” does not serve in an ongoing staff capacity when:

- (1) Conducting research and arriving at conclusions with respect to his or her rendition of information, advice, recommendation or counsel independent of the control and direction of the agency or of any agency official, other than normal contract monitoring; and
- (2) He or she possesses no authority with respect to any agency decision beyond the rendition of information, advice, recommendation or counsel and only provides services on a sporadic basis.

Disclosure requirements for Sections (a) & (b) above:

Section (a): Investments and business positions in business entities and sources of income, which provide the type of services utilized by the agency.

Section (b): Consultants who serve in a staff capacity shall disclose those financial interests listed in the assigned disclosure category for the corresponding staff position listed in Appendix A.

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Appendix C

Consultant Disclosure

The Executive Director may determine in writing that a particular consultant, although a “designated position”, is hired to perform a range of duties that is limited in scope and thus is not required to comply fully with the disclosure requirements described in this section. Such determination shall include a description of the consultant’s duties and, based upon that description, a statement of the extent of disclosure requirements. The Executive Director’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.