



## Board Governance Policy

# Conflict of Interest Policy

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### I. Purpose

- A. 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 Cal. Code of Regs. Section 18730, which contains the terms of a standard conflict of interest code. It can be incorporated by reference and may be amended by the Fair Political Practices Commission after public notice and hearings to conform to amendments in the Political Reform Act.

Therefore, the terms of Section 18730 of Article 2 of Chapter 7 of Division 6 of Title 2 of the California Code of Regulations and any amendments thereto adopted by the Fair Political Practices Commission are hereby incorporated by reference and, along with the Disclosure Categories, attached and incorporated herein as Attachment 1, constitute the Conflict of Interest Code of the San Joaquin County Employees' Retirement Association (SJCERA).

### II. Filing Requirements

- A. Pursuant to Section 4 of the standard Conflict of Interest code (Section 18730), persons identified in all Disclosure Categories shall file Statements of Economic Interest with SJCERA. Statements will be retained by SJCERA and listed in a certification filed with the County Registrar of Voters. All statements filed are public records open for public inspection and reproduction pursuant to Section 81008 of the California Government Code.
- B. Pursuant to Section 87314 of the California Government Code as added by Chapter 702, Statutes of 2010, attached and incorporated herein is an Appendix entitled "Agency Positions that Manage Public Investments for the Purpose of Section 87200 of the Government Code." Also, as required, this Appendix shall remain posted on the SJCERA website in a manner that is easily identifiable and accessible.
- C. Responsibility for accurately reporting disclosable interests rests solely with the person(s) required to file pursuant to statute or this code and not with SJCERA.

### III. Statements of Economic Interest

- A. Staff shall prepare an annual summary report of the Statements of Economic Interest filed with SJCERA pursuant to Section II.A. The report will be submitted to the Administrative Committee at its annual June meeting for receipt and filing.

#### IV. Policy Review

- A. Staff shall review this Policy at least once every three years to ensure that it remains relevant, appropriate, and in compliance with the Political Reform Act. Any revisions or amendments to this policy must be approved by the Board of Retirement in accordance with the bylaws.

#### V. History

- 08/09/1991 First adopted by the Board of Retirement  
02/09/1996 Disclosure Categories revised by Resolution No. 1996-02-02  
08/09/2002 Disclosure Categories revised by Resolution No. 2002-08-01  
07/14/2006 Disclosure Categories revised by Resolution No. 2006-07-02  
04/11/2008 Disclosure Categories revised by Resolution No. 2008-04-04 (First established standard policy format)  
12/17/2010 Disclosure Categories revised and Appendix Added by Resolution No. 2010-12-04  
05/09/2014 Disclosure Categories, Statutory References, and Policy Wording revised by Resolution No. 2014-05-02  
06/29/2018 Reviewed, no content changes, staff updated format  
04/12/2019 Policy Review section amended to at least once every three years  
07/12/2019 Amended per County's direction to send ROV certifications and retain statements on all filers  
01/20/2023 Amended to include Statements of Economic Interest procedure, clarify the Government Code reference, and update format  
12/08/2023 Added inhouse General Counsel position to the Designated Employees section in Group B of Attachment 1 and a non-substantive change.

#### Certification of Board Adoption:

  
Clerk of the Board

12/08/2023

Date

## ATTACHMENT 1

### SAN JOAQUIN COUNTY EMPLOYEES' RETIREMENT ASSOCIATION CONFLICT OF INTEREST CODE

#### DISCLOSURE CATEGORIES

Group A - Officials/Consultants: (Required to file pursuant to Government Code Section 87200)

Member of the Board of Retirement

Investment Consultants

External Managers (as defined in Government Code Section 82025.3 as it may be amended from time to time)

Group B – Designated Employees: (Required to file pursuant to this Conflict of Interest Code)

Chief Executive Officer

Assistant Chief Executive Officer

Investment Officer

General Counsel

Retirement Financial Officer

Departmental Systems Information Manager

Persons identified in all Disclosure Categories shall report on the following interests as defined in, and by completing, the California Fair Political Practices Commission's Statement of Economic Interests Form 700:

- a. Investments
- b. Interests in Real Property
- c. Income, Loans, and Business Positions
- d. Income – Gifts
- e. Travel Payments, Advances, and Reimbursements

**SAN JOAQUIN COUNTY EMPLOYEES' RETIREMENT ASSOCIATION  
CONFLICT OF INTEREST CODE**

**Agency Positions that Manage Public Investments  
for Purposes of Section 87200 of the California Government Code**

**Positions of the Board of Retirement:**

First Member:	San Joaquin County Treasurer-Tax Collector
Second Member:	Active General Member of SJCERA – elected
Third Member:	Active General Member of SJCERA – elected
Fourth Member:	Appointed by the Board of Supervisors
Fifth Member:	Appointed by the Board of Supervisors
Sixth Member:	Appointed by the Board of Supervisors - may be a County supervisor
Seventh Member:	Active Safety Member of SJCERA – elected
Alternate Seventh Member:	Active Safety Member of SJCERA - elected
Eighth Member:	Retired Member of SJCERA – elected
Alternate Retired Member:	Retired Member of SJCERA – elected
Ninth Member:	Appointed by the Board of Supervisors