



Board Governance Policy

Conflict of Interest Policy

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. Objectives

- 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 conduct an annual review of the Statements of Economic Interest filed with SJCERA pursuant to Section II.A.

IV. Law Prevails

- A. In the event a conflict between this policy and the County Employees Retirement Law, the Public Employees' Pension Reform Act, or other applicable statute arises, the law shall prevail.

V. Policy Review

- A. Staff shall review this Policy at least once every three (3) 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 in accordance with the bylaws.

VI. 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
07/10/2026	Eliminated preparing annual summary report and other non-substantive formatting changes

Certification of Board Adoption:



Clerk of the Board

07/10/2026

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

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