

San Diego Housing Commission
POLICY

Subject: **CONFLICT OF INTEREST CODE AND RELATED PROVISIONS**

Number: **PO101.000**

Effective Date: 11/3/94

Page 1 of 4

1. BACKGROUND

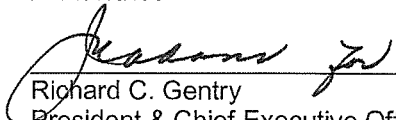
- 1.1 Federal, State and Local Conflict Laws Incorporated by Reference. All employees, Commissioners, consultants for the Commission, contractors doing business with the Commission, agents of the Commission, and each of them, shall comply with and adhere to all applicable conflict of interest provisions contained in the applicable federal, state and local law to the full extent required by the applicable federal, state and local law.
- 1.2 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 Regulations Section 18730, which contains the terms of a standard 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 Regulations Section 18730 and any amendments to it duly adopted by the Fair Political Practices Commission, along with the attached Appendices in which officials and employees are designated and disclosure categories are set forth, are hereby incorporated by reference and together constitute the Conflict of Interest Code of the San Diego Housing Commission.
- 1.3 Pursuant to Section b(4) of the Standard Code, designated employees shall file statements of economic interests with the Clerk of the City of San Diego and copies will be made available to any person upon request.

2. POLICY AND ADOPTION OF CODE

- 2.1 Compliance with Applicable Laws. All employees, officers, commissioners of the San Diego Housing Commission, consultants, contractors, subcontractors, grantees, and borrowers shall, to the full extent required by the applicable law, comply with all applicable laws including, but not limited to, HOME, CDBG, etc., and all other federal conflict requirements and provisions, if federal funds and/or programs are involved, including 24 CFR 570.611, 24 CFR Part 982, 24 CFR Part 92, 24 CFR Part 85, and any and all other federal applicable federal conflict provisions. State conflict provisions shall include, but are not limited to, Government Code Sections 87100, et. seq., Government Code Sections 1126, et. seq., Government Code Sections 1090, et. seq., Government Code Section 19990 et. seq., and Health and Safety Code Section 34281 et. seq. Local conflict of interest provisions shall include San Diego Municipal Code Sections 27.3501 et. Seq. (San Diego Ethics Ordinance) and any and all administrative regulations promulgated by the President & Chief Executive Officer, or designee, to implement the federal, state and local conflict laws, if any.

Supersedes Policy 101.000, Issued 11/3/94; Rev: 4/23/96, 11/26/96, 12/08/98, 11/14/00, 8/16/02, 12/15/06, 9/18/08, 02/20/09

Authorized


Richard C. Gentry
President & Chief Executive Officer

11/21/2013
Date

Date

San Diego Housing Commission
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Subject: **CONFLICT OF INTEREST CODE AND RELATED PROVISIONS**

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Effective Date: 11/3/94

Page 2 of 4

2.2 The Standard Code as referenced in 2 Cal. Code of Regulations Section 18730 is hereby adopted by the San Diego Housing Commission. A true and correct copy of the standard code contained in 2 Cal. Code of Regulations Section 18730 may be obtained by contacting the San Diego Housing Commission offices, located at 1122 Broadway, San Diego, CA 92101. Said copy of the Code of Regulations is incorporated herein by reference.

2.3 2 Cal. Code of Regulations 18730. Provisions of Conflict of Interest Code. Incorporation by reference of the terms of this regulation along with the designation of employees and the formulation of disclosure categories in the Appendix referred to below constitute the adoption and promulgation of a conflict of interest code within the meaning of Government Code Section 87300 or the amendment of a conflict of interest code within the meaning of Government Code Section 87306 if the terms of this regulation are substituted for terms of a conflict of interest code already in effect. A code so amended or adopted and promulgated requires the reporting of reportable items in a manner substantially equivalent to the requirements of Article 2 of Chapter 7 of the Political Reform Act, Government Code Sections 81000, et seq. The requirements of a conflict of interest code are in addition to other requirements of the Political Reform Act, such as the general prohibition against conflicts of interest contained in Government Code Section 87100, and to other state or local laws pertaining to conflicts of interest.

2.4 General Definitions:

A. Designated Employees, Disclosure Categories, Definitions: The designation of officers and employees, disclosure categories, and definitions referenced in the conflict of interest code amended or adopted and promulgated pursuant to this regulation are as follows:

(i) Designated Employees The persons holding positions listed in Appendix A are designated employees. It has been determined that these persons make or participate in the making of decisions which may have a foreseeable material effect on financial interests.

(ii) Disclosure Categories This Code does not establish any disclosure obligation for those designated employees who are also specified in Government Code Section 87200 if they are designated in this code in that same capacity or if the geographical jurisdiction of this agency is the same as or is wholly included within the jurisdiction in which those persons must report their financial interests pursuant to Article 2 of Chapter 7 of the Political Reform Act, Government Code Sections 87200, et seq.¹ Such persons are covered by this code for disqualification purposes only. With respect to all other designated employees and positions, the disclosure categories set forth in Appendix B specify which kinds of financial interests are reportable. Such a designated employee or position shall disclose in his/her statement of economic interests those financial interests he/she has which are of the kind described in the disclosure categories to which he/she is assigned in Appendix A. It has been determined that the financial interests set forth in a designated employee's or position's disclosure categories are the kinds of financial interests which he/she foreseeably can affect materially through the conduct of his/her office.

¹ Designated employees who are required to file statements of economic interests under any other agency's Conflict of Interest Code, or under Article 2 for a different jurisdiction, may expand their statement of economic interests to cover reportable interests in both jurisdictions, and file copies of this expanded statement with both entities in lieu of filing separate and distinct statements, provided that each copy of such expanded statement filed in place of an original is signed and verified by the designated employee as if it were an original. See Government Code Section 81004.

San Diego Housing Commission
POLICY

Subject: **CONFLICT OF INTEREST CODE AND RELATED PROVISIONS**

Number: **PO101.000**

Effective Date: 11/3/94

Page 3 of 4

(iii) Definitions The definitions contained in the Political Reform Act of 1974, regulations of the Fair Political Practices Commission (2 Cal. Code of Regs. Sections 18100, et seq.), and any amendments to the Act or regulations, are incorporated by reference into this conflict of interest code and in Appendix C.

B. Other Definitions: The following definitions are applicable to all portions of this policy except as referenced herein in Section 2.4 (A) above.

(i) "Contractor" means any individual or firm that enters into an agreement with the Housing Commission or the Housing Authority of the City of San Diego for the provision of goods and services, construction, architect/engineering, consulting services, loans and/or grants.

(ii) "Contract" means any mutually binding legal relationship obligating the seller to furnish supplies or services (including construction) and the buyer to pay for them. Examples include, but are not limited to, contracts, and amendments thereto, purchase orders, leases, maintenance agreements, and ordering agreements. Contract also includes loans and/or grants.

(iii) "Solicitation" means any informal or formal request for prices, bids, proposals, and/or qualifications that are issued in anticipation of making a contract, award and/or loan or grant.

2.5 Mandatory Disclosure of Interests by Prospective Contractors, Consultants, Suppliers, etc.

A. Purpose

To establish principles for determining the name and identity of any and all persons directly or indirectly involved in the proposed transaction, the precise nature of all interests of all persons therein, and other data pertinent to the award of a contract, including grants and/or loans.

B. Policy

No employee, officer, or agent of the Housing Commission or of the Housing Authority of the City of San Diego shall participate directly or indirectly in the selection or in the award or administration of any contract if a conflict, real or apparent, would be involved. Such conflict would arise when a financial or other interest in a firm selected for award is held by an employee, officer or agent involved in making the award or his/her Spouse and/or dependent children.

C. Disclosure Required

To ensure that all potential conflicts of interest are identified, all contractors, including grantees and borrowers, selected for award of contracts in excess of \$25,000, including options, for architect/engineering and professional consultants, and all contractors selected for award of contracts in excess of \$49,999, including options, for construction and goods and services, shall be required to submit a Statement for Public Disclosure.

D. Failure to Submit

San Diego Housing Commission
POLICY

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Number: **PO101.000**

Effective Date: 11/3/94

Page 4 of 4

Failure to submit a Statement for Public Disclosure, or failure to fully disclose all of the information enumerated in the Statement for Public Disclosure, shall be grounds for denial of contract award and may result in forfeiture of any and all rights and privileges that have been granted heretofore.

- 2.6 Notification of Conflicts or Potential Conflicts and Manner of Abstention All legally mandated abstentions should be filled out and transmitted to the Commission in advance of a hearing, but not later than the time of the hearing, using the form attached hereto as Appendix E. Examples of required written disclosures include, but are not limited to, conflicts involving economic interests under the Political Reform Act, Government Code sections 1090, 1091 and 1091.5 disclosures, Health and Safety Code section 34281 disclosures, City's Ethics Ordinance, and disclosures required by the "rule of necessity" under Government Code section 87100, et. seq.
- 2.7 Provision Governing Former Employees. No employee or member of the Housing Commission or of the Housing Authority of the City of San Diego shall have any prohibited interest, direct or indirect, not shall profit from any Housing Commission contract to the extent prohibited by applicable federal, state or local law.
3. Promulgation of Conflict of Interest Administrative Regulations The President & Chief Executive Officer of the Commission shall, from time to time, promulgate administrative regulations to implement the various conflict of interest provisions referenced above, if and when required. Such administrative regulations shall be made available to members of the public upon request. The Board of Commissioners may, but shall not be required to, review, approve and amend such administrative regulations, at such times as the Board, in its sole discretion shall determine. Subject to such discretionary review by the Board, all authority to promulgate, amend, review and revise the administrative regulations shall be vested in the President & Chief Executive Officer of the Commission.

Note: Authority cited: Section 83112, Government Code. Reference: Sections 87300-87302, 89501, 89502, 89503, and 89504, Government Code.

HISTORY:

New Section filed 4/2/80 as an emergency; effective upon filing. Certificate of Compliance included.

Editorial correction

Amendment of subsection (b) filed 1/9/81; effective thirtieth day thereafter

Amendment of subsection (b)(7)(B). filed 1/26/83; effective thirtieth day thereafter

Amendment of subsection (b)(7)(A) filed 11/10/83; effective thirtieth day thereafter

Amendment filed 4/13/87; effective thirtieth day thereafter

Amendment of subsection (b) filed 10/21/88; effective thirtieth day thereafter

Amendment filed 8/28/90; effective thirtieth day thereafter

Amendment filed 8/7/92; effective thirtieth day thereafter

Amendment filed 2/5/93; effective upon filing

Amendment filed 3/14/95; effective upon filing

Amendment filed 4/23/96; effective upon filing

Amendment filed 11/26/96; effective upon filing

Amendment filed 12/08/98; effective upon filing

Amendment filed 11/14/00; effective upon filing

Amendment filed 8/16/02; effective upon filing

Amendment filed 12/15/06; effective upon filing

Amendment filed 09/12/08; effective upon filing

Amendment filed 02/20/09; effective upon filing

Amendment filed 12/7/10; effective upon filing

Amendment filed 11/13/12; effective upon filing

APPENDIX A

DESIGNATED EMPLOYEES and DESIGNATED POSITIONS

Positions Requiring Full Disclosure Type I as set forth in Appendix B:

Assistant Directors
Board of Commissioners
Directors
Executive Vice President & Chief of Staff
Legal Counsel
Directors of the Housing Development Partners of San Diego
Directors of the HDP Mason Housing Corporation
Members of the Loan Committee
President & Chief Executive Officer
Senior Vice President
Vice Presidents

Positions Requiring Full Disclosure Type II, as set forth in Appendix B:

Executive Assistant to President & Chief Executive Officer

Positions Requiring Limited Disclosure Type I, as set forth in Appendix B: (contracting)

Communications Manager
Community Liaison
Community Relations Specialist
Contracts Analyst
Housing Construction Specialist
Housing Construction Supervisor
Housing Construction Manager
Human Resources Manager
Information Technology Manager

Positions Requiring Limited Disclosure Type II, as set forth in Appendix B: (services and grants)

Accountant
Accounting Supervisor
Budget Manager
Business Analyst
Contract Employees (who make/participate in Commission decisions in Board & Executive Functions, Business Services, Financial Services, Communications & Public Affairs, and/or Policy Departments)
Financial Specialist
Financial Analyst
Information Systems Service Manager
Project Manager
Senior Accountant
Senior Budget Analyst
Senior HR Analyst
Supervising Project Manager
Supervising Workforce Readiness Coordinator
Senior Program Analyst in Housing Innovations
Senior Program Analyst in Operations

Positions Requiring Limited Disclosure III, as set forth in Appendix B: (services/grants with RP)

Assistant Real Estate Managers
Contract Employees (who make/participate in Commission decisions in Real Estate, Operations, Housing Innovations and/or Rental Assistance Departments)
Housing Programs Manager
Senior Housing Supervisor
Loan Services Manager
Loan Underwriting Specialist
Loan Servicing Specialist
Real Estate Managers
Senior Program Analyst in Real Estate
Senior Program Analyst in Rental Assistance
Quality Assurance Manager

CONSULTANTS

"Consultant" is an individual who, pursuant to a contract with the Housing Commission either:

- (1) Makes a governmental decision whether to: (a) Approve a rate, rule or regulation; (b) Adopt or enforce a law; (c) Issue, deny, suspend, or revoke any permit, license, application, certificate, approval, order, or similar authorization or entitlement; (d) Authorize the agency to enter into, modify, or renew a contract provided it is the type of contract which requires agency approval; (e) 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; (f) Grant agency approval to a plan, design, report, study, or similar item; (g) Adopt, or grant agency approval of, policies, standards, or guidelines for the agency, or for any subdivision thereof; or
- (2) Serves in a 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 Conflict of Interest Code.

Consultants shall make Full Disclosure subject to the President & Chief Executive Officer's (or his/her designated authority's) determination, 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 fully comply with the disclosure requirements described in this section. Such written determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The President & Chief Executive Officer'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. Nothing herein excuses any such consultant from any other provision of this Conflict of Interest Code.

OFFICIALS WHO MANAGE PUBLIC INVESTMENTS

Director of Financial Services/Budget Officer - This position manages public investments and will file a Statement of Economic Interests pursuant to Government Code §87200.

APPENDIX B

DISCLOSURE CATEGORIES

Full Disclosure – Type I

You are required to disclose the following interests:

- any and all interests in real property that are within the jurisdiction* of the San Diego Housing Commission (“Housing Commission”);
- any and all investments, business positions and sources of income from a person or business in the jurisdiction* of the Housing Commission. A business is in the jurisdiction of the Housing Commission if it is currently doing business in the City of San Diego, is planning on doing business in the City of San Diego or has done business in the city of San Diego in the last two (2) years; and
- any and all gifts, loans, travel expenses, etc. from any person or business entity doing business with the Housing Commission and/or the Housing Authority of the City of San Diego (“Housing Authority”).

Full Disclosure – Type II (excluding interest in real property)

You are required to disclose the following interests:

- any and all investments, business positions and sources of income from a person or business in the jurisdiction* of the Housing Commission. A business is in the jurisdiction of the Housing Commission if it is currently doing business in the City of San Diego, is planning on doing business in the City of San Diego or has done business in the city of San Diego in the last two (2) years; and
- any and all gifts, loans, travel expenses, etc. from any person or business entity doing business with the Housing Commission and/or the Housing Authority.

Limited Disclosure – Type I (contracting)

You are required to disclose the following interests:

- any and all investments, business positions and sources of income from a person or business in the jurisdiction* of the Housing Commission that provides leased facilities, goods, equipment, machinery, vehicles, and/or services, including training and/or consulting services, of a type utilized by your department. A business is in the jurisdiction of the Housing Commission if it is currently doing business in the City of San Diego, is planning on doing business in the City of San Diego or has done business in the City of San Diego in the last two (2) years; and
- any and all gifts, loans, travel expenses, etc. from a person or business doing business with the Housing Commission and/or the Housing Authority, that provide leased facilities, goods, equipment, machinery, vehicles, and/or services, including training and/or consulting services, of the type utilized by your department.

Limited Disclosure – Type II (grant/service providers)

You are required to disclose the following interests:

- any and all investments, business positions and/or income from any person or business (including a non-profit entity) doing business in the jurisdiction* of the Housing Commission and that provides goods and/or services of a nature similar to those utilized by your department. A business is in the jurisdiction of the Housing Commission if it is currently doing business in the City of San Diego, is planning on doing business in the City of San Diego or has done business in the City of San Diego in the last two (2) years;
- any and all investments, business positions and/or income from any person or business (including a non-profit entity) within the jurisdiction* of the Housing Commission that is of the type to receive grants or other monies from or through the Housing Commission. A business is in the jurisdiction of the Housing Commission if it is currently doing business in the City of San Diego, is planning on doing business in the City of San Diego or has done business in the City of San Diego in the last two (2) years; and
- any and all gifts, loans, travel expenses, etc. from a person or business doing business with the Housing Commission and/or the Housing Authority that provides goods or services of a nature similar to those utilized by your department.

Limited Disclosure – Type III (grant/service providers with disclosure of real property interest)

You are required to disclose the following interests:

- any and all interests in real property that are within the jurisdiction* of the Housing Commission;
- any and all investments, business positions and/or income from any person or business (including a non-profit entity) doing business in the jurisdiction* of the Housing Commission and that provides goods and/or services of a nature similar to those utilized by your department. A business is in the jurisdiction of the Housing Commission if it is currently doing business in the City of San Diego, is planning on doing business in the City of San Diego or has done business in the City of San Diego in the last two (2) years;
- any and all investments, business positions and/or income from any person or business (including a non-profit entity) within the jurisdiction* of the Housing Commission that is of the type to receive grants or other monies from or through the Housing Commission. A business is in the jurisdiction of the Housing Commission if it is currently doing business in the City of San Diego, is planning on doing business in the City of San Diego or has done business in the City of San Diego in the last two (2) years; and

- any and all gifts, loans, travel expenses, etc. from a person or business doing business with the Housing Commission and/or the Housing Authority that provides goods or services of a nature similar to those utilized by your department.

* "Jurisdiction" means the geographical area encompassing the City of San Diego, as depicted on the map in Appendix D. Real property is considered to be "within the jurisdiction" if the property or any part of it is located within or not more than two miles outside the boundaries of the City of San Diego or within two miles of any land owned or used by the San Diego Housing Commission. (82035)

APPENDIX C

General Provisions

When a designated employee is required to disclose investments and sources of income, the employee need only disclose investments in business entities and sources of income that do business in the jurisdiction or have done business in the jurisdiction, within 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.

When a designated employee is required to disclose interests in real property, the employee shall disclose real property located whole or in part within or not more than two miles outside the boundaries of the jurisdiction or within two miles of any land owned by the local government agency. (The boundaries of the Housing Commission's jurisdiction are depicted and described on Appendix D.)

Designated employees or designated positions shall disclose their financial interest pursuant to the appropriate disclosure category(ies) as indicated in the chart in Appendix A.

Late Filing. The filing officer may impose penalties for statements of economic interests that are filed late. The fine is \$10 per day beginning the day after the filing deadline, up to a maximum of \$100. Late filing penalties can be reduced or waived under certain circumstances.

Amendment to Appendix A: The President & Chief Executive Officer is authorized to implement proposed revisions to the Designated Positions List as classifications are added and deleted. Changes to the approved Designated Positions List will be forwarded for document approval during the biennial review process per City Council Resolution 287239.

APPENDIX D

"Jurisdiction" means the geographical area encompassing the City of San Diego, as depicted on the map in Appendix D. Real property is considered to be "within the jurisdiction" if the property or any part of it is located within or not more than two miles outside the boundaries of the City of San Diego or within two miles of any land owned or used by the San Diego Housing Commission.

(Map of Jurisdiction)

APPENDIX E

WRITTEN DISCLOSURE OF CONFLICT OR POTENTIAL CONFLICT OR
OTHER REASON FOR ABSTENTION AND NOTICE OF INTENTION TO
ABSTAIN FROM PARTICIPATION AND ACTION ON THE ITEM

DATE: _____

TO: The Clerk of the City of San Diego, President & President & Chief Executive Officer,
Secretary and General Counsel of the San Diego Housing Commission

FROM: _____
(Name) (Title)

SUBJECT: San Diego Housing Commission Item _____
for Meeting Scheduled on _____ (“the Item”)

NATURE OF CONFLICT OR POTENTIAL CONFLICT OR OTHER REASON
FOR ABSTENTION:

The undersigned requests that this written disclosure be made part of the public record and incorporated into the minutes of the meeting, if, and to the extent, required by law, including but not limited to Government Code Sections 87100, 87101, 1090, 1091, 1091.5, Health and Safety code Section 32481, City’s Ethics Ordinance and the applicable regulations, including, but not limited to 2 Cal. Regs. 18730(b)(10).

Executed this _____ of _____, at San Diego, California.

(Name Printed or Typed)
Commissioner or Employee of the
San Diego Housing Commission

RESOLUTION NUMBER R- 307809

DATE OF FINAL PASSAGE NOV 13 2012

RESOLUTION ADOPTING AN AMENDED CONFLICT OF INTEREST CODE FOR THE SAN DIEGO HOUSING COMMISSION

WHEREAS, Government Code sections 87300 and 87302 require local agencies to adopt conflict of interest codes designating positions that involve the making or participation in making of decisions which may foreseeably have a material effect on financial interests, and for each position, the financial interests which are reportable; and

WHEREAS, in compliance with Government Code section 87306.5, the City is in the midst of a required City-wide biennial review of all conflict of interest codes for which the City Council serves as code-reviewing body; and

WHEREAS, by Resolution R-305874 (adopted by the City Council on May 25, 2010), the City Council directed every City department, agency, board and commission for which the City Council serves as code-reviewing body to make biennial reports and to update their conflict of interest codes as necessary; and

WHEREAS, as the City's code-reviewing body, the City Council finds it in the public interest to adopt the standard conflict of interest code promulgated by the California Fair Political Practices Commission (FPPC) in Regulation 18730, and hereby declares its intention to incorporate by reference the terms of FPPC Regulation 18730 and any amendments to that regulation duly adopted by the FPPC as part of each conflict of interest code for which the City Council has responsibility; and

WHEREAS, the Conflict of Interest Code for the San Diego Housing Commission was originally issued in November 1994 and has been amended periodically since that date; and

WHEREAS, the Conflict of Interest Code for the San Diego Housing Commission was last amended through Resolution No. R-306454, approved by the Council on December 7, 2010; and

WHEREAS, the San Diego Housing Commission now seeks to amend its conflict of interest code to include new positions that must be designated, revise disclosure categories, revise the titles of existing positions, and delete titles of positions that no longer exist, as detailed in its code; and

WHEREAS, the San Diego Housing Commission Board has voted to approve the amendments and to recommend that the City Council adopt the proposed amendments to the code; and

WHEREAS, Government Code section 87303 provides that when a proposed conflict of interest code or amendment is approved by the code-reviewing body, it shall be deemed adopted, and, accordingly, this resolution is not subject to veto by the Mayor; NOW THEREFORE,

BE IT RESOLVED, by the Council of the City of San Diego, that a Conflict of Interest Code for the San Diego Housing Commission is hereby adopted, consisting of standard language embodied in title 2, section 18730 of the California Code of Regulations, and any amendments to that regulation duly adopted by the Fair Political Practices Commission, with Appendix A showing designated positions and their duties, and Appendix B showing the disclosure categories.

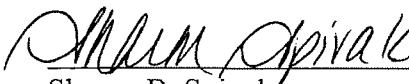
BE IT FURTHER RESOLVED, that a copy of Appendix A and Appendix B to the Conflict of Interest Code for the San Diego Housing Commission as adopted be placed on file in the Office of the City Clerk as Document No. RR- 307809.

BE IT FURTHER RESOLVED, that the persons whose positions are designated in the Conflict of Interest Code for the San Diego Housing Commission shall file their statements of economic interest with the City Clerk in compliance with the schedule set forth in Government Code section 87302(b) and Fair Political Practices Commission Regulation 18730, or any amendments thereto, which set forth the deadlines for the filing of initial statements, assuming office statements, annual statements and leaving office statements.

BE IT FURTHER RESOLVED, that the statements of economic interest filed by designated persons be retained by the Office of the City Clerk and be made available for public inspection and reproduction.

BE IT FURTHER RESOLVED, that the Conflict of Interest Code for the San Diego Housing Commission becomes effective upon the date of adoption of this resolution.

APPROVED: JAN I. GOLDSMITH, City Attorney

By 
Sharon B. Spivak
Deputy City Attorney

SBS:jdf
10/12/12
Or.Dept: S.D. Housing Commission
Doc. No.: 454794