

THE OFFICE OF THE STATE TREASURER

CONFLICT OF INTEREST CODE

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 (FPPC) 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 Office of the State Treasurer and the various boards, authorities, councils, commissions and committees chaired by the State Treasurer.

Individuals holding designated positions shall file their statements of economic interests with the FPPC filing officer in the Office of the State Treasurer, who will make the statements available for inspection and reproduction. (Gov. Code Sec. 81008.) With respect to officials who are determined to manage public investments within the meaning of Government Code Section 87200, the Office of the State Treasurer shall make and retain a copy and forward the original of these statements to the Fair Political Practices Commission. The Office of the State Treasurer shall forward copies of all other statements for appointed members of multi-member boards, authorities, councils, committees and commissions to the Fair Political Practices Commission.

NOTE: Authority cited: Sections 81008, 87300, and 87306, Government Code. Reference: Section 87302, Government Code.

**APPENDIX A
DESIGNATED POSITIONS**

Designated Positions	Disclosure Category
Office of the State Treasurer	
Deputy Treasurer	1
General Counsel	1
Attorney (all levels)	1
Director, Public Finance Division	1
Director, Centralized Treasury & Securities Management Division	2
Director, Administration Division	1
Assistant Director, Investment Division	2
Assistant Director, Public Finance Division	1
Assistant Director, Centralized Treasury & Securities Management Division	2
Partner Business Executive, Financial Information System for California (FISCal)	2
Director of Legislative Affairs	1
Director of Public Liaison	1
<u>Director of Risk Management</u>	<u>1</u>
Treasury Program Manager (II and III), except Centralized Treasury & Securities Management and Investment Divisions	1
Treasury Program Manager (II and III), Centralized Treasury & Securities Management Division	2
Treasury Program Manager (all levels), Investment Division	2
Staff Services Manager (II and III), except Business Services Unit	2
Accounting Administrator (all levels)	2
Associate Treasury Program Officer, Investment Division	2
Director, Information Services Division	4
System Software Specialist II	4
System Software Specialist III	4
Senior Program Analyst	4
Senior Information Systems Analyst (Supervisor)	4
<u>Data Processing Manager (all levels)</u>	<u>4</u>
Staff Services Manager (all levels), Business Services Unit	1
Associate Business Management Analyst, Business Services Unit	1
<u>Associate Governmental Program Analyst, Business Services Unit</u>	<u>1</u>
California Alternative Energy and Advanced Transportation Financing Authority	
Authority Members	3
Executive Director	3
Deputy Executive Director	3
Treasury Program Manager (all levels)	3

Designated Positions	Disclosure Category
California Debt and Investment Advisory Commission	
Commission Members	3
Executive Director	3
Deputy Executive Director	3
Research Manager (all levels)	3
Staff Services Manager (all levels)	3
California Debt Limit Allocation Committee	
Committee Members	3
Executive Director	3
Staff Services Manager (all levels)	3
California Educational Facilities Authority	
Authority Members	3
Executive Director	3
Deputy Executive Director	3
Treasury Program Manager (all levels)	3
California Health Facilities Financing Authority	
Authority Members	3
Executive Director	3
Deputy Executive Director	3
Treasury Program Manager (all levels)	3
<u>California Healthy Food Financing Initiative Council</u>	
<u>Council Members</u>	<u>3</u>
California Industrial Development Financing Advisory Commission	
Commission Members	3
Executive Director	3
Deputy Executive Director	3
California Pollution Control Financing Authority	
Authority Members	3
Executive Director	3
Deputy Executive Director	3
Treasury Program Manager (all levels)	3
<u>California Secure Choice Retirement Savings Investment Board</u>	
<u>Board Members</u>	<u>3</u>
California School Finance Authority	
Authority Members	3

Designated Positions	Disclosure Category
Executive Director	3
Staff Services Manager (all levels)	3
California Tax Credit Allocation Committee	
Committee Members	3
Executive Director	3
Staff Services Manager (all levels)	3
California Transportation Financing Authority	
Authority Members	3
Executive Director	3
California Urban Waterfront Area Restoration Financing Authority	
Authority Members	3
Executive Director	3
Deputy Executive Director	3
Local Agency Investment Advisory Board	
Board Members	3
Executive Secretary	3
Pooled Money Investment Board	
Board Members	3
Executive Secretary	3
ScholarShare Investment Board	
Board Members	3
Executive Director	3
Staff Services Manager (all levels)	3
Consultants and New Positions	
Consultants/New Positions	*

*Consultants and new positions shall be included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitation:

The Chief Deputy Treasurer may determine in writing that a particular consultant or new position, 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 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 Chief Deputy Treasurer’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.)

Note: The State Treasurer is covered by Government Code Section 87200, and as such, must file a statement of economic interests pursuant to Government Code Section 87200 and not pursuant to the Department's conflict of interest code.

Officials Who Manage Public Investments

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

- (1) Chief Deputy Treasurer
- (2) Deputy Treasurer (with oversight responsibility for the Investment Division)
- (3) Director, Investment Division
- (4) Pension & Benefits Officer
- (5) Pension Investment Officer
- (6) Treasurer's Designee for CalPERS and CalSTRS (whose names are listed on an up-to-date public document maintained by the filing officer)

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 categorized incorrectly. The Fair Political Practices Commission makes the final determination whether a position is covered by Government Code Section 87200.

**APPENDIX B
DISCLOSURE CATEGORIES**

1. All investments, business positions, and income (including receipt of loans, gifts and travel payments) from, in or with any source of the type to do business with, or apply for or receive bonds, grants, loans, tax credit allocations or tax-advantaged bond allocations, or any other forms of assistance from the Office of the State Treasurer or any board, authority, council, commission or committee chaired by the Treasurer or of which the Treasurer is a member, as well as from, in or with any source of the type that provides services on State bond projects or other programs maintained by the Office of the State Treasurer or projects funded by bonds, grants or loans, or other forms of assistance, including tax credit allocations or tax-advantaged bond allocations, provided by a board, authority, council, commission or committee chaired by the Treasurer or of which the Treasurer is a member, and interests in real property in the State of California.
2. All investments, business positions, and income (including receipt of loans, gifts, and travel payments) from, in or with any source of the type to do business with, or apply for or receive bonds, grants, loans, or any other forms of assistance from the Office of the State Treasurer, as well as from, in or with any source of the type that provides services on State bond projects or other programs maintained by the Office of the State Treasurer, and interests in real property in the State of California.
3. All investments, business positions, and income (including receipt of loans, gifts and travel payments) from, in or with any source of the type to do business with, or apply for or receive bonds, grants, loans, tax credit allocations or tax-advantaged bond allocations, or any other forms of assistance from the board, authority, council, commission or committee of which the filer is a member, employee, or consultant, as well as from, in or with any source of the type that provides services on projects funded by bonds, grants or loans, or other forms of assistance, including tax credit allocations or tax-advantaged bond allocations, provided by the board, authority, council, commission or committee of which the filer is a member, employee, or consultant, and interests in real property in the State of California.
4. All investments, business positions, and income (including receipt of loans, gifts and travel payments) from, in or with any source of the type to sell, rent, or lease information technology equipment, software, facilities, supplies or services, to the Office of the State Treasurer or any board, authority, council, commission or committee chaired by the Treasurer.

This is the last page of the conflict of interest code for the **Office of the State Treasurer**.



CERTIFICATION OF FPPC APPROVAL

Pursuant to Government Code Section 87303, the conflict of interest code for the **Office of the State Treasurer** was approved on 5/23/ 2016.

A handwritten signature in black ink, appearing to be "B. Lau", written over a horizontal line.

Brian G. Lau

Senior Commission Counsel

Fair Political Practices Commission

Pursuant to Government Code Section 11346.2:

Secretary of State Filing Date:

Effective: