

**CONFLICT-OF-INTEREST CODE FOR THE  
CALIFORNIA ENTERPRISE DEVELOPMENT AUTHORITY**

The Political Reform Act (Government Code Section 81000, et seq.) requires state and local government agencies to adopt and promulgate a conflict-of-interest code. The Fair Political Practices Commission has adopted a regulation (2 California Code of regulations, Section 18730) which 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 it may be amended to 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 Appendix designating officials and employees and establishing disclosure categories, shall constitute the conflict-of-interest code of the California Enterprise Development Authority.

Designated employees shall file their statements with the California Enterprise Development Authority who will make the statements available for public inspection and reproduction (Government Code Section 81008). Statements for Board of Directors shall be filed at the California Enterprise Development Authority and the originals sent to the Fair Political Practices Commission.



**California Enterprise Development Authority**  
**Conflict of Interest Policy**  
**Presented for Adoption January 5, 2023**  
**Adopted January 5, 2023**  
**Schedule A—Designated Positions**

**CLASSIFICATION**

Board

Members

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**DISCLOSURE CATEGORY**

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**California Enterprise Development Authority  
Conflict of Interest Policy  
Schedule B—Disclosure Categories**

**PROVISION**

A designated board member is required to disclose that he or she is a director, officer, partner, trustee, employee, or holds any position of management in a business entity if he or she would be required to disclose income from that entity. Income includes loans and gifts.

This policy pertains to projects and contracts brought before the Board.

This disclosure protocol will be implemented by including an item in board agendas, calling for the disclosure of any investment, income from, or business positions with any person or business entity engaged with the Joint Powers Authority.

**CATEGORY 1**

A. Any investment in, income from, or business positions with any person or business entity engaged in:

1. Municipal bond brokerage, financing, or underwriting;
2. Commercial and industrial real estate investment, brokerage, sales, or lending (including banking, savings, and thrift businesses);
3. Financial advisory or municipal bond counsel-related services; and
4. Law firms which represent any person or business entity disclosable pursuant to this Code.

B. Any investment in, income from, or business positions with any person or business entity, which engages in, land development, construction, or the acquisition or sale of real property within the jurisdiction of any member of the California Enterprise Development Authority.

C. Any investment in, income from, or business positions with any person or business entity, which engages in the acquisition, construction, or rehabilitation of industrial and energy development facilities, and equipment within the jurisdiction of any member of the California Enterprise Development Authority.

D. Any investment in, income from, or business positions with any person, business entity or consortium who, during the past twelve months, was an applicant or was

approved for bond financing of a development project by the California Enterprise Development Authority.

E. Any interest in real property zoned commercial or industrial and located within the jurisdiction of any member of the California Enterprise Development Authority and any interest in real property, however zoned, located within a quarter mile of property involved in a project proposed for financing when the Board of Directors convenes to consider recommendations by the California Enterprise Development Authority.

F. Any income from any individual who, during the twelve past months was employed by or applied for employment by the California Enterprise Development Authority or the California Association for Local Economic Development.