This Conflict of Interest Policy (Policy) governs outside activities and interests that could pose a conflict of interest with HACLA’s general operations and programs, and is incorporated into HACLA’s Manual of Policies and Procedures (MPP) as Section 108:13. The Policy shall be HACLA’s statement of incompatible activities.

I. PURPOSE

It is HACLA’s basic policy not to abridge any Employee’s civil or political liberties or other constitutionally guaranteed rights. However, HACLA is obligated to take reasonable steps to protect the public interest. HACLA policy requires Commissioners and Employees to refrain from participating in activities, employment or enterprises, which are in conflict with the public interest or with their duties as a Commissioner or Employee of the Authority. This policy provides notice to Commissioners and Employees (including the President and CEO and Executive Staff) of the acts HACLA deems incompatible and prohibited, violation of which may subject Employees to disciplinary action.

II. GENERAL

HACLA, and its Commissioners and Employees, will follow all applicable statutes, regulations, and Department of Housing and Urban Development (HUD) mandated contractual provisions related to employment, activities, or enterprises that may constitute a real or apparent conflict of interest. These legal obligations include, but are not limited to, 2 Code of Federal Regulations (C.F.R.) § 200.318, 24 C.F.R. § 982.161, the conflict of interest provisions found within HUD’s Annual Contributions Contract and Housing Assistance Payments Contract, California Health and Safety Code (Health & Saf. Code) § 34281, California Government Code (Gov. Code) § 1090, et seq., Gov. Code § 1126, et seq., Gov. Code § 34281, California Code of Regulations (Cal. Code Regs.), title 2, § 18700, et. seq. Further information regarding California conflict of interest obligations can be found at the website of the Fair Political Practices Commission (www.fppc.ca.gov).

Real and Apparent Conflicts of Interest. Commissioners and Employees will avoid anything that constitutes a real or apparent conflict of interest. A real conflict of interest exists whenever an individual exploits their position with HACLA or their association with HACLA programs for personal or financial gain. A real conflict of interest also exists whenever a Commissioner or Employee compromises their professional judgment in carrying out HACLA-related responsibilities because of an external relationship or situation that directly or indirectly affects the business or significant financial interest of the Commissioner or Employee, one of their immediate family members, or an associated entity. Apparent conflicts of interest involve circumstances such that a reasonable person with knowledge of the relevant facts would question the individual’s ability to act impartially in the matter, even if a real conflict of interest does not in fact exist. “Conflict of interest” as used in this Conflict of Interest Policy (COI Policy) encompasses both real and apparent conflicts of interest.

Definition of “Immediate Family Member.” Except as used in the portion of the COI Policy pertaining to HACLA’s Conflict of Interest Code, or when applicable law requires a more expansive definition, the term “immediate family member” means a spouse, domestic partner, mother, father, mother-in-law, father-in-law, daughter-in-law, son-in-law, grandparent, sister, brother, sister-in-law, brother-in-law, aunt, uncle, niece, nephew, first cousin, child, or grandchild of a covered class member, and includes “half” and “step” relatives, e.g., a half-brother or
stepchild. For the purposes of HACLA’s Conflict of Interest Code and the disclosures directly pertaining to that document, “immediate family member” is defined in a manner consistent with Gov. Code § 82029 and 2 Cal. Code Regs. tit. 2, § 18229 (a definition that as of the time of adoption of this COI Policy means spouse, registered domestic partner, and dependent children).

Definition of “Domestic Partner.” Except as used in the portion of the COI Policy pertaining to HACLA’s Conflict of Interest Code, or when applicable law requires a more expansive definition, the term “domestic partner” means a registered domestic partner, or an unrelated and unmarried person who shares common living quarters with a Commissioner or Employee and lives in a committed relationship with that Commissioner or Employee.

Note with Regard to Tenant Commissioners. The conflict of interest provisions contained herein shall not be construed to preclude HACLA tenants from serving as Commissioners, nor shall these provisions be construed as in any manner inhibiting the right of a tenant Commissioner to exercise the full powers vested in their office.

A. Financial Interests in HACLA Housing Subsidies or Contracts. Commissioners, Employees who formulate or influence HACLA policy or administrative decisions, and their immediate family members shall not knowingly own property that is subsidized under any housing program sponsored or administered by HACLA. Commissioners and Employees shall not participate in the selection, award, or administration of a contract if they, or their immediate family members, have a real or apparent conflict of interest. Such a conflict exists if a Commissioner, Employee, their immediate family member, or an organization which employs or is about to employ any of these individuals, has a financial or other interest in, or derives a tangible personal benefit from, a firm considered for a contract.

B. Tenant-Based Case Files. No Commissioner or Employee will knowingly handle HACLA matters related to their own tenant-based case file or the tenant-based case file of an immediate family member.

C. Supervision of Immediate Family Members. No Employee will knowingly supervise an immediate family member.

D. Outside Activities and Interest Form. All Employees shall complete and sign the Outside Activities and Interests form (OAI Form) attached as Exhibit 108:13A. The OAI Form includes disclosures regarding participation as a landlord in HACLA-subsidized voucher programs, immediate family members employed by HACLA, receipt of housing assistance through HACLA, business interests, participation as an officer in outside organizations, outside work as a contractor or in real estate, and vendor relationships with HACLA. The OAI Form shall be signed upon hire and thereafter on at least an annual basis. Employees must fill out the OAI Form completely and to the best of their knowledge. The OAI Form is independent of the Statement of Economic Interest disclosure requirements detailed in HACLA’s Conflict of Interest Code.

E. Due Diligence in Purchases of Real Property; Inheritance of Real Property. Employees are advised to use due diligence during the purchasing process of real property to determine in advance whether program participants reside in the prospective real property. Should a conflict exist as it relates to real property, the Employee has the responsibility to notify HACLA within 10 business days upon obtaining title to such property and resolve the conflict within 12 months from when
the conflict was disclosed. In instances of inheritance of HACLA subsidized property, or other such transfer of interest in real property, HACLA must be notified within 10 business days of receipt of such property. In all cases, the conflict must be resolved according to the procedures described in Section II.F., below.

F. Resolution of Conflicts. Upon becoming aware that a conflict exists, an Employee shall within 10 business days notify their supervisor of the conflict, and shall work with HACLA to promptly resolve the conflict by either:

1. *Obtaining a waiver from the applicable authority (President and CEO or HUD);
2. Terminating the outside activity;
3. Resigning from HACLA;
4. In the case of a familial or personal conflict pursuant to section II.B. or II.C., above, cooperating in a reassignment that removes the caseload issue or supervisory relationship; or
5. In the case of property subsidized under a HACLA sponsored or administered program, such as Section 8, under certain circumstances the Employee may request assistance from HACLA to transfer administration of the contract to another agency.

* Should HUD take longer than the twelve months provided to resolve any conflict of interest to determine whether or not to grant a waiver, HACLA will, to the extent permitted by HUD, extend the time for the employee to resolve the conflict of interest.

G. Disciplinary Action. Failure to disclose a conflict of interest within 10 business days or to promptly resolve a conflict of interest as described throughout this policy shall subject the Employee to disciplinary action, up to and including termination.

H. Appeal Procedures. Should an Employee subject to disciplinary action due to a prohibited act outlined in this Policy wish to appeal the action recommended or taken to resolve such conflict, the Employee shall follow the appeal procedures of the appropriate M.O.U. or Chapter 108:09 of the MPP, as applicable.

III. RELATIONSHIPS WITH CONTRACTORS, VENDORS, TENANTS, AND OTHER SERVICE PROVIDERS

A. Gifts. Commissioners and Employees shall neither solicit nor accept, either directly or indirectly, any form of earned or unearned gift, gratuity, contribution, favor, loan, discount, credit, perk or any other such benefit of monetary value from HACLA’s active or prospective contractors, subcontractors, vendors, or tenants. A non-monetary gift having a value less than or equal to the maximum allowable gift amount for designated employees and local government officials under the Political Reform Act and the regulations of the Fair Political Practices Commission ($500 in cumulative value per gift source per calendar year at the time of adoption of this Policy) and which can reasonably be substantiated as not having been offered in any way to influence the
Commissioner or Employee in their official duties, nor intended as a reward for any official actions performed by the Commissioner or Employee, will be excluded from this prohibition.

B. Sale of Services or Products. Selling any services or products either directly or indirectly, that are not officially sponsored by HACLA to active or prospective contractors, vendors, or tenants is also prohibited. This section is not intended to regulate candy or merchandise of nominal value, which is sometimes displayed and sold in the workplace for a non-profit purpose.

C. Fraternization. Fraternization with tenants in a way that is detrimental to the landlord-tenant relationship or which otherwise tends to compromise HACLA’s fiduciary relationship with its tenants shall be a conflict of interest and grounds for disciplinary action up to and including termination in accordance with the appropriate M.O.U. or Chapter 108:09 of the MPP Part I. Employees are strongly discouraged from entering into romantic relationships with individuals involved in any of the programs provided or administered by HACLA.

IV. OUTSIDE EMPLOYMENT OR ENTERPRISE

A. Outside Employment Generally. Employees will not engage in any outside employment or enterprise that constitutes a real or apparent conflict of interest. Should a conflict of interest be disclosed or discovered, the conflict must be resolved within 30 days, or if the conflict involves HACLA subsidized real property, 12 months, pursuant to the guidelines outlined in Section II.F., above.

B. Outside Employment Form. Employees that seek to engage in outside employment or enterprises shall complete HACLA's Outside Employment form and receive signed permission from the President and CEO or their designee prior to engaging in the activity. The signed form will act as confirmation that there is no real or perceived conflict of interest. Should it be discovered that a conflict of interest exists related to outside employment activities, the Employee must resolve the conflict within 30 days or if the conflict involves HACLA subsidized real property, 12 months, pursuant to Section II.F., above. On an annual basis, the Employee shall renew any such Outside Employment approval that is granted by the President and CEO or their designee.

C. Incompatible Activities. Pursuant to Gov. Code § 1126, Employees are prohibited from any outside employment, activity, or enterprise that:

1. Involves the use for private gain or advantage of HACLA's time, facilities, equipment, resources, supplies, name, badge, uniform, prestige, or influence. Employees shall not seek to receive a discounted rate, perk, credit, or other such benefit due to being employed by or associated with HACLA. A government rate that is generically provided to government employees shall be exempted from this prohibition;

2. Involves receipt or acceptance by the Employee of any money or other consideration from anyone other than HACLA for the performance of an act which the Employee, if not performing such act, would be required or expected to render in the regular course or hours of their employment with HACLA or as part of their duties as a HACLA Employee;
3. Involves the performance of an act in other than their capacity as a HACLA Employee which may later be subject directly or indirectly to the control, inspection, review, audit, or enforcement of HACLA or of any other HACLA Commissioner or Employee; or

4. Involves time demands that would render performance of duties as a HACLA Employee less efficient.

V. CONFIDENTIALITY

Employees are prohibited from using or accessing confidential information, available by virtue of employment with HACLA, for private gain or advantage. Employees are further prohibited from providing confidential information to unauthorized recipients. Employees are required to sign HACLA’s Confidentiality Agreement and any amendments or revisions to that document, which shall be placed within each Employee’s personnel file and a copy of which shall be given to the Employee.

VI. STATEMENT OF FINANCIAL DISCLOSURE

A. Annual Statement of Economic Interest. HACLA Commissioners and Employees shall participate in the annual Statement of Economic Interest (SEI) or other required filing as mandated by local or state law as it relates to fair political practices and ethics in government.

B. Conflict of Interests Code. HACLA has adopted a “Conflict of Interests Code,” utilized as part of the annual SEI process, which is separate from this Policy and attached as Exhibit 108:13B. Such separation is due to the limited number of Employees in designated positions (employees who are in positions that make or participate in the making of decisions which may have a foreseeable material effect on their financial interest) who are required to file the annual SEI forms and to whom the guidelines for filing such SEI disclosures apply.

C. Updates to the Conflict of Interest Code. Schedules A (summary of designated positions) and B (description of filing requirements) of the Conflict of Interest Code will be updated at least every other year (or as otherwise mandated by the Fair Political Practices Commission) in order to ensure accuracy in SEI reporting.

VII. POLITICAL ACTIVITIES AND CONTRIBUTIONS

Commissioners and Employees are subject to the restrictions on political activities of public employees articulated in California’s Government Code. To the extent applicable, Commissioners and Employees are also subject to the provisions of the federal Hatch Act.

A. Political Activities. Commissioners and Employees shall not participate in political activities, nor attend political rallies and political meetings, while on duty with HACLA. Commissioners and Employees are prohibited from engaging in political activity while on duty, in HACLA offices, on HACLA property, wearing an official HACLA uniform, or using a HACLA vehicle.
B. Political Contributions. No Commissioner or Employee shall knowingly solicit political contributions, either directly or indirectly, from other HACLA Commissioners or Employees. Nothing shall prohibit off-duty Commissioners and Employees from soliciting political contributions from the general public, which may include Commissioners or Employees.

VIII. AMENDMENTS TO POLICY

HACLA reserves the right to add, delete, clarify, or change the Policy. Prior to any amendment, HACLA will give notice to the relevant labor associations, and will participate in the meet and confer process as required under the Myers-Milias-Brown Act and other applicable laws.

Upon approval of the Board of Commissioners, the Policy will be amended to reflect such approved changes and notification of such changes will be provided to all Employees.

Upon approval of the Board of Commissioners of this or any amended Conflict of Interest Policy, Employees will sign an acknowledgement form (see Exhibit 108:13C) indicating receipt and understanding of the guidelines as stated herein. The signed acknowledgement form will be placed in each Employee’s personnel file.

IX. HISTORY

Date adopted: January 28, 2021
Board Resolution #: Reso. 9676
EXHIBIT 108:13A
Outside Activities and Interests Form – please see next page
OUTSIDE ACTIVITIES AND INTERESTS

Answer each question on this form as completely as possible and to the best of your knowledge. HACLA may contact you for additional information. If you need more space to provide complete answers, please attach additional pages, numbered to reflect the question(s) for which the additional information is being provided. For the purposes of this form, “immediate family members” include your domestic partner, spouse, mother, father, mother-in-law, father-in-law, daughter-in-law, son-in-law, grandparent, sister, brother, sister-in-law, brother-in-law, aunt, uncle, niece, nephew, first cousin, child, grandchild (whether related as a full relative, or as a “half” or “step” relative, e.g., a half-brother or stepchild). “Domestic partner” means a registered domestic partner, or an unrelated and unmarried person with whom you share common living quarters and that lives in a committed relationship with you.

Name: ___________________________ Work Location: ___________________________
Department: ______________________ For the Calendar Year ending: __________________
Title: ____________________________ Submission Date: __________________________

<table>
<thead>
<tr>
<th>Statement and Questionnaire</th>
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<tbody>
<tr>
<td>1. Do you, your spouse, or your domestic partner (see definition of “domestic partner” above) own (in part or in full) any property that is currently contracted under, or in the process of being contracted under, any HACLA-subsidized voucher program, including but not limited to Section 8? If yes, please provide the complete address for each property.</td>
<td>☐ Yes</td>
<td>☐ No</td>
</tr>
<tr>
<td>2. Aside from yourself and your spouse or domestic partner, do you have any other immediate family members (see definition of “immediate family members” above) that own, in part or in full, any property that currently has a contract with, or is in the process of contracting under, any HACLA-subsidized voucher program, including but not limited to Section 8? If yes, please provide the full name of each immediate family member falling under this description, their family relationship to you (i.e., “brother,” “mother-in-law,” etc.), and the address for each property.</td>
<td>☐ Yes</td>
<td>☐ No</td>
</tr>
<tr>
<td>3. Do you have any immediate family members (see definition of “immediate family members” above) currently employed by HACLA? If yes, please provide the full name of each immediate family member employed by HACLA, their family relationship to you (i.e., “brother,” “mother-in-law,” etc.), and the HACLA department in which they work.</td>
<td>☐ Yes</td>
<td>☐ No</td>
</tr>
<tr>
<td>4. Do you have any immediate family members (see definition of “immediate family members” above) currently receiving assistance through any HACLA program, including Public Housing, Section 8, or any other HACLA-subsidized voucher program? If yes, please provide the full name of each immediate family member, their family relationship to you (i.e., “brother,” “mother-in-law,” etc.), and their home address.</td>
<td>☐ Yes</td>
<td>☐ No</td>
</tr>
</tbody>
</table>
5. Do you own (full or partial interest) or operate a business that transacts business with HACLA, its vendors, its contractors, or its residents? If yes, please indicate the name, address, and nature of the business. This question includes, but is not limited to, interests in multi-level marketing business selling products not directly related to HACLA interests (i.e. Avon, Herbalife, etc.).

<table>
<thead>
<tr>
<th>□ Yes</th>
<th>□ No</th>
<th>□ Don't Know</th>
</tr>
</thead>
</table>

If you answered “yes” to Question 5, please list any HACLA contractors, vendors, or residents with whom your business transacts.

6. Are you an officer of a Corporation, Trust, Partnership, Limited Liability Company, Foundation, Non-Profit Corporation, or other such organization that transacts business with HACLA, its vendors, its contractors, or its residents? If yes, please indicate the name of each such organization, its business type, and your office or title with the organization, along with the names of any HACLA contractors, vendors, or residents with whom the organization transacts.

<table>
<thead>
<tr>
<th>□ Yes</th>
<th>□ No</th>
<th>□ Don't Know</th>
</tr>
</thead>
</table>

7. Are you a licensed contractor that conducts business with contractors or vendors that conduct business with HACLA? If yes, please list the names and addresses of the contractors or vendors with whom you conduct business.

<table>
<thead>
<tr>
<th>□ Yes</th>
<th>□ No</th>
<th>□ Don't Know</th>
</tr>
</thead>
</table>

8. Do you hold a Real Estate license that is under the supervision of a broker or brokerage firm that manages any HACLA-subsidized property? If so, please provide the name and address of the broker or brokerage firm below.

<table>
<thead>
<tr>
<th>□ Yes</th>
<th>□ No</th>
<th>□ Don't Know</th>
</tr>
</thead>
</table>

9. Do you have any immediate family members (see definition of “immediate family members” above) that have a vendor (construction, maintenance, services, goods, etc.) contract with HACLA or any of its programs, or who are in the process of bidding for a vendor contract with HACLA or any of its programs? If yes, please provide the full name of each immediate family member falling under this description, their family relationship to you (i.e., “brother," "mother-in-law," etc.), and the type of contract or contracts involved.

<table>
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<tr>
<th>□ Yes</th>
<th>□ No</th>
<th>□ Don't Know</th>
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</thead>
</table>

Under penalty of perjury under the laws of the State of California, I hereby certify that everything listed above is a true and full statement to the best of my knowledge and belief.

Signed: ____________________________________________ Date: ___________________
EXHIBIT 108:13B

Conflict of Interest Code, Housing Authority of the City of Los Angeles (for SEI Filing) – please see next page
INCORPORATION

The Political Reform Act of 1974 (PRA) requires state and local government agencies to adopt and promulgate conflict of interests codes to help government employees avoid financial conflicts. See California Government Code sections 81000 et seq.

The Fair Political Practices Commission (FPPC) has adopted a regulation that contains the terms of a standard conflict of interests code, can be incorporated by reference, and may be amended by the FPPC to conform to amendments to the PRA after public notice and hearings. The conflict of interests code of the Housing Authority of the City of Los Angeles (HACLA) incorporates by reference that regulation (2 California Code of Regulations section 18730); the attached Schedule A, which identifies each position in the agency that is charged with making or participating in making a government decision; and the attached Schedule B, which identifies the economic interests that the individuals in those designated positions must disclose.

HACLA officials (individuals holding or appointed to a position in Schedule A) must periodically submit statements of economic interests that disclose the economic interests in Schedule B that they held during the reporting period. The statements must be submitted to the Ethics Commission of the City of Los Angeles, which makes the statements available for public inspection and reproduction (see California Government Code section 81008).

HACLA officials are required to comply with the requirements of HACLA’s code and the requirements of state and federal law.
CERTIFICATION

This code accurately designates all positions at HACLA that make or participate in the making of governmental decisions. The disclosure category assigned to each position accurately requires individuals who hold the position to report their investments, business positions, interests in real property, and sources of income that could foreseeably be materially affected by the HACLA decisions they make or participate in making. This code was approved by the HACLA Board of Commissioners on

09/26/2019
(Date)

(Doug Outhwaite)
(Signature)

President and CEO
(Title)

10/2/19
(Date)

This code was adopted by order of the Council of the City of Los Angeles on and is effective as of 11/27/2019
(Date)
City of Los Angeles  
**HOUSING AUTHORITY**  
Conflict of Interests Code  
**DESIGNATED POSITIONS**  
* (Schedule A)  

<table>
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<tr>
<th>Position Title</th>
<th>Disclosure Category</th>
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<tbody>
<tr>
<td>Accounting Supervisor</td>
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<tr>
<td>Administrative Analyst I</td>
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<tr>
<td>Administrative Analyst II</td>
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<td>Administrative Assistant</td>
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<td>Administrative Program Specialist</td>
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<td>Administrative Services Manager</td>
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<td>Asset Manager</td>
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<td>Assistant Director</td>
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<td>Assistant Finance Manager</td>
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</tr>
<tr>
<td>Assistant Finance Officer</td>
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<td>Assistant Housing Manager</td>
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<tr>
<td>Bond Program Manager</td>
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<tr>
<td>Budget Manager</td>
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<td>Building Engineer</td>
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<td>Buyer</td>
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<td>Capital Grant Administrator</td>
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<td>Chief Administrative Officer</td>
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<td>Chief Financial Officer</td>
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<td>Position</td>
<td>Count</td>
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<tr>
<td>Chief Operating Officer</td>
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<td>Chief Strategic Development Officer</td>
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<td>Community Safety Partnership Manager</td>
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<td>Community Relations Officer</td>
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<td>Community Service Center Project Director</td>
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<td>Consultant</td>
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<td>Environmental Coordinator</td>
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<td>Facilities Manager</td>
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<td>Programs Development Manager</td>
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<td>Project Delivery Manager</td>
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<td>Quality Control Manager</td>
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<td>Records Management Specialist</td>
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Resident Development Program Coordinator  
10

Resident Services Manager  
15

Resident Services Site Coordinator  
13

Risk Manager  
8

Safety Coordinator  
5

Section 3 and MBE/WBE Compliance Administrator  
5

Security Supervisor  
6

Senior Accountant  
8

Senior Community Case Manager  
13

Senior Construction Project Manager  
15

Senior Fraud Investigator  
14

Senior Human Resources Analyst  
8

Senior Project Manager  
8

Senior Staff Attorney – Labor Relations  
8

Senior Staff Attorney – Transactional  
5

Staff Attorney - Unlawful Detainer Attorney  
5

Staff Attorney  
5

Special Programs Coordinator  
15

Supervising Construction Project Manager  
15

Supervising Financial Analyst  
8

Supervising Fraud Investigator  
14

Support Services Supervisor  
6
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<tbody>
<tr>
<td>TCC Project Manager</td>
<td>6</td>
</tr>
<tr>
<td>TCC Senior Project Manager</td>
<td>8</td>
</tr>
<tr>
<td>Technology Contracts Analyst</td>
<td>2</td>
</tr>
<tr>
<td>Workers Compensation Coordinator</td>
<td>7</td>
</tr>
<tr>
<td>Workforce Development &amp; Section 3 Manager</td>
<td>8</td>
</tr>
<tr>
<td>Workforce Development Grants Administrator</td>
<td>12</td>
</tr>
</tbody>
</table>
* Consultants/New Positions are 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 President and CEO may determine 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 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 and CEO's determination is a public record and shall be retained for public inspection in the same manner and location as this conflict of interests code. (Gov. Code Section 81008.)
An individual whose position is identified in the Designated Positions section (Schedule A) of an agency's conflict of interests code is a filer and must disclose each economic interest identified below for the disclosure category associated with the individual's position. Disclosure must be made by filing the California Form 700 on specified schedules.

The definitions for investments, business positions, sources of income, interests in real property, doing business, gifts, and other terms may be found in the California Political Reform Act, its associated regulations, and the instructions for the California Form 700. The term “division” means a subset of the filer's agency and, depending on the agency’s structure, may also be known as a department, group, office, section, or other similar term used to indicate a subordinate unit of the agency.

Economic interests must be disclosed for the applicable reporting period. In general, the following types of Form 700 filings have the following reporting periods:

Annual: January 1 through December 31 of the previous calendar year.

Assuming Office: the date the filer assumes office for investments, business positions, and interests in real property; for income, the 12 months immediately preceding the date the filer assumes office.

Leaving Office: the last date covered by the filer’s most recent filing through the date the filer left the designated position.

Reporting periods may vary in individual circumstances and for other types of filings and should be verified with the Ethics Commission.

**Category 1**

Any investment, business position, source of income, or interest in real property.

**Category 2**

A. Any investment in, business position with, or income from a source that did any of the following:

1. Provides the type of services, goods, or equipment used by the filer’s agency;

2. Provided or sought to provide services, goods, or equipment to the filer’s agency; or
3. Was a party or sought to become a party to a written agreement with the filer’s agency.

B. Any interest in real property that was involved in a contracting decision made by or pending with the filer’s agency or is located within 500 feet of such property.

C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer’s agency.

D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer’s agency provided a review, recommendation, or referral.

**Category 3**

A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer’s agency.

B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer’s agency or is located within 500 feet of such property.

**Category 4**

A. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer’s agency.

B. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer’s agency.

C. Any investment in, business position with, or income from a source that did any of the following:
   1. Provides the type of services, goods, or equipment used by the filer’s division;
   2. Provided or sought to provide services, goods, or equipment to the filer’s division; or
   3. Was a party or sought to become a party to a written agreement with the filer’s division.

D. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer’s agency or its employees when the filer’s division provided a review, recommendation, or referral.
Category 5

A. Any investment in, business position with, or income from a source that did any of the following:

1. Provides the type of services, goods, or equipment used by the filer’s agency;
2. Provided or sought to provide services, goods, or equipment to the filer’s agency; or
3. Was a party or sought to become a party to a written agreement with the filer’s agency.

B. Any interest in real property that was involved in a contracting decision made by or pending with the filer’s agency or is located within 500 feet of such property.

C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer’s agency.

D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer’s agency provided a review, recommendation, or referral.

E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer’s agency.

F. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's agency or is located within 500 feet of such property.

Category 6

A. Any investment in, business position with, or income from a source that did any of the following:

1. Provides the type of services, goods, or equipment used by the filer’s agency;
2. Provided or sought to provide services, goods, or equipment to the filer’s agency; or
3. Was a party or sought to become a party to a written agreement with the filer’s agency.

B. Any interest in real property that was involved in a contracting decision made by or pending with the filer’s agency or is located within 500 feet of such property.
C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer’s agency.

D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer’s agency provided a review, recommendation, or referral.

E. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer’s agency.

F. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer’s agency.

G. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer’s agency or its employees when the filer’s division provided a review, recommendation, or referral.

**Category 7**

A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer’s agency.

B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer’s agency or is located within 500 feet of such property.

C. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer’s agency.

D. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer’s agency.

E. Any investment in, business position with, or income from a source that did any of the following:

1. Provides the type of services, goods, or equipment used by the filer’s division;

2. Provided or sought to provide services, goods, or equipment to the filer’s division; or

3. Was a party or sought to become a party to a written agreement with the filer’s division.
F. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer’s agency or its employees when the filer’s division provided a review, recommendation, or referral.

**Category 8**

A. Any investment in, business position with, or income from a source that did any of the following:

1. Provides the type of services, goods, or equipment used by the filer’s agency;
2. Provided or sought to provide services, goods, or equipment to the filer’s agency; or
3. Was a party or sought to become a party to a written agreement with the filer’s agency.

B. Any interest in real property that was involved in a contracting decision made by or pending with the filer’s agency or is located within 500 feet of such property.

C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer’s agency.

D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer’s agency provided a review, recommendation, or referral.

E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer’s agency.

F. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer’s agency or is located within 500 feet of such property.

G. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer’s agency.

H. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer’s agency.

I. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer’s agency or its employees when the filer’s division provided a review, recommendation, or referral.
**Category 9**

A. Any investment in, business position with, or income from a source that did any of the following:

1. Provides the type of services, goods, or equipment used by the filer’s division;

2. Provided or sought to provide services, goods, or equipment to the filer’s division; or

3. Was a party or sought to become a party to a written agreement with the filer’s division.

B. Any interest in real property that was involved in a contracting decision made by or pending with the filer’s division or is located within 500 feet of such property.

C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the City when the filer’s division provided a review, recommendation, or referral.

D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer’s division provided a review, recommendation, or referral.

**Category 10**

A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer’s division.

B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer’s division or is located within 500 feet of such property.

**Category 11**

A. Any income from an individual, or immediate family member of an individual, who was employed by or applied for any position with the filer’s agency when the filer’s division provided a review, recommendation, or referral.

B. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees and for whom the filer’s division provided a review, recommendation, or referral.

C. Any investment in, business position with, or income from a source that did any of the following:
1. Provides the type of services, goods, or equipment used by the filer’s division;

2. Provided or sought to provide services, goods, or equipment to the filer’s division; or

3. Was a party or sought to become a party to a written agreement with the filer’s division.

D. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer’s agency or its employees when the filer’s division provided a review, recommendation, or referral.

Category 12

A. Any investment in, business position with, or income from a source that did any of the following:

1. Provides the type of services, goods, or equipment used by the filer’s division;

2. Provided or sought to provide services, goods, or equipment to the filer’s division; or

3. Was a party or sought to become a party to a written agreement with the filer’s division.

B. Any interest in real property that was involved in a contracting decision made by or pending with the filer’s division or is located within 500 feet of such property.

C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer’s agency when the filer’s division provided a review, recommendation, or referral.

D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer’s division provided a review, recommendation, or referral.

E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer’s division.

F. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer’s division or is located within 500 feet of such property.
**Category 13**

A. Any investment in, business position with, or income from a source that did any of the following:

1. Provides the type of services, goods, or equipment used by the filer’s division;

2. Provided or sought to provide services, goods, or equipment to the filer’s division; or

3. Was a party or sought to become a party to a written agreement with the filer’s division.

B. Any interest in real property that was involved in a contracting decision made by or pending with the filer’s division or is located within 500 feet of such property.

C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer’s agency when the filer’s division provided a review, recommendation, or referral.

D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer’s division provided a review, recommendation, or referral.

E. Any income from an individual, or immediate family member of an individual, who was employed by or applied for any position with the filer’s agency when the filer’s division provided a review, recommendation, or referral.

F. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees and for whom the filer’s division provided a review, recommendation, or referral.

G. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer’s agency or its employees when the filer’s division provided a review, recommendation, or referral.

**Category 14**

A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer’s division.

B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer’s division or is located within 500 feet of such property.
C. Any income from an individual, or immediate family member of an individual, who was employed by or applied for any position with the filer’s agency when the filer’s division provided a review, recommendation, or referral.

D. Any investment in, business position with, or income from a source that did any of the following:
   1. Provides the type of services, goods, or equipment used by the filer’s division;
   2. Provided or sought to provide services, goods, or equipment to the filer’s division; or
   3. Was a party or sought to become a party to a written agreement with the filer’s division.

E. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees and for whom the filer’s division provided a review, recommendation, or referral.

F. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer’s agency or its employees when the filer’s division provided a review, recommendation, or referral.

**Category 15**

A. Any investment in, business position with, or income from a source that did any of the following:
   1. Provides the type of services, goods, or equipment used by the filer’s division;
   2. Provided or sought to provide services, goods, or equipment to the filer’s division; or
   3. Was a party or sought to become a party to a written agreement with the filer’s division.

B. Any interest in real property that was involved in a contracting decision made by or pending with the filer’s division or is located within 500 feet of such property.

C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer’s agency when the filer’s division provided a review, recommendation, or referral.

D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer’s division provided a review, recommendation, or referral.
E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's division.

F. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's division or is located within 500 feet of such property.

G. Any income from an individual, or immediate family member of an individual, who was employed by or applied for any position with the filer's agency when the filer's division provided a review, recommendation, or referral.

H. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees and for whom the filer's division provided a review, recommendation, or referral.

I. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

Category 16

A. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the City when the filer's division provided a review, recommendation, or referral.

B. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees and for whom the filer's division provided a review, recommendation, or referral.

C. Any investment in, business position with, or income from a source that did any of the following:

   1. Provides the type of services, goods, or equipment used by the filer's division;

   2. Provided or sought to provide services, goods, or equipment to the filer's division; or

   3. Was a party or sought to become a party to a written agreement with the filer's division.

D. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to City employees and for which the filer's division provided a review, recommendation, or referral.
E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in a personnel, investigative, enforcement, claim, or litigation matter that involved the filer’s division.

**Category 17**

A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer’s agency.

B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer’s agency or is located within 500 feet of such property.

C. Any investment in, business position with, or income from a source that did any of the following:
   1. Provides the type of services, goods, or equipment used by the filer’s division;
   2. Provided or sought to provide services, goods, or equipment to the filer’s division; or
   3. Was a party or sought to become a party to a written agreement with the filer’s division.

D. Any interest in real property that was involved in a contracting decision made by or pending with the filer’s division or is located within 500 feet of such property.

E. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer’s agency when the filer’s division provided a review, recommendation, or referral.

F. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer’s division provided a review, recommendation, or referral.

**Category 18**

A. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer’s agency.

B. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer’s agency.

C. Any investment in, business position with, or income from a source that did any of the following:
1. Provides the type of services, goods, or equipment used by the filer’s division;

2. Provided or sought to provide services, goods, or equipment to the filer’s division; or

3. Was a party or sought to become a party to a written agreement with the filer’s division.

D. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer’s agency or its employees when the filer’s division provided a review, recommendation, or referral.

E. Any interest in real property that was involved in a contracting decision made by or pending with the filer’s division or is located within 500 feet of such property.

F. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer’s agency when the filer’s division provided a review, recommendation, or referral.

G. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer’s division provided a review, recommendation, or referral.
CONFLICT OF INTEREST POLICY

EXHIBIT 108:13C

Employee Acknowledgement Form for Conflict of Interest Policy – please see next page
I, the undersigned, acknowledge receipt of the Conflict of Interest Policy as provided to me on this_______day of_________,__________.

Under penalty of perjury, I hereby certify that I understand that noncompliance with and/or nondisclosure of required information as stated in the Conflict of Interest Policy may subject me to disciplinary action up to and including termination.

I recognize that signing this document is a condition of employment with the Housing Authority of the City of Los Angeles.

Name: ________________________________

Date: ________________________________