

**PERFORMANCE & ANALYTICS  
CONFLICT OF INTEREST CODE**

**APPENDIX A  
DESIGNATED POSITIONS, DUTIES, AND CATEGORIES**

<b><u>Position</u></b>	<b><u>Duties</u></b>	<b><u>Category</u></b>
Director	<ul style="list-style-type: none"> <li>• Direct the Performance &amp; Analytics Department and serve as the City's Chief Innovation Officer.</li> <li>• Lead the City's performance management and organizational efficiency programs and initiatives, including open data implementation, data analytics, and customer experience and service delivery solutions.</li> <li>• Collaborate with internal and external partners to improve access to and equity of City services and resources.</li> <li>• Present recommendations, research, and reports to the Mayor's Office, City Council, executive leaders, labor organizations, and public.</li> <li>• Prepare budgets and approve expenditures.</li> </ul>	1
Deputy Director, Technology & Innovation	<ul style="list-style-type: none"> <li>• Assist the Director with departmental planning, management, and day-to-day operations.</li> <li>• Lead the Department's Technology &amp; Innovation division and manage the City's Get It Done platform.</li> <li>• Present recommendations, research, and reports to the Mayor's Office, City Council, executive leaders, labor organizations, and public.</li> <li>• Prepare budgets and approve expenditures.</li> </ul>	1
Program Manager	<ul style="list-style-type: none"> <li>• Manage Performance &amp; Analytics Department programs.</li> <li>• Assist the Director and Deputy Director by developing, implementing, and/or monitoring the City's performance management and organizational efficiency programs and initiatives, including open data implementation, data analytics, and customer experience and service delivery solutions.</li> <li>• Direct studies and research, establish and facilitate internal or external working groups and meetings, and conduct analysis.</li> <li>• Create recommendations for consideration by the Mayor and City Council.</li> <li>• Prepare budgets and approve expenditures and provide administrative oversight.</li> <li>• Undertake special assignments, including participation in internal or external working groups and committees, as assigned.</li> </ul>	1

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<b><u>Position</u></b>	<b><u>Duties</u></b>	<b><u>Category</u></b>
Program Coordinator	<ul style="list-style-type: none"><li>• Assist Program Managers, Deputy Director, and Director in developing, implementing, and/or monitoring the City's performance management and organizational efficiency programs and initiatives, including open data implementation, data analytics, and customer experience and service delivery solutions.</li><li>• Manage research and study efforts in support of the City's performance management programs and organizational efficiency initiatives, including open data, data analytics, and customer experience and service delivery solutions.</li><li>• Assist in creating recommendations for consideration by the Mayor and City Council.</li><li>• Make budget and expenditure recommendations.</li><li>• Undertake special assignments, including participation in internal or external working groups and committees, as assigned.</li></ul>	2
Consultant/ New Position	<ul style="list-style-type: none"><li>• Perform consulting or staff services in support of programs managed by the Performance &amp; Analytics Department.</li></ul>	3

## **PERFORMANCE & ANALYTICS CONFLICT OF INTEREST CODE**

### **APPENDIX B DISCLOSURE CATEGORIES**

#### **CATEGORY 1**

1. All reportable investments, business positions, and income (including gifts) from any firm or business entity located in or doing business with the City of San Diego.
2. All reportable interests in real property located in the City of San Diego, including property located within a two-mile radius of any property owned or used by the City.
3. All reportable interests in real property owned or used by any person or business entity that supplies goods or services to the City of San Diego, is a tenant of the City of San Diego, or is granted authority by the City of San Diego to use City facilities.
4. All reportable income, including gifts, from any person or business entity that supplies goods or services to the City of San Diego or is granted authority by the City of San Diego to use City facilities.

#### **CATEGORY 2**

1. All reportable investments and business positions in any firm or business entity that supplies goods or services to the City, is a tenant of the City, is an adverse party to the City in a legal proceeding, or is granted authority by the City to use City facilities.
2. All reportable income, including gifts, from any person or business entity that supplies goods or services to the City, is a tenant of the City, is an adverse party to the City in a legal proceeding, or is granted authority by the City to use City facilities.
3. All reportable interests in real property owned or used by any person or business entity that supplies goods or services to the City, is a tenant of the City, is an adverse party to the City in a legal proceeding or is granted authority by the City of San Diego to use City facilities.

#### **CATEGORY 3**

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

The Director may determine in writing that a particular consultant/new position, although a “designated person,” 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/new position’s duties and, based upon that description, a statement of the extent of disclosure requirements. The Director’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.

Agency Report of:  
New Positions

RECEIVED  
A Public Document

California  
Form 804

2026 JAN -9 AM 9:38

Amendment

CITY  
CITY OF SAN DIEGO

CLERK

Date of Original Filing:

(month, day, year)

1. Agency Name (Also Include, Division, Department, or Region (if applicable))

City of San Diego, Performance & Analytics Department

Agency Contact

Alexander Hempton

Phone Number

619-384-4468

Email

ahempton@sandiego.gov

2. New Position Information

Position Title/Classification and Job Summary	Assigned Category	OR	Disclosure Requirement	Assuming/Start Date (Optional)
Deputy Director GIS (see attached)	Category 1			Start <u>1</u> / <u>2</u> / <sup>2024</sup> <u>m</u> / <u>d</u> / <u>yr</u>
				Start <u>  </u> / <u>  </u> / <u>  </u> <u>m</u> / <u>d</u> / <u>yr</u>
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				Start <u>  </u> / <u>  </u> / <u>  </u> <u>m</u> / <u>d</u> / <u>yr</u>

3. Verification

I have read and understand FPPC Regulations 18700.3 and 18734. I have verified that the disclosure assignment(s) set forth above, is in accordance with its provisions.

or m

Signature

Alex Hempton

Name

Director

Title

1 / 3 / 26

(month, day, year)

Comment: (Use this space or an attachment for any additional information.)

**Print**

**Clear**

## Agency Report of: New Positions

**California Form 804**

## A Public Document

State and local government agencies may use this form to identify new positions that will make or participate in making governmental decisions on behalf of the agency. An individual in a newly created position must file a Statement of Economic Interests (Form 700) within 30 days of assuming office.

This form identifies the Statement of Economic Interests, Form 700, disclosure requirements for individuals serving in new positions. This form is for the agency's internal use and should be maintained by the agency in the same manner as the agency's conflict of interest code. For more information, refer to the FPPC website [www.fppc.ca.gov](http://www.fppc.ca.gov) and Regulations 18700.3 and 18734.

## Disclosure Requirements

- Disclosure requirements should conform to the range of duties.
- Alternatively, the agency must require an individual to file under the broadest disclosure category in the agency's conflict of interest code or, if the agency does not have a conflict of interest code, full disclosure.

Full disclosure includes reporting all investments, business positions, and interests in real property held on the date of assuming office and income received during the 12 months immediately preceding assuming office.

When a new position is added, in addition to completing this form, the agency should begin the process to amend the conflict of interest code.

### *Examples:*

*An agency added a new data processing manager position. The individual will be assigned the same disclosure category that the agency's other IT staff are assigned.*

*An agency implemented a new licensing program and a new manager position was added. Because this was a new program, the agency provided a written description of the individual's disclosure requirements which included sources subject to the licensing procedures.*

*An agency reorganized and changed the duties of several positions listed in the conflict of interest code. This form is not required as positions are not new. The agency should begin to amend its conflict of interest code if the range of authority and types of decisions changed.*

*An agency changed the titles but not the duties and responsibilities of several positions. This form is not required. The agency must file an amendment to update the conflict of interest code.*

## Instructions

## Part 1

Identify the agency, contact information, and provide the amendment explanation in the comment section when applicable.

## Part 2

Identify the new position(s) and describe the position's duties. Identify the disclosure by:

- Assigning an existing category(s) in the agency's code, or
- Writing a disclosure requirement.

Complete if the agency knows the employment date.

### Part 3

The agency's conflict of interest code should identify the position that is responsible for the verification.

## Example

Agency Report of: New Positions		A Public Document																																									
		California Form 804																																									
<p><b>1. Agency Name (Also Include, Division, Department, or Region of Agency)</b></p> <p>CA Joint Powers Authority</p> <p>Agency Contact</p> <p>Smith, Adam      Executive Director</p> <p>Phone Number      555-555-5555</p> <p>E-mail      adam.smith@cjpa.ca.gov</p>																																											
<p><input type="checkbox"/> Amend/Rescind</p> <p>Date of Original Filing: _____ (month, day, year)</p>																																											
<p><b>2. New Position Information</b></p> <table border="1"> <thead> <tr> <th>Position Title/Classification and Job Summary</th> <th>Assigned Category</th> <th>OR</th> <th>Disclosure Requirement</th> <th>Assuming Start Date (Oversize)</th> </tr> </thead> <tbody> <tr> <td>Data Processing Manager (manages IT Dept)</td> <td>3</td> <td></td> <td></td> <td>Start <u>3</u> / <u>13</u> / <u>xx</u> <u>m</u> / <u>1d</u> / <u>yy</u></td> </tr> <tr> <td>Licensing Director (duty statement attached)</td> <td>3</td> <td>All investments, business positions in business entities, and sources</td> <td></td> <td>Start <u>3</u> / <u>8</u> / <u>xx</u> <u>m</u> / <u>1d</u> / <u>yy</u></td> </tr> <tr> <td>Licensing Director (duty statement attached)</td> <td>3</td> <td>of income, including gifts, loans, and travel payments, from entities</td> <td></td> <td>Start <u>1</u> / <u>1</u> / <u>xx</u> <u>m</u> / <u>1d</u> / <u>yy</u></td> </tr> <tr> <td>Licensing Director (duty statement attached)</td> <td>3</td> <td>that are of the type subject to licensing by the Department or are subject</td> <td></td> <td>Start <u>1</u> / <u>1</u> / <u>xx</u> <u>m</u> / <u>1d</u> / <u>yy</u></td> </tr> <tr> <td>Licensing Director (duty statement attached)</td> <td>3</td> <td>to regulation by the Department.</td> <td></td> <td>Start <u>1</u> / <u>1</u> / <u>xx</u> <u>m</u> / <u>1d</u> / <u>yy</u></td> </tr> <tr> <td>Licensing Director (duty statement attached)</td> <td>3</td> <td>(Alternately, attach a written explanation.)</td> <td></td> <td>Start <u>1</u> / <u>1</u> / <u>xx</u> <u>m</u> / <u>1d</u> / <u>yy</u></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td>Start <u>1</u> / <u>1</u> / <u>xx</u> <u>m</u> / <u>1d</u> / <u>yy</u></td> </tr> </tbody> </table>				Position Title/Classification and Job Summary	Assigned Category	OR	Disclosure Requirement	Assuming Start Date (Oversize)	Data Processing Manager (manages IT Dept)	3			Start <u>3</u> / <u>13</u> / <u>xx</u> <u>m</u> / <u>1d</u> / <u>yy</u>	Licensing Director (duty statement attached)	3	All investments, business positions in business entities, and sources		Start <u>3</u> / <u>8</u> / <u>xx</u> <u>m</u> / <u>1d</u> / <u>yy</u>	Licensing Director (duty statement attached)	3	of income, including gifts, loans, and travel payments, from entities		Start <u>1</u> / <u>1</u> / <u>xx</u> <u>m</u> / <u>1d</u> / <u>yy</u>	Licensing Director (duty statement attached)	3	that are of the type subject to licensing by the Department or are subject		Start <u>1</u> / <u>1</u> / <u>xx</u> <u>m</u> / <u>1d</u> / <u>yy</u>	Licensing Director (duty statement attached)	3	to regulation by the Department.		Start <u>1</u> / <u>1</u> / <u>xx</u> <u>m</u> / <u>1d</u> / <u>yy</u>	Licensing Director (duty statement attached)	3	(Alternately, attach a written explanation.)		Start <u>1</u> / <u>1</u> / <u>xx</u> <u>m</u> / <u>1d</u> / <u>yy</u>					Start <u>1</u> / <u>1</u> / <u>xx</u> <u>m</u> / <u>1d</u> / <u>yy</u>
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<p>Adam Smith Signature</p>		<p>Adam Smith Name</p>																																									
		<p>Executive Director Title</p>																																									
<p>3-10-XX (month, day, year)</p>																																											

**Attachment to Form 804**

December 16, 2025

Performance & Analytics Department

City of San Diego

<b>Position</b>	<b>Duties</b>	<b>Category</b>
Deputy Director GIS	Manages the enterprise Geographic Information Systems (GIS) environment and a staff of GIS professionals. Sets enterprise GIS strategy, policies, and procedures. Acts as a liaison between departments on matters related to GIS. Responsible for purchasing supplies and services related to GIS. May participate on selection panels which determine who will be awarded contracts for Citywide information technology purchases and/or services.	1