



Los Angeles City Ethics Commission

December 19, 2018

The Honorable City Council
c/o Holly Wolcott, City Clerk
200 North Spring Street
City Hall – 3rd Floor
Los Angeles, CA 90012

**Re: Amended Conflict of Interests Code
Los Angeles City Employees' Retirement System**

FOR COUNCIL CONSIDERATION
Action Required by **March 19, 2019**

Dear Councilmembers:

Enclosed are proposed amendments to the conflict of interests (COI) code for the Los Angeles Employees' Retirement System (LACERS). As the City's code-reviewing body, the City Council must approve, revise, or return the proposed amendments within 90 days of the date they are received. Cal. Gov't Code §§ 82011(c), 87303. We recommend that you approve the proposed amendments.

A. Background

State law requires every City agency to adopt a COI code to help officials in the agency avoid financial conflicts of interest. Each COI code must identify the positions in the agency that have the authority to make or participate in government decisions, as well as the financial interests that must be reported on California Form 700 by the individuals who occupy those positions. Cal. Gov't Code §§ 87300, 87302(a). Agencies are required to amend their COI codes when changed circumstances make amendments necessary. Cal. Gov't Code § 87306.

B. Elements of a COI Code

A COI code consists of three sections: the incorporation and certification, a list of designated positions (schedule A), and a list of disclosure categories (schedule B). 2 Cal. Code Regs. §§ 18730(a)–18730(b)(3).

The incorporation and certification is a standardized introductory statement that briefly explains the function of the COI code, provides references to relevant sections of the California Political Reform Act and its regulations, and certifies that the entire COI code was approved by the City Council. The incorporation and certification is included in each agency's COI code.

Schedule A is a list of specific positions in the agency that have the authority to make or participate in making decisions that could foreseeably have an effect on a personal financial interest. Each position is assigned to a disclosure category, which is found in Schedule B. The disclosure category is based on the position's type and level of decision-making authority and

describes the types of investments, business positions, sources of income, and interests in real property that must be reported on a statement of economic interests (California Form 700).

C. Process

LACERS's COI code was last amended in 2007 and the existing COI code is provided in Attachment A. A number of staffing changes have occurred since then, and the code requires further amendment to comply with state law and to ensure the code's accuracy. In consultation with the Ethics Commission, LACERS's staff conducted a substantive review, so that the amended code would reflect the agency's current organizational structure and decision-making processes.

On November 9, 2018, a notice of intention to amend LACERS's COI code was emailed to the staff and the unions that represent them and posted on the public bulletin boards in City Hall and City Hall East. A 30-day comment period subsequently began on November 12, 2018 and ended on December 11, 2018. During the comment period, no written comments were received, and no public hearing was requested.

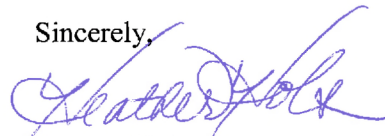
On December 11, 2018, Neil Guglielmo approved LACERS's proposed COI code, confirming that the Schedule A list of designated positions identifies all the individuals in LACERS who are required by state law to file statements of economic interests and that the assigned disclosure categories accurately reflect the scope of each position's decision-making authority. Copies of the proposed schedules are provided in Attachments C and D.

D. Conclusion

On behalf of LACERS, we urge you to approve its amended COI code, which consists of Attachments B, C, and D. Under State law, City Council action on the amended code is required by March 19, 2019 (90 days after this transmittal is received).

If you have any questions, please contact Samantha Rodriguez at (213) 978-1960.

Sincerely,



Heather Holt
Executive Director

Attachments:

- A Current Agency COI Code*
- B Incorporation and Certification*
- C Proposed Schedule A – Designated Positions*
- D Proposed Schedule B – Disclosure Categories*

cc: Assistant City Attorney Renee Stadel

**LOS ANGELES CITY EMPLOYEES' RETIREMENT SYSTEM
CONFLICT OF INTEREST CODE – SCHEDULE A
List of Designated Financial Disclosure Filing Positions**

<u>Position Title</u>	<u>Disclosure Category</u>
Members, Board of Administration	1
General Manager – LACERS	1
Assistant General Manager – LACERS	1
Chief Investment Officer	1
Investment Officer II	1
Investment Officer I	1
Investment/Money Manager	1
Internal Auditor IV	1
Chief Management Analyst (Admin. Services Division)	1
Principal Accountant (Chief Accounting Employee)	2
Senior Management Analyst II (Departmental Services Section)	2, 3, 4, 5
Senior Systems Analyst II	3
Chief Benefits Analyst (Health Benefits Admin. Division)	4
Senior Management Analyst II (Health Benefits Admin. Division)	4
Chief Benefits Analyst (Retirement Services Division)	4
Senior Management Analyst II (Benefits Processing Section)	4
Senior Management Analyst I (Executive Office – Strategic Planning)	4
Senior Management Analyst I (Executive Office – Member Communications)	5
Consultant	*

* Whether any individual is a consultant shall be determined by the Executive Director, who also determines which of the above categories is applicable to that consultant.

Agency Report of: **FEB 08 2017**
New Positions

A Public Document

California Form **804**

RECEIVED

1. Agency Name (Also include, Division, Department, or Region (if applicable)) LOS ANGELES CITY EMPLOYEES' RETIREMENT SYSTEM (LACERS)		<input type="checkbox"/> Amendment
Agency Contact (Last Name, First Name, Title) PERRY, RUTH, SENIOR MANAGEMENT ANALYST II		Date of Original Filing: January 27, 2017 (month, day, year)
Area Code/Phone Number (213) 473-7175	E-mail RUTH.PERRY@LACERS.ORG	

2. New Position Information

Position Title/Classification and Job Summary	Assigned Category	OR	Disclosure Requirement	Assuming/Start Date (Optional)
DEPT AUDIT MANAGER	1			Start 07 / 01 / 12 d / m / yr
INVESTMENT OFFICER III	1			Start 07 / 01 / 12 d / m / yr
INFORMATION SYSTEMS MGR	3			Start 07 / 01 / 11 d / m / yr
DEPT CHIEF ACCOUNTANT III	2			Start 07 / 01 / 10 d / m / yr
				Start / / d / m / yr
				Start / / d / m / yr
				Start / / d / m / yr

3. Verification

I have read and understand FPPC Regulations 18701 and 18734. I have verified that the disclosure assignment(s) set forth above, is in accordance with its provisions.

	RUTH PERRY	SR MGMT ANALYST II	01/27/17
	Print Name	Title	(month, day, year)

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

LOS ANGELES CITY EMPLOYEES' RETIREMENT SYSTEM
CONFLICT OF INTEREST CODE – SCHEDULE B
List of Disclosure Categories

General Provision

A designated employee 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.

Category 1

As required by State law (Government Code §87200), positions in this classification must disclose all investments, income, and interests in real property as defined in this Conflict of Interest Code.

Category 2

- A. Any investment in, income from, or business positions with any person or business entity engaged in providing accounting or auditing services.
- B. Any investment in, income from, or business positions with any person or business entity engaged in actuarial evaluations and/or manufacturing, selling, maintaining, or distributing computer hardware or software pertaining to benefits administration, record keeping, investments, or accounting.

Category 3

- A. Any investment in, income from, or business positions with any person or business entity which manufactures, sells, maintains, or distributes computer systems, hardware and/or software application products, or provides computer consulting services.
- B. Any investment in, income from, or business positions with any person or business entity that markets computer-based training services or management services.

Category 4

- A. Any investment in, income from, or business positions with any person or business entity engaged in providing healthcare services or healthcare consultant services, actuarial services, auditing services, or pension fund consulting services.

- B. Any investment in, income from, or business positions with any person or business entity engaged in providing medical evaluation reports.

Category 5

Any investment in, income from, or business positions with any person or business entity engaged in providing printing services or media production services.

**LOS ANGELES CITY EMPLOYEES' RETIREMENT
SYSTEM
CITY OF LOS ANGELES**

CONFLICT OF INTERESTS CODE
Incorporation and Certification
Page 1 of 2

Effective Date:

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. This agency's conflict of interests code 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.

City officials (individuals holding, elected to, 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, which makes the statements available for public inspection and reproduction (see California Government Code section 81008).

City officials are required to comply with the requirements of their agency's code and the requirements of state and City law.

**LOS ANGELES CITY EMPLOYEES' RETIREMENT
SYSTEM
CITY OF LOS ANGELES**

CONFLICT OF INTERESTS CODE
Incorporation and Certification
Page 2 of 2

Effective Date:

CERTIFICATION

This code accurately designates all positions in the agency 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 City decisions they make or participate in making. This code was approved by the agency's general manager or its governing board or commission on

December 11, 2018

(Date)

Mildred Rodriguez
(Signature)

General Manager
(Title)

12/18/18
(Date)

This code was adopted by order of the Council of the City of Los Angeles on and is effective as of _____
(Date)

Holly Wolcott, City Clerk

BY _____
Deputy City Clerk

City of Los Angeles
LOS ANGELES CITY EMPLOYEES' RETIREMENT SYSTEM
 Conflict of Interests Code
DESIGNATED POSITIONS
(Schedule A)

<u>Position Title</u>	<u>Disclosure Category</u>
Assistant General Manager	1
Chief Benefits Analyst	8
Chief Investment Officer	*
Consultant	**
Departmental Audit Manager	1
Departmental Chief Accountant	1
Fiscal Systems Specialist	6
General Manager	*
Information Systems Manager	2
Internal Auditor	1
Investment Officer	1
Member, Los Angeles City Employees' Retirement System Board	*
Senior Management Analyst	8
Senior Personnel Analyst	8

* Government Code Section 87200 *et seq.* requires that all filers in this classification disclose all investments, business positions, income, and interests in real property.

** 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 General Manager may determine in writing that a particular consultant, although a "designated position," is hired to perform a range of duties that is

Final Code
11/08/18

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 General Manager'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.)

City of Los Angeles

LOS ANGELES CITY EMPLOYEES' RETIREMENT SYSTEM

Conflict of Interests Code
DISCLOSURE CATEGORIES
(Schedule B)

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:
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 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:
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 - 2. Provided or sought to provide services, goods, or equipment to the filer's division;
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 - 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.
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- 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:
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 - 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.
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- 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.
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- D. Any investment in, business position with, or income from a source that did any of the following:
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- 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.
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Category 15

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- 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.
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- 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.
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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.