

February 5, 2020

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
Department of Recreation and Parks

FOR COUNCIL CONSIDERATION
Action Required by **May 5, 2020**

Dear Councilmembers:

Enclosed are proposed amendments to the conflict of interests (COI) code for the Department of Recreation and Parks (RAP). 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 amended COI code, which is provided in Attachments A through C.

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. Code Elements

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 standard introductory statement that is included in each agency's COI code. It briefly explains the code, refers to relevant sections of state law, and certifies that the code was approved by the City Council.

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

RAP's COI code was last amended in 2003, and the existing COI code is provided in Attachment E. 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, RAP's staff conducted a substantive review, and the amended code reflects the agency's current organizational structure and decision-making processes.

On August 15, 2019, a notice of intention to amend RAP's COI code was emailed to the staff and the unions that represent them, and it was posted on the public bulletin boards in City Hall and City Hall East. A 30-day comment period began that day and ended on September 14, 2019. During the comment period, a public hearing was not requested, but six written comments were received. The comments are provided in Attachment D. As a result of one of the written comments, changes were incorporated into RAP's proposed Schedule A.

Because of the changes to Schedule A, a second 30-day comment period was required. On September 30, 2019, a notice of intention to amend RAP's COI code was emailed to the staff and the unions that represent them, and it was posted on the public bulletin boards in City Hall and City Hall East. The second comment period began that day and ended on October 30, 2019. During this comment period, a public hearing was not requested, but five written comments were received. The comments are provided in Attachment D. No further changes were made to RAP's proposed COI code as a result of the comments.

On September November 20, 2019, RAP's governing board approved the proposed COI code, confirming that the Schedule A list of designated positions identifies all the individuals in RAP 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 A and B.

D. Conclusion

On behalf of RAP, we urge you to approve its amended COI code, which is provided in Attachments A, B, and C. Under State law, City Council action on the amended code is required by May 5, 2020 (90 days after this transmittal is received). If you have any questions, please contact Ethics Program Manager Samantha Rodriguez at (213) 978-1941.

Sincerely,



Heather Holt
Executive Director

Attachments:

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

cc: Assistant City Attorney Renee Stadel

City of Los Angeles
DEPARTMENT OF RECREATION AND PARKS
Conflict of Interests Code
DESIGNATED POSITIONS
(Schedule A)

<u>Position Title</u>	<u>Disclosure Category</u>
Accountant	5
Air Conditioning Mechanic Supervisor	9
Aquarium Educator	9
Aquatic Director	13
Aquatic Facility Manager	13
Architect	5
Associate Observatory Director	13
Architectural Associate	2
Assistant General Manager Recreation & Parks	1
Banning Residence Museum Director	15
Building Civil Engineer	5, 11
Building Repair Supervisor	15
Carpenter Supervisor	9
City Planner	14
City Planning Associate	5
Civil Engineer	5
Civil Engineering Associate	5
Chief Clerk Personnel	4

Chief Financial Officer	1
Chief Management Analyst	8
Chief Park Ranger	8
Child Care Center Director	15
Community Program Director	6
Construction & Maintenance Superintendent	2
Construction and Maintenance Supervisor	2
Consultant	*
Curator of Griffith Observatory	13
Departmental Chief Accountant	1
Director of Systems	5
Electrical Engineering Associate	5
Electrician Supervisor	9
Environmental Specialist	3
Environmental Supervisor	5
Equipment Specialist	3
Executive Director Expo Center	1
Financial Analyst	5
Fiscal Systems Specialist	6
General Manager	1
Golf Manager	15
Golf Operations Supervisor	13
Golf Starter Supervisor	14
Historic Site Curator	9

Landscape Architect	13
Landscape Architectural Associate	9
Management Analyst	2
Marine Aquarium Administrator	15
Marine Aquarium Program Director	9
Marine Aquarium Exhibits Director	9
Maritime Museum Director	15
Maritime Museum Curator	9
Mechanical Repair General Supervisor	9
Member, Board of Commissioners	1
Observatory Director	15
Observatory Program Supervisor	13
Observatory Technical Supervisor	9
Park Maintenance Supervisor	13
Park Services Supervisor	13
Payroll Supervisor	4
Personnel Director	8
Personnel Records Supervisor	11
Playground Equipment Supervisor	9
Principal Accountant	8
Principal Civil Engineer	5
Principal Clerk Personnel	4
Principal Project Coordinator	5
Principal Recreation Supervisor	15

Public Information Director	1
Public Relations Specialist	5
Recreation Facility Director	15
Recreation Supervisor	15
Recreation Coordinator	15
Risk Manager	5
Roofer Supervisor	9
Safety Engineer	5
Safety Engineering Associate	5
Senior Accountant	8
Senior Auditor	1
Senior Management Analyst	8
Senior Park Ranger	14
Senior Personnel Analyst	8
Senior Photographer	11
Senior Recreation Director	15
Senior Systems Analyst	6
Service Coordinator	2
Sheet Metal Supervisor	9
Structural Engineering Associate	5
Superintendent of Recreation and Parks Operations	1
Systems Analyst	2
Systems Programmer	2

Video Production Coordinator	9
Volunteer Coordinator	2

- * 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 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
DEPARTMENT OF RECREATION AND PARKS

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:
 - 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;
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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 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:
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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.
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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.
- 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.
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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 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.
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- 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.
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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;
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- 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.

**DEPARTMENT OF RECREATION AN PARKS
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.

DEPARTMENT OF RECREATION AN PARKS
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

11/20/19
(Date)


(Signature)

General Manager
(Title)

12/5/19
(Date)



Sally De Leon [Redacted]

NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE

Elizabeth Gutierrez [Redacted]
To: Sally De Leon <[Redacted]>

Fri, Aug 16, 2019 at 2:18 PM

Hi Sally,

I have some questions about this.... who should I contact?

Thank you,

Elizabeth N. Gutiérrez
Griffith Observatory

[Quoted text hidden]



Sally De Leon [REDACTED]

NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE

Sally De Leon [REDACTED]

Fri, Aug 16, 2019 at 2:21 PM

To: Elizabeth Gutierrez [REDACTED]

Hi Elizabeth,

I can assist you, and if I do not have the answers, I will inquire.
What are your questions?

[Quoted text hidden]

[Quoted text hidden]



Sally De Leon [REDACTED]

NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE

Elizabeth Gutierrez [REDACTED]

Fri, Aug 16, 2019 at 2:26 PM

To: Sally De Leon [REDACTED]

Thank you!

And sorry, .. I'm not following what the requested changes are.... is it the list of staff affected?

Because I wanted to mention that, certainly at least for us here at the Observatory, only Dr. Krupp's information is correct.
But I also noticed other errors.

Thank you for clarifying..

[Quoted text hidden]



Sally De Leon [REDACTED]

NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE

Lily Astorga [REDACTED]

Fri, Aug 16, 2019 at 4:13 PM

To: Mark Pine [REDACTED]

Cc: Sally De Leon [REDACTED]

Hi Mark,

Sally De Leon should be able to assist you with this. I have included her in this email response.

Thank you.

On Fri, Aug 16, 2019 at 10:23 AM Mark Pine [REDACTED] wrote:

Hi Lily -

If there are errors or comments I need to make on this, do I send through the formal process or through HR? Things like classifications that don't exist?

Thanks, Mark

[Quoted text hidden]

Lily Astorga

Recreation & Parks Human Resources

[REDACTED]



Sally De Leon [REDACTED]

NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE

Sally De Leon [REDACTED]

Mon, Aug 19, 2019 at 10:10 AM

To: Elizabeth Gutierrez [REDACTED]

Hello,

No problem. What kind of errors, on what section?

The **Current Code** is the one that is currently in existense, it is really outdated, as you can see.

The **Proposed Code** is what is being proposed, which means that if it is passed, it will replace the current code and the classes listed under schedule A will become designated filers.

The **Proposed Schedule B** is a decription of each category, categories are reflected to the right of each class on the proposed schedule B.

Did this anwer your question?

[Quoted text hidden]

[Quoted text hidden]



Sally De Leon [REDACTED]

NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE

Sally De Leon [REDACTED]

Mon, Aug 19, 2019 at 10:14 AM

To: Mark Pine [REDACTED]

Hi Mark,

Are you referring to the current code? If not, what section are you referring to?

I am your contact for this, please email me your questions/comments and I will be able to assist you.

[Quoted text hidden]



Sally De Leon [REDACTED]

NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE

Mark Pine [REDACTED]

Mon, Aug 19, 2019 at 10:51 AM

To: Sally De Leon [REDACTED]

Thanks Sally. I will send you all my comments, and you can advise if any of them need to be submitted through another process.

One example: one of the positions listed in the proposed changes (Associate Observatory Director) does not exist.

[Quoted text hidden]



Sally De Leon <[REDACTED]>

NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE

Bill Violante <[REDACTED]>

Wed, Aug 21, 2019 at 7:25 AM

To: Sally De Leon <[REDACTED]>

Good Morning:

Without knowing what EAA members and what specific jobs are being performed by those members that would require they disclose pursuant Government Code Section 87300 and 87306 EAA is unable provide any input at this time. Should there be an issue EAA with one of our members, EAA will look at each individual case and handle as appropriate on a case by case basis.

Best Regards,

Bill

“Strength in Unity”

Bill Violante

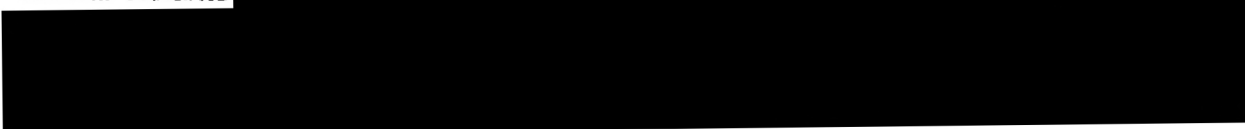
Executive Director



From: Sally De Leon <[REDACTED]>

Date: Thursday, August 15, 2019 at 7:02 PM

To: Bill Violante <[REDACTED]>





Sally De Leon [REDACTED]

NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE

Mark Pine [REDACTED]

Wed, Aug 21, 2019 at 5:19 PM

To: Sally De Leon [REDACTED], Mark Pine [REDACTED]

Cc: Jennifer Wong [REDACTED]

Hi again Sally -

I've gone through the entire list of positions, with a focus on the Observatory, and have the following comments. I'll confess I don't understand if the list of positions is somehow mandated by the code (i.e., above a certain salary level or in a certain type of field), so you can disregard any comments over which the Department has no purview. But it seemed like the list was crafted BY the Department, so hopefully there is a chance to revisit some of the decisions.

I'll proceed through the list in alphabetical order:

Associate Observatory Director

There is no such classification.

Astronomical Lecturer

This one was not part of the list in the past, and there is no reason it should be on the list now. The only possible justification would be that the position is exempt.

Building Repair Supervisor

Correct classification name is Building Repairer Supervisor.

Chief of Staff / Executive Officer

Neither of these classifications is listed. Executive Officer was on the old list.

Observatory Director

I'm assuming this covers both levels of the classification.

Observatory Program Supervisor

This classification was on the old list, but largely because it was the senior programming position at the Observatory. That spot is now held by the Curator of Griffith Observatory (which did get added to the list), to which the Observatory Program Supervisor reports. I'm not sure it still needs to be on the list.

Park Services Supervisor

This classification was on the old list but has been omitted for some reason from this list. It should be added, especially since lower-level positions in the job series (Principal Park Services Attendant and Senior Park Services Attendant) are included. I'm assuming this is just an oversight. But, if not, then I'd recommend removing the two lower-level positions as well.

Video Production Coordinator

This was not on the old list and has been added for some reason. I can see no rationale for that change, given the scope and responsibilities of the position, at least as it is used by the Observatory. We have the only Video Production Coordinator in the Department.

Volunteer Coordinator

I'm mystified by why this position would be added to this list. Neither its salary level nor responsibilities would seem to justify it.

As currently written (plus the Park Services Supervisor), the following 14 full-time staff members (out of 24 total) from the Observatory would have to report:

Observatory Director I / II (one of each)
Curator of Griffith Observatory
Observatory Program Supervisor
Astronomical Lecturer
Video Production Coordinator (proposed for deletion)



Sally De Leon <sally.deleon@lacity.org>

NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE

Sally De Leon [REDACTED]

Thu, Aug 22, 2019 at 8:30 AM

To: Mark Pine [REDACTED]

Cc: Jennifer Wong [REDACTED]

Good morning Mark,

Thank you for the input. I will discuss with Harold and the Ethics Commission, and will get back to you as soon as I have a response.

Have a great day.

[Quoted text hidden]

[Quoted text hidden]



Sally De Leon [REDACTED]

**NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE
SECOND PUBLIC COMMENT PERIOD**

Vanessa Leyva [REDACTED]

Mon, Sep 30, 2019 at 1:14 PM

To: Sally De Leon [REDACTED]

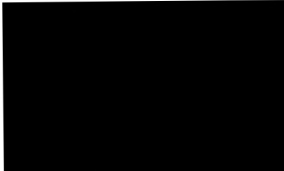
Good afternoon Sally,

I think this email was sent to me in error. Please advise.

Kind regards,

[Quoted text hidden]

--
Vanessa Leyva
Recreation Coordinator
City of Los Angeles
Department of Recreation & Parks
Ramona Hall Community Center





Sally De Leon [redacted]

**NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE
SECOND PUBLIC COMMENT PERIOD**

Cristina Lovett <[redacted]>
To: Sally De Leon <[redacted]>

Mon, Sep 30, 2019 at 1:22 PM

Hello Ms. De Leon,

The Rec&Parks Current Code pdf is really out of date. Many of those people have retired or have been promoted. I don't know if that matters, though, because the positions are the same. Either way, I don't mean to be rude, just thought to let you know since the date on the Notice of Intention is dated today.

Thank you for sending this out - it's definitely a good thing to know.

All the best,

Cristina Lovett
Westchester Senior Center
[redacted]

On Mon, Sep 30, 2019 at 12:30 PM Sally De Leon <[redacted]> wrote:
[Quoted text hidden]



Sally De Leon [REDACTED]

**NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE
SECOND PUBLIC COMMENT PERIOD**

James Muff [REDACTED]

Mon, Sep 30, 2019 at 1:29 PM

To: Sally De Leon [REDACTED]

Hi Sally, I have no idea why you sent this to me but looking at the list of names I can tell this is a very old list. I started on the Pool and Pump Crew in 1996 and I remember John Vowels from Aquatics I believe he retired in 1998 or so. I think we have had two or three GMs since then. This list is seriously old. I have no comments on the proposed amendments.

Please tell me why this was sent to me.

Thank you,

James Muff

[REDACTED]

On Mon, Sep 30, 2019 at 12:30 PM Sally De Leon [REDACTED] wrote:
[Quoted text hidden]



Sally De Leon [REDACTED]

**NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE
SECOND PUBLIC COMMENT PERIOD**

Sally De Leon [REDACTED]
To: Cristina Lovett [REDACTED]

Mon, Sep 30, 2019 at 1:36 PM

Hello Cristina,

Thank you for your email.

The attached current code is for your information only, and it is extremely outdated which is why it is being updated. The **proposed code** is also attached for your reference (3rd attachment - Revised COI Code), that is the code that will supersede the current code, if approved. Let me know if you have any questions.

[Quoted text hidden]

[Quoted text hidden]



Sally De Leon [REDACTED]

**NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE
SECOND PUBLIC COMMENT PERIOD**

Sally De Leon [REDACTED]

Mon, Sep 30, 2019 at 2:01 PM

To: James Muff <[REDACTED]>

Hello James,

The email was sent to everyone who will be affected by the proposed code in one way or the other. The current code is extremely outdated which is why the Ethics Commission is working with RAP to update it, and it is attached for your reference as is the revised, proposed COI code (3rd attachment), which will supersede the current code, if approved.

Let me know if you have additional questions.

[Quoted text hidden]

[Quoted text hidden]



Sally De Leon <[REDACTED]>

**NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE
SECOND PUBLIC COMMENT PERIOD**

Sally De Leon [REDACTED]
To: Vanessa Leyva [REDACTED]

Mon, Sep 30, 2019 at 2:33 PM

Hi Vanessa,

The email was sent to everyone who will be potentially affected if the proposed COI code is approved (attachment 3).
Let me know if you have additional questions.

[Quoted text hidden]

[Quoted text hidden]



Sally De Leon [Redacted]

**NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE
SECOND PUBLIC COMMENT PERIOD**

Sylvia Patsouras [Redacted]
To: Sally De Leon [Redacted]
Cc: Harold Arrivillaga [Redacted]

Mon, Sep 30, 2019 at 3:28 PM

Hi Sally,
I don't know if Schedule A under the attachment Current Code... is just a sample, but it needs to be updated.
Thanks.
Sylvia

Sylvia Patsouras, President
Board of Recreation and Park Commissioners

On Monday, September 30, 2019, 12:32:31 PM PDT, Sally De Leon [Redacted] wrote:

Hello,

*****SECOND PUBLIC COMMENT PERIOD*****

NOTICE IS HEREBY GIVEN that the Department of Recreation and Parks intends to amend a conflict of interest code.

Attached for your reference:

- Notice of Intention (Second public comment period)
- Current Code
- Proposed Schedule A
- Proposed Schedule B

Thank you.

Sally De León 😊
Secretary to Harold Fujita, Director of Human Resources

City of Los Angeles
Department of Recreation and Parks
[Redacted]

4 attachments

- Notice of Intention 09302019.pdf**
306K
- Rec&Parks Current Code.pdf**
585K



Sally De Leon [REDACTED]

**NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE
SECOND PUBLIC COMMENT PERIOD**

Sally De Leon [REDACTED]

Mon, Sep 30, 2019 at 3:46 PM

To: Sylvia Patsouras [REDACTED]

Cc: Harold Arrivillaga [REDACTED]

Hi Sylvia,

Thank you for your email.

The current code is extremely outdated which is why the Ethics Commission is working with RAP to update it. The revised, proposed Schedule A -COI code (3rd attachment), will supersede the current code, if approved. Let me know if you have any questions.

[Quoted text hidden]

[Quoted text hidden]



Sally De Leon [REDACTED]

**NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE
SECOND PUBLIC COMMENT PERIOD**

Alfred Tutungi [REDACTED]
To: Sally De Leon [REDACTED]

Mon, Oct 7, 2019 at 10:00 AM

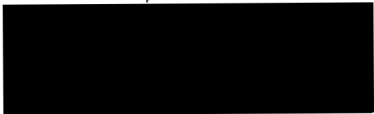
Hello Sally,

Why am I getting this notice.?

On Mon, Sep 30, 2019 at 12:30 PM Sally De Leon [REDACTED] wrote:
[Quoted text hidden]

--
Thank you,

Alfred Tutungi
Sr. Rec. Dir. II
North Hollywood R.C.



[Come Grow With Us, Click Here](#)



Sally De Leon [REDACTED]

**NOTIFICATION OF INTENTION TO AMEND THE CONFLICT OF INTEREST CODE
SECOND PUBLIC COMMENT PERIOD**

Sally De Leon [REDACTED]

Tue, Oct 8, 2019 at 2:07 PM

To: Alfred Tutungi [REDACTED]

Hello Alfred,

The email was sent to everyone who will be affected by the proposed code in one way or the other. The current code is extremely outdated which is why the Ethics Commission is working with RAP to update it, and it is attached for your reference as is the revised, proposed COI code (3rd attachment), which will supersede the current code, if approved.
Let me know if you have additional questions.

[Quoted text hidden]

[Quoted text hidden]

**DEPARTMENT OF RECREATION AND PARKS
REVISED CONFLICT OF INTEREST CODE
SCHEDULE A**

Designated Positions

Category

Board of Commissioners	1	L.Chase,M.Medavoy,D.Michaelson,R.Nizich,L.Specht
General Manager	1	E.Oppenheim
Senior Management Analyst I (Council Liaison)	1	M. Bingham
Executive Officer	1	M.Matthews
Principal Recreation Supervisor II (Class Parks)	3	M.White

Recreation and Parks Operations

Assistant General Manager	1	T.Coroalles
Senior Management Analyst II	1	L.Barth
Superintendent	1	M.Mariscal,G.Lum,K.Regan
Principal Recreation Supervisor II	3	E.Ferrante,M.Marquand,D.Rolland
Principal Grounds Maintenance Supervisor II	2	J.Ward,P.Kennedy,R.Berkowitz,S.Ball
Senior Park Maintenance Supervisor	2	T.McCall,R.Davis,A.Gonzalez,J.Vara,W.Lopez,J.Hammontree T.Chant,M.Castille,J.Medina,D.Wood
Principal Recreation Supervisor II (ClassParks/Youth Plus Prgm)	3	M.White
Principal Recreation Supervisor I (Class Parks/Youth Plus Prgm)	3	G.Baer,R.Gonzalez,S.Pina-Cortez
Recreation Supervisor	4	E.Bates,A.Henriquez,W.Wilkinson,A.Meacham,M.Wooden, J.Venditto,J.Pierce,T.Tellis,C.Chavoor,P.Orland,R.Kater,V.Punzal

Recreation and Parks Operations - Railroad Museum

Railroad Museum Director	5	Vacant
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Recreation and Parks Operations - Griffith Observatory

Director	5	E.Krupp
Management Analyst II	5	K.Warren
Observatory Program Supervisor	5	J.Mosley
Observatory Technical Supervisor	5	E.Vanderwall

Recreation and Parks Operations-Hollywood Museum, Sign & Travel Town

Senior Management Analyst II	5	L.Barth
Park Services Supervisor	6	D.Treadwell
Management Analyst II (Special Facility Liaison)	6	T.Petrique,T.Breckner,L.Loomis
Principal Park Services Attd: (Sherman Oaks Castle Park)*	6	J.Bolan
Systems Analyst II*	7	L.Draus

Recreation and Parks Operations - Banning Residence & Museum

Director	5	Vacant
Curator*	5	M.Sanborn

**DEPARTMENT OF RECREATION AND PARKS
REVISED CONFLICT OF INTEREST CODE
SCHEDULE A**

Recreation and Parks Operations - Cabrillo Marine Aquarium

Director	5	S.Lawrenz-Miller
Curator	5	C.Okamoto,E.Mastro,S.Vogel
Exhibits Director	5	M.Schaadt
Program Director	5	L.Fukuhara

Recreation and Parks Operations - Drum Barracks

Historic Sight Curator*	5	S.Ogle
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Recreation and Parks Operations - Fort MacArthur Military Museum

Director*	5	S.Nelson
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Recreation and Parks Operations - Los Angeles Maritime Museum

Director	5	W.Lee
Curator	5	M.Trivelli

Community Services

Assistant General Manager	1	J.Combs
Senior Management Analyst II*	1	G.Robison
Principal Recreation Supervisor II	3	V.Israel
Child Care Program Manager*	4	C.James
Senior Recreation Director I (Pershing Square)*	4	L.Capone
Principal Recreation Supervisor I (Senior Citizens Program)	4	L.Ritzman
Principal Recreation Supervisor I (Aquatics)	3	J.Vowles
Aquatic Director (Aquatics)	4	J.Batarse,R.Godino,P.Delgado
Principal Recreation Supervisor I (Community Services)	3	B.King
Project Assistant (L.A.Y.A.C.)*	4	M.Rios
Recreation Supervisor (Muni-Sports/Camps)	4	C.Singer
Recreation Supervisor (L.A. Kids)	4	S.Vollmer
Recreation Supervisor (Community Services)	4	A.Vollmer
Recreation Supervisor (Senior Citizens Program)	4	S.Kalsman
Senior Recreation Director I (Senior Citizens Program)	4	R.Brown

Community Services - Facility Repair

Superintendent	1	G.Stigile
Construction & Maintenance Supervisor II	2	M.Fea,C.Richmond,Vacant

Community Services - Golf Operations

Golf Manager*	2	C. Williams
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**DEPARTMENT OF RECREATION AND PARKS
REVISED CONFLICT OF INTEREST CODE
SCHEDULE A**

Golf Operations Supervisor*	2	Vacant
Senior Park Maintenance Supervisor	2	K.Novak
<u>Community Services - Rangers/Communications/Emergency Management</u>		
Chief Park Ranger	8	Vacant
<u>Community Services - Forestry</u>		
Principal Grounds Maintenance Supervisor II	2	T.Prosciewicz
<u>Community Services - Equipment</u>		
Equipment Specialist II	9	T.Lien,R.Quintero
<u>Planning and Construction</u>		
Assistant General Manager	1	M.Tamuri
Superintendent of Recreation and Parks	1	R.Fawcett
Senior Management Analyst I*	10	J.Miller
<u>Environmental/Analysis</u>		
Environmental Supervisor I*	10	D.Attaway, D.Barker
Environmental Specialist II*	10	Vacant,P.Davis
<u>Land Management Division</u>		
Senior Management Analyst II*	10	L.Dudley
Management Analyst II*	11	Vacant,Vacant,J.Alvarez,B.Reynolds,D.Tolliffee
Senior Management Analyst I*	10	J.Rietzel,Vacant
<u>Advance Planning Division</u>		
City Planner	10	C.Didier
City Planning Assoc II*	10	Vacant
Management Analyst II*	11	A.Cornier
<u>Design and Construction Division/Project Management</u>		
Contract Administrator	10	A.Delao,R.Klink
Landscape Architect I	10	K.Burmer,R.Gutierrez,V.Halvey
Landscape Architect Assoc II	10	Vacant
Landscape Architect IV	10	K.Chan
<u>Design and Construction Division/Project Management continued:</u>		
Architect	10	C.Chang,W.Yip,Vacant,G.David,Vacant,Vacant,R.Aficial A.Fernandez-DelaRosa,S.Wong
Architect Assoc II	10	P.Tseng

**DEPARTMENT OF RECREATION AND PARKS
REVISED CONFLICT OF INTEREST CODE
SCHEDULE A**

Architectural and Engineering Division

Landscape Architect I	10	S.Davis,Vacant
Landscape Architect Assoc III	10	Vacant, D.Deets
Landscape Architect Assoc II	10	S.Gomey,C.Huang,R.Oyakawa,S.Hsu
Senior Architect	10	R.Lew
Architectural Assoc III	10	Vacant,Vacant
Architectural Assoc II	10	Vacant,H.Ting,E.Emuslan,R.Delght,Vacant,Vacant
Structural Engineering Assoc III	10	Vacant
Mechincal Engineering Assoc III	10	E.Chang
Structural Engineer	10	W.Lit
Civil Engineer	10	S.Lagunzad
Electrical Engineer Assoc II	10	R.Torres
Electrical Engineer Assoc III*	10	Vacant

Finance

Chief Financial Officer	1	J.Duggan
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Finance - Budget & Concessions

Chief Management Analyst	12	B.Benjamins
Senior Management Analyst II (Budget & Concessions)	12	R.Kraus
Senior Management Analyst I (Revenue Management)*	6	T.Puchalski
Senior Management Analyst I (Concessions Management)	6	K.Hashiguchi

Finance - Systems

Fiscal Systems Spec. II	7	E.O.Esquerria
Sr. Systems Analyst II	7	D.Caballero
Sr. Systems Analyst I	7	J.Calderas

Finance - Accounting & Grants Administration

Chief Management Analyst	12	Vacant
Dept. Chief Accountant III	12	R.Reyes
Senior Auditor*	12	A.Hwang
Auditor*	12	R.Intia,R.Buluran,P. Jitkreesorn,R. Garaniel

Human Resources Division

Director of Human Resources	13	H.Fujita
Assistant Director	13	P.Heyne
Safety Engineer*	13	C.Holbrook

Development and Marketing

**DEPARTMENT OF RECREATION AND PARKS
REVISED CONFLICT OF INTEREST CODE
SCHEDULE A**

Director 1 J.Kolb

EPICC

Executive Director 1 Vacant

***Newly designated positions are noted with asterisks**

**DEPARTMENT OF RECREATION AND PARKS
REVISED CONFLICT OF INTEREST CODE
SCHEDULE B – DISCLOSURE CATEGORIES**

CATEGORY 1

1. Investment in, or income including loans and gifts from any person, business or organization which currently, within the past 12 months was, or proposes to:
 - a. sell goods or services to the Department of Recreation and Parks (Department); or
 - b. become a concessionaire, tenant, or sub-tenant of the Department; or
 - c. become licensed by the Department; or
 - d. issue health, accident or liability insurance to the Department; or
 - e. participate in Department-sponsored grant funded programs; or
 - f. influence any action of the Department; or
 - g. become a competitor of any person or business entity in any of the above groups.
2. Investment in or income including loans and gifts from any person, business or organization which owns real property or represents an owner of real property which during the past 12 months was offered for sale, lease, donation, or was sold, leased or donated to the Department.
3. Income, including loans and gifts from any person, business or organization which is or during the past 12 months:
 - a. was employed by or applied for employment at the Department; or
 - b. attempted to influence any action of the Department of Recreation and Parks; or
 - c. registered or was required to be registered as a municipal legislative advocate pursuant to the L.A.M.C. §48.01 et seq (registered lobbyist), with respect to advocacy before the Department or officers and employees of the Department; or
 - d. offered for sale, lease or donated property to the Department or was sold, leased or granted property by the Department; or
 - e. represented a property owner whose property was offered for sale, was sold, leased or donated to the Department or was sold, leased or granted property by the Department.
4. Interest in real property located within the City of Los Angeles, or within two miles of the boundaries of the City of Los Angeles, or any facility operated or proposed to be operated by the Department.

**DEPARTMENT OF RECREATION AND PARKS
REVISED CONFLICT OF INTEREST CODE
SCHEDULE B – DISCLOSURE CATEGORIES**

CATEGORY 2

Investment in, or income including loans and gifts from any person, business or organization which currently, within the past 12 months was, or proposes to:

- a. engage in construction or maintenance of facilities which are on land owned or used by the Department as a contractor or subcontractor; or
- b. supply or manufacture materials for use in the construction or maintenance of facilities and in promotion of public health and safety on land owned or used by the Department which are normally used in the occupational areas supervised or directed by the designated employee.

CATEGORY 3

1. Investment in, or income including loans and gifts from any person, business or organization which currently, within the past 12 months was, or proposes to provide any recreation related service, equipment, or supplies including, but not limited to those related to office operations, arts and crafts, museum displays such as paintings or historical artifacts, land and water sports, theater, food service, award ceremony, photography, fireworks, maintenance, and camping which are normally used in the occupational areas supervised or directed by the designated employee.
2. Income, including loans and gifts in the amount of \$320 or more, from any person who was employed by or who applied for employment at the Department during the past 12 months.
3. Interest in real property located within the City of Los Angeles or within two miles of the boundaries of the City of Los Angeles or any facility operated or proposed to be operated by the Department.

CATEGORY 4

1. Investment in, or income including loans and gifts from any person, business or organization which currently, within the past 12 months was, or proposes to provide any recreation related service, equipment, or supplies including, but not limited to those related to office operations, arts and crafts, museum displays such as paintings or historical artifacts, land and water sports, theater, food service, award ceremony, photography, fireworks, maintenance, and camping which are normally used in the occupational areas supervised or directed by the designated employee.
2. Income, including loans and gifts in the amount of \$320 or more, from any person who was employed by or who applied for employment in the Department during the past 12 months.

**DEPARTMENT OF RECREATION AND PARKS
REVISED CONFLICT OF INTEREST CODE
SCHEDULE B – DISCLOSURE CATEGORIES**

CATEGORY 5

1. Investment in, or income including loans and gifts from any person, business or organization which currently, within the past 12 months was, or proposes to:
 - a. sell goods or services including but not limited to those related to office operations, arts and crafts, museum displays such as paintings, artifacts and specimens and food service to the museum supervised or directed by the designated employee; or
 - b. become licensed by or become a concessionaire, tenant or sub-tenant of the museum supervised or directed by the designated employee; or
 - c. provide lecturing services to the museum supervised or directed by the designated employee; or
 - d. become a competitor of any person or business entity in any of the above groups.
2. Income, including loans and gifts, from any person who, during the past 12 months was employed by or applied for employment at the museum supervised or directed by the designated employee.

CATEGORY 6

Investment in, or income including loans and gifts from any person, business or organization which currently, within the past 12 months was, or proposes to become licensed by or become a concessionaire, tenant or sub-tenant of the facility attended by the designated employee.

CATEGORY 7

Investment in, or income including loans and gifts from any person, business or organization which currently, within the past 12 months was, or proposes to:

- a. supply computer or information technology hardware or software products to the occupation section whose computer and network systems the designated employee operates or administers; or
- b. provide consulting or education services on computer or information technology to the occupation section whose computer and network systems the designated employee operates or administers.

**DEPARTMENT OF RECREATION AND PARKS
REVISED CONFLICT OF INTEREST CODE
SCHEDULE B – DISCLOSURE CATEGORIES**

CATEGORY 8

Investment in, or income including loans and gifts from any person, business or organization which currently, within the past 12 months was, or proposes to:

- a. engage in construction or maintenance of \$1,000 or more of facilities which is on land owned or used by the Department as a contractor or subcontractor; or
- b. supply or manufacture materials valued at \$1,000 or more for use in construction or maintenance of facilities on land owned or used by the Department which are normally used in the occupational areas supervised or directed by the designated employee; or
- c. provide services and materials related to law enforcement and public safety on land owned or used by the Department which are supervised or directed by the designated employee.

CATEGORY 9

Investment in, or income including loans and gifts from any person, business or organization which currently, within the past 12 months was, or proposes to supply or manufacture equipment for use in the construction or maintenance of facilities on land owned by the Department.

CATEGORY 10

Investment in, or income including loans and gifts from any person, business or organization which currently, within the past 12 months was, or proposes to provide building equipment and fixtures, analytic testing, inspection, report preparation or services involving design, construction or maintenance of facilities for the Department.

CATEGORY 11

1. Investment in, or income including loans and gifts from any person, business or organization which currently, within the past 12 months was, or proposes to provide:
 - a. real estate services including but not limited to broker, appraisal, title search, insurance, structural and land inspection and escrow services to the Department; or
 - b. building equipment and fixtures, analytic testing, inspection, report preparation or services involving design, construction or maintenance of facilities for the Department.

**DEPARTMENT OF RECREATION AND PARKS
REVISED CONFLICT OF INTEREST CODE
SCHEDULE B – DISCLOSURE CATEGORIES**

2. Income, including loans and gifts from any person, business or organization which is or during the past 12 months:
 - a. attempted to influence any action of the Department; or
 - b. was registered or was required to be registered as a municipal legislative advocate pursuant to the L.A.M.C. §48.01 et seq (registered lobbyist), with respect to advocacy before the Department or officers and employees of the Department; or
 - c. offered for sale, lease or donated property to the Department or was sold, leased or granted property by the Department; or
 - d. represented a property owner whose property was offered for sale, was sold, leased or donated to the Department or was sold, leased or granted property by the Department.
3. Interest in real property located within the City of Los Angeles or within two miles of the boundaries of the City of Los Angeles or any facility operated or proposed to be operated by the Department.

CATEGORY 12

1. Investment in, or income including loans and gifts from any person, business or organization which currently, within the past 12 months was, or proposes to:
 - a. provide accounting services including investment counseling or financial auditing services to the Department; or
 - b. become a concessionaire, tenant, or sub-tenant of the Department; or
 - c. become licensed by the Department; or
 - d. participate in Department-sponsored grant funded programs; or
 - e. become a competitor of any person or business entity in any of the above groups.
2. Investment in or income including loans and gifts from any person, business or organization which owns real property or represents an owner of real property which during the past 12 months was offered for sale, lease, donation, or was sold, leased or donated to the Department.
3. Interest in real property located within the City of Los Angeles or within two miles of the boundaries of the City of Los Angeles or any facility operated or proposed to be operated by the Department.

**DEPARTMENT OF RECREATION AND PARKS
REVISED CONFLICT OF INTEREST CODE
SCHEDULE B – DISCLOSURE CATEGORIES**

CATEGORY 13

1. Investment in, or income including loans and gifts from any person, business or organization which currently, within the past 12 months was, or proposes to provide the Department employee training, instruction or seminars, and/or labor relations or management consulting services.
2. Income, including loans and gifts in the amount of \$320 or more, from any person who is or during the past 12 months was employed by or applied for employment at the Department.

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