

CITY OF LANSING - BOARD OF ETHICS

REGULAR MEETING

Aug 12, 2025, 5:30 P.M.

Reo Elections Office

1221 Reo Rd Lansing

AGENDA

CALL TO ORDER

ROLL CALL

- | | |
|--|---|
| <input type="checkbox"/> Jim DeLine, Chairperson | <input type="checkbox"/> R Cole Bouck |
| <input type="checkbox"/> Janielle Houston | <input type="checkbox"/> Keith Kris |
| <input type="checkbox"/> Jim Cavanagh | <input type="checkbox"/> John Folkers |
| <input type="checkbox"/> Rachelle Franklin | <input type="checkbox"/> Charles Filice |

A Quorum is: Present

Not Present

Others Present:

ELECTION OF CHAIRPERSON AND CO-CHAIRPERSON

PUBLIC COMMENT (TIME LIMIT OF 5 MINUTES PER SPEAKER)

APPROVAL OF AGENDA As Submitted With Changes Noted

SECRETARY'S REPORT Approval of Minutes: June 10, 2025

NEW BUSINESS

CITY ATTORNEY'S REPORT

Rules of Procedure Review

CHAIR'S REPORT:

TABLED ITEMS:

UNFINISHED BUSINESS:

Ethics Manual Update

Research on monetary gifts within similar populations like Lansing.

ADJOURNMENT

Persons with disabilities who need accommodation to fully participate in this meeting should contact the City Clerk's Office at (517) 483-4131 (TTY 711). 24-hour notice may be needed for certain accommodation. An attempt will be made to grant all reasonable accommodation requests.

**DRAFT MINUTES
LANSING CITY BOARD OF ETHICS
REGULAR MEETING
June 10, 2025, 5:30 PM**

Meeting Room
Reo Elections Office
1221 Reo Rd Lansing

The meeting was called to order at 5:38 p.m.

MEMBERS PRESENT:

Jim DeLine, Chairperson
R Cole Bouck,
John Folkers
Jim Cavanagh
Janielle Houston
Rachelle Franklin
Charles Filice

ABSENT: Keith Kris, Vice Chairperson

A QUORUM WAS PRESENT

OTHERS PRESENT:

Brian P Jackson, City Clerk's Office
Jessica Herrera, City Clerk's Office
Magdalene Callender, City Clerk's Office
Joe Abood, City Attorney's Office

PUBLIC COMMENT:

There was no public comment

APPROVAL OF AGENDA:

Moved by Janielle Houston to approve the agenda as submitted.

MOTION CARRIED

SECRETARY'S REPORT:

Approval of Minutes

Moved by Cole Bouck to approve the Minutes of May 13, 2025, as submitted.

MOTION CARRIED

NEW BUSINESS:

Statement of Financial Interest Ronald Embry, HRCS Department Contract Manager
Moved by R Cole Bouck to place the Statement of Financial Interests with no items disclosed listed above on file, having found no violation of the Ethics Ordinance or other issues to further debate or discuss at this time.

MOTION CARRIED

CITY ATTORNEY'S REPORT: Still reviewing Rules of Procedure that were approved in May

CHAIR'S REPORT: Thank you to John Folkers.

TABLED ITEMS: None.

UNFINISHED BUSINESS:

Ethics Manual Review & Research

Requests if the City Clerk's office could research on the limit of monetary gifts within cities with similar populations like Lansing.

Election for new officer reminder

ADJOURNED 6:22 p.m.

DRAFT RULES OF PROCEDURE
BOARD OF ETHICS OF THE CITY OF LANSING
With City Attorney's Office Recommendations 8/7/2025_

1. Regular meetings of the Board of Ethics, also referred to below as the "Board", shall be held at 5:30 p.m. on the second Tuesday of every month at a place designated by the Presiding Officer of the Board or by a majority of the voting members of the Board.
2. Special meetings of the Board may be called by the Presiding Officer of the Board or any three voting members of the Board. A written notice of any such special meeting including the time, place and subject matter shall be provided to each member of the Board by one of the following methods: personally serving notice directly to such members of the Board; leaving at the private residence of such members at least twenty-four hours prior to the time of said meeting; by first class mail, postage prepaid and addressed to the home address of each such member with such mailing being made at least five days prior to the time of the meeting; or, if the voting member so designates, transmitting an email or other form of approved electronic communication to the point of contact that the member provides at least three days prior to the time of the meeting.
3. The requirement of proper notice to a member of a special meeting shall be waived by the attendance of such a member at the special meeting.
4. Notice of the time and place of all meetings of the Board shall be posted on the City Hall bulletin board on the first floor of the City Hall. The schedule of the regular meetings shall be posted within ten days after the first meeting in each calendar year. A change in the schedule of regular meetings shall be posted within three days after the meeting at which the change is made and a rescheduled regular or a special meeting shall be posted at least twenty-four (24) hours before the meeting.
5. All meetings shall be open to attendance by members of the public except when the Board enters closed session for a reason for which a closed session is permissible pursuant to the Open Meetings Act of the State of Michigan as it now exists and may be amended in the future. (PA 1976, No. 267, MCL 15.261 et seq.)
6. Each member of the public [attending the meeting](#) will have up to a total of three minutes to address the Board. The Presiding Officer may reduce the amount of time allowed for each speaker if the Presiding Officer determines that the number of registered speakers is so numerous that the meeting cannot be concluded timely without a reduction in the time allocated for each speaker.
7. Any voting member of the Board who fails to attend three consecutive [regular](#) meetings of the Board without being excused from attendance [by a vote of majority of the Board [in attendance](#) may be removed from the Board. Such removal may be [effected](#) by the majority vote of the remaining [serving](#) Board members.

7.1 Voting members of the Board shall be residents of the City of Lansing and shall

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hold no elective public office or other City of Lansing appointed office or employment. If, during a member's term on the board such member is elected to public office or becomes a city officer or employee, said member shall immediately upon taking such office or employment be disqualified as a Board member and said position shall automatically be deemed vacant and subject to appointment pursuant to section 5-502.2 of the Lansing City Charter for the unexpired portion of that member's term.

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7.2 If an issue before the Board raises a conflict of interest for any member of the Board, such member shall announce the conflict and move for recusal on that issue. A motion for recusal shall be determined by a majority of Board members present and eligible to vote, excluding the member whose conflict is in question.

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If the motion to recuse passes, then the recused member shall be excused from voting on that issue. Determination of the recusal in question must occur before deliberation on the issue that was originally before the Board.

Commented [MC2]: To be discussed

7.3 All voting members of the Board in attendance at a properly convened meeting of the Board shall vote on all matters before the Board unless excused from voting pursuant to Rule 7.2.

7.4 Except as provided in Rule 7.1, a voting member of the Board shall hold office until a member's successor is appointed, unless that member has resigned or been removed.

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8. The officers of the Board shall be the Chairperson, Vice Chairperson and Secretary.

8.1 The Chairperson shall preside over meetings of the Board. The Chairperson and Vice Chairperson shall be selected annually. The selection shall be made at the first regular meeting in June of each year and their term shall begin on July 1st. They shall be selected by an affirmative vote of a majority of the voting and serving members of the Board. Their terms shall expire on June 30th of each year or upon the election of a successor, whichever occurs later; or upon resignation or removal of that person from the Board. The Chairperson or Vice Chairperson shall not serve more than two consecutive terms in each respective position.

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8.2 The Vice Chairperson shall preside and perform the duties of the Chairperson in the case of absence or inability of the Chairperson to perform the duties of the office. If the Chairperson is unable to complete the term of office, the Vice Chairperson shall assume the duties of the Chairperson. Fulfilling the unexpired term of the Chairperson or Vice Chairperson shall not be considered a term for purposes of computing two consecutive terms under subsection 8.1.

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8.3 The City Clerk shall be responsible for preparing and keeping the minutes and

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records of the Board and for such other administrative support as may be needed from time to time. The City Clerk shall be an ex officio non-voting member of the Board.

Commented [BJ3]: Board voted on 4/8 to updated 8.3 but the old 8.3 was accidental left in Rules.

8.4 The City Attorney shall serve as legal advisor to the Board and shall be an ex officio non-voting member of the Board.

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9. The minutes of the Board shall be kept in the office of the City Clerk and shall be available for inspection by members of the public except for the minutes of closed sessions which were closed pursuant to the Open Meetings Act of the State of Michigan. All other records of the Board shall be available for inspection and duplication by the public unless the release of such records to the public is prohibited by [Lansing Ordinance or other](#) law or unless the law permits such records to be withheld from the public and the Board approves the withholding of such records.

10. A majority of the voting members [serving](#) shall constitute a quorum for conducting business at a meeting of the Board.

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11. Any action of the Board shall require the concurrence of the majority of the voting members serving on the Board at a duly constituted and convened meeting of the Board.

12. The Board shall consider all requests for opinions at the next meeting following receipt of the request.

12.1 All requests for opinions shall be submitted in writing to the Lansing City Clerk.

12.2 Each request for an opinion shall be signed by the person making the request.

12.3 Upon receipt of a request for an opinion, the City Clerk shall forthwith forward a copy of such a request to each member of the Board. At the next meeting following receipt of a request for an opinion, the Board shall determine whether or not it will render an opinion in response to the request and whether the opinion will be formal or informal pursuant to the Lansing City Charter and the Lansing Code of Ordinances.

12.4 In the event the Board elects to prepare an [opinion](#) in response to a request, the City Attorney shall, prior to the next meeting of the Board after the decision to render the opinion is made, research all legal aspects of the opinion requested and prepare a legal memorandum to all members of the Board setting forth the results of that research and making such recommendations as the City Attorney shall deem advisable. A copy of that memorandum shall be provided to all members of the Board and the City Attorney, or the [attorney assigned](#) shall be present at said meeting to advise the Board.

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12.5 No opinion shall be rendered by the Board unless the substance and final text is

debated and agreed to at a duly constituted and convened meeting by a majority of the voting members serving on the Board.

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12.6 Preliminary drafts and research memoranda prepared in connection with any request for an opinion shall not constitute the view or position of the Board or the City of Lansing nor shall any memorandum or draft opinion be released or made available for inspection by the public unless such inspection or release is approved by a majority of the serving members at a duly constituted and convened meeting or unless such disclosure is ordered by a court of law or administrative agency with competent jurisdiction to make such an order or unless the City Attorney advises in writing that the release or inspection of such papers is legally required.

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12.7 The approval of an opinion of the Board shall be by roll call vote which shall be recorded in the minutes of the Board.

12.8 All points of procedure not specifically covered in this document shall be determined by reference to Roberts Rules of Order.

13. On a tie vote a motion is lost and no action of the Board has been taken.
14. Opinions of the Board shall be issued and dealt with in a manner least likely to reveal the identity of the person concerned. Upon receipt of an opinion request the City Clerk may, in their discretion, delete the name of the person involved, substituting therefore any other designation which is not likely to be confused with any other person.
15. At the first meeting of each calendar year, the Board shall request the City Clerk to provide the Board with any documents required to be filed under ordinances adopted by the City of Lansing for the purpose of establishing standards of conduct for officers and employees. Upon receipt of such documents, the Board shall review the same in a timely fashion and may take such action regarding said documents as it deems proper.
16. Nothing contained in these rules of procedure shall alter or amend the duties, functions and authority of the Board as is prescribed in the Lansing City Charter and the Lansing Code of Ordinances.
17. These rules of procedure may be amended by the Board by a majority vote of the voting members serving during any regular meeting, provided that all members were provided three days prior to said meeting with the full text of proposed amendment.

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As set forth in the City Charter, revised rules of procedure shall be submitted to the City Attorney for approval as to form. The rules shall then be submitted to the City Clerk for transmission to the City Council. The rules shall be effective at the conclusion of the Council meeting at which they are received unless the Council directs otherwise.



City of Lansing Ethics Manual

Prepared by:

**City of Lansing
Personnel Department
Lansing, MI 48933**

Published: May, 1997

Adopted by:

**City of Lansing
Board of Ethics
March 11, 1997**

ANDY SCHOR
MAYOR



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April 24, 2025

To City of Lansing Employees & Officials:

Everyone working in public service, whether as an elected or appointed official or as a City employee, is an important part of our community. We each play a role and have a duty to serve the public fairly and without self-interest. In our daily tasks, we also have an opportunity to establish the trust and respect with residents and visitors that is the best of our profession.

In the mid-1990's, Lansing voters amended the Lansing City Charter regarding the standards of conduct for elected officials and employees of the City. The City Council adopted an Ethics Ordinance to put these changes into effect.

The Lansing Board of Ethics plays an important role in ensuring our City's elected leaders, officers, and city employees operate transparently or with transparency. This manual fulfills the requirements of the Charter to provide information to City officers and employees about standards of conduct, protection of the public interest, and conflicts of interest. It also explains how an officer or employee can receive assistance from the Board of Ethics.

With the information provided here, officials and employees together can provide quality service at the highest ethical standards that enable us and all Lansing residents to be proud of our City Government.

Thank you for being part of the Lansing team and for the work you do.

Andy Schor
Mayor

THE BOARD OF ETHICS

The Board of Ethics of the City of Lansing was established by the City Charter which was adopted by the voters of Lansing in 1978 and amended on November 8, 1994.

The Board consists of eight members; four of whom are appointed by the City Council and four by the Mayor.

The Board normally meets once a month. Special meetings may be held when called in the manner provided in the rules of the Board. The meeting schedule and agendas are posted in the City Clerk's Office. Proceedings before the Board are subject to the applicable state law regarding the conduct of public meetings. Records of the Board are placed on file with the City Clerk and are available for public review as required by state law.

The City Clerk serves as Recording Secretary to the Board of Ethics and provides administrative support. All items to be forwarded to the Board or placed on the Board Agenda should be sent to the Clerk. Copies of Affidavits of Disclosure, Statements of Financial Interest and other forms used by the Board may be obtained from the Clerk's Office.

The City Attorney assists and advises the Board. Individuals desiring clarification or interpretation of the Ethics Ordinance and the Ethics Chapter of the City Charter may do so in writing to the City Attorney. The City Attorney will either provide a written response or refer the request to the Board of Ethics.

Additional copies of this manual are available in the City Clerk's Office and the Human Resources Department.

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ETHICS ORDINANCE SUMMARY

The following is a summary of the basic provisions of the Ethics Ordinance.

This summary and the "Frequently Asked Questions" sections of this manual are not inclusive. The full text of the Charter Amendments and the Ethics Ordinance is included **in this manual** and should be read for full understanding of the provisions.

Purposes of Ordinance

- ▶ Identifies minimum standards of ethical conduct for public servants.
- ▶ Establishes penalties for public servants who violate the public trust.
- ▶ Provides a process for public servants to identify and resolve ethical issues.
- ▶ Intends to promote public confidence in the integrity of public servants.

Scope of Ordinance

You are covered by this ordinance if you are:

- ▶ a person who might offer a gift to a city officer or employee
- ▶ a city officer
- ▶ a city employee
- ▶ a candidate for a city elective office
- ▶ a member of the immediate family of any of the above
- ▶ a business with which any of the above is associated

*Conflict of interest questions raised by or about a City Councilmember, at a City Council Meeting, and related to an Agenda Item, will be determined by the City Council at that meeting.

Prohibitions

If you are covered by this ordinance, you must not:

- ▶ Accept non-monetary gifts with a value greater than \$50
- ▶ Offer or give (directly or indirectly) any gift, loan, services, etc., or other

thing of value with the agreement or understanding that a vote or official action of an officer or employee will be influenced .

- ▶ Solicit (directly or indirectly) any payment, gift, loan, contribution, services, etc., or other thing of value based on any agreement or understanding with a person, including any administrative board established under the City Charter with the agreement or understanding a vote or official action will be influenced .
- ▶ Falsely represent personal opinions to be those of the governmental body of which you are a member or employee.
- ▶ Divulge confidential information before it is authorized to be released.
- ▶ Use the power of your office to intimidate or threaten other city employees or members of the public.
- ▶ Use your position to obtain financial gain for yourself or for your immediate family or a business in which you, or they, are associated.
- ▶ Use resources, property or funds under official control and care to obtain personal financial gain for yourself or immediate family members or business in which you, or they, are associated.
- ▶ Act on behalf of the city by making any policy statements promising to authorize or to prevent any future action, agreement or contract when you have no authority to do so.
- ▶ Engage in a business transaction that allows you to profit from confidential information you have obtained or may obtain because of your position or authority.
- ▶ Participate in, vote on, or act upon contracts for making loans or grants of public funds, subsidies, issuing permits or certificates or any other regulations relating to any business you are associated with or have an interest in.
- ▶ Participate in, vote on, or act upon any matter if you have a conflict of interest or have a financial interest, other than as a citizen of the city.
- ▶ Assist or agree to assist, directly or indirectly, in the violation of this

ordinance.

Penalties

- ▶ Violation of this ordinance shall be a misdemeanor.
- ▶ If you violate the ordinance, you can be penalized or fired, just as you can for any other employment violation.

This ordinance does not prohibit anything that is allowed by your collective bargaining agreement.

FREQUENTLY ASKED QUESTIONS ABOUT... GIFTS

What is the rule on accepting gifts while a city officer or employee?

First of all, let's define a gift. A gift is anything of value given without the expectation of receiving something in return. Gifts may include free meals, tickets to spectator events, free trips and services as well as actual cash gifts.

What if I work in purchasing and a vendor gives me a box of candy at Christmas? Can I accept this?

Probably. This gift would be allowed under the \$50 exception provided you did not ask for the gift, that total gifts from this vendor would not exceed \$50 in any year, and if there was no understanding with the vendor that your receiving such a gift would influence any decision relative to orders granted to the vendor.

What if I am a city building inspector and, when I'm at a home, the owner gives me \$40 in cash? Can I keep this?

No. Even though this would be under the \$50 exception, clearly there is an implied expectation on the part of the homeowner that your acceptance of this gift might influence your inspection report. Further, the \$50 exception only applies to **non-monetary** gifts.

Examples of prohibited gifts:

- ▶ A representative from a company that is applying for a grant from your department offers to give you an expensive present if there is an understanding or agreement that their official action will be influenced, and the value of the gift is greater than \$50.00.
- ▶ A salesman that sells software to your department invites you to dinner at a fancy restaurant if there is an agreement or understanding that official action will be influenced, and the dinner costs more than \$50.00.
- ▶ A local theater sends free season tickets to you and all other high-ranking employees in your section just because you work there if there is an understanding that an official action will be influenced and the tickets are worth more than \$50.00.

So, are there any gifts that I can accept?

Employees can, of course, accept gifts from defined categories of relatives and spouses of such relatives or gifts that are clearly given because of a family or personal friendship.

Free attendance at city sponsored event where lunch or other services may be included.

Snacks like soft drinks, coffee, or donuts that are not offered as part of a meal

Items of little inherent value such as plaques, certificates, trophies.

Anything for which you pay market value is not a gift.

Gifts between co-workers and supervisors of a department.

Key factors are: Was the gift solicited by you? Was there an agreement or understanding that any decision you might make as a city officer or employee will be influenced? Is the gift over \$50 in value?

There may be more exceptions than this. If in doubt, ask the City Attorney about your specific case by calling 517-483-4320.

FREQUENTLY ASKED QUESTIONS ABOUT..... FINANCIAL CONFLICTS OF INTEREST

I have stock in a corporation that is involved in a matter for which I have some job responsibility. Would my official participation in this matter be a problem?

It might be. You may be prohibited from participating in decisions involving this corporation. The prohibition would also apply when you know that any of the following individuals or organizations have a financial interest in the corporation, even if you personally don't:

- ▶ your spouse
- ▶ your minor child

- ▶ an organization for which you serve as an officer, director, trustee, general partner, or employee; and
- ▶ a person or organization which you are negotiating with, and/or have an arrangement concerning prospective employment

If any of these conditions exist, you should file an Affidavit of Disclosure with **the City Clerk's office for the Board of Ethics**. You also should report your association with this corporation on your annual financial disclosure form if you are a reporting individual.

My wife is the owner of the major local supplier of cellular phones. I work in purchasing and specifically with the procurement of cellular phones for city departments. Am I restricted from doing business with my wife's firm?

That depends. Are vendors for cellular phones selected by a blind bid process? Do you write the specifications for the bids? You should file an Affidavit of Disclosure **with the City Clerk's office for the Board of Ethics** before proceeding.

I work in the building department. I also operate a plumbing business in the evenings and on weekends. Someone told me that I have a big problem doing this. Is this right?

What is your job in the building department? Do you inspect plumbing in residences? Would you be in the position of inspecting your own work? Depending on your answers to these questions, you may very well have a problem. To make sure you do not have a problem, submit an Affidavit of Disclosure to the **City Clerk's office for the Board of Ethics**.

What kinds of decisions would the Board of Ethics make in these instances?

The Board might ask that you remove yourself from the decision making process for a specific issue; sell an asset which creates a conflict of interest; resign from an outside position or find that you do not have a conflict of interest.

FREQUENTLY ASKED QUESTIONS ABOUT..... IMPARTIALITY IN PERFORMING PUBLIC DUTIES

Do the provisions of the ethics ordinance concerning conflicts of interest cover all potential conflicts of which I should concern myself?

No. There are many more and it would be impossible to describe all the potential conflicts that might arise. The Standards of Conduct Provision of the City Charter (Chapter 5, Section 5-501) goes even further than the conflict of interest provisions. Under Standards of Conduct, situations that give even the appearance of a loss of impartiality are subject to Board of Ethics scrutiny.

What kinds of situations would come under this "appearance" provision?

Situations in which you, as a city officer or employee, may be called upon to participate in a matter involving parties and you know that...

- ▶ the matter is likely to affect the financial interests of a member of your household; or
- ▶ one or more of the parties to the matter is represented by:
 - * a person or organization with whom you have or seek a business relationship that involves something more than a routine consumer purchase;
 - * a person who is a member of your household, or who is a relative with whom you have a close personal relationship;
 - * a person or organization for whom your spouse, parent or dependent child is, to your knowledge, serving or seeking to serve as an officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee;
 - * any person or organization for whom you have, within the last year, served as an officer, director, trustee, general partner, agent, attorney, consultant, contractor or employee; or
 - * an organization, other than certain political organizations, in which you are an active participant.

Give me some examples...

Your spouse is the executive director of a non-profit organization that receives a large grant from the city each year. You review the grant requests and make recommendations on selection of recipients.

Your daughter is an electrician. You do electrical inspections in the same area as your daughter's business.

If I think something I am doing creates the "appearance" of a conflict of interest, what should I do?

Discuss the matter with your supervisor and file an Affidavit of Disclosure with the Board of Ethics.

FREQUENTLY ASKED QUESTIONS ABOUT..... MISUSE OF POSITION OR POWER

I know it would be wrong to use my employment with the city to further my own interests, but if I can do some good for my friends, relatives or nonprofit organizations, is there any harm in helping them?

Definitely. The ethics ordinance states that city officers and employees may not use their public offices for the private gain of others, which means your own gain or the gain of individuals or organizations with which you are connected.

My supervisor strongly suggested that I have my new home built by a local contractor. I happen to know that my Supervisor's brother owns this firm. I'm afraid that if I don't use this firm, I may not get the promotion I've been working for. What should I do?

Your supervisor may have violated a provision of the ethics ordinance. This provision states that no officer or employee shall use the power of his or her office to intimidate or threaten city employees or members of the public to gain personal, financial or political advantage.

A co-worker of mine has access to confidential information about a sensitive city matter. The local newspaper printed a big story about this

matter and my co-worker admitted they were the source of the leak. Is this a misuse of access to this confidential information?

Yes. This is a clear violation of the ethics ordinance.

I work very hard but my department has some times of the year when we're really not very busy. I use these times to catch up on personal correspondence, update my resume, and other personal items. I figure that I might as well do something worthwhile to keep me busy. My co-worker filed a complaint with the Board of Ethics. What's wrong with what I did? I didn't receive any financial gain from it.

Employees must use official time in an honest effort to perform official duties and to conserve government property (including equipment and facilities) and may not use city property for unauthorized purposes.

Give me some other examples of misuse of public office...

Writing a personal complaint letter to a merchant on city departmental stationery.

Using your work telephone to schedule appointments for your second job.

Calling the traffic department to tell them they better do you a favor and void your brother's parking ticket.

Deliberately giving false information to callers because they are rude to you, or for any other reason.

CITY CHARTER ETHICS PROVISIONS
CHAPTER 5. BOARD OF ETHICS

5-501 Standards of conduct.

.1 The people of this City recognize that the continuation of the proper operation of the City requires that public officers and employees be independent, impartial and responsible to the people; that decisions and policy be made in the proper channels of governmental structure; that members of the public have access to information upon which decisions affecting their City are made; that public office and employment not be used for personal gain; that the integrity and operation of City government to be subject to scrutiny of the public; and that acts or actions not compatible with the best interests of the City be defined and prohibited.

.2 In order to provide an orderly procedure for consideration and review of the issues which may arise concerning questions of standards of conduct for public officers and employees, a Board of Ethics is created.

5-502 Membership.

.1 The Board of Ethics shall be a review board and shall consist of eight members; four members shall be appointed by the City Council, one from each city ward, and four shall be appointed by the Mayor. The City Attorney shall assist and advise the Board and the City Clerk shall serve as Recording Secretary to the Board and provide such administrative services to the Board as may be necessary; however, neither shall be eligible for appointment as board members.

.2 Of the members appointed to the initial Board, the Mayor and the City Council shall each appoint members for a one year, a two year, a three year, and a four year term. A member shall hold office until a member's successor is appointed. Thereafter each Mayoral-appointed member and each Council-appointed member shall serve for a term of four years. An appointment to fill a vacancy shall be made by the Mayor to fill a vacant Mayoral-appointed member position and by the City Council to fill a vacant Council-appointed member position. Persons serving as members of the Board of Ethics on the effective date of this section shall continue as members until the expiration of their original terms.

.3 Members of the Board of Ethics shall be residents of the City and shall hold no elected public office and no other City office or employment.

.4 The Board shall adopt rules governing its procedure and the holding of regular meetings, subject to the approval of City Council. Special meetings may be held when called in the manner provided in the rules of the Board. The Board shall select its own presiding officer from among its members.

.5 If any issue before the Board involves any member of the Board, such member may not participate in Board deliberations pertaining to the member's issue nor shall such involved member be eligible to vote on any actions concerning the issue.

.6 All City employees and elected or appointed officials of the City shall cooperate with any investigations by the Board; such cooperation shall include the compilation and production of any information requested by the Board during an investigation unless the information requested is exempt from disclosure under the applicable state law.

.7 If any issue before the Board involves the office of the City Attorney, the Board may engage the services of outside counsel upon terms and arrangements approved by City Council.

5-503 Duties.

.1 At the request of a person, the Board of Ethics may render an informal opinion with respect to the prospective conduct of such person. An informal opinion need not be written and may be provided directly to the requestor of such opinion. All written opinions of the Board of Ethics shall be filed with the City Clerk and are open to public inspection. Written informal opinions shall be drafted in such a way as not to reveal information exempt from public disclosure under the applicable state law.

.2 The Board of Ethics on its own initiative or upon request may render and publish a formal opinion on any matter within the scope of the Board's authority which it may deem appropriate.

.3 The Board of Ethics does not have the authority to reverse or modify a prior action of the Mayor, City Council, or an officer or employee of the City. If the Board finds a prior action of the Mayor, Council, officer, or employee to have been ethically improper, the Board may advise the appropriate party or parties that the action should be reconsidered. Upon such advice by the Board, the action shall be reconsidered by the appropriate person or public body. If the Board determines an existing City contract to be ethically improper, after such determination and advice from the Board the

City may void or seek termination of the contract if legally permissible. The Board may refer a matter to the City Attorney for review and consideration for appropriate action. Upon completion of review and consideration, the City Attorney shall report its findings to the Board.

.4 The Board of Ethics may recommend to the Council standards of conduct for officers and employees of the City and changes in the procedures related to the administration and enforcement of those standards.

.5 The Board of Ethics shall review, at least annually, any documents required to be filed under ordinances adopted by the City for the purpose of establishing standards of conduct for officers and employees.

.6 The Board, when it deems it appropriate, may request the City Attorney's Office for assistance in compelling the production of documents and witnesses to assist the Board in the conduct of any investigation.

.7 Within one year from the effective date of this section the City shall provide an ethics manual for the use of all City officers and employees. Such manual shall first be approved by the Board of Ethics before distribution. Each City officer and employee shall acknowledge receipt of said manual.

.8 Proceedings before the Board are subject to the applicable state law regarding the conduct of public meetings. Records of the Board shall be filed with the City Clerk and are available for public review as required by state law.

5-504 Protection of public interest.

.1 The City shall adopt, by ordinance, such standards for the conduct of public affairs as may be deemed necessary to protect the public, including the ordinances referred to in this section.

.2 The City shall adopt, by ordinance, no later than one year after the effective date of this section, restrictions similar to those enacted by the State of Michigan by statute, prescribing standards of conduct for City officers and employees. To the extent permitted by law, the ordinance shall generally include, but not be limited to, prohibiting the use of City office or employment for the private benefit of any person; prohibiting the divulging of confidential information in advance of the time prescribed for its authorized release to the public; prohibiting the use of City personnel resources for private gain; prohibiting the profit from an official position and acceptance of things of

value by City officers or employees; requiring the financial disclosure by City officers and employees; and requiring lobbyist disclosure for all City officers and employees.

.3 Any violations of ordinances dealing with matters in this section shall be punishable to the maximum extent permitted by law and may be made punishable by forfeiture of office or position.

5-505 Conflict of interest.

.1 At least ten (10) days prior to the first of any of the events set forth in (A), (B), (C), (D), and (E) below, a City officer or employee who may derive any income or benefit, directly or indirectly, from a contract with the City or from any City action, shall file an affidavit with the City Clerk detailing such income and benefit to be derived:

- (A) The bidding of the contract;
- (B) The negotiation of the contract;
- (C) The solicitation of the contract;
- (D) The entry into the contract;
- (E) Any City action by which the City officer or employee may derive any income or benefit, directly or indirectly.

The above provisions shall not apply to individual or collective bargaining agreements pursuant to which a City officer or employee directly or indirectly receives income or benefits in the form of official remuneration as an officer or employee, or any City action pursuant to which a City officer or employee directly or indirectly receives income or benefit as a member of the public at large or any class thereof. At the first regularly scheduled City Council meeting following the filing of an affidavit pursuant to this section, the City Clerk shall notify the City Council of such filing. In particular cases and for good cause shown, the Board may waive the ten (10) day prior notice requirement contained herein.

.2 An officer or employee who has any other conflict between a personal interest and the public interest as defined by State law, this Charter, or ordinance shall fully disclose to the City Attorney the nature of the conflict.

.3 Except as provided by law, no elective officer, appointee or employee of the City may participate in, vote upon or act upon any matter if a conflict exists.

**CITY OF LANSING
ETHICS ORDINANCE
ORDINANCE NO. 953**

Adopted by the Lansing City Council on August 26, 1996

An Ordinance to amend Chapter 290, Conflicts of Interest, of the Codified Ordinances of Lansing, Michigan 1988, to retitle the Chapter "Ethics"; to declare public office and public employment as a public trust involving a fiduciary duty; to establish a complaint procedure applicable to the Board of Ethics; to define certain prohibited transactions; to regulate the participation in government decisions; to provide for financial disclosure by elected and appointed officials; to adopt gift regulations; to require lobbyist disclosure by city officers and employees; to provide for education concerning the provisions of this chapter; and to provide whistle blower protection.

The City of Lansing Ordains:

Section One. That Chapter 290 of the Code of the City of Lansing, be and hereby is amended to read as follows:

**CHAPTER 290
ETHICS**

290.01. DECLARATION OF PURPOSE; FINDINGS.

The People of the City of Lansing declare public office and public employment are held as a public trust and any effort to realize personal gain through official conduct is a violation of that trust. It is the finding of Council that all city officers and employees are trusted with public functions for the good of the public, that their official powers are fiduciary and are to be used to protect, advance and promote the public interest and not their own; that the people of the City want legislation to ensure that conflicts of interest of officers and employees are eliminated to the fullest extent possible and that violations of rules of ethical conduct are appropriately corrected.

290.02. DEFINITIONS.

As used in this chapter:

(a) "**Board of Ethics**" means the Board of Ethics created under Chapter 5 of Article V of the City Charter.

(b) **"Business"** means a corporation, partnership, sole proprietorship, firm, enterprise, franchise, association, organization, self-employed individual, holding company, joint stock company, receivership, trust, activity or entity, excluding a municipal corporation or governmental entity.

(c) **"Business with which an individual is associated"** means a business in which any of the following applies:

1. The individual is an owner, partner, director, officer or employee;
2. A member of the individual's immediate family is an owner, partner, director or officer;
3. The individual or a member of the individual's immediate family is a stockholder of close corporation stock which is worth at least one thousand dollars (\$1,000) at fair market value or which represents more than a five percent equity interest; or
4. The individual or a member of the individual's immediate family is a stockholder of publicly traded stock which is worth at least twenty-five thousand dollars (\$25,000) at fair market value or which represents more than ten percent equity interest, other than publicly traded stock under a trading account if the individual reports the name and address of the stockholder.

(d) **"Business with which an officer, employee or candidate is associated"** means a business with which the individual is associated.

(e) **"Candidate"** means an individual who is a candidate for city office, as defined in Public Act 388 of 1976, as amended, being M.C.L.A. 169.201 through 169.282.

(f) **"Child"** means a son or daughter, whether or not the son or daughter is the natural offspring of the legal parent or parents and whether or not the son or daughter is financially dependent on the parent or parents.

(g) **"Confidential information"** means information which has been obtained in the course of holding office or employment with the City, and which information is not available to members of the public under the Freedom of Information Act or other law or regulation and which the employee or officer has been instructed is being held confidentially. Any information which is disclosed in a meeting open to the public is deemed not

to be confidential.

(h) "**Gift**" means a payment, subscription, advance, forbearance, rendering or deposit of money, services or anything of value, made without the exchange of reasonable consideration. Gift does not include anything of value received as a devise, bequest or inheritance or a loan or credit arrangement made according to reasonable and prevailing rates and terms, and which does not discriminate against or in favor of an individual who is an officer or employee because of such individual's status as an officer or employee. "Gift" does not include a contribution or expenditure required to be recorded or reported pursuant to Public Act 388 of 1976, as amended, being M.C.L.A. 169.201 to 169.282. "Gift" does not include a gift received from one or more of the following:

1. A relative within the fifth degree of consanguinity, under the civil law computation method, to the officer or employee, or the spouse of such a relative; or
 2. A spouse of the officer or employee, or a spouse's relative within the fifth degree of consanguinity to the spouse, under the civil law computation method.
- (i) "**Governmental body**" means an authority, department, commission, committee, council, board, bureau, division, office, legislative body or other agency (as defined in the City Charter) of the City.
- (j) "**Immediate family**" means a child of an individual, a spouse of an individual, or an individual claimed by that individual or individual's spouse as a dependent under the Internal Revenue Code, or the parents, parents-in-law, brothers, sisters, sisters-in-law, brothers-in-law, stepparents, stepbrothers or stepsisters of an individual.
- (k) "**Loan**" means a transfer of money, property or anything else of ascertainable monetary value in exchange for an obligation, conditional or not, to repay in whole or in part.
- (l) "**Officer or employee**" means an elected or appointed officer or an employee of a governmental body of the City.

290.03. COMPLAINTS.

- (a) Any person may file a signed written complaint with the City Clerk

alleging a violation of Chapter 5 of Article V of the City Charter or of this chapter. Upon receipt of such a complaint, the City Clerk shall simultaneously forward the complaint to the Board of Ethics, the person named in the complaint and the City Attorney. The City Attorney shall provide the Ethics Board with a preliminary written analysis of the complaint no later than thirty (30) days from the date the complaint was filed with the City Clerk. At the next regular meeting following receipt of the City Attorney's analysis, the Board of Ethics shall review and consider the complaint and the City Attorney's analysis. At any time after such review and consideration, the Board of Ethics may do any of the following:

1. Request the City Attorney to investigate the complaint and report all findings back to the Board; or
2. Schedule the complaint for further review and consideration, or
3. Refer the complaint to the City Attorney for criminal prosecution consideration; or
4. Issue such reports, opinions and findings as the Board deems advisable under the circumstances and in accordance with the City Charter and ordinances; or
5. Dismiss the complaint based on any of the following grounds:
 - (a) Lack of jurisdiction in the Board of Ethics;
 - (b) Failure of the complaint to state a claim of a violation of the Ethics provisions contained in the Charter, law or ordinances;
 - (c) Failure of the complainant to cooperate in the Ethic Board's review and consideration of the complaint; or
6. Take such other action which the Board deems necessary and as authorized by the Charter or Ordinance.
 - (a) Pursuant to Michigan Compiled Laws 15.243(b)(I) and (ii), each complaint shall remain confidential until the meeting at which the Board of Ethics receives the analysis of the City Attorney. Continued confidentiality of the complaint and any material resulting from the Board's review and consideration

shall be determined on a case-by-case basis in accordance with the Michigan Freedom of Information Act or any successor law.

- (b) No person shall knowingly make a false or misleading statement in any complaint filed with the City Clerk pursuant to this Chapter.
- (c) Except in the case of dismissal under Section 290.03(a)(5)(a and b), the Board of Ethics shall not issue an opinion on any complaint without providing the person(s) charged with written notice of a complaint and a reasonable opportunity to be heard before the Board.

290.04 PROHIBITIONS.

(a) No person, including any administrative board established under Article V, Chapter 2 of the City Charter, shall directly or indirectly offer or give to any officer, employee or candidate; a member of the immediate family of any officer, employee or candidate; or a business with which any officer, employee or candidate is associated any gift, loan, money, goods, services, contribution, reward, employment or other thing of value based on an agreement or understanding that a vote or official action or decision of an officer, employee or candidate would be influenced .

(b) No officer, employee or candidate, a member of the immediate family of an officer, employee or candidate, or a business with which an officer, employee or candidate is associated shall directly or indirectly solicit or accept any payment, gift, loan, contribution, money, goods, services, reward, employment or other thing of value based on any agreement or understanding with a person, including any administrative board established under Article V, Chapter 2 of the City Charter, that a vote or official action or decision of an officer, employee or candidate would be influenced thereby.

(c) It shall be presumed that a non-monetary gift having a value of less than \$50 does not evidence a violation of paragraphs (a) and (b) of this Section or of Code Section 206.15. Paragraphs (a) and (b) of this Section do not prohibit communication between an individual or organization and a candidate regarding the candidate's views, record or plans for future action regarding an issue or measure in an attempt to determine a candidate's viewpoints or how the candidate plans to act in the future, if such communication results in an endorsement of the candidate, a decision not to endorse the candidate, or a contribution or expenditure required to be

recorded or reported under Public Act 388 of 1976, as amended.

(d) No officer or employee shall falsely represent his or her personal opinion to be the official position or determination of the governmental body of which he or she is a member or employee. This subsection shall not apply to statements by elected officials made in the course of fulfilling the responsibilities of their office or in running for election to office, nor shall it apply to the professional opinions of City officers or employees rendered in the course of performing their duties, provided that such opinions are clearly identified as professional opinions.

(e) No officer or employee shall divulge to any unauthorized person confidential information acquired in the course of holding his or her position in advance of the time prescribed by the governmental body of which he or she is a member or employee for its authorized release to the public.

(f) No officer or employee shall use, or allow others to use, the authority, title, or prestige of his or her public office for the attainment of the officer or employee's, or that of a member of his or her immediate family's, private financial benefit in any manner that is inconsistent with public interests.

(g) An officer or employee shall not use personnel, resources, property or funds under his or her official care and control to obtain personal financial gain in addition to his or her official remuneration as an officer or employee for himself or herself, a member of his or her immediate family, or a business with which either is associated.

(h) No officer or employee shall act as an attorney, agent or representative of a person other than himself or herself, before the governmental body of which such officer or employee is a member or employee. This provision shall not prevent an officer or employee from performing his or her responsibilities as an officer or employee.

(i) No officer or employee shall act on behalf of the City by making any policy statements, promising to authorize or to prevent any future action, agreement or contract, when such officer or employee has, in fact, no authority to do so.

(j) No officer or employee shall engage in a business transaction in which the officer, employee, a member of his or her immediate family, or a business with which either is associated, may profit from his or her official position or authority, or benefit financially from confidential information which the officer

or employee has obtained or may obtain by reason of that position or authority. This subsection shall not prohibit employment or a contract to conduct instruction which is not done during regularly scheduled working hours, except for annual leave or vacation time, if the officer or employee does not have any direct dealing with or influence on the employing or contracting person or entity in performing his or her official duties for the city.

(k) Except as otherwise provided by law, no officer or employee shall participate in, vote upon or act upon, contracts, the making of loans or grants of public funds, the granting of subsidies, fixing of rates, issuance of permits or certificates, or other regulation or supervision relating to any business in which the officer or employee, or a member of his or her immediate family, or any business with which either is associated has a financial or personal interest, other than an interest as a citizen, officer or employee of the city.

(l) In addition to the provisions set forth in Charter Section 5-505.1, no officer or employee, shall fail to disclose in writing to the Board of Ethics a conflict of interest or any financial interest other than as a citizen of the city in any matter prior to any action by the city in that matter. Nothing in this Section shall prohibit the request of an informal opinion by an officer or employee from the Ethics Board regarding a potential conflict of interest. Neither the filing of a request for an informal opinion, nor the making of a statement concerning a potential conflict of interest pursuant to Section 290.05(a), shall create a presumption or inference that an officer or employee actually has a conflict of interest concerning the matter filed with the Ethics Board or disclosed on the public record.

(m) No person shall directly or indirectly solicit, agree, aid or assist any officer or employee to violate this Chapter.

(n) The provisions and prohibitions set forth in this Section 290.04 shall not be construed to prohibit or restrict city employees from negotiating, entering into or enforcing a collective bargaining agreement between the city and a labor union to which the employee belongs pursuant to State or federal law.

(o) The provisions and prohibitions set forth in this Section 290.04 are subject to the applicable provisions and procedures of the State Statute entitled "Contracts of Public Servants with Public Entities", being MCL 15.321, et seq. as the same may be amended from time to time. In the event of a conflict between this Section 290.04 and the State Statute in any particular case, the State Statute shall prevail.

290.05 PARTICIPATION IN GOVERNMENTAL DECISIONS.

(a) A member of City Council who is required to make a motion to recuse herself/himself, or who is the subject of a motion to recuse herself/himself, on any question before the Council shall, before the matter is brought to a vote, first make a disclosure for the public record to the Council President of the conflict of interest or the financial interest other than as a citizen of the city, if any, or alternatively explaining why, despite any potential conflict, such member of Council is able to vote and otherwise participate fairly, objectively and in the public interest. A statement shall be entered in full in the minutes or other official record of the legislative body. The Clerk shall forthwith forward any such statement on to the Ethics Board. Compliance with the provisions of this Section 290.05(a) by an elected official shall be deemed compliance with Section 290.04(1).

(b) The provisions and prohibitions set forth in this Section 290.05 shall not be interpreted to prohibit or restrict an employee from engaging in negotiations, approval and enforcement of a collective bargaining agreement between the city and a labor union to which the employee belongs pursuant to State and federal laws.

(c) The provisions and prohibitions set forth in this Section 290.05 are subject to the applicable provisions and procedures of the State Statute entitled "Contracts of Public Servants with Public Entities" being MCL 15.321, et seq., as the same may be amended from time to time. In the event of a conflict between this Section 290.05 and the State Statute in any particular case, the State Statute shall prevail.

290.06 INVESTIGATIVE ASSISTANCE.

All city officers and employees shall fully and truthfully respond to any inquiries by the City Attorney or the Board of Ethics in investigating any complaint of a violation of this Chapter. All city employees and elected or appointed officials of the city shall cooperate with any investigations by the Board of Ethics; such cooperation shall include the compilation and production of any information requested by the Board during an investigation unless the information requested is exempt from disclosure under the applicable State law.

290.07 DISTRIBUTION OF COPIES OF CHAPTER.

The Department of Personnel and Training shall provide a copy of Chapter 5 Article V of the City Charter and of this chapter to each officer and employee of the City.

290.08 STATEMENTS OF FINANCIAL INTERESTS.

(a) For purposes of this Section, the following persons shall be referred to as "reporting individuals":

- (1) Each elected officer and
- (2) Each appointed officer, including appointed officers of the Board of Water and Light, but excluding members of boards, commissions or agencies of the city.

(b) Each reporting individual shall file by May 1 of each year, a sworn written statement of financial interests in accordance with the provisions of this Section, unless (s)he has already filed a statement in that calendar year.

(c) Statements of financial interest shall also be filed by the following:

- (1) An elected officer at the time of filing her/his oath of office;
- (2) A reporting individual whose appointment to office is subject to confirmation by the City Council at the time when her/his name is submitted to the Council for consideration;
- (3) Any other person at the time (s)he becomes a reporting individual.

(d) The Department of Personnel Services, the Finance Director's Office, City Council Staff and the Office of the Mayor shall cooperate with the City Clerk in notifying individuals of their obligation to file statements of financial interests and in effecting the filing of such statements.

(e) No appointed officer or employee shall be allowed to take the oath of office of shall enter into or continue her/his duties, unless (s)he has filed a statement of financial interests as required by this Chapter.

(f) Statements of financial interests shall contain the following information:

- (1) The name, address, and type of organization (other than the city) in

which the reporting individual was an officer, director, associate, partner, proprietor or employee, or served in any advisory capacity, and from which any income in excess of \$2,500 was derived during the preceding year.

- (2) The identity of any capital asset, located within the City of Lansing, including the address or legal description of real estate from which the reporting individual realized a capital gain of \$5,000 or more in the preceding calendar year other than the sale of the reporting individual's principal place of residence.
- (3) The name of any unit of government, other than the city, which employed the reporting individual during the preceding calendar year.
- (4) The name of any person, business or organization from whom the reporting individual received during the preceding calendar year one or more gifts or honoraria having an aggregate value in excess of \$500, but not including gifts from relatives, nor a campaign contribution or expenditure required to be recorded or reported under Public Act 388 of 1976, as amended.
- (5) The name and instrument of ownership in any entity conducting business in the city, in which the reporting individual, or a member of the individual's immediate family had a financial interest during the preceding calendar year. Ownership interests in publicly held corporations need not be disclosed.
- (6) The identity of any financial interest in real estate located in the city or other jurisdictions within which the city may own real estate or public utility improvements, other than the principal place of residence of the reporting individual, and the address or, if none, the legal description of the real estate, including all forms of direct or indirect ownership such as partnerships or trusts of which the corpus consists primarily of real estate.
- (7) The name of, and the nature of the city action requested by, any person which has applied to the city for any license or franchise, or any permit for annexation, zoning or rezoning of real estate during the preceding calendar year if the reporting individual or a member of the individual's immediate family has a financial interest in such person.

- (8) The name of any person doing independent contracting business with the city in relation to which business the reporting individual had a financial interest during the preceding calendar year, and the title or description of any position held by the reporting individual in such person.

(g) Form for statement of financial interests. Typewritten or printed statements of financial interests are to be filed with the City Clerk. The statement shall be verified, dated, and signed by the reporting individual personally. It shall be submitted on a form approved by the Board of Ethics.

(h) Filing of Statements.

- (1) The City's Finance Director and the Personnel Director shall certify to the City Clerk a list (current as of the prior January 1) of the names and mailing addresses of the persons who are required to file a statement of financial interests in the current year.
- (2) The City Clerk shall, in writing, notify all persons required to file statements of financial interests under this Section. Notice shall be delivered by first class mail to the last known address appearing in city records.
- (3) All statements of financial interests shall be available for examination and duplication by the public in the office of the City Clerk during the regular business hours of the City of Lansing, except as otherwise provided by law. Costs of duplicating the statement of financial interests shall be paid by the person requesting the duplication.
- (4) No person shall use for any commercial purpose information contained in or copied from statements of financial interests required to be filed by this Chapter or from lists compiled from such statements.

(i) Failure to file statements by deadline.

- (1) The City Clerk shall notify any person who fails to file such a statement by May 1 of each year, by certified mail of her/his failure to file by the specified date. Such person shall file her/his statement on or before May 31, along with a late filing fee of \$20.00. Failure

to file by May 31 shall constitute a violation of this Chapter, except as provided in subsection (3).

- (2) Any person who first becomes subject to the requirement to file a statement of financial interests within 30 days prior to May 1 of any year shall be notified at that time by the appointing or employing authority of the obligation to file and shall file his statement at any time on or before May 31 without penalty. The appointing or employing authority shall notify the City Clerk of the identity of such persons. If such person fails to file a statement by May 31, the City Clerk shall notify such person by certified mail of her/his failure to file by the specified date. Such person shall file her/his statement of financial interests on or before June 15, along with a late filing fee of \$20.00. Failure to file by June 15 shall constitute a violation of this Chapter, except as provided in subsection (3).
- (3) A person who is required to file such statements of financial interest may have one thirty day filing extension by filing a notice with the City Clerk by the date on which the statement of financial interest is due. Failure to file by the extended deadline shall constitute a violation of this Chapter.
- (4) A statement of financial interest is considered filed when it is received by the City Clerk.

290.09 LOBBYIST AND CONTRACTOR DISCLOSURE.

(a) All city officers and employees shall comply with the provisions of MCL 4.411, et seq., as the same may be amended from time to time, being the State act regulating lobbyists, lobbying agents, and lobbying activities, to the extent that the statutory provisions are applicable to the officers or employees activities.

(b) All contractors or vendors having contractual relationships or open purchase orders with the city shall fully disclose in writing to the City Clerk and the Board of Ethics the existence of any employment, partnership or ownership relationship the contractor or vendor has with a former employee or officer of the city if such relationship was created within one year from the date the officer or employee terminated employment with the city.

(c) The provision contained in Section 290.09(b) shall be included within every city contract and purchase order.

290.10 PENALTIES.

- (a) Violation by any person of any provision of this Chapter shall be a misdemeanor.
- (b) A violation of any provision of this Chapter may constitute a ground for forfeiture of office in proceedings brought pursuant to Charter 2-302.
- (c) The penalties prescribed in this Section shall be cumulative and not exclusive of each other.

290.11 EDUCATION.

The Board of Ethics shall develop a plan for implementation of a program to educate persons subject to the terms of this Chapter about their duties and responsibilities hereunder.

290.12 WHISTLE-BLOWER PROTECTION.

(a) The provisions of the Whistle-Blower's Protection Act MCL 15.361, et seq. are intended to apply to employees who report a violation or suspected violation of this Chapter.

(b) The city shall not discharge, threaten, or otherwise discriminate against an employee regarding the employee's compensation, terms, conditions, location, or privileges of employment because the employee, or a person acting on behalf of employee, reports or is about to report, or is perceived to have reported or be about to report, verbally or in writing, a violation or suspected violation of this Chapter, unless the employee knows that the report is false, or because an employee is requested by the city, or any agency or officer thereof, to participate in an investigation, hearing, or inquiry held by the city, agency or official.

Section 2. All ordinances, resolutions or rules, parts of ordinances, resolutions or rules inconsistent with these provisions are repealed.

Section 3. Should any Section, clause or phrase of this ordinance be declared to be invalid, the same shall not affect the validity of the ordinance as a whole, or any part other than the part so declared to be invalid.

Section 4. This ordinance shall take effect on the 30th day after enactment unless given immediate effect by the City Council.

Section 5. This ordinance shall expire 10 years from the date of its passage by the City Council unless readopted prior to that time.

ADOPTED BY THE LANSING BOARD OF ETHICS AT THEIR REGULAR MEETING
HELD ON TUESDAY, MARCH 11, 1997

Monetary Gifts Policy from Similar Cities

East Lansing

<https://www.cityofeastlansing.com/DocumentCenter/View/4463/Ordinance-No-1362-PDF?bidId=>

No specific dollar amount for their employees. Pg 3 & 4.

Ann Arbor

- <https://www.a2gov.org/media/zq1pcn2v/council-rules-as-amended-040725.pdf>

Pg. 22 – Only mention of a specific dollar amount is on this page: “This rule does not apply to other products with an estimated value under \$20 that are generally distributed at an educational seminar or event.” **This is only for their city council members**

- <https://www.a2gov.org/media/q5zfajhj/23-conflict-of-interest.pdf>

No specific dollar amount, this is from their Human Resources policies and procedures.

Detroit

- https://detroitmi.gov/sites/detroitmi.localhost/files/2018-02/FINAL_OPINION_2012-03_ISSUED_5.3.12_1.pdf

No specific dollar amount. Provided is the City of Detroit Board of Ethics final opinion on this issue.

Sterling Heights

https://codelibrary.amlegal.com/codes/sterlingheights/latest/sterlinghts_mi/0-0-0-64658

No specific dollar amount. From the City of Sterling Heights Charter and Code Ordinances, Article 4, section 2-155.

Grand Rapids

- <file:///C:/Users/JHerrera/Downloads/23-02-Employee-Code-of-Conduct.pdf>

No specific dollar amount.