

CITY OF LANSING - BOARD OF ETHICS

REGULAR MEETING

June 9, 2026, 5:30 P.M.

Lansing Elections Office (LEO)

701 W Jolly Rd Lansing

AGENDA

CALL TO ORDER

ROLL CALL

- Jim DeLine, Chairperson
- Rachelle Franklin, Vice Chairperson
- Luna Brown
- R Cole Bouck
- Jim Cavanagh
- Charles Filice
- Ryan Wier

A Quorum is: Present Not Present

Others Present:

PUBLIC COMMENT (TIME LIMIT OF 5 MINUTES PER SPEAKER)

APPROVAL OF AGENDA As Submitted With Changes Noted

SECRETARY'S REPORT Approval of Minutes: Feb 10, 2026

NEW BUSINESS

Election of Chairperson and Vice Chairperson (Term of Office July 1, 2026 – June 30, 2027)

CITY ATTORNEY'S REPORT

CHAIR'S REPORT

TABLED ITEMS

UNFINISHED BUSINESS

- Clara Martinez Statement of Financial Interests City Council
- Sean Gehle Statement of Financial Interests HRCS Board Member
- Richard Peffley Statement of Financial Interests BWL General Manager
- Continued Review of [Ethics Ordinance Chapter 290](#)
- Proposed Edits to the Statement of Financial Interests Form

ADJOURNMENT

Persons with disabilities who need accommodation to fully participate in this meeting can complete a request form available online at <https://www.lansingmi.gov/1369/Request-for-Reasonable-Accommodations> or call the City Clerk's Office at (517) 483-4133 (TTY 711). Advance notice may be needed for certain accommodations. An attempt will be made to grant all reasonable accommodation request.

CITY OF LANSING STATEMENT OF FINANCIAL INTERESTS

This statement must be completed by you and filed with the Lansing City Clerk no later than **May 1 of each year.**

Each and every part of this form must be completed. If you have no information to report, you must note that in that part of the form. If you feel a part is not applicable, you must state your reasoning. Forms with missing or incomplete information will be returned for completion.

The full text of the Financial Interests section 290.08 of the Ethics Ordinance and the Conflict-of-Interest section 5-505 of the City Charter are attached to this disclosure to assist in the full completion of this form. For additional guidance, please contact the Office of the City Attorney.

Reporting Individual to Complete – Basic Filing Information

Name of Reporting Individual Clara Martinez

Position with the City City Council member Name of Supervisor The People

Principal Address of Reporting Individual 100 S Hosmer St Apt 22 Lansing, MI 48912

Contact Numbers: 517-410-9119 Email: clara.martinez@lansingmi.gov

I, make the foregoing disclosure parts I-IX under oath and assert the statements are true and accurate to the best of my knowledge, information, and belief.

[Signature]
Signature

5-29-2026
Date

MAY29'26 4PMCLERK

STATE OF MICHIGAN)
)ss.
COUNTY OF Ingham)

The foregoing instrument was acknowledged before me this 29 day of May, 2024 (year), by Clara Martinez
(Name of Reporting Individual)

[Signature] (Notary Signature)
Brian P Jackson (Print Name) Notary

Public, Ingham County,

Acting in Ingham County,

My Commission Expires: July 28 2027

Report Terms

For purpose of your disclosures in this form, the following words have the defined meaning:

1. "Benefit" includes the receipt, directly or indirectly, of any payment, gift, grant, pass through to another, forbearance, service, good, real property, personal property, or any other right, title or interest of value.
2. "Organization," includes for profit and nonprofit corporation, partnership, association, club, limited liability company, any group acting as a unit, or any other legal entity.
3. "Past" means the preceding calendar year (past 12 months) from the time this disclosure is filed.
4. "Present" means at the time this disclosure is filed.
5. "City" means City of Lansing
6. "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.

Part I

List each and every organization (other than the City) in which you are an employee, officer, director, associate, partner, or proprietor, or served in any advisory capacity and from which any income in excess of \$2500 was derived during the preceding calendar year (past 12 months).

| Organization's Name | Address | Type of Organization | Your Function/Title | Past 12 Months or Present |
|-------------------------|-----------------|----------------------|---------------------|---------------------------|
| Lansing School District | 519 W Kalamazoo | Government | Teacher | Present |
| | | | | |
| | | | | |

Do any of the organizations listed above receive any funding or have any contracts with the City of Lansing?

YES NO

If yes, then please review Part IX for additional details on documentation required for submission.

As my role as a teacher, I am not immediately connected or receive direct benefit.

Part II

List any capital asset located within the city of Lansing, including the address or legal description of real estate, from which you realized a capital gain of \$5,000 or more in the past (12 months). Do not include any gain from the sale of your principal place of residence.

| Asset | Description |
|-------|-------------|
| None. | |
| | |
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| | |

Part III

List each and every past (12 months) and present unit of government, other than the City, for which you are or have been employed.

| Unit of Government | Past 12 Months or Present |
|-------------------------|---------------------------|
| Lansing School District | Present |
| | |

Part IV

List each and every person, or organization from which you received in the past (12 months), or that has presently promised you, one or more gifts or honoraria having an aggregate value in excess of \$500. This does not include gifts from relatives, nor a campaign contribution or expenditure required to be recorded or reported under the Michigan Campaign Finance Act.

| Name | Address of Principle Residence | Nature of Gift | Value of Gift | Past 12 Months or Present |
|-------|--------------------------------|----------------|---------------|---------------------------|
| None. | | | | |
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Do any of the organizations listed above receive any funding or have any contracts with the City of Lansing?

YES
 NO

If yes, please provide additional information on the nature of the Financial Interest.

Part V

List each and every name of and instrument of ownership in any organization conducting business within the city of Lansing in which you, or a member of your Immediate Family had or have a financial interest in the past (12 months) or present. Ownership interests in publicly held corporations need not be disclosed.

| Name | Address | Instrument of Ownership | Past 12 Months or Present |
|-------|---------|-------------------------|---------------------------|
| None. | | | |
| | | | |
| | | | |

Part VI

Identify each and every parcel of real property, past (12 months) or present, and describe your right, title or interest, or your financial interest in the parcel if the city of Lansing may also possess a real property interest or maintain public utility improvements in the parcel. Include all forms of your direct ownership or indirect ownership such as partnerships or trusts of which the corpus consists primarily of real estate. Do not include your principal place of residence. Include real property both within and outside the city of Lansing.

| Address or Description of Real Estate | Nature of Right or Interest | Past 12 Months or Present |
|---------------------------------------|-----------------------------|---------------------------|
| None. | | |
| | | |
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| | | |

Part VII

List each and every person or organization that has applied to the City for a license, franchise, or permit, or requested annexation, zoning or rezoning of real property, past (12 months) or present, if you, or a member of your Immediate Family has a financial interest in such a person or organization. Include the nature of the City action requested.

| Name of Contracting Person or Organization | Names of Applicable Immediate Family Member(s) | Nature of Interest | Past 12 Months or Present |
|--------------------------------------------|------------------------------------------------|--------------------|---------------------------|
| None. | | | |
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Part VIII

List each and every person or organization doing independent contracting business with the City in which you, or a member of your immediate family, had (within the past 12 months) or currently have a financial interest or personal interest. Include the title and description of any position held by you, or the member of your Immediate Family, in the organization.

| Name of Person or Organization | Nature of Financial Interest | Title or Description of Position Held by Reporting Individual or Immediate Family | Past 12 Months or Present |
|----------------------------------|------------------------------|-----------------------------------------------------------------------------------|---------------------------|
| Marcos Martínez, Lansing Lugnuts | Employee | Employee of Lansing Lugnuts | Present |
| | | | |
| | | | |
| | | | |

If yes, please provide additional information on the nature of the Financial Interest.

Part IX

If you, your Immediate Family, or any organization you are required to disclose under Part I, had or have in the past (12 months) or present, a contract, agreement, arrangement or participate in a program with the City that directly or indirectly benefits you, your Immediate Family, or the organization you must provide:

- A written statement containing a detailed description and explanation of the contract, agreement, arrangement or program and the nature of involvement and participation therein by you, your Immediate Family or the organization and describe all the beneficiaries thereof.
- Provide separate written statements for each contract agreement, arrangement and program and include a full and complete statement of the program, performance, beneficiaries, compensation, duties and obligations therein.

Please note that this disclosure is intended to include contracts, agreements, and arrangements that are formal or informal, written or oral, and direct or indirect.

Part VIII – Clara Martinez

My brother, Marcos Martinez, is an employee of the Lansing Lugnuts. His financial interests only include his salary received for employment. The Lansing Lugnuts has an operating contract with the City of Lansing as our baseball team.

Jackson, Brian

From: R Cole Bouck <rcbouck@gmail.com>
Sent: Monday, May 18, 2026 5:13 PM
To: Jackson, Brian
Cc: Swope, Chris
Subject: [EXTERNAL] Statement of Financial Interests
Attachments: Statement of Financial Interests Form 2025 (PDF) - REWRITE - Cole - 2026-05-18.docx;
Statement of Financial Interests Form Instructions (PDF) - Highlights.pdf

Categories: important

Greetings from NOLA Brian!

I have taken quite a bit of time to go over this form, along with the relevant section of the ordinance.

Attached is my mock up of suggestions (don't let it alarm you!) and some issues the Board will need to address. I have also attached a copy of the signed SOFI letter and ordinance language with some highlights that correspond to my comments and changes to the form.

I would like to ask the Clerk's office to get for the Board a definitive answer regarding the requested address for the person filling it out (you will recall our discussion about personal address vs. work address).

1. Is there an absolutely correct answer here (it has to be, or it must be...); or, can it be either, at the discretion of the Board (doesn't seem like that would be the case)? City Attorney should be able to help with this.
2. If there is an ABSOLUTE answer, then we need to follow that, whichever it is.
3. If not, I'll have to think about what my preference would be.

I reformatted this form in Word (converted PDF to Word, then edited it), to add some consistency throughout. Feel free to work from this document going forward if that saves you time and effort in making changes.

See you in June!

Cole

CITY OF LANSING
STATEMENT OF FINANCIAL INTERESTS

This statement must be completed by you and filed with the Lansing City Clerk no later than May 1 of each year.

Each and every part of this form must be completed. If you have no information to report, you must note that in that part of the form (NONE). If you feel a part is not applicable, you must ALSO NOTE THAT (N/A) AND state your reasoning. EACH ACRONYM MUST BE SPELLED OUT THE FIRST TIME IT IS USED. Forms with missing or incomplete information will be returned for completion.

The full text of the Financial Interests section 290.08 of the Ethics Ordinance and the Conflict-of-Interest section 5-505 of the City Charter are attached to this disclosure to assist in the full completion of this form. For additional guidance, please contact the Office of the City Attorney [or City Clerk's Office ?].

Reporting Individual to Complete – Basic Filing Information

FULL Name of Reporting Individual:
Position withIN the City: ELECTED OR APPOINTED:
NAME OF DEPARTMENT/WORK AREA/BOARD:
Principal RESIDENCE Address of Reporting Individual:
[Is there a 'RIGHT' answer for this (personal or work), or can Board decide?]
ARE YOU A RESIDENT OF THE CITY OF LANSING? YES NO
PRIMARY Contact Number(s): Email:
FULL Name of IMMEDIATE Supervisor:
THEIR POSITION WITHIN THE CITY:

SUGGESTED: Move Notary section to the end of the document.

I, make the foregoing disclosureS IN parts I-IX under oath and assert the statements are true and accurate to the best of my knowledge, information, and belief.

Signature Date

STATE OF MICHIGAN)
)ss.
COUNTY OF)

The foregoing instrument was acknowledged before me this ___ day of ___,
___ (year), by
(Name of Reporting Individual)

(Notary Signature)
(Print Name)

Notary Public, ___ County,
Acting in ___ County,
My Commission Expires: _____

Report Terms

For purpose of your disclosures in this form, the following words have the defined meaning:

1. "Benefit" includes the receipt, directly or indirectly, of any payment, gift, grant, pass through to another, forbearance, service, good, real property, personal property, or any other right, title or interest of value.
2. "Organization," includes for profit and nonprofit corporation, partnership, association, club, limited liability company, any group acting as a unit, or any other legal entity.
3. "Past" means the preceding calendar year (past 12 months) from the time this disclosure is filed. [By definition, 'calendar year' means a period of 12 months ending on December 31. So regardless of when they complete it, they technically only have to report through December 31 of the previous calendar year, potentially leaving a gap between that date and when they complete the form. Conversely, if they fill it out for the past 12 months, they are technically leaving a gap at the front end of the calendar year. Was Council's intent the previous (most recent) 12 months, or THE previous calendar year, leaving a gap in reporting?]
4. "Present" means at the time this disclosure is filed.
5. "City" means City of Lansing
6. "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.

Part I [This is one we need to discuss. Ordinance specifically states 'was' and only asks regarding the 'preceding YEAR' (past tense), which is correctly interpreted as the past (12 months). This is annual reporting that looks backwards 12 months. Do we care now if they are still in that 'position', or not until next year when they complete this form again?]

List each and every organization (other than the City) in which you ~~are~~ WERE an employee, officer, director, associate, partner, or proprietor, or served in any advisory capacity, and from which any income in excess of \$2,500 was derived during the preceding calendar year (past 12 months). [ORDINANCE 290.08 (F) (1)]

| Organization's Name | ORGANIZATION FULL Address | Type/DESCRIPTION of Organization | Your POSITION/Function/Title | Past 12 Months or Present DO YOU REMAIN IN THAT POSITION? (Y/N) |
|---------------------|---------------------------|----------------------------------|------------------------------|-----------------------------------------------------------------|
| | | | | |
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| | | | | |

Do any of the organizations listed above receive any funding or have any contracts with the City of Lansing?

_____ YES _____ NO

If yes, then please review Part IX for additional details on documentation required for submission.

Part II

List any capital asset located within the city of Lansing, including the address or legal description of real estate, from which you realized a capital gain of \$5,000 or more in the **PRECEDING CALENDAR YEAR** ~~past (12 months)~~. Do not include any gain from the sale of your principal place of residence. [ORDINANCE 290.08 (F) (2)]

| Asset | FULL ADDRESS OR LEGAL Description OF REAL ESTATE |
|-------|--------------------------------------------------|
| | |
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Part III [This is one we need to discuss. Ordinance specifically states 'during the preceding calendar year' (past tense). This is annual reporting that looks backwards 12 months. See my note under 'Reporting Term', #3, 'Past above'. Do we care if they are still in that 'position' now, or not until next year when they complete this form again?]

List **THE NAME OF ANY UNIT OF GOVERNMENT** ~~each and every~~ **past (12 months)** and present unit of **government**; other than the City, for which you **WERE EMPLOYED DURING THE PRECEDING CALENDAR YEAR** ~~are or have been employed~~. [ORDINANCE 290.08 (F) (3)]

| Unit of Government | Past 12 Months or Present DO YOU REMAIN IN THAT POSITION? (Y/N) |
|--------------------|-----------------------------------------------------------------------|
| | |
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Part IV

List each and every person, BUSINESS or organization from which you received **in the past (12 months), or that has presently promised you**, one or more gifts or honoraria having an aggregate value in excess of \$500 **DURING THE PRECEDING CALENDAR YEAR, OR THAT IS PRESENTLY PROMISED TO YOU**. This does not include gifts from relatives, nor a campaign contribution or expenditure required to be recorded or reported under the Michigan Campaign Finance Act. **[ORDINANCE 290.08 (F) (4)]**

| Name (PERSON, BUSINESS, ORGANIZATION) | THEIR Address of Principle Residence [?] | DESCRIPTION Nature of Gift | Value of Gift | Past 12 Months, PresentLY PROMISED, OR BOTH? |
|---------------------------------------------|------------------------------------------------|-------------------------------|------------------|-------------------------------------------------------|
| | [?] Address isn't required. | | | |
| | | | | |
| | | | | |

Do any of the organizations listed above receive any funding or have any contracts with the City of Lansing?

_____ YES _____ NO

If yes, please provide additional information on the nature of the financial interest.

Part V

List **THE each and every** name of and instrument of ownership **FOR in** any **ENTITY organization** conducting business within the city of Lansing in which you, or a member of your Immediate Family had, ~~or have~~ a financial interest in **DURING THE PRECEDING CALENDAR YEAR the past (12 months)** or **PRESENTLY DO HAVE present**. Ownership interests in publicly held corporations need not be disclosed. **[ORDINANCE 290.08 (F) (5)]**

| NAME OF INTEREST HOLDER (YOU OR YOUR IMMEDIATE FAMILY MEMBER) | RELATIONSHIP OF FAMILY MEMBER TO YOU | ENTITY Name | ENTITY FULL Address | Instrument of Ownership | Past 12 Months, PresentLY PROMISED, OR BOTH? |
|------------------------------------------------------------------------------------|-----------------------------------------------|-------------|---------------------------|----------------------------|-------------------------------------------------------|
| | | | | | |
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Part VI [Ordinance does not reference a time frame.]

Identify each and every parcel of real ESTATE ~~property~~ LOCATED IN THE CITY, OR OTHER JURISDICTIONS WITHIN WHICH THE CITY MAY OWN REAL ESTATE OR PUBLIC IMPROVEMENTS, IN WHICH YOU HAVE A FINANCIAL INTEREST. past (12 months) or present, and Describe your right, title or ~~interest, or your~~ financial interest in the parcel. INCLUDE THE ADDRESS OR, IF NONE, THE LEGAL DESCRIPTION OF THE REAL ESTATE. ~~if the city of Lansing may also possess a real property interest or maintain public utility improvements in the parcel.~~ Include all forms of ~~your~~ direct ownership or indirect ownership such as partnerships or trusts of which the corpus consists primarily of real estate. Do not include your principal place of residence. ~~Include real property both within and outside the city of Lansing.~~ [ORDINANCE 290.08 (F) (6)]

| FULL Address or LEGAL Description of Real Estate | Nature of Right, or FINANCIAL Interest | Past 12 Months or Present |
|--------------------------------------------------|----------------------------------------|---------------------------|
| | | |
| | | |
| | | |

Part VII

List each and every person or organization that has applied to the City for a license, franchise, or permit, or requested annexation, zoning or rezoning of real property, DURING THE PRECEDING CALENDAR YEAR past (12 months) or ARE PRESENTLY DOING SO ~~present~~, if you, or a member of your Immediate Family has a financial interest in such a person or organization. Include the nature of the City action requested. [ORDINANCE 290.08 (F) (7)]

| Name of Contracting Person or Organization APPLYING | NAME OF INTEREST HOLDER (YOU OR YOUR IMMEDIATE FAMILY MEMBER) | RELATIONSHIP OF FAMILY MEMBER TO YOU | Nature of FINANCIAL Interest | CITY ACTION REQUESTED | Past 12 Months, PresentLY APPLYING, OR BOTH? |
|----------------------------------------------------------------|---------------------------------------------------------------|--------------------------------------|------------------------------|-----------------------|---------------------------------------------------------------------------------------------|
| | | | | | |
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|--|--|--|--|--|--|
| | | | | | |
|--|--|--|--|--|--|

Part VIII

List each and every person or organization doing independent contracting business with the City in which you, or a member of your immediate family, had A FINANCIAL OR PERSONAL (?) INTEREST DURING THE PRECEDING CALENDAR YEAR (within the past 12 months) or PRESENTLY DO currently have a financial interest or personal interest. Include the title and description of any position held by you or the member of your Immediate Family, AND THE NATURE OF THE FINANCIAL INTEREST in the organization. [ORDINANCE 290.08 (F) (8)]

| Name of CONTRACTING Person or Organization | NAME OF INTEREST HOLDER (YOU OR YOUR IMMEDIATE FAMILY MEMBER) | RELATIONSHIP OF FAMILY MEMBER TO YOU | TITLE OR DESCRIPTION OF POSITION HELD BY INTEREST HOLDER | Nature of PERSONAL (?) OR Financial Interest | Past 12 Months, PresentLY APPLYING, OR BOTH? |
|--------------------------------------------|---------------------------------------------------------------|--------------------------------------|----------------------------------------------------------|----------------------------------------------|----------------------------------------------|
| | | | | | |
| | | | | | |
| | | | | | |

If YOU NEED ADDITIONAL SPACE TO DESCRIBE THE INTEREST, PLEASE PROVIDE IT AS AN ATTACHMENT ~~yes, please provide additional information on the nature of the Financial Interest.~~

Part IX

If you, your Immediate Family, or any organization you are required to disclose under Part I, had ~~or have~~ in the past (12 months) or presentLY HAVE, a contract, agreement, arrangement or participate in a program with the City that directly or indirectly benefits you, your Immediate Family, or the organization you must provide:

- A written statement containing a detailed description and explanation of the contract, agreement, arrangement or program, ~~and~~ the nature of involvement and participation ~~therein~~ by you, your Immediate Family or the organization, and A DESCRIPTION OF ~~describe~~ all the beneficiaries thereof.
- Provide separate written statements for each contract agreement, arrangement and program and include a full and complete statement of the program, performance, beneficiaries, compensation, duties and obligations therein.

Please note that this disclosure is intended to include contracts, agreements, and arrangements that are formal or informal, written or oral, and direct or indirect.



Chris Swope

Lansing City Clerk

April 4, 2022

EXPLANATION OF ANNUAL STATEMENT OF INTEREST

The City of Lansing Ethics Ordinance Section 290.08 requires you report in writing certain information to assure your personal activities do not conflict with your City employment duties. The ordinance specifies that the applicable disclosure period for many of the subject areas is one calendar year immediately preceding the date of disclosure.

In addition, the Lansing City Charter Section 5-505 requires you to make written disclosure by affidavit of certain other conflicts under Michigan Statute, City Charter, and ordinance. This disclosure is required to be made in advance of certain activities.

To simplify this procedure and reduce your need to make multiple disclosures, this reporting form has been modified to include both past and prospective disclosure information.

Please be aware that you have a continuing responsibility to make an additional disclosure under Section 5-505 of the Charter if a new described conflict arises between the time of your annual disclosures under ordinance section 290.08.

Your disclosure may result in the request for supplemental information by the Lansing Ethics Board.

Thank you,

Chris Swope, MMC/MiPMC

Lansing City Clerk

Rules
No un~~classified~~ ^{classified} ~~anonymized~~ ^{anonymized}
Principle address & contact info
City or personal? Is this specified or is there options?
Full address (street, city, state, zip)
Stop Calendar year - Cal = Jan - Dec.
preced yr = 12 mois
ced. says = prec year

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 form 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 30-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.

(Ord. No. 953, 8-26-96)

City of Lansing Ethics Ordinance

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 or 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 \$2,500.00 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 \$5,000.00 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 \$500.00, 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

No
time period

Proposed Edits by the Board of Ethics (March 10, 2026)

Bold = new language

~~Strikeout text = text removed~~

Blue text is v2 edits proposed on April 14, 2026

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:

Board of Ethics means the Board of Ethics created under Chapter 5 of Article V of the City Charter.

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.

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 \$1,000.00 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 \$25,000.00 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.

Business with which an officer, employee or candidate is associated means a business with which the individual is associated.

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.

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.

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.

Consanguinity – legal definition (OCA) CHART?

Extended Family means the aunt, uncle, grandparent, grandchild, or first cousins (but 3rd degree excludes cousins) of an individual (per Cole) (per Chris, how do you include aunt, uncle without including niece, nephew?)

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 ~~third~~ **third** ~~degree of consanguinity~~, under the civil law computation method, **or a member of the immediate and extended family (OCA), including relatives through adoption or another lawfully recognized relationship**, to the officer or employee, or the spouse of such a relative; or
- (2) A spouse of the officer or employee, or a **member of the spouse's extended family** ~~spouse's relative within the third~~ **third** ~~degree of affinity, to the spouse, under the civil law computation method, to the officer or employee;~~
~~degree of consanguinity~~ **immediate and extended family and (legal adoption? Non-blood, legal OCA)**, to the spouse, under the civil law computation method.
 (Note: Domestic Partner is not defined in MCL per Google)

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.

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.

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.

Officer or employee means an elected or appointed officer or an employee of a governmental body of the City.

Spouse means an individual to whom the employee is legally married under the laws of any state.

290.03. - Complaints.

- (a) Any person may file a signed written complaint with the **Office of 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 **Office of the** City Clerk shall simultaneously forward the complaint to the Board of Ethics, the person named in the complaint and the **Office of the** City Attorney. The **Office of the** City Attorney shall provide the Ethics Board with a preliminary written analysis of the complaint no later than 30 days from the date the complaint was filed with the **Office of the** City Clerk. At the next regular meeting following receipt of the **Office of the** City Attorney's analysis, the Board of Ethics shall review and consider the complaint and the **Office of 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 **Office of 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 **Office of 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.
- (b) 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 **Office 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.

- (c) No person shall knowingly make a false or misleading statement in any complaint filed with the **Office of the** City Clerk pursuant to this chapter.
- (d) 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 thereby.
- (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 \$50.00 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) **A non-monetary gift having a value in excess of \$500.00, 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 is a rebuttable presumption evidence of a violation of paragraphs (a) and (b) of this section or of Code Section 206.15. (as a presumption make it rebuttal - must report and maybe okay or not to be determine by Board of Ethics - ask OCA)**
- (e) No officer or employee shall falsely represent ~~his or her~~ **their** personal opinion to be the official position or determination of the governmental body of which ~~he or she is~~ **they are** 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.

- (f) No officer or employee shall divulge to any unauthorized person confidential information acquired in the course of holding **their** 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.
- (g) No officer or employee shall use, or allow others to use, the authority, title, or prestige of **their** public office for the attainment of the officer or employee's, or that of a member of **their** immediate family's, private financial benefit in any manner that is inconsistent with public interests.
- (h) An officer or employee shall not use personnel, resources, property or funds under **their** official care and control to obtain personal financial gain in addition to **their** official remuneration as an officer or employee for **themselves**, a member of **their** immediate family, or a business with which either is associated.
- (i) No officer or employee shall act as an attorney, agent or representative of a person other than **themselves**, 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 **their** responsibilities as an officer or employee.
- (j) 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.
- (k) No officer or employee shall engage in a business transaction in which the officer, employee, a member of **their** immediate family, or a business with which either is associated, may profit from **their** 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 **their** official duties for the City.
- (l) 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 or 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 **their** 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.
- (m) 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.

- (n) No person shall directly or indirectly solicit, agree, aid or assist any officer or employee to violate this chapter.
- (o) 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.
- (p) 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 fully, objectively ad in the public interest. A statement shall be entered in full in the minutes or other official record of the legislative body. The **Office of the City** 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(l).
- (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 and 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 **Office of 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 **Human Resources** ~~Personnel and Training~~ shall provide a copy of Chapter 5, Article V of the City ~~charter~~ **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~~ **they have** 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~~ **their** 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~~ **their** name is submitted to the Council for consideration;
 - (3) Any other person at the time ~~(s)he becomes~~ **they become** a reporting individual.
- (d) The Department of ~~Personnel Services~~ **Human Resources**, the Finance Director's Office, City Council Staff and the Office of the Mayor shall cooperate with the **Office of 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~~ **their** duties, unless ~~(s)he has~~ **they have** 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 \$2,500.00 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 \$5,000.00 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 \$500.00, 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 **Office of 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 **Human Resources Personnel** Director shall certify to the

Office of the City Clerk a list (current as of the prior January 1) of the names, **email address**, and mailing addresses of the persons who are required to file a statement of financial interests in the current year.

- (2) The **Office of the** City Clerk shall, in writing, notify all persons required to file statements of financial interests under this section. Notice shall be delivered by **electronic delivery or by** ~~and~~ 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 form lists compiled from such statements.
- (i) Failure to file statements by deadline.
- (1) The **Office of the** City Clerk shall notify any person who fails to file such a statement by May 1 of each year, by **electronic delivery and certified mail** of their ~~her/his~~ failure to file by the specified date. Such person shall file ~~her/his~~ **their** statement on or before May 31, along with a late filing fee of \$20.00. Failure to file by ~~May~~ ~~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 **Office of the** City Clerk of the identity of such persons. If such person fails to file a statement by ~~May~~ ~~may~~ 31, the **Office of the** City Clerk shall notify such person by **electronic delivery and-certified mail** of ~~her/his~~ **their** failure to file by the specified date. Such person shall file ~~her/his~~ **their** 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 30-day filing extension by filing a notice with the **Office of 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 **Office of the** City Clerk.

- (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, **and applicants** having contractual relationships or open purchase orders with the City shall fully disclose in writing to the **Office of the** City Clerk and the Board of Ethics the existence of any employment, partnership, or ownership relationship the contractor, ~~or~~ vendor, **or applicant** 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~~ **Department of Human Resources** shall **implement** ~~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.