

CITY OF LANSING - BOARD OF ETHICS

REGULAR MEETING

July 12, 2022 5:30 P.M.

CONFERENCE ROOM

2500 SOUTH WASHINGTON

AGENDA

CALL TO ORDER

ROLL CALL

☐ Keith Kris
☐ Brendon Basiga
☐ John Folkers

☐ R Cole Bouck, Chairperson
☐ Janielle Houston, Vice-Chairperson

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: June 14, 2022

Lori Adams Simon Resignation

NEW BUSINESS

1. Affidavit of Disclosure, Terry C. Cannon, Building Inspector, EDP
2. Statement of Financial Interest, Paul Dripchak, HRCS Advisory Board
3. Proposed Revisions to Statement of Financial Interests Form

CITY ATTORNEY'S REPORT

CITY ATTORNEY'S REPORT

CHAIR'S REPORT

TABLED ITEMS

UNFINISHED BUSINESS

ADJOURNMENT

DRAFT MINUTES
LANSING CITY BOARD OF ETHICS
REGULAR MEETING
June 14, 2022, 5:30 PM

Training Room
South Washington Office Complex
2500 S. Washington

The meeting was called to order at 5:31 p.m.

MEMBERS PRESENT: R Cole Bouck, Chairperson
Connie Doyle
John Folkers
Janielle Houston, Vice-Chairperson
Keith Kris

ABSENT: Lori Adams Simon – excused
Brian Basiga – excused

A QUORUM WAS PRESENT

OTHERS PRESENT: Mary Bowen, City Attorney's Office
Brian P Jackson, City Clerk's Office
Suela Sefa, City Clerk's Office

PUBLIC COMMENT:

There was no public comment

APPROVAL OF AGENDA:

MOVED by Keith Kris to move Connie Doyle's resignation to the end of the agenda so that she could still vote at the meeting.

MOTION CARRIED

MOVED by Keith Kris to approve the agenda with changes noted.

MOTION CARRIED

SECRETARY'S REPORT:

Approval of Minutes

MOVED by Janielle Houston to note that John Folkers' had an excused absence from the meeting of May 10, 2022

MOTION APPROVED

Moved by Janielle Houston to approve the Minutes of May 10, 2022

MOTION APPROVED

NEW BUSINESS

1. Statements of Financial and Personal Interest with No Items Disclosed

- Kilpatrick, Andrew, Director of Public Service
- Lee, Frank CEO, Self
- Sturdivant, Brian Fire Chief

The Board reviewed the Statements of Financial Interest with no items disclosed and found no violation of the Ethics or other issues to further debate or discuss. No further action is required.

MOVED by Keith Kris to place the statements file, having found no violation of the Ethics Ordinance or other issues to further debate or discuss at this time.

MOTION APPROVED

2. Statements of Financial Interests with Items Disclosed:

- Frayer, Shelbi Chief Strategy Officer

MOVED by Keith Kris to place Shelbi Frayer's Statement of Financial Interest on file, having found no violation of the Ethics Ordinance or other issues to further debate or discuss at this time.

MOTION APPROVED

- Todd, LaVella Corporate Secretary

MOVED by Janielle Houston to place LaVella Todd's Statement of Financial Interest on file, having found no violation of the Ethics Ordinance or other issues to further debate or discuss at this time.

MOTION APPROVED

- Macciocca, Frank

MOVED by Keith Kris to place Frank Macciocca's Statement of Financial Interest on file, having found no violation of the Ethics Ordinance or other issues to further debate or discuss at this time.

MOTION APPROVED

- Sanchez Gazella, Linda

MOVED by Janielle Houston to place Linda Sanchez Gazella's Statement of Financial Interest on file, having found no violation of the Ethics Ordinance or other issues to further debate or discuss at this time.

MOTION APPROVED

- Spitzley, Patricia

MOVED by Keith Kris to place Patricia Spitzley's Statement of Financial Interest on file, having found no violation of the Ethics Ordinance or other issues to further debate or discuss at this time.

MOTION APPROVED

UNFINISHED BUSINESS:

1. Statement of Financial Interest, Charla Burnett, Board Member, HRCS

MOVED by Janielle Houston to place Charla Burnett's Statement of Financial Interest on file, having found no violation of the Ethics Ordinance at this time. The Board's written response will include a reminder of their ongoing duty to submit a new Statement of Financial Interest if any new and relevant information arises and recuse if there is a conflict of interest.

MOTION APPROVED

2. Statement of Financial Interest, Ronald Embry, Board Member, HRCS

MOVED by Janielle Houston to place Ronald Embry's Statement of Financial Interest on file, having found no violation of the Ethics Ordinance or other issues to further debate or discuss at this time.

MOTION APPROVED

3. Statement of Financial Interest, Sharon Frischman, City Assessor

MOVED by Keith Kris to place Sharon Frischman's Statement of Financial Interest on file, having found no violation of the Ethics Ordinance or other issues to further debate or discuss at this time.

MOTION APPROVED

4. Statement of Financial Interest, Brian McGrain, Director, ED&P

MOVED by Keith Kris to place Brian McGrain's Statement of Financial Interest on file, having found no violation of the Ethics Ordinance or other issues to further debate or discuss at this time.

MOTION APPROVED

5. Statement of Financial Interest, Christopher Mumby, Chief Information Officer

MOVED by Janielle Houston to place Christopher Mumby's Statement of Financial Interest on file, having found no violation of the Ethics Ordinance or other issues to further debate or discuss at this time.

MOTION APPROVED

6. Statement of Financial Interest, Joseph McDonald, Housing Ombudsman, HRCS

Deputy Clerk Jackson shared that HRCS is developing written documentation on their procedures to avoid potential conflict of interest. This item will remain on the agenda until the Board has made a determination.

CITY ATTORNEY'S REPORT:

Mary Bowen announced that Heather Sumner has left the City Attorney's Office

CHAIR'S REPORT:

Chairperson Bouck thanked the City Clerk's Office and the City Attorneys for their work.

He also expressed thanks for the years of service that Connie Doyle has provided to the Board of Ethics and will be missed by the Board after her resignation.

Constance Doyle Resignation

John Folker shared his appreciation for Connie Doyle's service to the City of Lansing and moved to accept her resignation

MOTION APPROVED

ADJOURNED 6:03 p.m.

RE: [EXTERNAL] July 12 - 5:30pm Ethics Board Agenda and Packet is available online

Simon, Lori <Lori.Simon@sparrow.org>

Tue 2022-07-12 9:17 AM

To: Jackson, Brian <Brian.Jackson@lansingmi.gov>; Bowen, Mary <Mary.Bowen@lansingmi.gov>; 'Brendon Basiga (brendon@basigalawfirm.com)' <brendon@basigalawfirm.com>; 'Janielle Houston (janiellehouston@yahoo.com)' <janiellehouston@yahoo.com>; 'John Folkers (jvfolkers@gmail.com)' <jvfolkers@gmail.com>; 'Keith Kris (keith.a.kris@gmail.com)' <keith.a.kris@gmail.com>; 'R Cole Bouck (rcbouck@gmail.com)' <rcbouck@gmail.com>; Swope, Chris <Chris.Swope@lansingmi.gov>; Sefa, Suela <Suela.Sefa@lansingmi.gov>; Washington, Shara <Shara.Washington@lansingmi.gov>
Cc: O'Boyle, Amanda <Amanda.O'Boyle@lansingmi.gov>

Good Morning Board Members:

Unfortunately, due to a work conflict on Tuesdays I must resign from the Board. It has been a pleasure working with you.

Thank you and be well!

Lori

Lori Adams Simon, MPA, CDM, CTA
Director Diversity, Equity, Inclusion & Belonging

Human Resources Department
1200 E. Michigan Avenue, Suite 235
Lansing, MI 48912
T 517.364.5076 C 517.712.8363

Diversity & Inclusion doesn't happen by chance. Organizations have to be strategic and intentional!



Sparrow Diversity & Inclusion Mission Statement:

Through Cultural Competency and evidence-based practices, Sparrow Health System will maintain a caring, respectful, and inclusive work environment that recognizes, supports and values the diversity of our Patients, Caregivers, and the Communities we serve..

From: Jackson, Brian <Brian.Jackson@lansingmi.gov>

Sent: Friday, July 8, 2022 11:56 AM

To: Bowen, Mary <Mary.Bowen@lansingmi.gov>; Brendon Basiga (brendon@basigalawfirm.com) <brendon@basigalawfirm.com>; Janielle Houston (janiellehouston@yahoo.com) <janiellehouston@yahoo.com>; John Folkers (jvfolkers@gmail.com) <jvfolkers@gmail.com>; Keith Kris (keith.a.kris@gmail.com) <keith.a.kris@gmail.com>; Simon, Lori <Lori.Simon@sparrow.org>; R Cole Bouck (rcbouck@gmail.com) <rcbouck@gmail.com>; Swope, Chris <Chris.Swope@lansingmi.gov>; Sefa, Suela <Suela.Sefa@lansingmi.gov>; Washington, Shara <Shara.Washington@lansingmi.gov>

Cc: O'Boyle, Amanda <Amanda.O'Boyle@lansingmi.gov>

Subject: [EXTERNAL] July 12 - 5:30pm Ethics Board Agenda and Packet is available online

Warning: This email originated from outside of Sparrow. **Do not click links or open attachments** unless you recognize the sender **and** are expecting the message.



CITY OF LANSING
AFFIDAVIT OF DISCLOSURE

TO: CITY CLERK

DATE: 6/17/2022

I, Terry C. Cannon make the following disclosure under oath:
Name (please print)

PLEASE CHECK THE BOX AND FILL IN THE APPROPRIATE BLANKS FOR EACH OF THE FOLLOWING ITEMS

Yes No

1. ☒ ☐ I am an ☐ elected or ☐ appointed ☐ officer or ☒ employee of the City of Lansing holding the position of Building Inspector in the EDP Department.
- ☐ ☒ I am an immediate family member related to an elected or appointed officer or employee of the City of Lansing named _____, holding the position of _____ in the _____ Department. JUN17'22 8AMCLERK
- ☐ ☒ I am a Business Associate of an elected or appointed officer or employee of the City of Lansing named _____ holding the position of _____ in the _____ Department.
2. ☐ ☒ I may derive income or benefit directly or indirectly from the bidding of, negotiation of, solicitation of or entry into a contract with the City or from any City action detailed below. (Charter 5-505.1)
- ☐ ☒ I may have a conflict between a personal interest and the public interest, the nature of which is disclosed below. (Charter 5-505.2)
[Chapter 290.04(I) of the Code of Ordinances]
- ☐ ☒ I may have a financial interest in a matter proposed to be acted upon by the City of Lansing as described below. [Chapter 290.04(I) of the Code of Ordinances]
- ☒ ☐ I make this disclosure because of a possible appearance that I may be in violation of or in conflict with the City of Lansing Ethics Ordinance as provided for in the Code of Ordinances and in the City Charter.
3. My City of Lansing position is:
☒ Full-time ☐ Part-time (less than 25 hours/wk) ☐ Unpaid
4. Name of the activity/business in question: House Remodel
5. Do you have ownership or interest in the activity/business? Yes X No _____

6. Does this activity/business conduct business with the City of Lansing? Yes _____ No X
If yes, please explain _____

7. Does the activity/business depend on you being an employee of the City of Lansing?
Yes _____ No X
If yes, please explain: _____

8. Who are the clients/customers of the activity/business?
myself

9. Does this activity/business require your using equipment/facilities of the City of Lansing?
Yes _____ No X
If yes, please explain: _____

10. Does the activity/business use any advertisements or circulars that reference your employment with the City of Lansing? Yes _____ No X
If yes, please attach copies.

11. Explain what you will be doing in the activity/business:
Completing the remodel of 910 Vine St home that I purchased
and began remodeling prior to my employment with
the City of Lansing

12. Explain why you believe a conflict may/may not exist with this activity/business:
I will have to pre-pull the permit that I was told I had
to cancel due to my acceptance of the offer of employment.
I need the permit (building) as required by the City of Lansing.
The conflict could be related to my position of Building Inspector

13. Is there any additional information that you believe would assist the Board of Ethics in its review of your business or personal activities for potential conflicts of interest? Yes X No _____
If so, please describe:
I will not be continuing to pull permits to conduct business.
I only want to complete the project that I started
I will not be performing the required inspections

In providing this additional information, the Board of Ethics asks that you give special attention to the Conflicts of Interest section of the Charter found at 5-505.1 – 5-505.3. A copy is enclosed for your convenience.

I hereby certify that this disclosure is complete and accurate to the best of my knowledge, information and belief. The foregoing Affidavit of Disclosure was executed on this 17th day of June, 2022.

Suz C. Good

Signature of Filer

STATE OF MICHIGAN)
)ss.
COUNTY OF Ingham)

The foregoing instrument was acknowledged before me this 17th day of June,
2022 (year), by Christina Raeder (Notary Signature)

Christina Raeder (Print Name)

Notary Public, Ingham County,
Acting in Ingham County,
My Commission Expires: 7.11.2027



CITY OF LANSING STATEMENT OF FINANCIAL INTEREST AND PERSONAL INTEREST

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 Paul Dripchak
 Job Title HRES Advisory Board Name of Supervisor Kim Coleman
 Principal Address of Reporting Individual 515 Bartlett St Lansing, MI 48915
 Phone Numbers: Personal: [REDACTED] Work: _____

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.

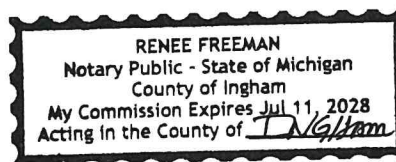
[Signature]

Signature

7/7/22

Date

STATE OF MICHIGAN)
)SS.
 COUNTY OF INGHAM)



JUL 8'22 11AMCLERK

The foregoing instrument was acknowledged before me this 7th day of July,
2022 (year), by Renee Freeman (Notary Signature)
RENEE FREEMAN (Print Name)

Notary Public, INGHAM County,

Acting in INGHAM County,

My Commission Expires: 7-11-2028

S:\Clerk_Staff\Board of Ethics\Statements of Financial Interests\Statement of Financial Interests Form.Current 06 08 2021

Approved to form by the Board of Ethics on 6/8/2021

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 officer, director, associate, partner, proprietor or employee, 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
CEE-CMH	812 E Jolly Rd Lansing, MI 48910	Nonprofit Corporation	Employee/Therapist	Present
Healing Conversations Counseling	301 Williamston Center Rd Ste 800 Williamston, MI 48895	For profit Business	Employee/Therapist	Present
Michigan State University	655 Adairton Rd #254 East Lansing, MI 48824	State Higher Education University	Employee	Past 12 Months

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	

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
County - CEI - Community Mental Health	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				

]

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 principle 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		

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			

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
None			

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.

PROPOSED EDITS

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**CITY OF LANSING STATEMENT OF FINANCIAL
INTEREST AND PERSONAL INTEREST**

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 _____ Job Title _____

_____ Name of Supervisor _____ Principal _____

Address of Reporting Individual _____ Contact Numbers: _____

Commented [JB1]: So that home phone numbers are not public record

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

Date

STATE OF MICHIGAN)
)ss.
COUNTY OF _____)

The foregoing instrument was acknowledged before me this ____ day of _____,

____ (year), by _____

(Name of Reporting Individual)

Commented [JB2]: Comply with Notary Standards

_____(Notary Signature)

_____(Print Name) Notary

Public, _____ County,

Acting in _____ County,

My Commission Expires: _____

PROPOSED EDITS

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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 officer, director, associate, partner, proprietor or employee, 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

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

Commented [JB3]: Suggested by the Board with edit from Clerk Swope

 YES NO

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

PROPOSED EDITS

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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

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

PROPOSED EDITS

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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

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.

Commented [JB4]: Suggested by the Board with edit from Clerk Swope

PROPOSED EDITS

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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

PROPOSED EDITS

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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

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

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

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

Commented [JB5]: Suggested by Deputy Clerk Brian as it allows details to share on the form similar to the other edits

Part X

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.