



2348 S. Brentwood Boulevard  
Brentwood, MO 63144  
314-963-8600  
fax 314-962-0819  
www.brentwoodmo.org

## ADDENDUM

### Conflict of Interests Disclosure Report

The City of Brentwood, Missouri passed Ordinance 4713 on May 16, 2016, amended by Ordinance 4732 on September 6, 2016 which has been codified under Title I of the Revised Code of Ordinances of the City of Brentwood, Missouri, Chapter 115: Officers and Employees.

The purpose of this ordinance is to set forth standards of conduct for elected and appointed officials as well as employees of the City of Brentwood. This ordinance also provides references to certain state statutes that define and regulate the conduct of officers and employees of municipal government. The proper operation of municipal government requires that public officials and employees be independent, impartial, and responsible to the people; that government decisions and policy be made in the proper channels of the government structure; that public office not be used for personal gain; and that the public have confidence in the integrity of its government. In recognition of these goals, there is hereby established a procedure for disclosure and/or recusal of officials and employees faced with financial or personal conflicts of interest in matters affecting the City. All elected and appointed officials as well as employees of the City of Brentwood shall comply with Section 105.452 and 105.454 RSMo., on conflicts of interest as well as any other State law governing official conduct.

The disclosure reports, on a form acceptable to the Missouri Ethics Commission, shall be made available by the office of the City Clerk for distribution electronically, by telephone fax, and by regular mail. The City Clerk will send a notice in the month of January every year reminding the elected and appointed officials, as well as the City employees of their obligations under this ordinance. Completed disclosure reports shall be filed with the City Clerk and with the Missouri Ethics Commission in accordance with the Commission's requirements. The reports shall be available for public inspection and copying during normal business hours.

### Section 115.030.4 Circumstances Requiring Disclosure

1. Each elected official of the City of Brentwood, each member of the Brentwood Architectural Review Board, Board of Adjustment (including alternate members) and Planning and Zoning Commission, the City Administrator, Assistant City Administrator, Finance Director, and City Attorney shall disclose the following information annually by May first (1<sup>st</sup>), if any such transactions were engaged in during the calendar year ending with the immediately preceding December thirty first (31<sup>st</sup>):

- (a) Any transaction with the City in excess of five-hundred dollars (\$500.00) which involved the official or employee and any and all persons within the first degree of consanguinity or affinity of that person. Transactions exempted from disclosure include: compensation received as an employee or elected official, payment of any tax, fee or penalty, or any transfers for no consideration to the City.
- (b) Any transaction with the City in excess of five-hundred dollars (\$500.00) which involved any business entity in which such person had a substantial personal or

private interest. Transactions exempted from disclosure include: compensation received as an employee or elected official, payment of any tax, fee or penalty, or any transfers for no consideration to the City.

2. The City Administrator, Assistant City Administrator, and Finance Director also shall disclose by May first (1<sup>st</sup>) for the calendar year ending with the immediately preceding December thirty first (31<sup>st</sup>) the following information:

- (a) The names and addresses of each of the employers of such person from whom income of one thousand dollars (\$1,000.00) or more was received during the year covered by the statement;
- (b) The names and addresses of each sole proprietorship owned; the name, address and the general nature of the business conducted of each general partnership and joint venture in which he/she was a partner or participant; the name and address of each partner or co-participant for each partnership or joint venture unless such names and addresses are filed by the joint venture or partnership with the Secretary of State; the name, address and general nature of the business conducted of any closely held corporation or limited partnership in which the person owned ten percent (10%) or more of any class of the outstanding stock or limited partnership units; the name of any publicly traded corporation or limited partnership that is listed on a regulated stock exchange or automated quotation system in which the person owned two percent (2%) or more of any class of outstanding stock, limited partnership units or other equity interests;
- (c) The name and address of each corporation for which such person served in the capacity of a director, officer, or receiver.

3. Each elected official of the City of Brentwood and each member of the Brentwood Architectural Review Board, Board of Adjustment (including alternate members) and Planning and Zoning Commission shall disclose by May first (1<sup>st</sup>) for the calendar year ending with the immediately preceding December thirty first (31<sup>st</sup>) the following information, and shall file supplementary or revised disclosures within thirty days of a change to relevant information:

- (a) The address of any real estate located in the City of Brentwood in which the elected official or a member of the elected official's immediate family has an ownership or leasehold interest;
- (b) The name and address of any business with which the official is associated or in which the official has a substantial interest that (i) has an ownership or leasehold interest in any real estate in the City of Brentwood; or (ii) is located in the City of Brentwood; or (iii) does business with the City of Brentwood.

4. Each candidate (as defined in Sec. 130.011, RSMo.) for election to a Brentwood municipal office and each committee (as defined in Sec. 130.011, RSMo.) that accepts any contribution or makes any expenditure for the primary or incidental purpose of influencing or attempting to influence the action of voters with regard to any Brentwood municipal candidate or issue election shall file a copy of each report filed with the Missouri Ethics Commission and/or with the St. Louis County Board of Election Commissioners with the city clerk within 24 hours of filing with the Commission or Board.

**The following definitions in Ordinance 4713, Section 115.030** through 115.030.8, are provided, unless the context clearly requires otherwise, the following terms mean:

- (1) "Business entity", a corporation, association, firm, partnership, proprietorship, or business entity of any kind or character;
- (2) "Business with which a person is associated":
  - (a) Any sole proprietorship owned by himself or herself, the person's spouse or any dependent child in the person's custody;
  - (b) Any partnership or joint venture in which the person or the person's spouse is a partner, other than as a limited partner of a limited partnership, and any corporation or limited partnership in which the person is an officer or director or of which either the person or the person's spouse or dependent child in the person's custody whether singularly or collectively owns in excess of ten percent of the outstanding shares of any class of stock or partnership units; or
  - (c) Any trust in which the person is a trustee or settlor or in which the person or the person's spouse or dependent child whether singularly or collectively is a beneficiary or holder of a reversionary interest of ten percent or more of the corpus of the trust;
- (3) "Dependent child" or "dependent child in the person's custody", all children, stepchildren, foster children and wards under the age of eighteen residing in the person's household and who receive in excess of fifty percent of their support from the person;
- (4) "Immediate family" includes: husband, wife, son, daughter, father, mother, brother, sister, brother-in-law, sister-in-law, father-in-law, mother-in-law, uncle, aunt, nephew, niece, step parent and stepchild.
- (5) "Substantial interest", ownership by the individual, the individual's spouse, or the individual's dependent children, whether singularly or collectively, directly or indirectly, of ten percent or more of any business entity, or of an interest having a value of ten thousand dollars or more, or the receipt by an individual, the individual's spouse or the individual's dependent children, whether singularly or collectively, of a salary, gratuity, or other compensation or remuneration of five thousand dollars, or more, per year from any individual, partnership, organization, or association within any calendar year;
- (7) "Substantial personal or private interest in any measure, bill, order or ordinance", any interest in a measure, bill, order or ordinance which results from a substantial interest in a business entity.

**Additional Assistance / Information:**

If you need further assistance regarding the Disclosure Report, it is suggested that you review Ordinance 4713, Title I of the Revised Code of Ordinances of the City of Brentwood, Missouri, Chapter 115: Officers and Employees, Section 115.030 Conflicts of Interests. Filed Conflict of Interests Disclosure Reports may be found on the city's Transparency Portal.



**Financial Disclosure Statement for Political Subdivisions - 105.485(4), RSMo**

**1. Statement Information (select one)**

Type:  New  Amended

**2. Filing Status & Time Period Covered (select one & insert time period)**

A. Filing Status

- Annual Filer:** file from Jan 1 to Dec 31 of prior year (if no longer serving, enter the time period served), due by May 1
- Newly Appointed/Employed:** file for calendar year before start date, due within 30 days
- Incumbent Candidate:** file from Jan 1 of prior year to closing date for candidacy (may be longer than 12-month period), due within 14 days of closing date for candidacy
- New Candidate:** file for the 12-month period before the closing date for candidacy, due within 14 days of closing date for candidacy

B. Time Period Covered: From \_\_\_/\_\_\_/\_\_\_ to \_\_\_/\_\_\_/\_\_\_ (mm/dd/yyyy)

**3. Filer Information**

Filer's name (First, Middle, Last) \_\_\_\_\_

Spouse's name (First, Middle, Last) \_\_\_\_\_

Mailing address \_\_\_\_\_

City, State, Zip \_\_\_\_\_

Dependent child's name\* (First, Middle, Last) \_\_\_\_\_

Dependent child's name\* (First, Middle, Last) \_\_\_\_\_

Political Subdivision or State Agency \_\_\_\_\_

Title (Position/Office Seeking) \_\_\_\_\_

Check if spouse is filing separate from yourself (if your spouse is not required to file a PFD, this statement MUST disclose his/her information).

\*Includes all children, stepchildren, foster children and wards under the age of eighteen residing in the person's household and who receive in excess of 50% of their support from the person.

**4. Transaction Information**

A. List the transactions, valued at more than \$500, you, your spouse, or any relative within the first degree of blood or marriage had with the political subdivision listed above. *Do not include* compensation received as an employee, payment of taxes, fees or penalties or transfers for no consideration.

Date (mm/dd/yyyy) \_\_\_\_\_ Parties involved in transaction \_\_\_\_\_

Date (mm/dd/yyyy) \_\_\_\_\_ Parties involved in transaction \_\_\_\_\_

B. List the transactions for any business entity, in which you, your spouse, or dependent child(ren) held a substantial interest, that conducted business with the political subdivision listed above valued at more than \$500. *Do not include* payments of taxes, fees or penalties due to the political subdivision or transactions involving payment for providing utility service to the political subdivision or transfers for no consideration. (NOTE: Substantial interest includes ownership of 10% of the business entity or interest valued at \$10,000 or more, or from which a salary, gratuity or other compensation of \$5,000 or more is paid per calendar year).

Date (mm/dd/yyyy) \_\_\_\_\_ Name of Business \_\_\_\_\_ Parties involved in transaction \_\_\_\_\_

Date (mm/dd/yyyy) \_\_\_\_\_ Name of Business \_\_\_\_\_ Parties involved in transaction \_\_\_\_\_

**5. Signature (select one, sign & date)**

- I affirm and attest under penalty of perjury that information and facts in this report are complete, true, and accurate. I further acknowledge that I am aware that any false statement or declaration made herein is punishable under Ch. 575 RSMo.
- I affirm and attest under penalty of perjury that information and facts in this report are complete, true, and accurate and that my spouse has refused or failed to provide information concerning his or her financial interest and that I have no working knowledge of such interests. I further acknowledge that I am aware that any false statement or declaration made herein is punishable under Ch. 575 RSMo.

Filer's Signature (Required) \_\_\_\_\_

Date (mm/dd/yyyy) \_\_\_\_\_

**NOTE:** The following information is required from the **Chief Administrative Officer** and **Chief Purchasing Officer** only. Include information for filer, spouse and dependent child(ren).

**6. Employment**

List the name and address of each employer from whom you, your spouse, or dependent child(ren) received income of \$1,000 or more during the time period covered by this statement.

Employer Name _____	Employer Address/City/State/Zip _____	Person's name whom received income _____
Employer Name _____	Employer Address/City/State/Zip _____	Person's name whom received income _____

**7. Sole Proprietorships**

List each sole proprietorship owned by you, your spouse or dependent child(ren) during the time period covered by this statement.

Sole Proprietorship Name _____	Sole Proprietorship Address/City/State/Zip _____
Sole Proprietorship Name _____	Sole Proprietorship Address/City/State/Zip _____

**8. General Partnerships, Joint Ventures**

List each general partnership and joint venture in which you, your spouse or dependent child(ren) were a partner or participant, and the names of partners or co-participants, unless such names and addresses are filed with the Secretary of State, during the time period covered by this statement.

General Partnership or Joint Venture Name _____	Address/City/State/Zip _____	Nature of Business _____	Partner/Coparticipant's Name & Address _____	Party Involved _____
General Partnership or Joint Venture Name _____	Address/City/State/Zip _____	Nature of Business _____	Partner/Coparticipant's Name & Address _____	Party Involved _____

**9. Stocks, Bond & Other holdings**

EXCEPTION: Interest in any qualified plan or annuity pursuant to the Employees Retirement Income Security Act (ERISA) is not required to be listed.

A. **Limited Partnerships, Closely-held Corporations:** List the name of any closely-held corporation/limited partnership in which you, your spouse, or dependent child(ren) own ten percent (10%) or more of any class of the outstanding stock or units during the time period covered by this statement.

Limited Partnership/Closely-held Corporation Name _____	Address/City/State/Zip _____	Nature of business _____	Party Involved _____
Limited Partnership/Closely-held Corporation Name _____	Address/City/State/Zip _____	Nature of business _____	Party Involved _____

B. **Publicly Traded Corporation or Limited Partnership:** List the name of any publicly traded corporation or limited partnership which is listed on a regulated stock exchange or automated quotation system in which you, your spouse or dependent child(ren) own two percent (2%) or more of any class of outstanding stock, units or other equity interests during the time period covered by this statement.

Corporation/Limited Partnership Name _____	Party Involved _____
Corporation/Limited Partnership Name _____	Party Involved _____

**10. Corporations**

List the name and address of each corporation for which you, your spouse, or dependent child(ren) served in the capacity of a director, officer or receiver during the time period covered by this statement.

Corporation Name _____	Corporation Address/City/State/Zip _____	Person's name who served in this capacity _____
Corporation Name _____	Corporation Address/City/State/Zip _____	Person's name who served in this capacity _____

This form is required to be filed with the Missouri Ethics Commission and with the governing body of your political subdivision. All elected and appointed officials as well as employees of a political subdivision must comply with §105.454 RSMo., on conflicts of interest and their own local code of ethics.

**Section 115.030.4 Circumstances Requiring Disclosure**

3. Each elected official of the City of Brentwood and each member of the Brentwood Architectural Review Board, Board of Adjustment (including alternate members) and Planning and Zoning Commission shall disclose by May first (1<sup>st</sup>) for the calendar year ending with the immediately preceding December thirty first (31<sup>st</sup>) the following information, and shall file supplementary or revised disclosures within thirty days of a change to relevant information:

(a) The address of any real estate located in the City of Brentwood in which the elected official or a member of the elected official's immediate family has an ownership or leasehold interest;

Property Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

**Section 115.030.4 Circumstances Requiring Disclosure**

3. Each elected official of the City of Brentwood and each member of the Brentwood Architectural Review Board, Board of Adjustment (including alternate members) and Planning and Zoning Commission shall disclose by May first (1<sup>st</sup>) for the calendar year ending with the immediately preceding December thirty first (31<sup>st</sup>) the following information, and shall file supplementary or revised disclosures within thirty days of a change to relevant information:

(b) The name and address of any business with which the official is associated or in which the official has a substantial interest that (i) has an ownership or leasehold interest in any real estate in the City of Brentwood; or (ii) is located in the City of Brentwood; or (iii) does business with the City of Brentwood.

Name of Business: \_\_\_\_\_

Address of Business: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Are you associated? \_\_\_\_\_

Do you have substantial interest? \_\_\_\_\_

Please indicate the name and address of the immediate family \_\_\_\_\_

Do you have ownership interest? \_\_\_\_\_

Please indicate the name and address of the immediate family \_\_\_\_\_

Located in the City of Brentwood, MO: \_\_\_\_\_

Does business with the City of Brentwood, MO? \_\_\_\_\_

Name of Business: \_\_\_\_\_

Address of Business: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Are you associated? \_\_\_\_\_

Do you have substantial interest? \_\_\_\_\_

Please indicate the name and address of the immediate family \_\_\_\_\_

Do you have ownership interest? \_\_\_\_\_

Please indicate the name and address of the immediate family \_\_\_\_\_

Located in the City of Brentwood, MO: \_\_\_\_\_

Does business with the City of Brentwood, MO? \_\_\_\_\_