

1 CITY OF SANTA FE, NEW MEXICO

2 ORDINANCE NO. 2011-8

3
4
5 AN ORDINANCE

6 AMENDING VARIOUS SECTIONS OF ARTICLE 1-7 SFCC 1987 RELATING TO THE
7 CODE OF ETHICS; REPEALING SECTION 1-7.8 SFCC 1987 OF THE CODE OF ETHICS;
8 AMENDING VARIOUS SECTIONS OF ARTICLE 6-16 SFCC 1987 RELATING TO THE
9 ETHICS AND CAMPAIGN REVIEW BOARD; REPEALING ARTICLE 19-6 SFCC 1987
10 REGARDING NEPOTISM; AND MAKING SUCH OTHER CHANGES AS ARE
11 NECESSARY.

12
13 BE IT ORDAINED BY THE GOVERNING BODY OF THE CITY OF SANTA FE:

14 Section 1. Section 1-7.3 SFCC 1987 (being Ord. No. 2005-14 §3) is amended to
15 read:

16 1-7.3. Purpose and Intent.

17 The purposes of the Code of Ethics are:

18 A. To fulfill the obligation imposed on the governing body by Section 2.01 of the city of
19 Santa Fe Municipal Charter to adopt an ordinance establishing standards for the ethical conduct of all
20 public officials and public employees of the city, and to provide consequences for violating such
21 ethical standards;

22 B. To adopt standards of behavior for public officials and employees of the city of Santa
23 Fe that insure that decisions are made without consideration of personal benefit to the decision-
24 maker;

25 C. To provide clear guidance with respect to such standards by clarifying which acts are

1 | allowed and which are not;

2 | D. To advance openness in city government by requiring disclosure by public officials
3 | or public employees and establishing a process for reviewing and resolving alleged violations of this
4 | Article; and

5 | E. To exercise to the fullest extent the legislative powers granted to the governing body
6 | by Article X, Section 6, of the New Mexico Constitution and the New Mexico Municipal Charter Act
7 | (§§3-15-1 et seq. NMSA 1978) and to adopt a code of ethics which particularly suits the local
8 | concerns and needs of the city of Santa Fe without regard to any provisions of state law that may be
9 | inconsistent with the city's code.

10 | **Section 2. Section 1-7.5 SFCC 1987 (being Ord. No. 2005-14 §5) is amended to**
11 | **read:**

12 | **1-7.5. Definitions.**

13 | As used in the Code of Ethics:

14 | *Business* means a corporation, partnership, sole proprietorship, firm, or other profit-making
15 | enterprise.

16 | *Confidential information* means information which is acquired by a public official or public
17 | employee by reason of his or her public office or public employment, which has not previously been
18 | made public, and which is not required to be made available to the public under the Inspection of
19 | Public Records Act (§§10-15-1 et seq. NMSA 1978).

20 | *Conflict of interest* means a specific and identifiable prospect of pecuniary gain or loss, other
21 | than a gain or loss that is de minimis in amount or shared with a substantial segment of the general
22 | public, to any of the individuals or entities here listed from an official act of any public official or
23 | employee:

24 | (1) The public official or public employee who is to perform the official act;

25 | (2) Any member of his or her family;

1 (3) Any business of which he or she or any member of his or her household is an
2 owner;

3 (4) Any employer, client or customer from whom the public official or public
4 employee knows or reasonably should know that he or she or any member of his or her
5 household or any business of which he or she is an owner has received remuneration of more
6 than five hundred dollars (\$500.00) during the year preceding the official act;

7 (5) Any civic group, labor union, or social, charitable or religious organization
8 of which the public official or public employee or a member of his or her household is an
9 officer or director; or

10 (6) Any "contributor" who has made "contributions," as those terms are defined
11 in Section 9-2.3(G) and (H) SFCC 1987, to the public official's or public employee's
12 campaign for elected office during the two years preceding the official act of more than one
13 thousand dollars (\$1,000.00) in the aggregate for councilor position and of more than two
14 thousand five hundred dollars (\$2,500.00) in the aggregate for mayor position.

15 *Employer, in the case of a person who is employed by a governmental entity other than the*
16 *city, means the governmental department for which the person works.*

17 *Family of an individual means members of the individual's household, his or her children,*
18 *step-children, brothers, sisters, parents, step-parents, domestic partner and all persons claimed as*
19 *dependents on the individual's latest federal income tax return.*

20 *Financial benefit means any money, service, license, permit, contract, loan, travel,*
21 *entertainment, gratuity or any other thing of monetary value or any promise of any of these.*

22 *Governing body means the mayor and the city council.*

23 *Governmental body means the governing body and any board, commission or committee*
24 *appointed by the governing body or by the mayor with the advice and consent of the governing body.*

25 *Household of an individual means all persons whose primary residence is in the individual's*

1 home, including non-relatives, who are not rent-payers or employees.

2 *Official act* means an official decision, vote including, but not limited to items on a consent
3 calendar, recommendation, approval, disapproval or other action which involves the use of
4 discretionary authority.

5 *Owner of a business* means each of the business's proprietors, partners or holders of more
6 than two per cent of its outstanding stock.

7 *Public employee* means any exempt, classified, probationary, temporary, term or part-time
8 employee of the city of Santa Fe except the municipal judge, the city manager, the city clerk, the city
9 attorney and the members of the governing body.

10 *Public official* means the city manager, the city attorney, the city clerk and any member of a
11 governmental body, including the governing body.

12 *Subordinate of a public official or public employee* means a public employee over whose
13 work for the city the public official or public employee has direction, supervision or control. All
14 public officials and public employees except other members of the governing body are deemed to be
15 subordinates of each member of the governing body.

16 **Section 3. Section 1-7.6 SFCC 1987 (being Ord. No. 2005-14 §6) is amended to**
17 **read:**

18 **1-7.6 Public Officials and Public Employees; Disclosure.**

19 A. Each public official and public employee shall be given a copy of the Code of Ethics
20 upon election, appointment or employment and shall sign a statement to the effect that the public
21 official or public employee has received the Code of Ethics and understands that the public official or
22 public employee shall abide by its terms and conditions. The city attorney's office shall conduct an
23 annual review of the Code of Ethics for all public employees.

24 B. Upon election, appointment, or employment, public officials and department heads
25 shall disclose in writing to the city clerk the information listed below. This information shall be

1 updated every July and shall be available to the public at all times.

2 (1) Name;

3 (2) Address and telephone number;

4 (3) Employer, if other than the city;

5 (4) Professional, occupational or business licenses;

6 (5) Membership on board of directors of corporations, public or private
7 associations or organizations; and

8 (6) Businesses of which he or she is an owner.

9 C. The information on the disclosures shall be made available by the city clerk for
10 inspection, upon request. In addition, the city clerk shall forward a copy of the disclosure statement
11 for those public employees required to make disclosures to the personnel office for inclusion in the
12 public employee's personnel file. The ethics and campaign review board shall be given copies of the
13 disclosures for its review.

14 **Section 4. Section 1-7.7 SFCC 1987 (being Ord. No. 2005-14 §7) is amended to**
15 **read:**

16 **1-7.7. Improper Gifts; Improper Transactions; Representation of Private Interests;**
17 **Conflicts of Interest; and Other Prohibitions.**

18 A. *Improper Gifts to Public Officials and Employees.* A public official or public
19 employee shall not request or receive, directly or indirectly, a gift or other financial benefit, including,
20 but not limited to, travel and accommodations, from any person or entity which, to the knowledge of
21 the public official or public employee, has any prospect of direct or indirect pecuniary gain or loss
22 from any official act to be performed by the public official or public employee, other than a gain or
23 loss shared with a substantial segment of the general public. If a public official or public employee
24 has received a gift or other financial benefit from a person or entity within the last calendar year and
25 then discovers that this person or entity has any prospect of direct or indirect pecuniary gain or loss

1 from any official act to be performed by the public official or public employee, that public official or
2 public employee shall return the gift or shall be deemed to have a conflict of interest and shall deal
3 with that conflict under the provisions of Section 1-7.7 L. SFCC 1987. However, nothing in this
4 paragraph A. shall be deemed to prohibit any of the following:

5 (1) An occasional meal or nonpecuniary gift with a fair market value not to
6 exceed fifty dollars (\$50.00) valued in a manner consistent with Internal Revenue Service
7 (IRS) rules.

8 (a) If relevant to the performance of his or her official duties, members
9 of the governing body, the city manager, the city attorney, or the city clerk may
10 receive an occasional non-pecuniary gift not to exceed two hundred and fifty dollars
11 (\$250.00); however, such person shall report the gift, its value and the provider to the
12 city clerk's office within ten (10) days of receipt of the gift, and such gift report shall
13 be immediately posted by the city clerk, on the city's website.

14 (b) If relevant to the performance of his or her official duties, a public
15 employee may receive an occasional non-pecuniary gift not to exceed two hundred
16 and fifty dollars (\$250.00); however, such person shall report the gift, its value and
17 the provider to the city manager and the public employee shall obtain the manager's
18 approval prior to receiving the gift, and if approved, such gift report shall be
19 immediately posted by the city clerk, on the city's website;

20 (2) An award, publicly presented in recognition of public service, having a fair
21 market value not to exceed fifty dollars (\$50.00) valued in a manner consistent with IRS rules
22 except for employee of the month recognition or non-profit or civic recognition of a public
23 employee that does not otherwise violate the Code of Ethics;

24 (3) A campaign contribution that is properly received and reported in the manner
25 required by Article 9-2 SFCC 1987;

1 (4) A commercially reasonable loan made in the ordinary course of business by
2 an institution authorized by the laws of the state to engage in the business of making loans; or

3 (5) Compensation for services rendered or capital invested or payment for a sale
4 of property which is normal and reasonable in amount, commensurate with the value of the
5 property sold or services rendered or the magnitude of the risk undertaken on the investment,
6 and in no way increased or enhanced by reason of the recipient's position as a public official
7 or public employee.

8 B. *Improper Transactions with the City.* A public official or public employee shall not
9 enter into a contract or transaction with the city of Santa Fe during his or her term of office or
10 employment or for a period of one (1) year following the leaving of public office or public
11 employment when the contract or transaction is a result of an official act by that public official or
12 public employee; provided, however, that nothing in this paragraph B. shall be deemed to prohibit a
13 present or former public official or public employee from seeking or obtaining, on his or her own
14 behalf, a city permit, license or service that is provided by the city on the same terms and conditions
15 to a substantial segment of the general public.

16 C. *Representation of Private Interests.*

17 (1) A governing body member, the city manager, the city attorney and the city
18 clerk shall not, during his or her term of office or within one year after the termination
19 thereof, accept monetary compensation from a third party for consulting with, representing or
20 advising that party regarding any transaction with the city or matter before the city.

21 (2) A public employee shall not, during his or her term of employment or within
22 one year after the termination thereof, accept monetary compensation from a third party for
23 consulting with, representing or advising that party regarding any transaction with the city
24 department that the public employee is or was employed by or any matter before such city
25 department in which the public employee has had or reasonably should expect to have any

1 influence or personal involvement in his or her capacity as a city employee.

2 (3) A governmental body member, excluding members of the governing body,
3 shall not, during his or her term of office or within one year after the termination thereof,
4 accept monetary compensation from a third party for consulting with, representing or
5 advising that party regarding any transaction with such governmental body or matter before
6 such governmental body in which he or she has had or reasonably should expect to have any
7 influence or personal involvement in his or her capacity as a governmental body member.

8 D. *Misuse of Confidential Information.* A public official or public employee shall not
9 use or disclose confidential information when he or she knows or reasonably should know that the use
10 or disclosure will or may result in a financial gain or the avoidance of a financial loss on the part of
11 any person or entity other than the city.

12 E. *Misuse of City Resources.* A public official or public employee shall not use city
13 services, personnel or equipment for personal benefit, convenience or profit, except when such use is
14 generally available to the public.

15 F. *Nepotism.* A public official or public employee shall not perform any act to obtain
16 the employment or to influence the employment by the city of a member of his or her family. No
17 public official or public employee shall serve as the immediate supervisor of a member of his or her
18 family.

19 G. *Financial Dealings with Subordinates.* A public official or public employee shall not
20 knowingly require, expressly or impliedly, or authorize another person to require that any subordinate
21 of the public official or public employee engage in a non-official financial transaction, including a
22 personal loan or charitable contribution.

23 H. *Improper Political Campaigning.* A public official or public employee shall not
24 knowingly request or authorize another person to request that any subordinate of the public official or
25 public employee make a campaign contribution or provide services to a political campaign, and shall

1 not engage in political campaigning while on duty for the city, or use city funds, supplies, vehicles or
2 facilities to benefit or assist a political campaign.

3 I. *City Employment as a Political Reward.* A public official or public employee shall
4 not promise an appointment or the use of his or her influence to obtain an appointment to any position
5 with the city as a reward for any political activity or contribution.

6 J. *Honoraria.* A public official or public employee shall not request or receive an
7 honorarium for a speech or service rendered in the performance of his or her duties as a public official
8 or public employee. For the purposes of this paragraph J., "honorarium" means payment of money, or
9 any other thing of monetary value, but does not include reasonable reimbursement for meals, lodging
10 or actual travel expenses incurred in making the speech or rendering the service. However, the public
11 official or public employee shall report all such reimbursement to the city clerk within ten (10) days
12 of receipt.

13 K. *Retaliation and Whistleblower Protection.* A public official or public employee shall
14 not be dismissed, threatened with dismissal, or otherwise singled out for retaliation for the reason that
15 the person has filed a complaint of violation of this Code of Ethics or any other violation of a legal
16 prohibition or requirement or has given evidence or participated in an investigation of any such
17 violation. Any act in violation of this paragraph K. shall be deemed a violation of the Code of Ethics.
18 The outcome of the original ethics complaint shall not be deemed relevant to the complaint of
19 retaliation itself.

20 L. *Conflicts of Interest.* The following shall govern conflicts of interest:

21 (1) A public official or public employee who has a conflict of interest as defined
22 in Section 1-7.5 SFCC 1987 shall immediately disclose the conflict in the following manner:

23 (a) In the case of a member of a governmental body, to the
24 governmental body at a public meeting;

25 (b) In the case of the city manager, the city attorney or the city clerk, to

1 the governing body at a public meeting; and

2 (c) In the case of a public employee, to the city manager.

3 (2) A public official or public employee shall not perform an official act or
4 attempt to influence another person to perform an official act in any matter in which he or she
5 has a conflict of interest.

6 (3) If compliance with paragraph L.(2) above by a public official or public
7 employee would deprive a governmental body of a quorum for taking necessary action or
8 would render the city unable to take necessary action on any matter, and it is deemed an
9 emergency, the public official or public employee shall be excused from such compliance
10 when he or she has made the disclosure required by paragraph L.(1) above.

11 **Section 5. [REPEAL] Section 1-7.8 SFCC 1987 (being Ord. No. 2005-14 §10) is**
12 **repealed.**

13 **Section 6. Section 1-7.9 SFCC 1987 (being Ord. No. 2005-14 §12) is amended to**
14 **read:**

15 **1-7.9 Enforcement.**

16 A. The Code of Ethics shall be enforced by the ethics and campaign review board
17 pursuant to the provisions of Article 6-16 SFCC 1987.

18 B. The governing body may by separate ordinance establish an office of inspector
19 general.

20 **Section 7. Section 6-16.1 SFCC 1987 (being Ord. No. 2005-14 §17 as amended) is**
21 **amended to read:**

22 **6-16.1 Creation and Appointment.**

23 A. *Creation.* There is created an "ethics and campaign review board" ("the board").

24 B. *Appointment.*

25 (1) The board shall consist of seven (7) members appointed by the mayor, with

1 the advice and consent of the city council, in the following manner:

2 (a) Four (4) members appointed from a list of eight (8) attorneys
3 licensed to practice in New Mexico submitted by the First Judicial District Bar
4 Association.

5 (b) Three (3) members at large.

6 (2) Members shall be qualified by training and experience and have the ability to
7 exercise sound and practical judgment regarding the powers and duties of the board.

8 (3) Each member of the board shall be a resident of the city.

9 (4) No member of the board shall be a member of the governing body, the city
10 manager, the city attorney, the city clerk or a "public employee" or a member of the "family"
11 of any of these persons (the quoted terms being used as defined in Section 1-7.5 SFCC 1987).
12 No member of the board shall make a contribution to or participate in the campaign of any
13 candidate for an elected municipal office.

14 C. *Chair and Subcommittees.* The board shall elect a chair and a vice-chair from among
15 its members, and may organize subcommittees or panels to conduct hearings, recommend advisory
16 opinions or perform other delegated tasks. The board may at any time act directly on any pending
17 matter without subcommittee action or recommendations.

18 D. *Term.* Members shall be appointed for staggered terms of four (4) years beginning
19 July 1, 2011. The initial members shall draw lots to determine which three members serve an initial
20 term of four years, which two members serve an initial term of three years and which two members
21 serve an initial term of two years; thereafter all members shall serve four-year terms. Members shall
22 serve until their successors are appointed and qualified. Members may be reappointed. A member
23 who has participated in any hearing on a pending case involving an alleged violation of the Code of
24 Ethics, the Campaign Code or the Public Campaign Finance Code shall continue to serve as a board
25 member for purposes of that case until the case is concluded, regardless of the expiration of that board

1 member's term. Newly appointed board members shall not serve on cases in which hearings have
2 already been held at the time of their appointment.

3 E. *Removal for Just Cause.* During a member's term, he or she may be removed only
4 for just cause by a majority vote of the governing body.

5 F. *Vacancies.* A vacancy on the board shall be filled by appointment by the mayor, with
6 the advice and consent of the city council, and the appointee shall serve for the remainder of the
7 unexpired term. If the vacant position was originally filled by appointment from a list of nominees
8 submitted by a particular group or organization, the appointment to fill the vacancy shall be made in
9 the same manner.

10 G. *Compensation.* Members of the board shall not receive any salary or compensation
11 for services.

12 H. *Meetings.* The board shall meet at least four (4) times yearly and on an as-needed
13 basis.

14 **Section 8. Section 6-16.2 SFCC 1987 (being Ord. No. 2005-14, §18 as amended) is**
15 **amended to read:**

16 **6-16.2 Powers and Duties.**

17 A. The board shall enforce the provisions of the Code of Ethics (Article 1-7 SFCC
18 1987), the Campaign Code (Article 9-2 SFCC 1987) and the Public Campaign Finance Code (Article
19 9-3 SFCC 1987) in accordance with the procedures prescribed in this Article and such rules as the
20 board may adopt.

21 B. The board shall establish reasonable rules of practice and procedure which are not in
22 conflict with the provisions of city code or other city rules of practice and procedure, timetables and
23 explanatory materials designed to educate the public, to encourage voluntary compliance and to
24 ensure fair and prompt disposition of alleged violations. All such rules of practice and procedure
25 shall be available to the public in the city clerk's office and on the city's website.

1 C. The board may give advisory opinions to any person requesting an opinion as to
2 whether his or her own future conduct would violate the Code of Ethics, the Campaign Code or the
3 Public Campaign Finance Code. An advisory opinion rendered by the board shall be binding on the
4 board in any subsequent proceeding on a complaint against the person or entity who requested the
5 opinion and acted in good faith in reliance thereon, unless the person or entity omitted or misstated a
6 material fact in requesting the advisory opinion. Advisory opinions shall be indexed and maintained
7 on file with the city clerk and placed on the city's web site.

8 D. In the exercise of its responsibilities, the board may audit campaign or other records.
9 After each election campaign the board may contract for professional reviews or audits of campaign
10 finance statements and shall file their results with the city clerk's office.

11 E. The board shall periodically review and recommend changes to the governing body
12 for improving the Code of Ethics, the Election Code, the Campaign Code or the Public Campaign
13 Finance Code, particularly following a municipal election.

14 H. The board shall review and make recommendations to the governing body regarding
15 the governing body procedural rules and other procedural matters including, but not limited to, the
16 city's annual open meetings act compliance resolution.

17 **Section 9. Section 6-16.4 SFCC 1987 (being Ord. No. 2005-14 §20 as amended) is**
18 **amended to read:**

19 **6-16.4 Determination of Legal Sufficiency; Setting a Hearing.**

20 A. Upon receipt of the complaint, the board shall determine the following:

21 (1) If the face of the complaint sets forth legally sufficient facts which, if true,
22 show probable cause to believe that there was a violation;

23 (2) If the complaint was filed within one (1) year after the complainant first
24 discovered or reasonably should have discovered the facts on which the complaint is based;

25 (3) If the complaint is frivolous or intended solely to harass or intimidate; and

1 (4) If the board lacks jurisdiction to adjudicate the complaint.

2 B. The city attorney, or a qualified attorney designated by the city attorney, may file a
3 complaint with the board on the basis of information referred by the board or obtained otherwise,
4 upon the city attorney's independent determination that probable cause exists of a violation of the
5 Code of Ethics, the Campaign Code or the Public Campaign Finance Code.

6 C. To promote public participation, and to preserve the board's transparency, credibility,
7 and stature, all final board determinations, including board decisions on complaints, advisory
8 opinions, and settlements, shall be made during public meetings in compliance with the Open
9 Meetings Act. No complaint shall be dismissed without a prior evidentiary hearing or prior board
10 discussion in a public meeting of the reasons for the determination.

11 D. If the board determines that the complaint is legally sufficient, was filed timely and is
12 not frivolous, and that the board has jurisdiction to adjudicate the complaint, the board shall at the
13 same meeting set a schedule for hearing the complaint. The board shall conduct a public hearing
14 regarding the complaint in accordance with due process of law. The chair of the board has authority
15 to order appropriate discovery and issue subpoenas for the attendance of witnesses or the production
16 of documents. Any decision of the chair with respect to discovery or with respect to the issuance of
17 subpoenas shall be reviewable by the board upon request of any affected person. The board may seek
18 enforcement of administrative subpoenas or discovery requests in district court.

19 E. The city clerk may require electronic posting of all documents generated pursuant to
20 the Code of Ethics, the Campaign Code or the Public Campaign Finance Code, in an accessible and
21 searchable format, including the proceedings of the ethics and campaign review board.

22 **Section 10. Section 6-16.7 SFCC 1987 (being Ord. No. 2005-14, §22 as amended) is**
23 **amended to read:**

24 **6-16.7 Sanctions.**

25 A. To encourage compliance and deter Campaign Code violations, the city clerk shall

1 assess such fines as provided for in Section 9-2.10 SFCC 1987 and Section 9-2.15 SFCC 1987. The
2 fine shall be payable within thirty (30) calendar days to the city of Santa Fe. Respondents may contest
3 the validity of such fine by filing a written appeal to the board within five (5) calendar days of its
4 assessment, which the board shall promptly affirm or reject.

5 B. Except as set forth in paragraph C. below, if the board following a hearing
6 determines that there has been a violation of the Code of Ethics, the Campaign Code or the Public
7 Campaign Finance Code, it may:

8 (1) Issue a public reprimand;

9 (2) Impose a fine not to exceed five hundred dollars (\$500.00) per violation.

10 Each day of a continuing or repetitive violation may be deemed a separate offense. The board
11 may seek enforcement of fines in district court;

12 (3) Recommend removal or suspension from office of a public official by the
13 governing body;

14 (4) Refer complaints against public officials, where appropriate, to the district
15 attorney's office for investigation and prosecution; and

16 (5) In the case of a violation of the Public Campaign Finance Code, revoke a
17 candidate's certification as a participating candidate or order repayment or refund by a
18 candidate of any money received by the candidate from the Public Campaign Finance Fund
19 pursuant to Section 9-3.10 SFCC 1987 or Section 9-3.13 SFCC 1987.

20 C. Although public employees are subject to and bound by the provisions of the Code of
21 Ethics, the Campaign Code and the Public Campaign Finance Code, the sanctions authorized by this
22 Section may not be imposed on public employees unless they are public officials or exempt
23 employees. All other public employees found to have violated the Code of Ethics, the Campaign
24 Code or the Public Campaign Finance Code shall be subject to discipline only in accordance with the
25 personnel rules and regulations of the city of Santa Fe and applicable collective bargaining

1 agreements.

2 D. The sanctions set forth in paragraphs A., B. and C. do not preclude the enforcement
3 of applicable existing state and federal statutes.

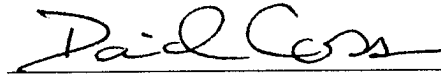
4 E. A respondent may submit a written waiver of hearing.

5 **Section 11. [REPEAL] Article 19-6 SFCC 1987 (being Ord. No. 1996-38, §§1-4),**
6 **is repealed.**

7 **Editor’s Note. A note shall be added as follows: “See Section 1-7.7F. SFCC 1987 for the**
8 **city’s code regarding nepotism.”**

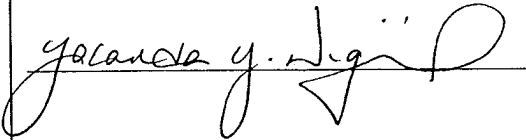
9 **Section 12. Review.** This Ordinance shall be reviewed one (1) year from the date of
10 adoption.

11 PASSED, APPROVED and ADOPTED this 30th day of March, 2011.

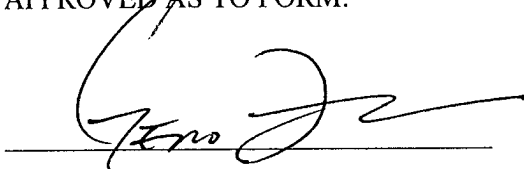
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14 DAVID COSS, MAYOR

15 ATTEST:

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17 
18

19 APPROVED AS TO FORM:

20
21 

22 GENO ZAMORA, CITY ATTORNEY

23

24

25 *mdb/ca/jpmb/ordinances 2011/code of ethics*