

O-2022-9

AN ORDINANCE

ADOPTING TITLE 2, CHAPTER 2.03 OF THE MUNICIPAL CODE OF THE CITY OF LAKEWOOD, COLORADO, IN CONNECTION WITH ESTABLISHING A CODE OF ETHICS.

WHEREAS, the City of Lakewood ("Lakewood" or "City") is a home rule municipality organized under Article XX of the Colorado Constitution and the authority of the Home Rule Charter for the City of Lakewood (Charter);

WHEREAS, Sections 1.2 and 2.1 of the Charter vests all municipal legislative powers in the City Council, and authorizes the City Council to establish those laws necessary and proper to provide for the safety, preserve the health, promote the prosperity, and improve the morals, order, comfort, and convenience of such municipality and the inhabitants thereof;

WHEREAS, the City Council finds and determines that its regulation of the subject of the ethical conduct of Representatives of the City is a matter of local concern upon which the City of Lakewood is empowered to legislate and that once adopted these regulations shall supersede within the City of Lakewood all conflicting state laws, including, but not limited to, Title 24, Article 18, Colorado Revised Statutes, C.R.S. § 24-6-203; and C.R.S. § 31-4-404;

WHEREAS, the provisions of this Code of Ethics are distinct from and in addition to the reporting requirements for candidates for elected position, and do not relieve an incumbent in, or elected candidate to, public office from reporting financial matters in accordance with applicable provisions of law;

WHEREAS, approval of this ordinance on first reading is intended only to confirm that the City Council desires to comply with the Lakewood Municipal Code by setting a public hearing to provide City staff and the public an opportunity to present evidence and testimony regarding the proposal; and

WHEREAS, approval of this ordinance on first reading does not constitute a representation that the City Council, or any member of the City Council, supports, approves, rejects or denies the proposal.

NOW, THEREFORE, BE IT ORDAINED by the City Council of the City of Lakewood, Colorado, that:

SECTION 1. Chapter 2.03 of the Lakewood Municipal Code shall be adopted as follows:

Chapter 2.03 – CODE OF ETHICS

2.03.010 - PURPOSE AND AUTHORITY

- A. The City Council finds and determines that its regulation of the subject of the ethical conduct of elected representatives of the City is a matter of local concern upon which the City of Lakewood is empowered to legislate pursuant to the home rule authority granted in Article XX of the Constitution of the State of Colorado. Accordingly, this Code of Ethics supersedes all conflicting state statutes, including, but not limited to:
1. Title 24, Article 18, Colorado Revised Statutes;
 2. C.R.S. § 24-6-203; and
 3. C.R.S. § 31-4-404.
- B. The City Council finds and determines that this chapter addresses the matters covered by Article XXIX of the Constitution of the State of Colorado, including a gift ban, a complaint and investigative process, a discipline process, and an independent decisionmaker. Therefore, Article XXIX shall not apply to the City or any City Councilmember and the independent ethics commission created by Section 5 of said Article XXIX shall have no jurisdiction over any City Councilmember.
- C. The provisions of this Code of Ethics are distinct from and in addition to the reporting requirements for candidates for elected position, and do not relieve an incumbent in or elected candidate to public office from reporting financial matters in accordance with State law and the City's Campaign Finance laws.

2.03.020 - PUBLIC TRUST; FIDUCIARY DUTY

The holding of public office is a public trust and imposes a fiduciary duty to protect the interests of the people of the City upon every City Councilmember. Each member of City Council or a Board shall carry out their duties for the benefit of the people of the City in accordance with this Code of Ethics.

2.03.030 - DEFINITIONS

As used in this chapter, the following terms shall have the meanings ascribed thereto, unless the context requires otherwise:

BOARD: Any board, committee, commission, authority or other body appointed by the City Council, whether standing, provisional or temporary.

BOARD MEMBER: A member of any board, commission or committee appointed by the City Council, pursuant to the authority vested in the City Council through the Charter, any City ordinance, or state law, including both regular and alternate members. Board Member does not include or cover any compensated full-time or part-time City employee.

BUSINESS: Any corporation, limited liability company, partnership, sole proprietorship, trust or foundation, or other individual or organization providing a service, resource(s) or goods, whether or not operated for profit.

CHARTER: The City of Lakewood home rule charter.

CITY COUNCILMEMBER OR COUNCILMEMBER: A member of the Governing Body of the City of Lakewood, Colorado, including both the Mayor and the elected representatives of the five wards of the City.

CODE OF ETHICS: This chapter 2.03 of the Lakewood Municipal Code.

COMPENSATION: Any money, thing of value, or economic benefit conferred on or received by any person in exchange for goods or services rendered, whether rendered by such individual or another.

COMPLAINANT: Any person who files a verified complaint with the City Clerk alleging that a City Councilmember or a Board Member has violated an applicable provision of this Code of Ethics.

CONFLICT OF INTEREST (Personal or Private): A personal or pecuniary right or liability that would materially (i.e., not de minimis) affect a financial interest of a City Councilmember, Family Member, or any Business with which the City Councilmember is associated. A Conflict of Interest does not include a Public Interest.

Examples of a Conflict of Interest include: (i) a City Councilmember or their family member being employed by or consulting for a Business that will directly benefit by a decision of the City Council; (ii) a City Councilmember or a Family Member owning a share of a Business that is pursuing a new development that requires City Council action to move forward; or (iii) a City Councilmember or a Family Member owning an interest in property the City desires to purchase.

ECONOMIC BENEFIT: Any benefit that can be quantified in terms of either money specifically received as a result of an action, money generated or derived as the result of an action, or a reduction in monetary debt or increase in monetary credit as the result of an action.

FAMILY or FAMILY MEMBER: Any person related to the City Councilmember by one degree of kinship (i.e., parents, siblings, children) by blood, adoption or marriage and shall also include spouses, domestic partners, persons living as a member of the City Councilmember's household, and persons in a civil union.

FIDUCIARY DUTY: A duty to act for the benefit of the City on matters within the scope of one's position.

FINANCIAL INTEREST: An interest that can be quantified monetarily and is:

1. An ownership interest in a Business;
2. A creditor interest in an insolvent Business;
3. An employment relationship;
4. A prospective employment relationship for which negotiations have begun;

5. A Business relationship established by contract;
6. An ownership interest in real or personal property;
7. A loan or any other debtor interest; or
8. A directorship or position of corporate officer in a Business.

GIFT: The acceptance by a City Councilmember of goods, services or money, for such Councilmember's own personal benefit, offered by a person who is at the same time providing goods or services to the City under a contract or other arrangement over which the City Councilmember has a measure of control or decision-making authority, unless the totality of the circumstances attendant to the acceptance of the goods or services indicates that the transaction is legitimate, the terms are fair to both parties, the transaction is supported by full and adequate consideration, and the City Councilmember does not receive any substantial benefit resulting from such person's official or governmental status that is unavailable to members of the public generally.

OFFICIAL ACT or OFFICIAL ACTION: Any vote, decision, recommendation, approval, disapproval, or other action, including inaction, which involves the use of discretionary authority.

PERSON: Any individual or any other legal entity.

PUBLIC INTEREST: Something in which the community at large has the same general interest as any Councilmember. Public Interests do not cause a Conflict of Interest even when the Councilmember may indirectly benefit.

Examples of Public Interest include: (i) interests in general City goals, such as facilitating economic opportunity or protecting the natural environment, are shared by all citizens of the City, whether or not they are a Councilmember; (ii) a Councilmember who patronizes a grocery store or other Business does not have a Conflict of Interest if the Business seeks some type of licensing or land use approval from the City because the Councilmember's interest as a customer is shared with the public; (iii) a Councilmember living in the City, attending church place of worship or having children who attend local schools..

RESPONDENT: The individual who is the subject of the complaint

SUBSTANTIAL BENEFIT: A monetary benefit in excess of \$100.

THING OF VALUE: Any tangible or intangible thing having a market value.

2.03.040 - RULES OF CONDUCT

A. It shall be a breach of a Councilmember's Fiduciary Duty and the public trust to:

1. Disclose or use confidential information acquired in the course of the Councilmember's official duties in order to substantially further their own or another's personal Financial Interest. Confidential or privileged information, including information learned within an executive session, shall not be disclosed except as provided by law.

2. Engage in a substantial financial transaction for a private Business purpose with a Person who is inspected or supervised by a Councilmember in their capacity as a Councilmember.
 3. Perform an Official Act when the Official Act directly and substantially provides a direct or indirect Economic Benefit to/for a Business or other undertaking in which the Councilmember or a Family Member either have a substantial Financial Interest or are engaged as counsel, consultant, representative, or agent, or when there is a significant risk that a Councilmember's ability to consider, recommend or carry out an appropriate course of action for the City will be materially limited as a result of the Councilmember's personal or professional responsibilities or interests.
 4. Vote on any matter when that Councilmember has been recused from voting by the unanimous consent of the other Councilmembers present at such meeting.
 5. Vote on any question or issue relative to the conduct of that individual Councilmember.
- B. Each Councilmember present shall vote on all ordinances, resolutions, or motions at any regular, special, or emergency meeting of the City Council unless recused due to a Conflict of Interest or as otherwise provided in this Code of Ethics.

2.03.050 - GIFTS

- A. No Councilmember shall solicit or accept any Gift from any Person, either directly or indirectly through a Family Member, which Gift the Councilmember knows or which a reasonable Person in such Person's position should know, under the circumstances:
1. would tend to improperly influence the Councilmember to depart from the faithful and impartial discharge of the Councilmember's public duties; or
 2. is being solicited or given for the primary purpose of rewarding the Councilmember for an Official Action the Councilmember has taken;
- B. The following acts of accepting a gift shall be presumed to be a violation of this ethics code unless the individual who accepted the gift can provide facts and/or evidence showing that the act as described below was not an ethical violation (i.e. a rebuttable presumption of ethical violation arising from the acceptance of Gift).
1. There shall be a rebuttable presumption the Councilmember knows such they are prohibited from accepting a Gift from a Person who has submitted a pending application, proposal, or contract to the City, or whom the Councilmember knows is considering submitting such request.
 2. There shall be a rebuttable presumption that a Gift exceeding \$100.00, trips outside the jurisdiction for non-work-related purposes, or tickets to an event outside the jurisdiction for a non-work-related purpose is a prohibited Gift unless enumerated under subsection (C) below.

3. The dollar amount associated with determining whether a gift is of a value that would tend to improperly influence an elected official shall be established as either money or property in excess of One Hundred Dollars and no cents (\$100.00).
- C. The following Gifts shall not be deemed to improperly influence a Councilmember as described in subsection (A)(1) or to be an unlawful reward for Official Action as described in subsection (A)(2) and shall not be prohibited for that reason:
1. Campaign contributions and contributions in kind as authorized by law;
 2. An unsolicited, occasional non-pecuniary Gift that is of trivial value not exceeding one hundred dollars (\$100.00);
 3. An unsolicited token or award of appreciation in the form of a plaque, trophy, desk item, wall memento, or similar item;
 4. Unsolicited informational material, publications, or subscriptions related to the recipient's performance of official duties;
 5. Payment of, or reimbursement for, meals, lodging, travel expenses, and admission for attendance at a convention or other meeting at which the Councilmember is scheduled to participate;
 6. Gifts similarly available to the general public;
 7. Gifts given to the City which may be used by a Councilmember during such Councilmember's term in office, but that never become the Councilmember's property;
 8. Educational scholarships, fellowships, and grants (hereafter collectively referred to as "scholarships") awarded by any person, whether such scholarships and grants are awarded to the Councilmember or a Family Member; provided however, the scholarships must be awarded based on merit, competitive application, or ongoing performance requirements, and they must be awarded on the basis of objective and non-discriminatory criteria;
 9. Gifts received pursuant to fundraising activities within the community at large when a Councilmember Family Member has special medical or financial needs resulting from an accident, medical condition, or other extraordinary event;
 10. Gifts received pursuant to fundraising activities within the community at large when a Councilmember or Family Member retires;
 11. An occasional, unsolicited opportunity to participate in a Business meeting or social function where a meal is served and/or entertainment is provided if the Councilmember's attendance would not be considered extraordinary when viewed in light of the position held by the Councilmember, including sponsored group dinners at Colorado Municipal League or similar sponsored events to which a group of similarly situated individuals from multiple municipalities are invited, and from which there is no expectation of benefit to the sponsoring organization.
 12. Anything given by an individual who is a relative;

13. Anything given by a personal friend of the Councilmember and such Gift is given for personal reasons, including wedding, birthday, or similar commonly understood reason for Gift giving;
14. Any ticket to a sporting, recreational, or cultural event where the Councilmember's attendance is reasonably related to the official or ceremonial duties of the Councilmember;
15. Payment for a speech, appearance, or publication with an organization unrelated to the City and not anticipated to enter into a contract with the City;
16. Payment of salary from employment;
17. Anything given as part of an inter-office gift exchange; or
18. Gifts or things of value received by a Councilmember from the City or received by a Councilmember arising from Councilmember's non-City employment and which is unrelated to Councilmember's official City duties.

2.03.060 - APPEARANCE OF IMPROPRIETY DISCOURAGED

An appearance of impropriety is created when a Councilmember will or may take a direct Official Action that, although not constituting a Conflict of Interest, will create a reasonable perception that the Councilmember's ability to carry out their official duties with integrity, impartiality, and competency is impaired.

2.03.070 - DISCLOSURE AND RECUSAL PROCEDURE; REVIEW BY THE BODY

A. Disclosure.

1. Conflict of Interest. Disclosure of a personal/private Conflict of Interest is mandatory and shall be made by the Councilmember on the record at the time of any Official Action by the City Council upon such matter, or sooner when appropriate. In addition, and when necessary, such conflict may also be disclosed in writing to the City Manager for distribution to all other members of the City Council.
2. Disclosure of an appearance of impropriety is voluntary and may be made by the Councilmember on the record at the time of any Official Action by the City Council upon such matter, or sooner when appropriate.
3. Approving an ordinance on first reading shall not be recognized as an Official Action as the purpose of such approval is merely to notify the public of a future action upon the ordinance.

B. Recusal.

1. When a Councilmember must be recused from participating in a matter pending before the City Council due to a Conflict of Interest, or the Councilmember has been excused following a voluntary request due to an appearance of impropriety, the Councilmember shall thereafter refrain from communicating with any other

Councilmember regarding the matter or attempting to influence any other City Councilmember's Official Action concerning the matter by speaking as a City Councilmember on the matter during official meetings of the City Council;

2. The City Council may require the recusal of a Councilmember in accordance with subsection (C) below.

C. Challenges for Conflict of Interest.

In accordance with Article VII of the Charter, the City Council may review whether any individual member has a Conflict of Interest under this Code. By unanimous vote of those present and voting (excluding the member under review) the City Council may render a determination whether a Conflict of Interest exists and whether recusal of the challenged Councilmember is required. Such determination is final and not subject to appeal. The City Clerk shall note in the minutes of the meeting the recused Councilmember's vote on such matter as "an abstention due to Conflict of Interest."

2.03.080 – COMPLAINT AND INVESTIGATION OF ETHICAL VIOLATIONS

A. Filing Complaints.

1. A Complainant may file a verified complaint with the City Clerk, upon a form provided by the City Clerk, identifying:
 - a. The Complainant's name, address, telephone number and email address, if applicable;
 - b. The name of the Councilmember who is the subject of the complaint (Respondent);
 - c. The nature of the alleged violation, including the specific provision of this Code of Ethics or other law allegedly violated;
 - d. A statement of facts giving rise to the complaint, including dates or time period in which the alleged violation occurred; and
 - e. Any other relevant documents or materials in support the alleged violation.
2. Any complaint must be filed within one (1) year of the date the violation is alleged to have occurred.

B. Complaint Process.

1. The City shall use independent, non-City personnel to address ethics complaints filed against Councilmembers. The City Clerk shall establish a list of Independent Ethics Officers (IEOs) with experience in either local government law or human resources law. To avoid perceptions of conflict of interest, such IEOs shall not otherwise be retained by the City, or whose law firm has provided outside legal services to the City during the prior two years. Also, excluding any hearing officer who has failed to meet City standards in a previous matter, including failure to file a decision in a timely manner.
2. Upon receipt of a complaint against any Councilmember, the City Clerk shall promptly transfer such complaint to an IEO, selected on a rotating basis from the established list. The IEO will conduct an initial screening of the complaint to

determine whether it states a cause of action under this Code of Ethics. Within ten (10) days following receipt of such complaint, the IEO shall make one of the following four findings and shall issue a written determination.

- a. Dismiss the complaint as incomplete or untimely;
 - b. Dismiss the complaint if the complaint, on its face, fails to state allegations, that, if true, would violate this Code of Ethics;
 - c. Refer alleged violations of municipal, state or federal laws to the appropriate law enforcement agency if the complaint states, on its face, allegations, that, if true, would constitute a violation of law; or
 - d. If the complaint states, on its face, allegations that may constitute a violation of this Code of Ethics, the matter shall be referred for independent investigation and administrative hearing in accordance with this Code of Ethics.
3. The IEO shall notify, in writing, the Complainant, the Respondent and the City Clerk of the outcome of the IEO's initial review in accordance with subsection (B)(2) above. In all circumstances, the City Clerk shall follow the IEO's determination.
 4. If the IEO makes a determination pursuant to section 2.03.080(B)(2)(d), the Respondent may:
 - a. Submit a written response in defense of such complaint to be incorporated into the official investigative record;
 - b. Agree, in writing, that the complaint establishes that the Respondent violated a provision of this Code of Ethics. Such agreement shall be deemed an admission and a waiver of the investigation and hearing process. If the investigation and hearing are waived, enforcement action will be pursuant to section 2.03.090 of this Code of Ethics.
 5. If the Respondent does not agree with the allegations of the Complaint, the IEO shall recommend an independent investigation and administrative hearing. The investigation will be conducted by an independent investigator selected by the IEO in consultation with the City Clerk. Any hearing shall be scheduled no earlier than thirty-five (35) days following receipt by the City of the investigative report.
 6. Upon completion of the independent investigation, the independent investigator shall provide the investigative report to the IEO, who shall then submit the report to the City Clerk. The City Clerk, within three days of receipt of such report, shall transmit copies thereof to both the Respondent and the Complainant.
 7. The administrative hearing shall be conducted as follows:
 - a. The hearing shall be open to the public.
 - b. Notice of the hearing shall be provided to the Complainant and to the Respondent (together, the "parties") at least ten (10) days prior to the hearing.
 - c. The hearing shall be recorded.

- d. The IEO shall serve as the administrative hearing officer and shall have the discretion to conduct the hearing in a manner the IEO determines will best meet the intent of this Code of Ethics. To assure that the participants are best able to participate effectively in the hearing, the hearing will not be held in strict conformance with the rules of civil or criminal procedure, and the formal rules of evidence shall not apply.
 - e. The parties may, but are not required to, submit supplemental evidentiary material to the IEO prior to the date of the hearing, including the names of any individuals who such party intends to call as a witness at such hearing. If a party does wish to submit such evidentiary material, the party must file three (3) copies of the material with the City Clerk. One copy shall be forwarded to the IEO, one copy shall be forwarded to the opposing party, and one copy shall be maintained for the record.
 - f. The parties may, but are not required to, present their positions and facts to the IEO at the hearing. Each party shall be allotted a reasonable amount of time to make its presentation to the IEO. The IEO may ask questions of either party as the IEO deems necessary and appropriate.
 - g. This administrative process is established with the intent that it be informal enough that each party can confidently present their position on the pending matter to the IEO without representation by legal counsel. However, each party shall have the right to have the assistance of legal counsel at their own expense. A party may not be represented by an individual not licensed to practice law within the State of Colorado. Participation of an attorney in this process shall not change the hearing standards set forth in subsection (7)(d) above.
 - h. All parties may call witnesses to give testimony at the hearing, which testimony shall be given under oath, with the witnesses stating their legal names. All witnesses shall be subject to cross-examination by both the IEO and the opposing party.
 - i. The IEO may ask questions of any party, counsel, or witness at any time during the hearing.
 - j. The IEO shall issue a written ruling within thirty (30) days of the conclusion of the hearing.
8. If, at any time prior to the hearing, the IEO determines that the complaint should not go forward in accordance with the provisions of this Code, the IEO shall issue a written dismissal with copies provided to the Complainant, the Respondent, and the City Clerk.
 9. The IEO shall determine, by a preponderance of the evidence, whether the Respondent violated a provision of this Code of Ethics. The written decision shall be submitted to the City Clerk, for distribution to the parties, within thirty (30) days following the conclusion of the hearing.
 10. The decision of the IEO may be appealed in accordance with C.R.C.P. 106(a)(4).

C. The City Attorney's Office shall be available to advise the City Clerk on carrying out the tenants of this Ethics Code but shall not act in support of either a Complainant or Respondent.

2.03.090 - ENFORCEMENT OF ETHICAL VIOLATIONS

- A. Thirty days following a finding by the IEO that the Respondent has violated a provision of this Code of Ethics, the matter will be transferred to the City Council for disciplinary action unless an appeal of that determination is pending in a court of law.
- B. Disciplinary actions against Councilmembers shall be considered in a public session of the City Council in accordance with the provisions of Article VII of the City Charter.
- C. Disciplinary action may include 1) public censure upon a two-thirds majority vote of the entire City Council, or 2) determination of specific action to bring the Respondent into compliance with the terms of this Code of Ethics, such as exclusion from executive sessions impacted by a matter with which the member has an ethical conflict, or exclusion from a vote of the Body upon a matter with which the member has been found to have an ethical conflict. Such specifically identified action must be found, by the affirmative vote of three-quarters ($\frac{3}{4}$) of the entire membership of the City Council, to be a necessary and appropriate response to the identified violation of this Code of Ethics to avoid further violations of this Code of Ethics.
- D. General Enforcement Provisions.
 - 1. Enforcement of this Code of Ethics shall not be pursuant to LMC Title 1, Chapter 16, Penalty for Violations.
 - 2. Enforcement action under this Code of Ethics shall not prohibit or prevent reporting such violations to a professional association, or the pursuit of criminal or civil action if a crime or civil wrong is deemed to have occurred.
 - 3. Any violation determined to be a violation subject to Charter § 2.13 and/or Title 2, Chapter 2.05, of the Lakewood Municipal Code shall be addressed in accordance with the terms of such laws.

2.03.100 - BOARD MEMBERS

- A. It shall be a breach of a Board Member's fiduciary duty to the City to carry out any of the following acts:
 - 1. Vote on any matter proposed or pending before the Board or attempt to influence the decisions of the other members of the Board in voting on any matter in which such Board Member has a personal or private interest. The Board Member shall disclose such interest to the board pursuant to section 2.03.070. A public interest is not a personal or private interest.
 - 2. Fail to disclose an appearance of impropriety in any matter proposed or pending before the Board.
- B. Board Members shall comply with all prohibitions regarding Gifts as set forth above in section 2.03.050 of this Code of Ethics.

- C. Board Members shall follow the disclosure and recusal requirements set forth in section 2.03.070 with the exception that disclosure shall be made either orally during a meeting or in writing to all other members of the Board.
- D. A Complainant may challenge any Board Member's failure to declare a conflict of interest or failure to recuse by filing a complaint with the City Clerk in conformance with section 2.03.080(A) of this Code of Ethics.
- E. Upon receipt of a complaint against a Board Member (Respondent) regarding an alleged violation of this Code of Ethics, the City Clerk shall immediately forward the complaint to the City Council. The City Council shall review the complaint and take whatever action it deems appropriate and notify the Complainant and the Respondent. The actions available to the City Council shall be by majority vote and shall include, but are not limited to:
 - 1. Dismissal of the complaint as incomplete or untimely;
 - 2. Dismissal of the complaint for failure to assert a violation of this Code of Ethics;
 - 3. Assigning the complaint to an *ad hoc* committee for further review and investigation;
 - 4. Requiring the Respondent to recuse themselves from matters associated with the area of Conflict; or
 - 5. Removal of the Respondent from the Board to which such individual had previously been appointed.

SECTION 2. This ordinance shall take effect thirty (30) days after final publication.

SECTION 3. If any provision of this Ordinance should be found by a court of competent jurisdiction to be invalid, such invalidity shall not affect the remaining portions or applications of this Ordinance that can be given effect without the invalid portion, provided that such remaining portions or application of this Ordinance are not determined by the court to be inoperable.

I hereby attest and certify that the within and foregoing ordinance was introduced and read on first reading at a regular hybrid meeting of the Lakewood City Council on the 13th day of June, 2022; published by title in the Denver Post and in full on the City of Lakewood's website, www.lakewood.org, on the 16th day of June, 2022; set for public hearing on the 27th day of June, 2022, read, finally passed and adopted by the City

Council on the 27th day of June, 2022 and, signed and approved by the Mayor on the 28th day of June, 2022.



Adam Paul

Adam Paul, Mayor

ATTEST:

Jay Robb

Jay Robb, City Clerk

APPROVED AS TO FORM:

Alison McKenney Brown

Alison McKenney Brown, City Attorney