



CITY OF ATLANTA

Ethics Division

Office of the Inspector General

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2020 Financial Disclosure Statement Audit Report

Each year pursuant to Section 2-814 of the Atlanta Code of Ethics, elected officials and certain employees are required to disclose assets and income sources to the Ethics Division of the Office of the Inspector General on the City Financial Disclosure Statement. The Ethics Division audits a percentage of the statements received and the information submitted for completeness and accuracy. The process and results are outlined in this report. For a blank copy of the 2020 Financial Disclosure Statement, please [see Appendix A](#).

Section 2-814 of the Atlanta City Code

Section 2-814 is a critical component of the Ethics Code. This section pertains to the requirements of the city financial disclosure statement, and specifies the officials, employees and board members required to file the statement. For Section 2-814, please [see Appendix B](#).

Items required to be disclosed on the financial disclosure statement include:

1. Positions of employment outside of city income. This includes personal business entities.
2. Sources of income above \$5,000.
3. Family members' employment with the city.
4. Family members' contractual agreements with the city.
5. Ownership of real estate in the state of Georgia.
6. For certain filers only, ownership of stocks, bonds and other debt obligations in excess of \$10,000.

History of Financial Disclosure Statement Audits

Early years of the program and selected groups for audits

The Ethics Division's auditing process began in 2017 with an inaugural audit and continues to develop and expand each year. Audits for the 2018, 2019 and 2020 years have included two tiers. The first tier for each audit consists of city elected officials and high-level employees, specifically department heads and their deputies. The second tier consists of a selected group of employees uniquely identified each year. The selected group for the 2018 audit consists of inspectors from all departments. The selected group for the 2019 audit included employees in the departments of procurement and contract compliance. The selected group for the 2020 audit consists of employees in the department of finance. The second tier also includes filers flagged during prior year audits as requiring further review.

Results of the prior year, 2019, Financial Disclosure Statement Audit

The 2019 financial disclosure season included 3,131 required filers. The audit sought to review compliance with Section 2-814, specifically that all required filers disclosed outside sources of income, outside business entities, family members employed by the city, and real estate ownership. The two tiers of the population, as described above, with tier one consisting of elected officials and high-level employees, and the second tier consisting of employees in the departments of procurement and contract compliance, totaled 176 individuals whose financial disclosure statements were audited. Of those audited, 24 were forwarded to the Ethics Officer for further review, 14 were sent letters or received phone calls from our office for clarification, and eight were forwarded to the Ethics Investigator for further review and investigation if necessary.



Overview of the 2020 Audit

The 2020 financial disclosure season included 3,480 required filers. As in prior years, the audit was split into two tiers with the first tier consisting of elected officials and high-level employees. Results from the first tier is outlined below in *Exhibit 1*. The second tier for the 2020 audit consists both of employees in the department of finance, and employees who had been flagged in previous audits and required a follow up review. Results from the second tier is outlined in *Exhibit 2*. A total of 302 filers were audited for both Tier 1 and Tier 2.

2020 Audit Process

The process of auditing financial disclosure statements is generally as follows:

1	Reviewed 2020 financial disclosure statement for completeness.	Noted potential omissions or potential errors.
2	Compared 2020 statements with 2018 and 2019 statements for consistency.	Noted inconsistencies for further review.
3	If necessary, performed a “look-ahead” review of 2021 and 2022 financial disclosure statements.	For persons with noted omissions or inconsistencies in steps 1 and 2 above, reviewed 2021 and 2022 financial disclosure statements if available and noted discrepancies.
4	Public records search	Performed a public records search using TLO (TransUnion subscription service) to compare a person’s known business entities with entities disclosed on financial disclosure statement.
5	Public records search	Performed records search using Georgia Secretary of State website to note business activity based on entities revealed in TLO.
6	Public records search	Performed various records searches as necessary in county tax assessors’ websites, governmentcontracts.us, and Small Business Administration website, among others, as necessary.
7	Social media search	Performed basic searches using Linked In, Facebook and Google, as necessary.
8	Internal City of Atlanta records searches	Performed searches using City of Atlanta Final Action Legislation page and Oracle for vendor/supplier activity, as necessary.

2020 Audit Findings

The following two exhibits provide a summary of our findings, if any, from the process listed above. The resolution for each finding may fall under one of the following categories:

- A. Sent email or made phone call to filer requesting clarification
- B. Filer acknowledged error and filed an amended statement
- C. Referred to Ethics Investigator for further review
- D. Former employee; did not pursue

Exhibit 1 First Tier 2020 Audit – Findings and Actions Taken

First Tier consists of elected officials and high-level employees

AUDIT #	DEPT	POSITION	FINDING	ACTION TAKEN	RESOLUTION
1013	Aviation	Employee	Did not disclose entity	Admitted error and filed an amendment	B
1015	Watershed	Employee	Did not complete section 5	Admitted error and filed an amendment	B
1030	Executive Offices	Employee	Did not disclose entity	Former Employee; did not pursue	D
1031	Procurement	Employee	Did not disclose entities	Email requesting amendment	A
1049	Watershed	Employee	Did not disclose entity	Former employee; did not pursue	D
1052	Finance	Employee	Did not complete section 5	Former employee; did not pursue	D
1071	AIM	Employee	Disclosed entity with potential appearance of impropriety	Referred to Ethics Investigator	C
1072	Executive Offices	Employee	Did not disclose entities	Former employee; did not pursue	D
1077	City Council	Member	Did not disclose entities	Former employee; did not pursue	D

Exhibit 2 Second Tier 2020 Audit – Findings and Actions Taken

Second Tier consists of employees in the Department of Finance and employees flagged in prior audits

AUDIT #	DEPT	POSITION	FINDING	ACTION TAKEN	RESOLUTION
2008	Finance	Employee	Disclosed entity with potential ethical issues	Referred to Ethics Investigator	C
2014	Executive Offices	Employee	Did not disclose entity; disclosed entities with potential ethical issues	Referred to Ethics Investigator	C
2016	Procurement	Employee	Did not disclose entity	Referred to Ethics Investigator	C
2017	Finance	Employee	Disclosed entities with potential ethical issues	Referred to Ethics Investigator	C
2031	Finance	Employee	Did not disclose entity	Email and phone call requesting clarification	A
2032	Executive Offices	Employee	Disclosed family transaction with potential ethical issues	Referred to Ethics Investigator	C
2034	Finance	Employee	Did not disclose entity	Email requesting clarification	A
2067	Parks and Recreation	Employee	Did not disclose entity	Email requesting clarification	A
2072	Executive Offices	Employee	Incomplete statement	Former employee; did not pursue	D
2088	Executive Offices	Employee	Did not disclose family member employee	Email requesting clarification	A
2100	Finance	Employee	Incorrect form filed	Letter requesting correct form	B
2103	Finance	Employee	Did not disclose entity	Former employee; did not pursue	D
2125	Finance	Employee	Did not disclose entity	Email requesting clarification	B
2128	Finance	Employee	Did not disclose entity	Former employee; did not pursue	D
2130	Finance	Employee	Did not disclose entity	Email requesting clarification	B

AUDIT #	DEPT	POSITION	FINDING	ACTION TAKEN	RESOLUTION
2136	Finance	Employee	Did not disclose entities	Email requesting clarification	A
2140	Finance	Employee	Did not disclose entity	Former employee; did not pursue	D

After presenting preliminary results of the audit to the Ethics Officer for further review,

- 11 filers were sent an email from the Ethics Analyst requesting clarification and amended statements if appropriate,
- 5 filers filed amendments to statements filed in either 2021 or 2022,
- 6 filers were referred to the Ethics Investigator for further review and investigation, and
- 9 filers had become former employees after their 2020 financial disclosure filings, and no further action was taken.

Integrity of data obtained during the 2020 financial disclosure filing season

Due to system generated report errors in the 2020 financial disclosure statement e-filing system developed by the vendor RFD & Associates, Inc., the data obtained during the filing season included statements which contained blank fields. The 2020 financial disclosure statements were provided to the Ethics Division in pdf format and could not be amended by filers. Therefore, if we observed a potential omission or inaccuracy, we communicated this finding with the filer and requested that they file correct statements in future years. [Appendix C](#) provides screenshots of the two most common fields that were required by a given filer and, while those fields were completed by the filers, their statements do not accurately reflect this information. The Ethics Officer will continue to monitor this issue.

Appendix A

2020 Financial Disclosure Statement



CITY OF ATLANTA ETHICS DIVISION 2020 Financial Disclosure Statement

To be completed by city officials and employees currently serving or who served in 2019

Identifying Information *(Read all instructions carefully and complete each part)*

Full Name:

Name of City Department,
Commission, Board or Agency:

Reporting Year: 2019

Filing Deadline: 4/1/2020

Reason(s) for Filing *(Check all that apply)*

City Employee: Yes <input type="checkbox"/> No <input type="checkbox"/>	Current Employee? Yes <input type="checkbox"/> No <input type="checkbox"/>	Last Month as City Employee:
City Elected Official: Yes <input type="checkbox"/> No <input type="checkbox"/>	Currently Serving? Yes <input type="checkbox"/> No <input type="checkbox"/>	Last Month of Service:
City Board, Commission or Agency: Yes <input type="checkbox"/> No <input type="checkbox"/>	Currently Serving? Yes <input type="checkbox"/> No <input type="checkbox"/>	Last Month of Service:
Executive Board, Commission or Agency: Yes <input type="checkbox"/> No <input type="checkbox"/>	Currently Serving? Yes <input type="checkbox"/> No <input type="checkbox"/>	Last Month of Service:
Neighborhood Planning Unit: Yes <input type="checkbox"/> No <input type="checkbox"/>	Currently Serving? Yes <input type="checkbox"/> No <input type="checkbox"/>	Last Month of Service:

Section One: Sources of Income

A) City of Atlanta Employment

Have you received income from the City of Atlanta in the prior year?

Yes No

Current or Former Job Title: _____

B) Other Employment

Since January 1, 2019, were you employed by any business, organization, or governmental agency? (this includes any self-employment)

Yes No

If you answered yes, list the name(s) of your employer(s)

Choose the category listed below that best describes the type of business or services offered by each entity you listed above.

**Note: If you listed more than one entity, state the entity name next to its category.*

- | | |
|--|--|
| <input type="checkbox"/> Arts and entertainment | <input type="checkbox"/> Manufacturing |
| <input type="checkbox"/> Construction | <input type="checkbox"/> Professional services |
| <input type="checkbox"/> Educational services | <input type="checkbox"/> Other services |
| <input type="checkbox"/> Finance | <input type="checkbox"/> Real estate |
| <input type="checkbox"/> Food and accommodation services | <input type="checkbox"/> Retail trade |
| <input type="checkbox"/> Government | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Health care | <input type="checkbox"/> Wholesale trade |
| <input type="checkbox"/> Insurance | |
| <input type="checkbox"/> Other category (describe) _____ | |

If you checked professional or other services, specify the type of services offered.

- Legal
- Accounting
- Consulting
- Public relations
- Other service (describe) _____

***Note:** If you require additional space to complete this or any other section of your City Financial Disclosure Statement, please attach additional sheets as an addendum and reference the section of the Statement which you are completing.

C) Sources of Income more than \$5,000

Since January 1, 2019, have you received more than \$5,000 in annual income from any corporation, partnership, proprietorship, non-profit organization, or other business entity, including limited partnerships or limited liability corporations?

Yes No

If you answered yes, list the source(s) of income

Choose the category listed below that best describes the type of business or services offered by each entity you listed above.

**Note: If you listed more than one entity, state the entity name next to its category.*

- | | |
|--|--|
| <input type="checkbox"/> Arts and entertainment | <input type="checkbox"/> Manufacturing |
| <input type="checkbox"/> Construction | <input type="checkbox"/> Professional services |
| <input type="checkbox"/> Educational services | <input type="checkbox"/> Other services |
| <input type="checkbox"/> Finance | <input type="checkbox"/> Real estate |
| <input type="checkbox"/> Food and accommodation services | <input type="checkbox"/> Retail trade |
| <input type="checkbox"/> Government | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Health care | <input type="checkbox"/> Wholesale trade |
| <input type="checkbox"/> Insurance | |
| <input type="checkbox"/> Other category (describe) _____ | |

Section Two: Business with the City

A) Doing Business with the City

Has any person, employer, or entity that you listed as a source of income engaged in business with the City of Atlanta since January 1, 2019?

Yes No

If you answered yes, list the person, employer or entity (next page)

Name	Nature of business or contract with the City	To which City Department or Agency were the services or products provided?

How was the business awarded?

**Note: If you listed more than one entity, state the entity name next to its category.*

- Competitive sealed bid
- Request for proposal
- Contract for goods and services
- Memorandum of understanding
- Grant
- Other contractual agreement
- Other (describe) _____

B) Representing Private Interests before City Agencies

Since January 1, 2019, have you been paid or compensated to appear on behalf of any person, client, or private interest before any city agency?

Yes No

If you answered yes, list the person, client or private interest

Name	Nature of business with the City	Before which City Department or Agency did you appear?

C) Representing Private Interests before Courts

Since January 1, 2019, have you been paid or compensated to appear in court on behalf of any person or private interest in any action, proceeding, or litigation against the City of Atlanta or a city agency, or where the City is the complainant?

Yes No

If you answered yes,

In what court did you appear?

- Municipal Court of Atlanta
- Superior or State Court
- State Appellate Court
- Federal Court
- Other (describe) _____

In what capacity did you appear?

- Attorney
- Expert witness
- Other (describe) _____

Section Three: Family Transactions with the City

A) Family Employment with the City

Since January 1, 2019, has the City of Atlanta employed any of the following immediate family members: your spouse, registered domestic partner, father, mother, brother, sister, an adopted or natural child, or the spouse of a parent, sibling, or child? (please include family members hired as interns and extra help)

Yes No

If you answered yes, list the name(s) or your immediate family member(s)

(next page)

Name	Relationship to you	City department or agency where relative works

B) Family Transactions with the City

Since January 1, 2019, has your spouse, registered domestic partner, father, mother, brother, sister, an adopted or natural child, or the spouse of a parent, sibling, or child derived any benefit from any transactions with the City of Atlanta directly or through a business in which they have a majority or controlling interest?

Yes No

If you answered yes, list the immediate family member(s) or business' name

Name	Relationship to you	Nature of the transaction with the City	With what City department or agency is the transaction?

Section Four: Real Property

Direct Ownership in Real Property

Do you have a mortgage or deed on any property in the State of Georgia?

Yes No

If you answered yes, list the location of each property

City	Zip Code	Inside City of Atlanta?
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>
		Yes <input type="checkbox"/> No <input type="checkbox"/>

Section Five: Additional Questions for Certain Designated Filers

A) Stocks, Bonds, Blind Trusts, and Debt Holdings

To be completed by city elected officials; chief or deputy chief operating officers; chief or deputy chiefs of staff; commissioners, department heads, or their equivalents; deputy commissioners, deputy department heads, or their equivalents; and employees in the Mayor's office who report directly to the Mayor.

During 2019, did you hold more than \$10,000 in any stock, bond, blind trust, debenture, or other form of debt obligation of any corporation or business entity?

Yes No

If you answered yes, list name of the stock, bond, blind trust, debenture, or other debt obligation

B) Relatives Employed by the City

To be completed by the City Council President and members of the City Council.

Since January 1, 2019, has the City employed any of the following relatives or other related persons: your husband or wife; registered domestic partner; father, mother, or their spouses; brother, sister, or their spouses; son, daughter, or their spouses; grandfather, grandmother, or grandchild; or any relative living in your household; any person whom you intend to marry or with whom you intend to form a household; or any other natural person having the same legal residence as you?

Yes No

If you answered yes, list the relative(s) or related person(s)

Name	Relationship	City department or agency where relative works

C) Identity of Individual Clients

To be completed by the City Council President and members of the City Council.

For each business that was a source of income more than \$5,000 in 2019, does it have a client, customer, or patron that does or seeks business with the city, does or seeks official action from the city, is a registered lobbyist, or is a "prohibited source" for another reason?

Yes No

If you answered yes, list the name(s) of the prohibited source client, customer or patron

(next page)

Name of Client, Customer or Patron	Address of Client, Customer or Patron

Section Six: Acknowledgement and Signature

You must sign and date your statement to complete it.

I understand and acknowledge that I will be required to file a financial disclosure statement for one year following my last date of service with the City.

By submitting this form, *I acknowledge and declare under penalty of perjury* that I have reviewed this City Financial Disclosure Statement and to the best of my knowledge it is a true, accurate, and complete statement of my current financial and personal interests. I understand that intentionally filing a statement that contains false or misleading information can result in sanctions or other penalties.

Signature

Date

Potential Civil Penalties for Violating Financial Disclosure Requirements

- Automatic fines for filing after **Wednesday, April 15, 2020** (end of late-filing grace period)
- Listing in the Roll of Delinquent Filers posted on the Ethics Division website
- Public or Private Reprimand
- Recommendation to department head of disciplinary action up to a day's suspension without pay
- Recommendation to appointing authority of removal from office of any non-filing official
- Recommendation that former employees are ineligible for rehiring and former board members and NPU officers are ineligible for appointment for one year

Updated: 2/21/2020

Appendix B

Section 2-814 City of Atlanta Code of Ordinances

Sec. 2-814. - Disclosure of income and financial interests.

- (a) The officials and employees listed in subsection (b) of this section shall annually file statements with the ethics division disclosing the following:
- (1) All positions of employment held by the official or employee in any business (as defined in section 2-801 (b)) for all or any portion of the year, including a description of the type of business and the existence and nature of any business done by the employer entity with the city. Lawyers, accountants, consultants, public relations representatives, and other persons rendering services for financial consideration shall disclose the organization, if any, with which they are connected, the type of services offered by the organization, and any particular segment of such services in which the member specializes;
 - (2) Each and every source of income from any business received by such official or employee in excess of \$5,000.00 derived from any single source in the preceding calendar year. Nothing in this section shall be construed to require reporting of the identity of individual clients, customers or patrons; however, the president of council and members of council shall include the information required to be reported under paragraph (d) of this section;
 - (3) Any benefit, whatever its nature, of such official's or employee's immediate family derived from transactions with the city or an agency, by employment, contract, or otherwise, either directly or through a business in which such immediate family member has a majority or controlling interest;
 - (4) All direct ownership interests in real property held by the official or employee; and
 - (5) All persons listed in subparagraphs (b)(1) through (8) of this section shall also disclose the identity of all stocks, blind trusts, bonds, debentures, and other forms of debt obligations of any corporation or any business or entity collectively in excess of \$10,000.00 held by the official or employee at any time during the year except for mutual funds, personal checking accounts, time deposit accounts, other savings or retirement fund accounts held by any financial institution of the United States government, or any city approved or maintained deferred compensation or pension program.
- (b) The following officials and employees shall be required to file annual statements disclosing information set forth in subsection (a) of this ordinance:
- (1) Mayor;
 - (2) President of council;
 - (3) Members of council;
 - (4) Municipal court judges;
 - (5) Chief operating officer and deputy chief operating officers;
 - (6) Chief of staff and deputy chiefs of staff;

- (7) All employees of the office of the mayor who report directly to the mayor;
- (8) Commissioners, deputy commissioners, department heads and their equivalents;
- (9) Bureau directors, assistant bureau directors, managers and their equivalents;
- (10) Division heads and their equivalents;
- (11) Executive directors of city boards, commissions, authorities or other similar bodies;
- (12) Zoning administrator and any assistant zoning administrators;
- (13) Inspectors of all departments and bureaus;
- (14) City attorney, deputy, chief counsel, assistant, associate city attorneys and their equivalents;
- (15) Director of the office of contract compliance and employees of the office of contract compliance with discretionary or supervisory authority over certification, compliance, monitoring, or auditing;
- (16) Department of procurement deputies, contract administrators, contracting officers, buyers and their equivalents;
- (17) Within the department of finance, assistant directors and all employees who have discretionary or supervisory authority over the investment of city funds or the auditing of city finances or city contracts;
- (18) City internal auditor and employees of the office of internal auditor with investigative and supervisory authority over audits, the audit process, and audit reports;
- (19) Inspector general of the City of Atlanta, ethics officer, all employees of the office of the inspector general;
- (20) Administrative hearing officers and their equivalents;
- (21) Members, whether paid or unpaid, of all city boards, committees, councils, commissions, authorities and other similar bodies created by state law, Charter, ordinance or resolution;
- (22) Members appointed by the mayor and/or council or council president to other public boards, committees, councils, commissions, task forces, authorities of the city, county or state, or similar entities; and
- (23) Officers of neighborhood planning units; and
- (24) All positions for which the job descriptions or actual duties include negotiation, authorization, or approval of contracts, leases, franchises, revocable consents, concessions, variances, special permits, or licenses; the purchase, sale, rental, or lease of real property, personal property, or services, or a contract for any real or personal property or services; obtaining grants of money or loans; adoption or repeal of any rule or regulation having the force and effect of law; or positions for which the job description or actual job duties present a significant risk of a potential conflict of interest under division 2 of chapter 2 (Administration), article VII (Officers And Employees), of the Code of Ordinances, City of Atlanta, Georgia.

- (c) The municipal clerk shall maintain a list of all current members of all city boards, committees, authorities and commissions and all current members appointed by the mayor and council to other public boards, committees, councils, commissions, and authorities of the city, county, or state. The chief operating officer or his designee shall provide a complete list of all employees required to submit income disclosure forms as designated in subsection (b) of this ordinance, including the employee's name, title and department, to the municipal clerk and ethics division no later than January 5 of each calendar year. The ethics division shall prescribe the form and method of disclosure statement forms. The ethics division shall have such forms made available to each official and employee required to file disclosure statements, by no later than March 1 of each year. The failure of the ethics division to cause a disclosure form to be delivered to any official or employee required to file a disclosure statement shall not relieve such official or employee of the obligation to file a disclosure statement. The ethics division shall maintain all completed disclosure forms as public documents available for public inspection immediately upon filing.
- (d) With respect to the president of council and members of council, if the official reports income from a business in accordance with paragraph (a) (2), said official shall be required to report the identity (name and address) of individual clients, customers, or patrons of the business when (i) the client, customer, or patron is a prohibited source; (ii) the official has actual knowledge that the client, customer, or patron is a prohibited source; and (iii) the official has actual knowledge that the prohibited source is a client, customer, or patron of the official's business.
- (e) Every official and employee required to file an annual disclosure statement shall do so on or before the close of business on April 1 of each year in which the official or employee holds a position with the city or an agency and for the year following that in which the official or employee leaves such position. Such official or employee shall sign such disclosure statement under penalty of perjury. The failure of any official or employee so required to file an annual disclosure statement by April 1 without reasonable cause shall render such person delinquent and result in an administration sanction of \$50.00 per day for each business day beyond April 1 of such delinquency, provided that the maximum penalty for the first offense shall be \$500.00.
- (f) The ethics division shall be responsible for collecting all administrative sanctions levied by the board under this section for deposit to the City of Atlanta General Fund.

(Ord. No. 2002-27, § 1, 4-10-02; Ord. No. 2013-54(13-O-1294), § 1, 10-30-13; Ord. No. 2016-25(16-O-1405), §§ 1, 2, 8-24-16; Ord. No. 2019-22(19-O-1038), § 5, 3-12-19; Ord. No. 2020-09(19-O-1729), § 7, 2-6-20; Ord. No. 2021-45(21-O-0501), § 1, 9-15-21)

State Law reference— Acceptance by public officers of monetary fees or honoraria, O.C.G.A. § 21-5-11.

Appendix C

Required Fields in 2020 Financial Disclosure Statement Potentially Blank Upon Form Submission

APPENDIX C

This appendix provides two examples of required fields that may have been left blank in a submitted 2020 Financial Disclosure Statement. Due to system generated report errors, filers were able to submit their statement without completing all required fields.

Example 1

Screenshot of **Job Title**, a required field that remained blank in many of the forms submitted by filers. To illustrate how common this error was, we opened the first ten statements organized alphabetically beginning with Aaro... and ending in Abup..., and found that eight of those ten were blank in the job title field.

Sources of Income

City of Atlanta Employment
Since January 1, 2019 "were you employed by the City of Atlanta or any city-related agency?"
Yes

Job Title	Department	Current Employee	Last Month on Payroll	Year
	Finance	Yes		

Example 2

Screenshot of **Additional Questions for Certain Designated Filers**. Like the job title field, this question remained blank in many of the forms submitted by filers for whom this is a required field.

Additional Questions For Certain Designated Filers

Stocks, Bonds, Blind Trusts, and Debt Holdings
To be completed by city elected officials; chief or deputy chief operating officers; chief or deputy chiefs of staff; commissioners, department heads, or their equivalents; deputy commissioners, deputy department heads, or their equivalents; and employees in the Mayor's office who report directly to the Mayor.
During 2019 did you hold more than \$10,000 in any stock, bond, blind trust, debenture, or other form of debt obligation of any corporation or business entity?