

MILWAUKEE COUNTY FINANCIAL DISCLOSURE REQUIREMENT

STATEMENT OF ECONOMIC INTERESTS **INFORMATION AND INSTRUCTIONS**

STATEMENT OF ECONOMIC INTERESTS

- The portion of Milwaukee County's Code of Ethics regarding financial disclosures - Milwaukee County General Ordinance ("MCGO"), [Section 9.03](#) - requires that Milwaukee County elected officials, appointed officials, candidates, and certain employees file annual reports of their and their spouse's financial affairs (a "Statement of Economic Interests" or "SEI").
- Statements of Economic Interests provide accountability, transparency, and help ensure that there are no prohibited conflicts of interest between County employees' official responsibilities and private interests.
- Statements of Economic Interests filed under this ordinance are open for public inspection (*see* MCGO 9.08(4)).

WHO IS REQUIRED TO FILE?

- All County employees as described in MCGO 9.03(1) and as identified by their department heads. In this document, these employees are called "Annual Filers."
- Certain New County Employees (*see* MCGO 9.03(3)).
- Elected and Appointed County Officials (*see* MCGO 9.03(1)).
- Non-Incumbent Candidates for Elected County Office (*see* MCGO 9.03(3)).
- Members of Certain Boards and Commissions (*see* MCGO 9.03(1)).

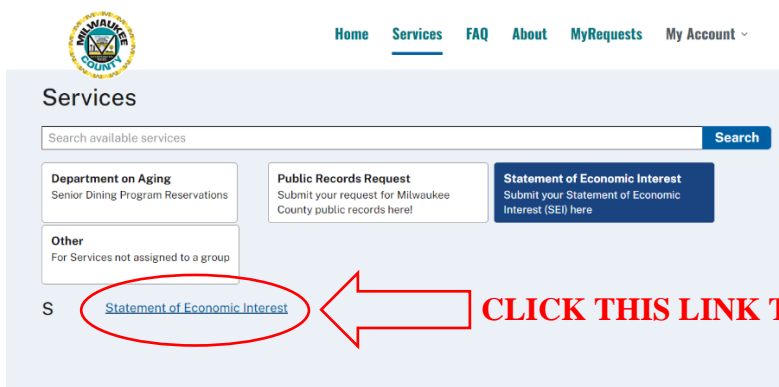
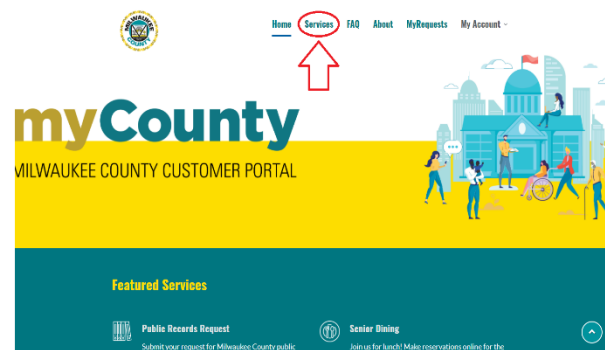
HOW TO FILE

- Go to the MyCounty Customer Portal at <https://mycounty.milwaukee.gov/>
Be sure to use Google Chrome, Mozilla Firefox or Microsoft Edge. **Do NOT use Internet Explorer.**

- To Register:
 - Click “Register” in the top banner.
 - Enter a preferred contact e-mail address.
This e-mail address will act as your username.
 - Create a password, using at least one letter and one number.
 - Once submitted, MyCounty Customer Portal will send instructions to activate your profile to the e-mail address used to create your account.

- To Login:
 - Click “Login”
 - Enter your username and password and click “Sign In.”
 - If you forget your password, click “Forgotten Your Password”. An e-mail will be sent to the e-mail address used to create the account in order to reset the password. The e-mail sender will be: MyFirmStepProfile.
 - If you do not receive the e-mail, contact IMSD for further troubleshooting.***

- Once You’re Logged In:
 - From the Main Page, click “Services” in the top banner.
 - Select “Statement of Economic Interest”
 - Click the “Statement of Economic Interest” link that appears and you’ll be taken to the start of the form.



CLICK THIS LINK TO START THE FORM

SAVE-AS-YOU-GO FEATURE

The portal allows you to save your progress in case you need to step away and finish later. Here's how to do so:

- While completing the form in the MyCounty Customer portal, you can click the “Save” button to save your progress. You're free to continue working on your submission or logout and finish at a later time. ***It never hurts to save as you go!***
- If you left and you're ready to continue, go to the MyCounty Customer Portal and log back in:
 - Click “Login”
 - Enter your username and password and click “Sign In.”
- Go to “My Requests”
 - Select the dropdown arrow for your case number.
 - Click “Continue” on the case – the full line should be in bold, but you can also recognize it from its “Process” (or name), the “Case Start Date,” or the “Saved” Case Status.
- Click “Continue.”
- You should be routed back to the point where you last clicked “Save” in the form to complete your submission.

The screenshot shows the 'Milwaukee County - SEI' portal with the 'Creditors' section active. At the bottom, there are three buttons: '< Previous', 'X Cancel', and 'Save', with the 'Save' button circled in red. A 'Next >' button is also visible.



The screenshot shows the 'My Requests' page with a table of cases. The first case, 'FS-Case-14704917', is highlighted with a red circle and an arrow pointing to it.

Case ID	Process	Case Start Date	Case End Date	Case Status
FS-Case-14704917	Statement of Economic Interest	11/29/2023 01:01:41 PM		Saved
FS-Case-12700670	Statement of Economic Interest	05/26/2022 08:31:08 AM	05/26/2022 08:40:32 AM	Closed
FS-Case-12700663	Registration Form	05/26/2022 08:26:12 AM	05/26/2022 08:26:13 AM	Closed

The screenshot shows the details of the selected case, 'FS-Case-14704917'. At the bottom right, there is a 'Continue' button circled in red with an upward-pointing arrow.

Case ID	Process	Case Start Date	Case End Date	Case Status
FS-Case-14704917	Statement of Economic Interest	11/29/2023 01:01:41 PM		Saved

Task ID	Start Date	Completed Date	Summary	Action
FS14704917	11/29/2023 01:01:41 PM		By checking this box, I certify that the information contained in this Statement of Economic Interests is true, correct and complete, and that I have read, understand and, to the best of my knowledge and belief, complied with the provisions of MCOG Chapter 9.	Continue

COMPLETING YOUR STATEMENT OF ECONOMIC INTERESTS

The sections of your Statement of Economic Interests should be reflective of their status as of the 15th day of the month preceding the month in which the statement is filed unless otherwise provided for in this letter.

OFFICES, DIRECTORSHIPS, & POSITIONS – MCGO 9.04(1)(a)

When listing offices, directorships, and positions held by you and/or your spouse, you are also required to include any charitable, religious, and educational organizations doing business with Milwaukee County. Positions on a body politic (elected governmental bodies such as a school board) *do not need to be reported*.

When entering a position in the form, follow the position title with “(Spouse)” if the position is held by your spouse and not you.

SIGNIFICANT FIDUCIARY RELATIONSHIPS – MCGO 9.04(1)(a)

List each business in which you and/or your spouse own, directly or indirectly:

- At least ten (10) percent of the outstanding stock of any business corporation; or
- Any individual stock having a value of at least \$5,000; or
- An interest of at least ten percent or \$5,000 of any business.

EXAMPLES OF ITEMS TO REPORT:

- Individual stocks having a value of at least \$5,000; or
- 10% of the outstanding stock of any corporation, partnerships, future contracts, trusts, sole proprietorships, credit unions; or
- Individual stocks held in individual retirement accounts.

EXAMPLES OF ITEMS NOT TO REPORT:

- Mutual Funds
- Certificates of Deposit
- Annuity Contracts
- Insurance Policies
- County Government Retirement Plans
- Saving Account in Stock-Held Banks
- U.S. Bonds

The filing portal does not support reporting of locations outside the United States. To report international businesses, please determine whether the business has a US-based office and use that city/state for your reporting.

VALUATION:

- The value of securities listed on a stock exchange shall be the closing price on the exchange.
- The value of unlisted securities traded in the over-the-counter market shall be the average of the bid and asked price.
- The value of securities for which no market information is readily available shall be determined as follows:

- Common shares or equivalent securities – book value (net worth divided by the number of outstanding shares, times the number of shares held)
- Preferred Stock – redemption price or par or stated value if not redeemable
- The value of a sole proprietorship shall be its net worth as shown on the books of the business.
- The value of an interest in the capital of a partnership shall be the book value (net worth of the partnership times percentage of interest held). If the interest is only in “net profit or loss” of a partnership, identify the partnership and indicate that the interest is only in “net profit or loss”.

Examples of assets owned or controlled indirectly are assets held by a trust. If you or a member of your immediate family are the creator or beneficiary of a trust, note that: (a) a person is the owner of items held by a trust if he or she is the creator of the trust and has the power to revoke the trust without obtaining the consent of all the trust’s beneficiaries; or (b) a person is the owner of items held by a trust to the same degree that the present or future beneficial interests in the trust vested in all the trust’s beneficiaries. For example, if you or your spouse has a one-third (1/3) interest in a trust, list the name of each businesses in which the trust holds securities valued at \$15,000 or more. You or your spouse need not identify a trust, only assets held by a trust. To determine how best to report any non-domestic entities/holdings, contact the Ethics Board office.

BONDS, DEBENTURES, AND DEBT OBLIGATIONS – MCGO 9.04(1)(b)

If you or your spouse hold any bonds, debentures, or debt obligations of a corporation or of a municipal corporation, which aggregate in value in excess of \$5,000, the holding must be disclosed.

If relevant information regarding the value of a bond, debenture, or debt obligation is not available within sixty (60) days of the filing deadline, the valuation must be made as of the most recent date such information is available. The date must be indicated on the form when entering the information required to be disclosed. The following methods of valuation must be used:

- The value of securities listed on a stock exchange shall be the closing price on the exchange.
- The value of unlisted securities traded in the over-the-counter market shall be the average of the bid and asked price.
- The value of securities for which no market information is readily available shall be the unpaid balances.

Indicate the name of the issuer and the city and state of its principal office. Also, give a description of the bond, debenture, or debt obligation and the face amount.

Example: XYZ Company (bond) / Wilmington, DE / under \$50,000

Indicate the value of the bond, debenture, or debt obligation as the date valuation was made. All dollar face amounts and dollar values are to be reported in terms of “under \$50,000” or “over \$50,000.”

CREDITORS – MCGO 9.04(1)(c)

Indicate the name of any creditor that you or your spouse owe \$5,000 or more. List the creditor and the city and state of its principal office.

All dollar amounts owed are to be reported in terms of “under \$50,000” or “over \$50,000.” You are not required to report the exact amount.

- If more than one debt is owed to a single person or entity and the aggregate value is \$5,000 or more, the creditor must be identified.
- A sole proprietor must identify a creditor of his or her business to whom he or she owes \$5,000 or more.
- A general partner must identify a creditor to whom the partnership owes an amount that, when multiplied by their interest in the partnership (expressed as a percentage) is equal to or greater than \$5,000.
- Personal property mortgages, credit cards, and student loans are reportable.

REAL PROPERTY – MCGO 9.04(1)(e)

Identify any property *in Milwaukee County OR a contiguous county* in which you or your spouse has an interest valued at \$5,000 or more. The “value” of the property may be determined by the last assessment, current appraisal, or recent sales price. You are **not** required to identify your primary residence.

TRANSFERS – MCGO 9.04(1)(d)

Identify any property (real, monetary, etc.) in excess of five thousand dollars (\$5,000.00) transferred by you or your spouse to an immediate family member during the two (2) calendar years preceding the filing of the statement.

Two calendar years preceding the filing of this Statement means (as an example) if you are filing a statement after the first of February of a given year, you will have to include all transfers that took place in the lapsed beginning portion of the present year *plus* the two whole preceding calendar years.

CANDIDACY – MCGO 9.03(3)

Please identify whether you are completing the form as a current **non-incumbent** candidate for an elected County office.

If yes, you’ll be asked to identify your present employer and the position you hold. If you own your own business or are otherwise self-employed, please write “Self-Employed” for employer. If you are retired, please write “Retired” for employer. Use “N/A” in the position line if appropriate. If no, you will be directed to the Gifts, Honoraria, Fees and Expenses report form.

If you are completing a hard copy Candidacy SEI form for the Election Commission office, be sure to sign and date the form before submission.

GIFTS, HONORARIA, FEES and EXPENSES – MCGO 9.14

For all other filers, please list each individual and organization from which you or your spouse received a gift, honorarium, fee or expense during the preceding taxable year.

When entering information in the “Name of giver/payer” and “Organization” lines for a reporting item and the information would be redundant or not applicable in a given situation (e.g., receiving an item from an organization and not a specific individual), you can write “See Name” under Organization or, vice versa, “See Org” under Name – you cannot leave an entry blank.

You must enter an estimated value of each item – those who fail to do so or enter “\$0” will be asked to redo their submission.

EXAMPLES OF ITEMS TO REPORT:

- Tickets to events
- Lodging
- Prizes
- Transportation
- Promotional Samples
- Money

ITEMS YOU SHOULD NOT REPORT:

- *Anything received for a purpose unrelated to your duties and responsibilities as a County official/employee.*
- The value of food and beverage offered incidentally with a talk or meeting related to County business.

TERMS – MCGO 9.04(2)

If you are completing your SEI in the My County Customer Portal, *it is important to select all categories that apply to your filing*. For example, if you are a current elected official currently running for re-election, you should select **both** “Milwaukee County elected official” as well as “Candidate for Milwaukee County public office.” By selecting the “Candidate” option in this section, a copy of your submission will be sent to both the Ethics Board office as well as the Election Commission office for their records.

All those required to file a Statement of Economic Interests are also required to affirm their understanding of and compliance with the provisions of Chapter 9.

AFTER YOU FILE

Once you’ve submitted your form, someone with the Ethics Board will review and confirm your submission. Once the review is complete, a copy of your final SEI form will be sent to the e-mail account you registered with the portal for your own records.

ADDITIONAL INFORMATION

DEFINITIONS: For definitions of terms such as “Immediate Family,” “Significant Fiduciary Relationships,” and others, refer to the Definitions Section (9.02) of the Code of Ethics.

ADVICE: Any person subject to Milwaukee County’s Code of Ethics may request from the Board written advice regarding the propriety of any matter to which he or she is or may become a party. Such persons may request the Board to obtain any advisory opinion from Corporation Counsel on the application of Chapter 9 of the M.C.G.O. No member or employee of the Board shall make public the content or identity of the person requesting an advisory opinion or of persons mentioned in the request or opinion. It is prima facie evidence of intent to comply with the Code of Ethics when a person refers a matter to the Board and abides by the Board’s advisory opinion. (MCGO 9.09)

**STANDARDS OF CONDUCT FROM
CODE OF ETHICS, CHAPTER 9, COUNTY GENERAL ORDINANCES**

9.05. Standards of Conduct

(1) **NO PERSONAL OR ECONOMIC INTEREST IN DECISIONS AND POLICIES.** The county board hereby reaffirms that a county elected official, appointed official or employee holds his/her position as a public trust, and any effort to realize personal gain through official conduct is a violation of that trust. This chapter shall not prevent any county elected official, appointed official or employee from accepting other employment or from following any pursuit which does not interfere with the full and faithful discharge of his/her duties to the county. The county board further recognizes that in a representative democracy, the representatives are drawn from society and, therefore, cannot and should not be without all personal and economic interest in the decisions and policies of government; that citizens who serve as public officials or public employees retain their rights as citizens to interests of a personal or economic nature; that standards of ethical conduct for public employees and public elected and appointed officials need to distinguish between those minor and inconsequential conflicts which are unavoidable in a free society and those conflicts which are substantial and material; and that county elected officials, appointed officials or employees may need to engage in employment and/or professional or business activities, other than official duties, in order to support their families and to maintain a continuity of professional or business activity or may need to maintain investments. However, the code maintains that such activities or investments must not conflict with the specific provisions of this chapter.

(2) **(a) NO FINANCIAL GAIN OR ANYTHING OF SUBSTANTIAL VALUE:** Except as otherwise provided or approved by the county board, no county public official or employee shall use his/her public position or office to obtain financial gain or anything of substantial value for the private benefit of himself/herself or his/her immediate family, or for an organization with which he/she is associated. This paragraph does not prohibit a county elected official from using the title or prestige of his/her office to obtain campaign contributions that are permitted by and reported as required by Ch. 11, Wis. Stats.

(b) NO PERSON MAY OFFER ANYTHING OF VALUE: No person shall offer or give to any public official or employee, directly or indirectly, and no public official or employee shall solicit or accept from any person, directly or indirectly, anything of value if it could reasonably be expected to influence the public official's or employee's vote, official actions or judgment, or could reasonably be considered as a reward for any official action or inaction or omission by of the public official or employee. This section does not prohibit a public official or an employee from engaging in outside employment.

(c) NO SUBSTANTIAL INTEREST OR BENEFIT: Except as otherwise provided in paragraph (1), no public official or employee shall:

1. Take any official action substantially affecting a matter in which the public official, employee, a member of his/her immediate family, or an organization with which the public official or employee is associated has a substantial financial interest.

2. Use his/her office or position in a way that produces or assists in the production of a substantial benefit, direct or indirect, for the public official, employee, members of the public official's or employee's immediate family either separately or together, or an organization with which the public official or employee is associated.

(d) NO DISCLOSURE OF PRIVILEGED INFORMATION: No county public official or employee shall use or disclose privileged information gained in the course of, or by reason of, his/her position or activities which in any way could result in financial gain for himself/herself or for any other person.

(e) NO USE OF PUBLIC POSITION TO INFLUENCE OR GAIN UNLAWFUL BENEFITS, ADVANTAGES OR PRIVILEGES: No county public official or employee shall use or attempt to use his/her public position to influence or gain unlawful benefits, advantages, or privileges for himself/herself or others.

(f) NO OFFER OF GIFTS OR ANYTHING OF VALUE: No county public official shall offer or give anything of value to a member or employee of a county department or entity, while that member or employee is associated with the county department or entity, and no member or employee of a department shall solicit or accept from any such person anything of value from a county official or employee.

(g) LIMITS ON CONTRACTS WITH COUNTY: No county public official or employee and no business with which he/she or his/her spouse has a significant fiduciary relationship or any organization with which he/she or his/her spouse is associated shall enter into any contract with the county unless that contract has been awarded through a process of public notice and competitive bidding in conformity with applicable federal and state statutes and county ordinances.

(h) LIMITS ON LEASE OF REAL ESTATE WITH COUNTY: No county public official or employee and no business in which that county public official or employee has a ten (10) percent or greater interest shall enter into a lease of real property with the county, except that the county board, upon a publicly filed and

considered request, shall waive this subsection when it is in the best interests of the county.

(i) NO LIMITS ON LAWFUL PAYMENTS: Paragraph (c) does not prohibit an elected official from taking any action concerning lawful payment of salaries or employee benefits or reimbursement of actual and necessary expenses, or prohibit an elected official from taking official action with respect to any proposal to modify a county ordinance.

(j) NO SOLICITATION OF AT-WILL EMPLOYEES: No elected county official shall knowingly solicit a campaign contribution from any "at-will employee" defined as an employee who is not under union or labor contract with the county, who is hired for an indefinite term or who is under an independent contract with the county or its subparts or who can be discharged or terminated at any time for any nondiscriminatory reason.

(k) NO SOLICITATION OF COUNTY CONTRACTORS: No elected county official, or appointee of an elected county official, shall knowingly solicit support or anything of value from a contractor to influence the outcome of an elected county official's appointment.

(l) NO CAMPAIGN CONTRIBUTIONS TO COUNTY OFFICIALS: No person(s) with a personal financial interest in the approval or denial of a contract or proposal being considered by a county department or with an agency funded and regulated by a county department, shall make a campaign contribution to any county elected official who has approval authority over that contract or proposal during its consideration. Contract or proposal consideration shall begin when a contract or proposal is submitted directly to a county department or to an agency funded or regulated by a county department until the contract or proposal has reached final disposition, including adoption, county executive action, proceedings on veto (if necessary) or departmental approval. This provision does not apply to those items covered by section 9.14 unless an acceptance by an elected official would conflict with this section. The language in subsection 9.05(2)(k) shall be included in all Requests for Proposals and bid documents.

(m) LIMITS ON HONORARIUM FEES OR EXPENSE REIMBURSEMENTS: No county public official or employee shall accept or solicit any honorariums, fees or expense reimbursements except in accordance with section 9.14.

(3) LIMITS ON CONTACT: **(a) LIMITS ON CONTACT WITH FORMER COUNTY ASSOCIATES:** No former county public official or employee, for twelve (12) months following the date on which he/she ceases to be a county public official or employee, shall, for compensation, on behalf of any person other than a governmental entity, provide any contractual services to the county. Nor shall the former county public official or employee make any formal or informal appearance before or try to settle or arrange a matter by calling, writing, or conferring with, any county public official, officer or employee of the department with which he/she was associated as a county public official or employee. The county board committee on finance and audit may waive the contractual services prohibition provision of this section, first effective for county public officials or employees that separate service after April 1, 2016, upon the petition of the administrator seeking services with the former public official or employee that the need is critical to county operations.

(b) LIMITS ON CONTACT WITH JUDICIAL OR QUASI-JUDICIAL PROCEEDINGS: No former county public official or employee for twelve (12) months following the date on which he/she ceases to be a county public official or employee, shall for compensation on behalf of himself/herself or any person other than a governmental entity, make any formal or informal appearance before, or try to settle or arrange a matter by calling, writing, or conferring with, any county public official, officer or employee of a department in connection with any judicial or quasi-judicial proceeding, application, contract, claim, or charge which was under the former public official's or employee's responsibility as a county public official or employee.

(c) LIMITS ON CONTACTS WITH JUDICIAL OR QUASI-JUDICIAL PROCEEDINGS WHERE PERSONALLY PARTICIPATED: No former county public official or employee shall, whether for compensation or not, act on behalf of any party other than the county in connection with any judicial or quasi-judicial proceeding, application, contract, claim, or charge in which the former public official or employee participated substantially as a public official or employee.

(d) CONSIDERATION OF EXEMPTIONS: The ethics board shall accept and review written requests by former appointed officials for an exemption from the prohibitions of (3), except that only the committee on finance and audit shall consider exemptions to the contractual services prohibition. Such exemption requests must be heard and deliberated during a properly convened open session of an ethics board meeting and must be included in a written ethics board opinion stating the reason(s) that the former appointed official should be exempt from the otherwise prohibited conduct.