

June 30, 2026

The Honorable City Council  
c/o Holly Wolcott, City Clerk  
200 North Spring Street  
City Hall – 3rd Floor  
Los Angeles, CA 90012

**Re: Amended Conflict of Interests Code  
Los Angeles Police Department**

*FOR COUNCIL CONSIDERATION*  
Action Required by **September 28, 2026**

Dear Councilmembers:

Enclosed is the proposed amended conflict of interests (COI) code for the Los Angeles Police Department (LAPD). As the City's code-reviewing body, the City Council must approve, revise, or return the proposed amendments within 90 days of the date they are received. Cal. Gov't Code §§ 82011(c), 87303. We recommend that you approve the COI code, which is provided in Attachments A through C.

**A. Background**

State law requires every City agency to adopt a COI code to help officials in the agency avoid financial conflicts of interest. Each COI code must identify the positions in the agency that have the authority to make or participate in government decisions, as well as the financial interests that must be reported on California Form 700 by the individuals who occupy those positions. Cal. Gov't Code §§ 87300, 87302(a). Agencies are required to amend their COI codes when changed circumstances make amendments necessary. Cal. Gov't Code § 87306.

**B. Elements of a COI Code**

A COI code consists of three sections: the incorporation and certification, a list of designated positions (schedule A), and a list of disclosure categories (schedule B). 2 Cal. Code Regs. §§ 18730(a)–18730(b)(3).

The incorporation and certification is a standardized introductory statement that briefly explains the function of the COI code, provides references to relevant sections of the California Political Reform Act and its regulations, and certifies that the entire COI code was approved by the City Council. The incorporation and certification is included in each agency's COI code.

Schedule A is a list of specific positions in the agency that have the authority to make or participate in making decisions that could foreseeably have an effect on a personal financial

interest. Each position is assigned to a disclosure category, which is found in Schedule B. The disclosure category is based on the position's type and level of decision-making authority and describes the types of investments, business positions, sources of income, and interests in real property that must be reported on a statement of economic interests (California Form 700).

### **C. Process**

LAPD previously amended their COI Code in January 2001 (attachment E). In an effort to comply with state law, the agency has developed an amended COI code in consultation with the Ethics Commission. LAPD's staff conducted a substantive review, and the newly amended code reflects the agency's current organizational structure and decision-making processes.

On March 19, 2026, a notice of intention to amend LAPD's COI code was emailed to the staff and the unions that represent them. The notice was also posted on the public bulletin boards in City Hall and City Hall East. A 30-day public comment period began that day and ended on April 19, 2026. During the comment period, a public hearing was not requested. However, LAPD voluntarily held a public hearing during their regular board meeting on May 5, 2026, where the proposed Code was approved by the Board of Police Commissioners. Additionally, nine written comments were received during the public comment period. Redacted copies of these comments are provided in attachment D. The comments received did not result in any substantive changes or modifications to the proposed COI Code and no additional public comment periods were required as a result.

On May 18, 2026, the Chief of Police, James McDonnell, approved LAPD's proposed COI code, confirming that the Schedule A list of designated positions identifies all individuals in LAPD who are required by state law to file statements of economic interests and that the assigned disclosure categories accurately reflect the scope of each position's decision-making authority. Copies of the proposed schedules are provided in Attachments A and B.

### **D. Conclusion**

On behalf of LAPD, we urge you to approve its COI code, which is provided in Attachments A, B, and C. Under state law, City Council action on the code is required by **September 28, 2026** (90 days after this transmittal is received).

If you have any questions, please contact Ethics Program Manager Samantha Rodriguez at (213) 978-1960.

Sincerely,



Samantha Rodriguez  
Ethics Program Manager

*Attachments:*

- A Proposed Schedule A – Designated Positions*
- B Proposed Schedule B – Disclosure Categories*
- C Incorporation and Certification*
- D Written Public Comments*
- E Current COI Code*

City of Los Angeles  
**POLICE DEPARTMENT (LAPD)**  
 Conflict of Interests Code  
**DESIGNATED POSITIONS**  
*(Schedule A)*

<u>Position Title</u>	<u>Disclosure Category</u>
Assistant Chief	1
Assistant Inspector General	1
Captain	8
Chief Information Security Officer	8
Chief Information Officer	8
Chief of Police	1
Chief Psychologist	8
Commander	8
Consultant	**
Deputy Chief	8
Deputy Chief Accountant	8
Detective I / II / III in the following assignment:	
Chief's Aide, Office of the Chief of Police	8
Commission Investigation Division	8
Director of Police Training and Education	8
Director of Police Transportation	8
Director of Systems	8
Executive Administrative Assistant III in the following assignment:	
Office of the Chief of Police	8
Executive Director, Board of Police Commissioners	1
Geographical Information Specialist Supervisor	8

Hearing Examiner	4
Inspector General	1
Information Systems Manager II	8
Lieutenants in following assignments:	
Information Technology Bureau	8
Information Technology Division	8
Metropolitan Division	15
Emergency Services Division	15
Facilities Management Division	8
Training Bureau	15
Training Division	15
Police Training and Education	15
Commission Investigation Division	8
Adjutant, Constitutional Policing and Policy Bureau	8
Adjutant, Office of Operations	8
Adjutant, Office of Special Operations	8
Adjutant, Office of Support Services	8
Adjutant, Office of Chief of Staff	8
Adjutant, Professional Standards Bureau	8
Executive Officer, Office of the Chief of Police	8
Member, Police Permit Review Panel	3
Member, Board of Police Commissioners	1
Police Administrator	8
Police Officer II/III in the following assignments:	
Information Technology Bureau	8
Information Technology Division	8
Commission Investigation Division	8
Training Bureau	8
Principal Accountant I/II	8
Principal Storekeeper	8
Programmer Analyst V	8
Public Information Director	8
Senior Accountant I/II	8
Senior Communications Engineer	8

Senior Management Analysts in the following assignments:	
Fiscal Group	8
Facilities Management Division	8
Information Technology Bureau	8
Information Technology Division	8
Technical Investigation Division	15
Strategic Planning and Policies Division	8
Commission Investigation Division	8
Police Commission	8
Senior Systems Analyst I/II	8
Sergeant IIs in the following assignments:	
Facilities Management Division	8
Information Technology Bureau	8
Information Technology Division	8
Office of the Inspector General	8
Training Bureau	15
Training Division	15
Police Training and Education	15
Sergeant Is in the following assignments:	
Information Technology Bureau	8
Information Technology Division	8
Senior Police Service Representative IIs in the following assignments:	
Emergency Command Control Communication Systems Division	8
Senior Storekeeper	8
Systems Programmer II/III	8

\* The positions that are specific to an assignment at a division or bureau are subject to change if the division or bureau is renamed. The Los Angeles Police Department will submit an Agency Report of New Positions (California Form 804) if a division or bureau changes names.

\*\* Consultants/New Positions are included in the list of designated positions and shall disclose pursuant to the broadest disclosure category in the code, subject to the following limitation:

The Chief of Police may determine in writing that a particular consultant, although a "designated position," is hired to perform a range of duties that is limited in scope and thus is not required to fully comply with the disclosure requirements in this section. Such written determination shall include a description of the consultant's duties and, based upon that description, a statement of the extent of disclosure requirements. The Chief of Police determination is a public record and shall be retained for public inspection in

the same manner and location as this conflict of interests code. (Gov. Code Section 81008.)

City of Los Angeles  
POLICE DEPARTMENT (LAPD)  
*Conflict of Interests Code*  
DISCLOSURE CATEGORIES  
(Schedule B)

An individual whose position is identified in the Designated Positions section (Schedule A) of an agency's conflict of interests code is a filer and must disclose each economic interest identified below for the disclosure category associated with the individual's position. Disclosure must be made by filing the California Form 700 on specified schedules.

The definitions for investments, business positions, sources of income, interests in real property, doing business, gifts, and other terms may be found in the California Political Reform Act, its associated regulations, and the instructions for the California Form 700. The term "division" means a subset of the filer's agency and, depending on the agency's structure, may also be known as a department, group, office, section, or other similar term used to indicate a subordinate unit of the agency.

Economic interests must be disclosed for the applicable reporting period. In general, the following types of Form 700 filings have the following reporting periods:

Annual: January 1 through December 31 of the previous calendar year.

Assuming Office: the date the filer assumes office for investments, business positions, and interests in real property; for income, the 12 months immediately preceding the date the filer assumes office.

Leaving Office: the last date covered by the filer's most recent filing through the date the filer left the designated position.

Reporting periods may vary in individual circumstances and for other types of filings and should be verified with the Ethics Commission.

**Category 1**

Any investment, business position, source of income, or interest in real property.

**Category 2**

- A. Any investment in, business position with, or income from a source that did any of the following:
1. Provides the type of services, goods, or equipment used by the filer's agency;
  2. Provided or sought to provide services, goods, or equipment to the filer's agency;
- or

3. Was a party or sought to become a party to a written agreement with the filer's agency.
- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's agency or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency.
- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's agency provided a review, recommendation, or referral.

### **Category 3**

- A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's agency.
- B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's agency or is located within 500 feet of such property.

### **Category 4**

- A. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer's agency.
- B. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer's agency.
- C. Any investment in, business position with, or income from a source that did any of the following:
  1. Provides the type of services, goods, or equipment used by the filer's division;
  2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  3. Was a party or sought to become a party to a written agreement with the filer's division.
- D. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

### **Category 5**

- A. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's agency;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's agency;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's agency.
- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's agency or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency.
- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's agency provided a review, recommendation, or referral.
- E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's agency.
- F. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's agency or is located within 500 feet of such property.

### **Category 6**

- A. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's agency;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's agency;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's agency.
- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's agency or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency.

- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's agency provided a review, recommendation, or referral.
- E. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer's agency.
- F. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer's agency.
- G. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

### **Category 7**

- A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's agency.
- B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's agency or is located within 500 feet of such property.
- C. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer's agency.
- D. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer's agency.
- E. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.
- F. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

### **Category 8**

- A. Any investment in, business position with, or income from a source that did any of the following:

1. Provides the type of services, goods, or equipment used by the filer's agency;
  2. Provided or sought to provide services, goods, or equipment to the filer's agency;  
or
  3. Was a party or sought to become a party to a written agreement with the filer's agency.
- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's agency or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency.
- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's agency provided a review, recommendation, or referral.
- E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's agency.
- F. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's agency or is located within 500 feet of such property.
- G. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer's agency.
- H. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer's agency.
- I. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

### **Category 9**

- A. Any investment in, business position with, or income from a source that did any of the following:
1. Provides the type of services, goods, or equipment used by the filer's division;
  2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  3. Was a party or sought to become a party to a written agreement with the filer's division.

- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's division or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the City when the filer's division provided a review, recommendation, or referral.
- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's division provided a review, recommendation, or referral.

### **Category 10**

- A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's division.
- B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's division or is located within 500 feet of such property.

### **Category 11**

- A. Any income from an individual, or immediate family member of an individual, who was employed by or applied for any position with the filer's agency when the filer's division provided a review, recommendation, or referral.
- B. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees and for whom the filer's division provided a review, recommendation, or referral.
- C. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.
- D. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

### **Category 12**

- A. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.
- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's division or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency when the filer's division provided a review, recommendation, or referral.
- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's division provided a review, recommendation, or referral.
- E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's division.
- F. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's division or is located within 500 feet of such property.

**Category 13**

- A. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.
- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's division or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the

filer's agency when the filer's division provided a review, recommendation, or referral.

- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's division provided a review, recommendation, or referral.
- E. Any income from an individual, or immediate family member of an individual, who was employed by or applied for any position with the filer's agency when the filer's division provided a review, recommendation, or referral.
- F. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees and for whom the filer's division provided a review, recommendation, or referral.
- G. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

#### **Category 14**

- A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's division.
- B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's division or is located within 500 feet of such property.
- C. Any income from an individual, or immediate family member of an individual, who was employed by or applied for any position with the filer's agency when the filer's division provided a review, recommendation, or referral.
- D. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.
- E. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees and for whom the filer's division provided a review, recommendation, or referral.

- F. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

### **Category 15**

- A. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.
- B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's division or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency when the filer's division provided a review, recommendation, or referral.
- D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's division provided a review, recommendation, or referral.
- E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's division.
- F. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's division or is located within 500 feet of such property.
- G. Any income from an individual, or immediate family member of an individual, who was employed by or applied for any position with the filer's agency when the filer's division provided a review, recommendation, or referral.
- H. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees and for whom the filer's division provided a review, recommendation, or referral.
- I. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

## **Category 16**

- A. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the City when the filer's division provided a review, recommendation, or referral.
- B. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees and for whom the filer's division provided a review, recommendation, or referral.
- C. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.
- D. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to City employees and for which the filer's division provided a review, recommendation, or referral.
- E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in a personnel, investigative, enforcement, claim, or litigation matter that involved the filer's division.

## **Category 17**

- A. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's agency.
- B. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's agency or is located within 500 feet of such property.
- C. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.

- D. Any interest in real property that was involved in a contracting decision made by or pending with the filer's division or is located within 500 feet of such property.
- E. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency when the filer's division provided a review, recommendation, or referral.
- F. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's division provided a review, recommendation, or referral.

### **Category 18**

- A. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer's agency.
- B. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer's agency.
- C. Any investment in, business position with, or income from a source that did any of the following:
  - 1. Provides the type of services, goods, or equipment used by the filer's division;
  - 2. Provided or sought to provide services, goods, or equipment to the filer's division;  
or
  - 3. Was a party or sought to become a party to a written agreement with the filer's division.
- D. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.
- E. Any interest in real property that was involved in a contracting decision made by or pending with the filer's division or is located within 500 feet of such property.
- F. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency when the filer's division provided a review, recommendation, or referral.
- G. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's division provided a review, recommendation, or referral.

# POLICE DEPARTMENT CITY OF LOS ANGELES

CONFLICT OF INTERESTS CODE  
Incorporation and Certification  
Page 2 of 2

Effective Date: \_\_\_\_\_  
Council File No. \_\_\_\_\_

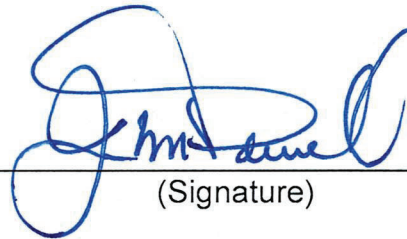
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## CERTIFICATION

This code accurately designates all positions in the agency that make or participate in the making of governmental decisions. The disclosure category assigned to each position accurately requires individuals who hold the position to report their investments, business positions, interests in real property, and sources of income that could foreseeably be materially affected by the City decisions they make or participate in making. This code was approved by the agency's general manager or its governing board or commission on

May 5, 2026  
(Date)

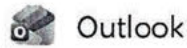
BY



(Signature)

Chief of Police  
(Title)

5-18-26  
(Date)



Concerns with the conflict of interest with the Los Angeles Police department and elsewhere.

!!!!!!!!!!!!!!

From George Padilla [REDACTED]

Date Mon 3/23/2026 6:32 PM

To LAPD Ethics COI [REDACTED]

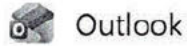
**ATTENTION:** This email originated outside of LAPD. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello I hope everyone is having a good day God bless us all and let us see through the storm. The concerns, I'm pretty sure can be escalated to serious with the level of corruption, embarrassing, heart-wrenching what they are reporting on television, Also social media . Having to escalate from hardcore gang members to elementary schools in daycare centers LAUSD Los Angeles California., and will we see currently around the world. Holding on to certain people and escalating the crime to kidnapping children also ignoring them after school discriminating and also elsewhere, and here comes with the other aspects say the running of the DPSS case backwards so that the applicant does not receive the proper or adequate help aid and resources. And the Sasha Estrada people's concern Santa Monica the para Los ninos, DCFS, children's court, alikdavis and all the others. Okay, child abduction rancho gang members San Pedro harbor area. Also gang stalking, identity theft, falsifying documents also backdating and fabricating documents all sorts. False accusations as well with the defamation of character gas lighting and so on. The whale most definitely is not there including the level of pathetic nature people persons. It is very much against the law and people need to address it properly like in the real world. Help father and child to be reunited while back together. And for the record father has no mental health issue or condition these persons whom are doing this they're the same people from his childhood, and father is very well off also fluent. Arresting people won't be a problem due to the nature and severe. Currently was being reported on the news here in LA Los Angeles , father and daughter are victims of domestic violence possibly terrorism Dad hopeful still, unsuppressed , top flight, highest of powers.

Arrest those gang members and those involved associated also, conspired, Harbored, transported, funded, and other sorts they have committed.

Yeah and also just for the record these people have claimed that we are a part of their function or criminal underground their political congregation, their private organization that does their own as well as these others just mention their own banking social services also do their own laws or guidelines where they also enforce their own with their own law enforcement

Father and daughter are not a part of. They have been taken advantage of, their identities misused stolen use elsewhere without their knowledge or consent. They have reported it Father has. Asking for the real world to shine the light and finally exposed everyone and everything that's going on. There's no reason why father and daughter should be going through any of this this is extensive for beyond . Thank you help Dad Daughter.



**FW: ATTN: Proposed Change to LAPD Conflict of Interest Code that impacts your current assignment**

From GENTLE WINTER <[REDACTED]>

Date Wed 3/25/2026 8:20 PM

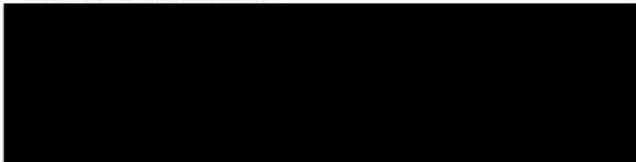
To LAPD Ethics COI [REDACTED]

Cc GENTLE WINTER [REDACTED]

5 attachments (1 MB)

Current LAPD Ethics Conflict of Interest Code.pdf; LAPD-Proposed Schedule B.pdf; Notice of Intention.pdf; Notice of Public Hearing.pdf; Proposed LAPD Ethics Conflict of Interest Code Revisions.pdf;

Deputy Chief Billy Brockway  
Ethics Coordinator



Good afternoon Chief,  
I have reviewed the proposed Schedule B. Please consider the following:

**REAL PROPERTY**

The inclusion of real property disclosures appears to be unnecessary and burdensome for the affected persons. ITB does not deal with real property.

**TRAINING TRIPS REGULATED?**

Consider the following: COMPANY wants a contract with the City. COMPANY takes key decision-makers (including a Sgt II) to Detroit to show its operations. COMPANY pays for food, airfare, and lodging. Would this come within the ambit of A2? Another section?

**GRATUITIES/DISCOUNTS**

Does the policy address individuals accepting gifts/discounts? Consider, for example, a merchant who WANTS to sell widgets to the LAPD and who offers discounted widgets to City employees who may exert influence over the sale. Is this addressed? If the discounted sale occurs after the contract is executed, does the result differ?

Consider the following comments on the document itself:

A. Any investment in, business position with, or income from a source that did any of the following:

- 1. Provides the type of services, goods, or equipment used by the filer's agency;

**CONCERN:**

As written, this includes the employment contract with the City. This is seemingly over-inclusive.

2. Provided or sought to provide services, goods, or equipment to the filer's agency;  
Or  
See A1 above

3. Was a party or sought to become a party to a written agreement with the filer's agency.  
See A1 above

B. Any interest in real property that was involved in a contracting decision made by or pending with the filer's agency or is located within 500 feet of such property.

CONCERN:

Information Technology Bureau (ITB) does not deal with real property.

C. Any investment in, business position with, or income from a source that rented, leased, subrented, sublet, purchased, or sold real property or facilities to or from the filer's agency.

See B above

D. Any investment in, business position with, or income from a source that applied for or received a grant from or provided grant funding to the City when the filer's agency provided a review, recommendation, or referral.

E. Any investment in, business position with, or income from a source that was involved as a party, participant, or representative in an investigative, enforcement, claim, litigation, regulatory, legislative, permitting, or licensing issue made by or pending with the filer's agency.

CONCERN:

This is so broad as to cover a workers' comp claim. This is seemingly inapplicable to ITB, and over-inclusive.

F. Any interest in real property that was involved in an enforcement, regulatory, legislative, permitting, or licensing decision made by or pending with the filer's agency or is located within 500 feet of such property.

See E above

G. Any income from an individual, or an immediate family member of an individual, who was employed by or applied for any position within the filer's agency.

H. Any investment in, business position with, or income from a source that represented or sought to represent an employee or group of employees in the filer's agency.

CONCERN

Does this include Labor Union?

I. Any investment in, business position with, or income from a source that provided or sought to provide benefits, services, goods, or equipment to the filer's agency or its employees when the filer's division provided a review, recommendation, or referral.

In making these proposed amendments, LAPD must determine that no alternative considered by the agency would be more effective in carrying out the purpose for which the amendments are proposed or would be as effective as and less burdensome to affected persons than the proposed amendments.

Thank you,

Gentle

Sergeant II Gentle Winter [REDACTED]  
Los Angeles Police Department  
Information Technology Bureau/ABC  
[REDACTED]

---

**From:** LAPD Ethics COI [REDACTED]  
**Sent:** Thursday, March 19, 2026 3:34 PM  
**To:** LAPD Ethics COI [REDACTED]  
**Subject:** ATTN: Proposed Change to LAPD Conflict of Interest Code that impacts your current assignment  
**Importance:** High

Hello,

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This means that your position is perceived to have influence, could potentially have influence, or does have influence over how LAPD spends public dollars. If your position is ultimately added to the list, you will be required to annually report financial interests you have in certain items depending on the disclosure category for your position. We will provide training to you if your position is added.

For example, you would have to disclose if you have investments in Axon, Motorola, or other companies that contract with the LAPD. You would not be prohibited from having those investments, you would just be required to disclose them. Additionally, you would not need to disclose all investments (e.g., mutual funds).

The Ethics Commission is also requiring us to update the disclosure categories to standardize the categories across all City departments. Together, the list of filers and the disclosure categories, make up the LAPD's Conflict of Interest (COI) Code.

Part of the process to amend our COI Code is notifying employee unions, current filers, proposed new filers, and the public of our intention to amend the code. This allows everyone to have an opportunity to provide input. If you would like to provide any input, please do so by responding to this email.

We are also required to get the new COI Code approved by the Board of Police Commissioners (BOPC). The Department is planning on presenting it to the BOPC for approval on April 21, 2026. The COI Code will then

be forwarded to the Ethics Commission to submit to the City Council for approval.

Attached are the current list of filers and categories (Current LAPD Ethics Conflict of Interest Code), the proposed list of filers (Proposed LAPD Ethics Conflict of Interest Code), the proposed disclosure categories (LAPD-Proposed Schedule B), the Notice of Intention to amend our COI Code (Notice of Intention), and the Notice of Public Hearing regarding the date this will be presented to the BOPC (Notice of Public Hearing).

A virtual information session will be held on this topic on Thursday, March 26, 2026, at 1500 hours for all employees via Teams.

**Microsoft Teams meeting**

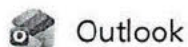
**Join:** <https://teams.microsoft.com/meet/21470786339148?p=xOGV9zlkWQ1e13wbyE>

Meeting ID: 214 707 863 391 48

Passcode: nE3My2PN

Respectfully,

Deputy Chief Billy Brockway, Department Ethics Coordinator  
Lieutenant Roy Yoo, Department Ethics Support Staff  
Sergeant Michelle Smith, Department Ethics Support Staff



**FW: Proposed Change to LAPD Conflict of Interest Code**

From Annette Nino [REDACTED]  
Date Tue 4/7/2026 5:26 PM  
To LAPD Ethics COI [REDACTED]

6 attachments (2 MB)

Current LAPD Ethics Conflict of Interest Code.pdf; LAPD-Proposed Schedule B.pdf; Notice of Intention.pdf; Notice of Public Hearing.pdf; Proposed LAPD Ethics Conflict of Interest Code Revisions.pdf; New filers for MOU 8 and 17;

**ATTENTION: This email originated outside of LAPD. Do not click on links or open attachments unless you recognize the sender and know the content is safe.**

Good morning, LAPD Ethics COI.

SEIU 721 has done their due diligence with our impacted members, and we concur with the attached new list containing the only impacted MOU 8 and 17 members, Program Manager Vs and Senior Communications Engineers, currently four people assigned to LAPD, included in the proposed change to LAPD Conflict of Interest Code. Thank you.

Very best,

Annette Nino

SEIU Local 721  
Worksite Organizer



Visit our website [www.seiu721.org](http://www.seiu721.org)  
Member Benefits Website <https://www.seiumb.com/>  
Member Connection: 877.721.4YOU = 877.721.4968

[Click to Become a Member](#)

[Click to Contribute to COPE](#)

**From:** LAPD Ethics COI [REDACTED]  
**Date:** Thursday, March 19, 2026 at 3:31 PM  
**To:** LAPD Ethics COI [REDACTED]  
**Subject:** Proposed Change to LAPD Conflict of Interest Code

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

The LAPD is updating the list of required Form 700 Statement of Economic Interest filers because it is extremely outdated. You are receiving this email because employees belonging to your union are either current filers or are being proposed to be added to the list of filers by the LAPD and the Ethics Commission.

These positions are perceived to have influence, could potentially have influence, or do have influence over how LAPD spends public dollars. Employees added to the list will now be required to annually report financial interests they have in certain items depending on the disclosure category for their position. We will provide training to them if their position is added.

For example, these employees would have to disclose if they have investments in Axon, Motorola, or other companies that contract with the LAPD. They would not be prohibited from having those investments, they would just be required to disclose them. Additionally, they would not need to disclose all investments (e.g., mutual funds).

The Ethics Commission is also requiring us to update the disclosure categories to standardize the categories across all City departments. Together, the list of filers and the disclosure categories, make up the LAPD's Conflict of Interest (COI) Code.

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#### **Microsoft Teams meeting**

**Join:** <https://teams.microsoft.com/meet/21470786339148?p=xOGV9zlkWQ1e13wbyE>

Meeting ID: 214 707 863 391 48

Passcode: nE3My2PN

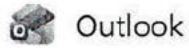
Respectfully,

Deputy Chief Billy Brockway, Department Ethics Coordinator

4/29/26, 12:34 PM

FW: Proposed Change to LAPD Conflict of Interest Code - LAPD Ethics COI - Outlook

Lieutenant Roy Yoo, Department Ethics Support Staff  
Sergeant Michelle Smith, Department Ethics Support Staff



Re: ATTN: Proposed Change to LAPD Conflict of Interest Code that impacts your current assignment

From BARBRA ANN MONTESQUIEU [redacted]  
Date Fri 4/17/2026 5:47 PM  
To MICHELLE SMITH <[redacted]> ROY YOO <[redacted]>  
Cc BILLY BROCKWAY [redacted] LAPD Ethics COI <[redacted]>

Hi Michelle -

We have been visited in the past few cycles and was determined that we don't qualify.

- we are but part of the negotiation. - this is bet contracts, LACA, SME
- we don't write the specifications of the bid - this is bet contracts and SME
- we don't advise with regards to selection criteria

Thanks,  
Barbra

Barbra Bollozos Montesquieu  
Sr Management Analyst  
Grants Section  
Los Angeles Police Department



From: MICHELLE SMITH [redacted]  
Sent: Friday, April 17, 2026 9:02 AM  
To: BARBRA ANN MONTESQUIEU [redacted] ROY YOO [redacted]  
Cc: BILLY BROCKWAY [redacted] LAPD Ethics COI [redacted]  
Subject: Re: ATTN: Proposed Change to LAPD Conflict of Interest Code that impacts your current assignment

Hello Barbra,

Yes, your position and any Senior MA I assigned to SPPD are proposed to be added. We will take your input into consideration.

To clarify why you are being proposed to be added, actual influence is not needed, however, we are required to include anyone that participates in making governmental decisions. This is defined as:

- Negotiating the terms of a contract
- Writing the specifications of a bid

- c. Advising or making recommendations to the decision-maker or governing body without significant intervening substantive review

Substantive review does not occur when:

- a. the superior is relying on the data or analysis without checking on the data or analysis independently,
- b. the superior relies on the professional judgment of the employee, or
- c. the employee influences the final decision in some other way.

Those definitions were provided by the Ethics Commission and might provide you with more understanding. Let us know if, when considering these definitions, you still think your position should not be added.

Thank you,  
Michelle

Sergeant Michelle Smith  
Internal Affairs Division



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**From:** BARBRA ANN MONTESQUIEU - [REDACTED]  
**Sent:** Friday, April 17, 2026 8:45 AM  
**To:** ROY YOO - [REDACTED]; MICHELLE SMITH - [REDACTED]  
**Cc:** BILLY BROCKWAY - [REDACTED]  
**Subject:** Fw: ATTN: Proposed Change to LAPD Conflict of Interest Code that impacts your current assignment

Hello -

Is my position added into the list?

The LAPD Grants OUC have no influence on contracts and purchasing. All of grants-funded expenses go through the respective entities for purchasing and contracts. And subrecipient an are identified by the respective Commands.

Thanks,

Barbra

Barbra Montesquieu  
Officer in Charge, LAPD Grants Section




---

**From:** LAPD Ethics COI [REDACTED]  
**Sent:** Friday, April 17, 2026 8:02:15 AM

To: LAPD Ethics COI <[REDACTED]>

Subject: Re: ATTN: Proposed Change to LAPD Conflict of Interest Code that impacts your current assignment

Hello,

The Board of Police Commissioners meeting has been cancelled next week and therefore the scheduled public hearing on this matter has been postponed. It will appear at a future Board of Police Commissioners meeting.

Respectfully,

Deputy Chief Billy Brockway, Department Ethics Coordinator

Lieutenant Roy Yoo, Department Ethics Support Staff

Sergeant Michelle Smith, Department Ethics Support Staff

---

From: LAPD Ethics COI

Sent: Thursday, March 19, 2026 10:34 PM

To: LAPD Ethics COI <[REDACTED]>

Subject: ATTN: Proposed Change to LAPD Conflict of Interest Code that impacts your current assignment

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Attached are the current list of filers and categories (Current LAPD Ethics Conflict of Interest Code), the proposed list of filers (Proposed LAPD Ethics Conflict of Interest Code), the proposed disclosure

4/29/26, 12:37 PM

Re: ATTN: Proposed Change to LAPD Conflict of Interest Code that impacts your current assignment - LAPD Ethics COI - Outlook

categories (LAPD-Proposed Schedule B), the Notice of Intention to amend our COI Code (Notice of Intention), and the Notice of Public Hearing regarding the date this will be presented to the BOPC (Notice of Public Hearing).

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**Microsoft Teams meeting**

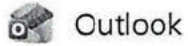
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Meeting ID: 214 707 863 391 48

Passcode: nE3My2PN

Respectfully,

Deputy Chief Billy Brockway, Department Ethics Coordinator  
Lieutenant Roy Yoo, Department Ethics Support Staff  
Sergeant Michelle Smith, Department Ethics Support Staff



Re: Proposed amendment for LAPD Conflict of interest code

From Cmdt. Lassard <[REDACTED]>  
Date Tue 3/31/2026 2:31 PM  
To LAPD Ethics COI <[REDACTED]>

ATTENTION: This email originated outside of LAPD. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Thank you.

Why does the public have to ask for this? You could just include this in the announcement on the LAPD website.

----- Original Message -----

On Tuesday, 03/31/26 at 07:28 LAPD Ethics COI <[REDACTED]> wrote:

Hello,  
Please see attached.

**From:** Cmdt. Lassard <[REDACTED]>  
**Sent:** Monday, March 30, 2026 11:01 PM  
**To:** LAPD Ethics COI <[REDACTED]>  
**Subject:** Proposed amendment for LAPD Conflict of interest code

ATTENTION: This email originated outside of LAPD. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

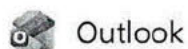
Hi Deputy Chief Brockway,

Please provide a copy of the proposed conflict of interest code and all of the information upon which it is based.

Provide this information ASAP since the comment period is terminating on April 19, 2026.

Moreover, why do you make people ask for the proposed code rather than publish it along with your notice announcing the comment period? It sure sounds like you would rather not publish it.





Re: Proposed Change to LAPD Conflict of Interest Code

From Aaron Peardon [redacted]  
Date Tue 3/24/2026 4:01 PM  
To LAPD Ethics COI [redacted]  
Cc Larry Gates, President (L3090) [redacted]

ATTENTION: This email originated outside of LAPD. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Thank you, the Senior PSR IIs are in the EAA unit. Thank you for the notification, but there is no impact to AFSCME Local 3090 so we will not be attending the meeting.

Thanks again,

Aaron Peardon  
Business Representative  
AFSCME District Council 36

[redacted]

From: LAPD Ethics COI [redacted]  
Sent: Tuesday, March 24, 2026 7:05 AM  
To: Aaron Peardon (DC36) [redacted]  
Cc: Larry Gates, President (L3090) [redacted]  
Subject: Re: Proposed Change to LAPD Conflict of Interest Code

You don't often get email from lapdethicscoi@lapd.online. [Learn why this is important](#)

Good Morning,  
Senior PSR IIS at ECCCD were added to the new COI. Page 3 of the new draft COI.

From: Aaron Peardon (DC36) [redacted]  
Sent: Monday, March 23, 2026 10:44 PM  
To: LAPD Ethics COI [redacted]  
Cc: Larry Gates, President (L3090) [redacted]  
Subject: Re: Proposed Change to LAPD Conflict of Interest Code

ATTENTION: This email originated outside of LAPD. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hello,

This is Aaron Peardon, Business Representative for AFSCME District Council 36 representing LAPD MOU 3 for Local 3090. Speaking with President Larry Gates, who is copied on this email, we don't see where this would impact 3090 members such as PSRs and Admin Clerks.

Can you please clarify if we are missing anything?

Thank you,

Aaron Peardon  
Business Representative  
AFSCME District Council 36  
[REDACTED]

---

**From:** LAPD Ethics COI [REDACTED]  
**Sent:** Thursday, March 19, 2026 3:31 PM  
**To:** LAPD Ethics COI [REDACTED]  
**Subject:** Proposed Change to LAPD Conflict of Interest Code

Some people who received this message don't often get email from lapdethicscoi@lapd.online. [Learn why this is important](#)

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4/29/26, 12:35 PM

Re: Proposed Change to LAPD Conflict of Interest Code - LAPD Ethics COI - Outlook

Intention), and the Notice of Public Hearing regarding the date this will be presented to the BOPC (Notice of Public Hearing).

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**Microsoft Teams meeting**

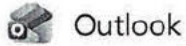
**Join:** <https://teams.microsoft.com/meet/21470786339148?p=xOGV9zlkWQ1e13wbyE>

Meeting ID: 214 707 863 391 48

Passcode: nE3My2PN

Respectfully,

Deputy Chief Billy Brockway, Department Ethics Coordinator  
Lieutenant Roy Yoo, Department Ethics Support Staff  
Sergeant Michelle Smith, Department Ethics Support Staff



Re: Trying to contact about Conflicts of Interest amendment...

From LAPD Ethics COI [redacted]  
Date Thu 4/23/2026 11:19 PM  
To Chris Damien <[redacted]>  
Cc SARAH BELL <[redacted]>; PIO [redacted]

Hello Again Sir,

After the Police Commission approves it, it is sent back to the Ethics Commission for presentation to the City Council for their approval. It will not be enacted until the Council approves it.

The disclosure categories listed in the new Schedule B are being mandated by the Ethics Commission to match the rest of the City. The LAPD had no input in those so any questions about Schedule B should be directed to the Ethics Commission. The list of designated positions (Schedule A) is the only item with LAPD input.

Respectfully,

Deputy Chief Billy Brockway, Department Ethics Coordinator  
Lieutenant Roy Yoo, Department Ethics Support Staff  
Sergeant Michelle Smith, Department Ethics Support Staff

From: Chris Damien <[redacted]>  
Sent: Thursday, April 23, 2026 10:13 PM  
To: LAPD Ethics COI [redacted]  
Cc: SARAH BELL <[redacted]> PIO [redacted]  
Subject: Re: Trying to contact about Conflicts of Interest amendment...

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Hello,

Thanks for the update and clarification.

I'll be sure to track the agenda to see when it will be considered by the commission. Is it your understanding that should the commission vote on it it would be enacted (or not) at that time?

The prior policy was voted on by city council. Will this one be voted on by the city council too?

I have some further questions about the modifications to the various disclosure categories. But I'll hold those until I can do a little more research. I'll follow up when I've done that.

Best  
Chris

On Thu, Apr 23, 2026 at 1:30 PM LAPD Ethics COI <[REDACTED]> wrote:

Hello Sir,

That is the current Conflict of Interest code with the 2001 date stamp. The proposed changes were drafted with input from the Ethics Commission, LAPD, and the City Attorney's Office. The notice of intent was posted for 30 days to seek community, employee, and labor union input. The first time the new draft will be discussed in a public forum will be at an upcoming Board of Police Commissioners meeting. We initially hoped it was going to be heard at the April 21<sup>st</sup> meeting, but that meeting was cancelled so it will appear at a future meeting. To know when it will occur, please monitor future Board of Police Commission agendas as they are posted.

Respectfully,

Deputy Chief Billy Brockway, Department Ethics Coordinator  
Lieutenant Roy Yoo, Department Ethics Support Staff  
Sergeant Michelle Smith, Department Ethics Support Staff

---

**From:** Chris Damien [REDACTED]  
**Sent:** Thursday, April 23, 2026 7:17 PM  
**To:** LAPD Ethics COI [REDACTED]  
**Cc:** SARAH BELL [REDACTED]  
**Subject:** Re: Trying to contact about Conflicts of Interest amendment...

**ATTENTION:** This email originated outside of LAPD. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Ok, thanks for sending.

I got the attached current Conflict of Interest code from the LA Ethics Commission public portal. Can you confirm it is in fact the current code?  
(Date stamp on bottom says 2001)

And who was involved in drafting these proposed changes? Was this done through the Ethics Commission or some other public forum I can review?

thanks  
Chris

On Tue, Apr 21, 2026 at 3:59 PM LAPD Ethics COI [REDACTED] wrote:

Hello Sir,  
Including this email, a total of 3 emails.

Attached are the proposed schedule and the disclosure categories.

---

**From:** Chris Damien [REDACTED]  
**Sent:** Tuesday, April 21, 2026 3:46 PM  
**To:** LAPD Ethics COI [REDACTED]  
**Subject:** Re: Trying to contact about Conflicts of Interest amendment...

ATTENTION: This email originated outside of LAPD. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

How many emails did you receive from me? Just the ones we exchanged just now?

Because I sent you several others and now I don't think you received them.

Here is what I was inquiring about:

I saw posted today on the Police Commission website a notice of intention to amend the conflict of interest code.

It says on it: "Copies of the proposed code and all of the information upon which it is based may be obtained from the LAPD at [REDACTED] or 100 W. First Street, Los Angeles, CA 90012.

Could you please provide the proposed code and all of the information upon which it is based (as stated in the notice)?

Thanks  
Chris Damien  
[REDACTED]

On Tue, Apr 21, 2026 at 3:42 PM LAPD Ethics COI [REDACTED] wrote:

Hello Sir,  
Not sure what the technical problem could be. This email has been active with no issues previously.

---

**From:** Chris Damien <[REDACTED]>  
**Sent:** Tuesday, April 21, 2026 3:40 PM  
**To:** LAPD Ethics COI [REDACTED]  
**Subject:** Re: Trying to contact about Conflicts of Interest amendment...

ATTENTION: This email originated outside of LAPD. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Oh, Hi, do you know why the email was bouncing back before?

On Tue, Apr 21, 2026 at 3:38 PM LAPD Ethics COI <[REDACTED]> wrote:  
Hello Sir,  
You have reached the LAPD ethics coi email.

**From:** Chris Damien [REDACTED]  
**Sent:** Tuesday, April 21, 2026 3:02 PM  
**To:** LAPD Ethics COI [REDACTED]  
**Subject:** Trying to contact about Conflicts of Interest amendment...

ATTENTION: This email originated outside of LAPD. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Messaging about this conflict of interest amendment I emailed earlier and the email bounced back. see attached



Mail Delivery Subsystem <mailer-daemon@googlemail.com>  
to me

12:43 PM (2 hours ago) ☆ ☹ ↶ ⋮



**Address not found**

Your message wasn't delivered to [REDACTED] because the address couldn't be found, or is unable to receive mail.

**LEARN MORE**

▲ This link will take you to a third-party site

--  
**Christopher Damien**  
Enterprise Reporter, The LA Local



**THE LA LOCAL**

--  
Christopher Damien

Enterprise Reporter, [The LA Local](#)



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**Christopher Damien**

Enterprise Reporter, [The LA Local](#)



**THE LA LOCAL**

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**Christopher Damien**

Enterprise Reporter, [The LA Local](#)



**THE LA LOCAL**

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**Christopher Damien**

Enterprise Reporter, [The LA Local](#)



**THE LA LOCAL**

**LOS ANGELES POLICE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**SCHEDULE "A" – DESIGNATED POSITIONS**

<b><u>Designated Position</u></b>	<b><u>Category</u></b>
Police Commissioner	1
Chief of Police	2
Executive Director Police Commission	2
Inspector General	2
Assistant Inspector General	2
Sergeant II, Office of the Inspector General	2
Deputy Chief	3
Commander (not otherwise designated)	3
Captain (not otherwise designated)	3
Captain (Geographic Area)	4
Captain, Detective Services (OSD)	4
Commander (Training Group)	5
Police Training Administrator	5
Captain (Training Division)	5
Lieutenant II, Training Division	6
Sergeant II, Training Division	6
Sergeant I, Training Division	6
Chief Information Officer	7
Police Administrator	7
Chief Management Analyst (Records and Identification)	7
Chief Management Analyst (Property Division)	7
Director of Systems, Information Technology Division	7
Director of Systems, Emergency Command Control Communication System Division	7
Asst. C/O (Sr. MA II), Emergency Command Control Communication System Division	7
Lieutenant, Crime Analysis	7
Sr. Systems Analyst II, Information Technology Division	8
Systems Specialist II, Information Technology Division	8
Sr. Management Analyst II, Information Technology Division	8
Sr. Management Analyst I, Information Technology Division	8
Systems Specialist I, Information Technology Division	8
Police Officer, Information Technology Division	8
Detective II, Information Technology Division	8

**LOS ANGELES POLICE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**SCHEDULE "A" – DESIGNATED POSITIONS**

<b><u>Designated Position</u></b>	<b><u>Category</u></b>
Commander (Uniformed Services Group)	9
Captain, Air Support Division	10
Police Permit Review Panel Member	11
Sr. Management Analyst II, Police Commission Executive Office	11
Hearing Examiner	11
Lieutenant, Commission Investigation Division	11
Detective III, Commission Investigation Division	11
Sr. Management Analyst I, Enforcement Section, CID	11
Sr. Management Analyst I, Alarms Section, CID	11
Sr. Management Analyst II, Facilities Management	12
Stores Supervisor	12
Principal Storekeeper, OIC, Stores Section	12
Sr. Management Analyst I, OIC-Services Section, Supply Division	12
Sr. Storekeeper I, Uniform Store Supervisor & Printing Coordinator, Supply Division	12
Sr. Storekeeper I, Assistant OIC-Stores Section, Supply Division	12
Management Analyst II, Equipment Unit Supervisor, Supply Division	12
Management Analyst I, Building Liaison Supervisor, Supply Division	12
Captain (Scientific Investigation Division)	13
Director of Police Transportation II	14
Director of Police Transportation I	14
Director of Behavioral Science Services Section	15
Police Training Administrator	15
Sr. Management Analyst II, Personnel Group	15
Sr. Management Analyst II, Personnel Group	15
Chief Management Analyst (Fiscal Operations Division)	16
Detective 1 (Electronics Officer), Administrative, Vice Division	17
Commander, Community Affairs Group	18
Sergeant II, OIC-Crime Prevention Section, Community Affairs Group	18
Sergeant I, Act. OIC-Public Affairs Section, Community Affairs Group	18
Captain (Management Services Division)	19

**LOS ANGELES POLICE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**SCHEDULE "A" – DESIGNATED POSITIONS**

<b><u>Designated Position</u></b>	<b><u>Category</u></b>
Police Administrator, Support Services Bureau	20
Police Administrator, Fiscal Support Bureau	21
Captain, Metropolitan Division	22
Sr. Management Analyst II, OIC-Planning Section, Management Services Division	23
Lieutenant II, OIC-Procedures & Directives Section, Management Services Division	23
Sergeant II, OIC-Researchers, Special Projects Unit, Management Services Division	23
Police Officer III, Researchers, Special Projects Units, Management Services Division	23
Management Analyst I, Researchers, Special Projects Unit, Management Services Div.	23
Lieutenant II, Metropolitan Division	23
Detective III, OPG RFP Unit	24
Detective I, OPG RFP Unit	24
Police Officer III (5 positions), OPG RFP Unit	24

Agency Report of:  
New Positions

A Public Document

MAR 01 2012

California Form **804**

**1. Agency Name** (Also include, Division, Department, or Region (if applicable))  
Los Angeles Police Department, Information Technology Bureau & ADSD

**Agency Contact** (Last Name, First Name, Title)  
Thomas, Jennifer, Lieutenant II

**Area Code/Phone Number** [REDACTED] **E-mail** [REDACTED]

Amendment  
**Date of Original Filing:** 02/28/2012  
(month, day, year)

**2. New Position Information**

Position Title/Classification and Job Summary	Assigned Category	OR	Disclosure Requirement	Assuming/Start Date (Optional)
Sr. Systems Analyst II Information Technology Bureau	8			Start 02 / 27 / 12 d / m / yr
Lieutenant II Information Technology Bureau	8			Start 02 / 27 / 12 d / m / yr
Sr. Systems Analyst II Application Development and Support Division	8			Start 02 / 27 / 12 d / m / yr
				Start 02 / 27 / 12 d / m / yr
				Start / / d / m / yr
				Start / / d / m / yr
				Start / / d / m / yr

**3. Verification**

I have read and understand FPPC Regulations 18701 and 18734. I have verified that the disclosure assignment(s) set forth above, is in accordance with its provisions.

[REDACTED SIGNATURE]

JENNIFER THOMAS  
Print Name

LIEUTENANT  
Title

02-28-12  
(month, day, year)

Comment: (Use this space or an attachment for any additional information.)

**Agency Report of:  
New Positions**

**A Public Document**

California Form **804**

**1. Agency Name** (Also include, Division, Department, or Region (if applicable))  
Los Angeles Police Department

**Agency Contact** (Last Name, First Name, Title)  
Potter, Kerri Sergeant

**Area Code/Phone Number** [Redacted]

**E-mail** [Redacted]

Amendment

**Date of Original Filing:** **LOS ANGELES CITY ETHICS COMMISSION**  
NOV 17 2015 (month, day, year)

**RECEIVED**

**2. New Position Information**

Position Title/Classification and Job Summary	Assigned Category	OR	Disclosure Requirement	Assuming/Start Date (Optional)
Assistant Uniform & Equipment Coordinator (Coordinate and research any	6			Start <u>17</u> / <u>11</u> / <u>15</u> d / m / yr
projects relating to uniform and personal equipment matters. Assist with staff projects and product				Start ___ / ___ / ___ d / m / yr
evaluations as necessary. Present all items under consideration for approval to the Uniform Committee				Start ___ / ___ / ___ d / m / yr
members and the Chief of Police.)				Start ___ / ___ / ___ d / m / yr
				Start ___ / ___ / ___ d / m / yr
				Start ___ / ___ / ___ d / m / yr
				Start ___ / ___ / ___ d / m / yr

**3. Verification**

*I have read and understand FPPC Regulations 18701 and 18734. I have verified that the disclosure assignment(s) set forth above, is in accordance with its provisions.*

[Redacted Signature]      KERRI POTTER      SERGEANT      11-17-15  
Signature      Print Name      Title      (month, day, year)

Comment: (Use this space or an attachment for any additional information.)  
Newly added position.

**LOS ANGELES POLICE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**SCHEDULE "B"**

**General Provision**

Income is discloseable pursuant to Section 302(B)(2) or (3) when the person from whom the income is received is of the type listed in the category to which the designated employee's position is assigned.

As used herein except as otherwise provided, the terms, "investment," "income," "interest in real property," and "business entity" are defined as provided in this Conflict of Interest Code.

**Category 1**

- A. Any investment, as defined by this Code.
- B. Any interest in real property located within the City of Los Angeles.
- C. Income from any individual who is or during the past twelve months was employed by the Department.
- D. Income from any person or business entity which:
  - (1) Is subject to the police permit provisions of Section 103.12 of the Los Angeles Municipal Code:
  - (2) Manufactures or sells:
    - (a) Automobiles, Automotive Parts and Supplies.
    - (b) Motorcycles, Motorcycle Parts and Supplies.
    - (c) Aircraft (Helicopter and Fixed Wing), Aircraft Parts and Supplies.
    - (d) Weapons (Revolvers, Shotguns, Police Special Weapons).
    - (e) Ammunition of a type and calibre used in police weapons.
    - (f) Uniforms.
    - (g) Police Safety Equipment.
    - (h) Computer Hardware and Software.
    - (i) Photography Equipment and Supplies.
    - (j) Alcohol Breath Testing Equipment and Supplies.
    - (k) Polygraph Testing Equipment and Supplies.
    - (l) Explosive and Firearms Testing Equipment and Supplies.
    - (m) Electronic Investigation Equipment and Supplies.
    - (n) Television Equipment and Supplies.

**LOS ANGELES POLICE DEPARTMENT  
CONFLICT OF INTEREST CODE**

(o) Sound Recording Equipment and Supplies;

**SCHEDULE "B"**

- (3) Operates any news gathering or reporting agency;
- (4) Is a news reporter or a representative of a news gathering or reporting agency;
- (5) Is a regular tenant of the Los Angeles Memorial Coliseum and Sports Arena.

E. Income from any other person or business entity which during the past twelve months:

- (1) Filed any request, complaint or petition with the Police Commission;
- (2) Was a tenant of Dodger Stadium, the Los Angeles Memorial Coliseum and Sports Arena, the Greek Theater, the Hollywood Bowl.

F. In any case in which the Police Commission considers any matter, which may foreseeably have any effect on a financial interest of a member of the Commission, such member shall promptly announce the nature of his or her interest, and said announcement shall be recorded in the minutes of the meeting. In addition, such member shall file with the Commission Secretary a written notice of the nature of his or her interest, which notice shall become a public record. The requirement shall be in addition to any other requirement of this Code.

**Category 2**

A. Any investment in or income from any person or business entity operating a business located within the City of Los Angeles or owning an interest in real property within the City of Los Angeles.

B. Any interest in real property located within the City of Los Angeles.

C. Any investment in or income from any person or business entity which designs, tests, manufacturers, sells or repairs, or consults on the design, testing, manufacture, sale or repair of any of the following:

- (1) Automobiles, Automotive Parts and Supplies.
- (2) Motorcycles, Motorcycle Parts and Supplies.
- (3) Aircraft (Helicopter and Fixed Wing), Aircraft Parts and Supplies.
- (4) Weapons (Revolvers, Shotguns, Police Special Weapons).
- (5) Ammunition of a type and calibre used in police weapons.
- (6) Uniforms.
- (7) Police Safety Equipment.
- (8) Computer Hardware and Software.

**LOS ANGELES POLICE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**SCHEDULE "B"**

- (9) Photography Equipment and Supplies.
  - (10) Alcohol Breath Testing Equipment and Supplies.
  - (11) Polygraph Testing Equipment and Supplies.
  - (12) Explosive and Firearms Testing Equipment and Supplies.
  - (13) Electronic Investigation Equipment and Supplies.
  - (14) Television Equipment and Supplies.
  - (15) Sound Recording Equipment and Supplies.
- D. Income from any individual who is or during the past twelve months was employed by the Department.

**Category 3**

- A. Any investment in or income from any person or business entity operating a business located within the City of Los Angeles or owning an interest in real property within the City of Los Angeles.
- B. Any interest in real property located within the City of Los Angeles.

**Category 4**

- A. Any investment in a business entity located in or owning an interest in real property in the geographic area over which the designated officer exercises command authority of police operations.
- B. Any income from any person or business entity operating a business located in or owning an interest in real property in the geographic area over which the designated officer exercises command authority of police operations.
- C. Any interest in real property in the geographic area over which the designated officer exercises command authority of police operations.

**Category 5**

- A. Any investment in or income from any person or business entry operating a business located within the City of Los Angeles or owning an interest in real property within the City of Los Angeles.

**LOS ANGELES POLICE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**SCHEDULE "B"**

- B. Any interest in real property located within the City of Los Angeles.
- C. Any investment in or sources of income from any person or business entity which designs, tests, manufactures, sells or repairs, or consults on the design, testing, manufacture, sale or repair of;
  - (1) Weapons (Revolvers, Shotguns, Police Special Weapons).
  - (2) Ammunition of a type and calibre used in police weapons.
  - (3) Television Equipment and Supplies.
  - (4) Sound Recording Equipment and Supplies.
  - (5) Police Safety Equipment.

**Category 6**

- A. Any investment in or income from any person or business entity which designs, test, manufactures, sells or repairs, or consults on the design, testing, manufacture, sale or repair of:
  - (1) Weapons (Revolvers, Shotguns, Police Special Weapons).
  - (2) Ammunition of a type and calibre used in police weapons.
  - (3) Television Equipment and Supplies.
  - (4) Sound Recording Equipment and Supplies.
- B. Any investment in or sources of income from any person or business entity engaged in the production, manufacture, sale, repair or design of, or provides consulting services regarding police safety equipment, uniforms, weapons, ammunition, non-lethal control devices, or other police equipment.

**Category 7**

- A. Any investment in or income from any person or business entity operating a business located within the City of Los Angeles or owning an interest in real property within the City of Los Angeles.
- B. Any interest in real property located within the City of Los Angeles.
- C. Any investment in or income from any person or business entity which designs, tests, manufactures, sells or repairs, or consults on the design, testing, manufacture, sale or repairs of computer hardware or software or telecommunications equipment.

**LOS ANGELES POLICE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**SCHEDULE "B"**

**Category 8**

- A. Any investment in or income from any person or business entity operating a business located within the City of Los Angeles or owning an interest in real property within the City of Los Angeles.
- B. Any interest in real property located within the City of Los Angeles.
- C. Any investment in or income from any person or business entity which designs, tests, manufactures, sells or repairs, or consults on the design, testing, manufacture, sale or repair of telecommunications equipment.

**Category 9**

- A. Any investment in or income from any person or business entity operating a business located within the City of Los Angeles or owning an interest in real property within the City of Los Angeles.
- B. Any interest in real property located within the City of Los Angeles.
- C. Any investment in or income from any person or business entity which designs, tests, manufactures, sells or repairs, or consults on the design, testing, manufacture, sale or repair of aircraft, aircraft parts and supplies.
- D. Any investment in or sources of income from any person or business entity engaged in the production, manufacture, sale, repair or design of or provides consulting services regarding police safety equipment, uniforms, weapons, ammunition, non-lethal control devices, or other police equipment.

**Category 10**

- A. Any investment in or income from any person or business entity operating a business located within the City of Los Angeles or owning an interest in real property within the City of Los Angeles.
- B. Any interest in real property located within the City of Los Angeles.
- C. Any investment in or income from any person or business entity which designs, tests, manufactures, sells, or repairs, or consults on the design, testing, manufacture, sale or repair of aircraft, aircraft parts and supplies.

**LOS ANGELES POLICE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**SCHEDULE "B"**

**Category 11**

- A. Any investment in or income from any person or business entity which operates a business within the City of Los Angeles requiring the issuance of a police permit, or interest in real property within the City of Los Angeles on which it operates a business requiring the issuance of a police permit.

**Category 12**

- A. Any investment in or income from any person or business entity which designs, tests, manufactures, sells or repairs, or consults on the design, testing, manufacture, sale or repair of the following:

- (1) Aircraft (Helicopter and Fixed Wing), Aircraft Parts and Supplies.
- (2) Weapons (Revolvers, Shotguns, Police Special Weapons).
- (3) Ammunition of a type and calibre used in police weapons.
- (4) Uniforms.
- (5) Police Safety Equipment.
- (6) Computer Hardware and Software.
- (7) Scientific Investigation Equipment.
  - (a) Photography Equipment and Supplies.
  - (b) Alcohol Breath Testing Equipment and Supplies.
  - (c) Polygraph Testing Equipment and Supplies.
  - (d) Explosive and Firearms Testing Equipment and Supplies.
  - (e) Electronic Investigation Equipment and Supplies.
- (8) Television Equipment and Supplies.
- (9) Sound Recording Equipment and Supplies.
- (10) Office Supplies, Paper Printing and Printing Equipment.
- (11) Telephone Equipment and Supplies.
- (12) Building Contracts.
- (13) Building and construction of police facilities.

- B. Any interest in real property used by the City of Los Angeles as a police facility.

**Category 13**

- A. Any investment in or income from any person or business entity operating a business located within the City of Los Angeles or owning an interest in real property within the City of Los Angeles.

**LOS ANGELES POLICE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**SCHEDULE "B"**

- B. Any interest in real property located within the City of Los Angeles.
- C. Any investment in or income from any person or business entity which designs, tests, manufactures, sells or repairs, or consults on the design, testing, manufacture, sale or repair of equipment or supplies used for photography, alcohol breath testing, polygraph testing, explosive or firearms testing, electronic investigation, or other scientific testing utilized in criminalistics.

**Category 14**

- A. Any investment in or income from any person or business entity operating a business located within the City of Los Angeles or owning an interest in real property within the City of Los Angeles.
- B. Any interest in real property located within the City of Los Angeles.
- C. Any investment in or income from any person or business entity which designs, tests, manufactures, sells, or repairs, or consults on the design, testing, manufacture, sale or repair of automobiles, automotive parts or supplies, motorcycles, or motorcycle parts or supplies.

**Category 15**

- A. Any investment in or income from any person or business entity operating a business located within the City of Los Angeles or owning an interest in real property within the City of Los Angeles.
- B. Any interest in real property located within the City of Los Angeles.
- C. Any investment in or income from any person or business entity providing social or psychological counseling or other treatment for emotional disorders or providing consulting services of a social, psychological or organizational nature.

**Category 16**

- A. Any investment in or income from any person or business entity operating a business located within the City of Los Angeles or owning an interest in real property within the City of Los Angeles.

**LOS ANGELES POLICE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**SCHEDULE "B"**

- B. Any interest in real property located within the City of Los Angeles.
- C. Any interest or investment from any person or business entity, which is competing, through the RFP process, for the City of Los Angeles' business.
- D. Any investment in or income from any person or business entity which manufactures or sells:
  - (1) Automobiles, Automotive Parts and Supplies.
  - (2) Motorcycles, Motorcycle Parts and Supplies.
  - (3) Aircraft (Helicopter and Fixed Wing), Aircraft Parts and Supplies.
  - (4) Weapons (Revolvers, Shotguns, Police Special Weapons).
  - (5) Ammunition of a type and calibre used in police weapons.
  - (6) Uniforms.
  - (7) Police Safety Equipment.
  - (8) Computer Hardware and Software.
  - (9) Photography Equipment and Supplies.
  - (10) Alcohol Breath Testing Equipment and Supplies.
  - (11) Polygraph Testing Equipment and Supplies.
  - (12) Explosive and Firearms Testing Equipment and Supplies.
  - (13) Electronic Investigation Equipment and Supplies.
  - (14) Television Equipment and Supplies.
  - (15) Sound Recording Equipment and Supplies.

**Category 17**

- A. Any investment in or income from any person or business entity which designs, sells, tests, manufactures, repairs or consults on the design, testing, manufacturing, sale or repair of electronic components.

**Category 18**

- A. Investment or sources of income from any person or business entity engaged in the production of crime prevention materials, procedures or publications.

**LOS ANGELES POLICE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**SCHEDULE "B"**

**Category 19**

- A. Any investment in or income from any person or business entity operating a business located within the City of Los Angeles or owning an interest in real property within the City of Los Angeles.
- B. Any interest in real property located within the City of Los Angeles.
- C. Any investment in or sources of income from any person or business entity engaged in the production, manufacture, sale, repair or design of, or provides consulting services regarding police safety equipment, uniforms, weapons, ammunition, non-lethal control devices or other police equipment.

**Category 20**

- A. Any investment in or income from any person or business entity operating a business located within the City of Los Angeles or owning an interest in real property within the City of Los Angeles.
- B. Any interest in real property located within the City of Los Angeles.
- C. Any investment in or income from any person or business entity which designs, tests, manufactures, sells or repairs, or consults on the design, testing, manufacturing, sale or repair of computer hardware or software.
- D. Any investment in or income from any person or business entity which designs, tests, manufactures sells, or repairs, or consults on the design, testing, manufacturing, sale or repair of equipment or supplies used for photography, alcohol breath testing, polygraph testing, explosive or firearms testing, electronic investigation, or other scientific testing utilized in criminalistics.

**Category 21**

- A. Any investment in or income from any person or business entity operating a business located within the City of Los Angeles or owning an interest in real property within the City of Los Angeles.
- B. Any interest in real property located within the City of Los Angeles.

**LOS ANGELES POLICE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**SCHEDULE "B"**

- C. Any investment in or income from any person or business entity which manufactures or sells:
- (1) Automobiles, Automotive Parts and Supplies.
  - (2) Motorcycles, Motorcycle Parts and Supplies.
  - (3) Aircraft (Helicopter and Fixed Wing), Aircraft Parts and Supplies.
  - (4) Weapons (Revolvers, Shotguns, Police Special Weapons).
  - (5) Ammunition of a type and calibre used in police weapons.
  - (6) Uniforms.
  - (7) Police Safety Equipment.
  - (8) Computer Hardware and Software.
  - (9) Photography Equipment and Supplies.
  - (10) Alcohol Breath Testing Equipment and Supplies.
  - (11) Polygraph Testing Equipment and Supplies
  - (12) Explosive and Firearms Testing Equipment and Supplies.
  - (13) Electronic Investigation Equipment and Supplies.
  - (14) Television Equipment and Supplies.
  - (15) Sound Recording Equipment and Supplies.

**Category 22**

- A. Any investment in or income from any person or business entity operating a business located within the City of Los Angeles or owning an interest in real property within the City of Los Angeles.
- B. Any interest in real property located within the City of Los Angeles.
- C. Any investment in or sources of income from any person or business entity engaged in the production, manufacture, sale repair or design of, or provides consulting services regarding police safety equipment, uniforms, weapons, ammunition, non-lethal control devices or other police equipment.
- D. Any investment in or income from any person or business entity which designs, tests, manufactures, sells or repairs, or consults on the design, testing, manufacture, sale or repair of:
- (1) Weapons (Revolvers, Shotguns, Police Special Weapons).
  - (2) Ammunition of a type and caliber used in police weapons.

**LOS ANGELES POLICE DEPARTMENT  
CONFLICT OF INTEREST CODE**

**SCHEDULE "B"**

**Category 23**

- A. Any investment in or sources of income from any person or business entity engaged in the production, manufacture, sale, repair or design of, or provides consulting services regarding police safety equipment, uniforms, weapons, ammunition, non-lethal control devices or other police equipment.

**Category 24**

- A. Any investment in or income from any person or business entity which operates an Official Police Garage business or Towing Operation within the City of Los Angeles.