



March 4, 2025

Denton City Council  
2015 E. McKinney Street  
Denton, Texas 76201

Honorable Members of the City Council,

The Board of Ethics has met and approved the attached packet of amendments during four meetings over the last year. During these meetings, the Board approved two proposals to amend the Ethics Ordinance, which are briefly outlined below:

**1. Restructure Sec. 2-273(a) Conflicts of Interest.**

Primarily, this proposal (1) expands the scope of when a Conflict of Interest may arise from only when a City Official is deliberating a Pending Matter to when a City Official is acting in their official capacity; (2) clarifies disclosure timelines; and (3) adjusts the relationships that create a Conflict of Interest.

	<b>Current</b>	<b>Proposed</b>	<b>Summary of Change</b>
<b>Definition</b>	"a stake, share, equitable interest, or involvement in an undertaking in the form of any one (1) or more of the following:"	"a situation, in which personal and/or financial considerations actually have, or are reasonably certain to, influence or compromise the judgment or actions of a City Official when acting in their official capacity. Conflicts of interest arise when City Officials, in their official capacity, act or fail to act in ways that they know, or should know, are likely to impact the personal or financial interests of the following in a way that is not shared with a substantial segment of the City's population."	Expands the scope of when a Conflict of Interest (previously a Conflicting Interest) arises.
<b>Deliberation Prohibition</b>	"deliberate regarding a Pending Matter for which the City Official currently has a Conflicting Interest"	"participate in Deliberations involving a current Conflict of Interest."	
<b>Disclosure Requirements</b>	"Disclosures under this subsection shall be for the time period, including the	"Disclosures under this subsection must be made within thirty (30) calendar	

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	previous calendar year, and up to date where the Conflicting Interest arises before the City Official”	days of the Conflict of Interest arising and shall remain valid for the period covering one year (12 months) from the date of disclosure or until the Conflict of Interest is resolved, whichever occurs first.”	how long a disclosure is valid.
<b>Relationships Creating Conflicts</b>	See Attachment 1	See Attachment 1	Modernizes conflicting relationships (i.e., adds Domestic Partner, Household Member, etc.); removes great-grandparents and great-grandchildren; adds Clients; removes automatic conflicts with Business Entities, nonprofits, and unincorporated associations created by City Official relatives other than their immediate family.

Key definitions to understand the above summary are shown below. It should be noted that these definitions are currently included in the Ethics Ordinance:

*Deliberations*: discussions at the dais; voting as a Member of the Board or Commission; presentations as a member of the audience before any City Board or Commission; and conversing or corresponding with other City Officials or Staff. This term does not apply to a general vote on a broad comprehensive, or omnibus motion, such as approval of the City budget or polling places.

*Pending Matter*: an application seeking approval of a permit or other form of authorization required by the City, State, or Federal law; a proposal to enter into a contract or arrangement with the City for the provision of goods, services, real property, or other things of value a case involving the City that is (or is anticipated to be) before a civil, criminal, or administrative tribunal.

This proposal also defines Relatives in plain language and creates definitions for the terms: Domestic Partner, Client, Employer, and Household Member. Exact proposed definitions can be seen in Exhibit 3.

## **2. Amend Sec. 2-281 (c)(4) to clarify the evidentiary standard of review for Board of Ethics Hearings.**

This proposal clarifies the evidentiary standard of review to be used during Board of Ethics Hearings by requiring the Complainant to “present sufficient facts to establish that it is reasonably certain that a violation of [the Ethics Ordinance] has occurred.” (emphasis added). There is not currently a clearly stated evidentiary standard of review.

The proposed language changes can be seen in:

- Exhibit 3 – Redlined Ethics Ordinance

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Annetta Ramsay". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Annetta Ramsay  
Chair, Board of Ethics

CC:

Mack Reinwand, City Attorney  
Sara Hensley, City Manager,  
Madison Rorschach, City Auditor

**Attachment 1: Summary of Conflicting Relationship Changes**

<b>Relationship</b>		<b>Current Proposed</b>	
<b>City Official's</b>	spouse	Yes	Yes
	Domestic Partner	No	Yes
	child, step-child, adoptive child	Yes	Yes
	foster child	No	Yes
	parent, step-parent	Yes	Yes
	sibling	Yes	Yes
	parent's sibling	Yes	Yes
	sibling's child	Yes	Yes
	grandparent, step-grandparent	Yes	Yes
	grandchild, step-grandchild	Yes	Yes
	great-grandchild	Yes	No
	great-grandparent	Yes	No
	Household Member	No	Yes
	Employer	Yes	Yes
	Client	No	Yes
	Business Entity with an ownership interest	Yes	Yes
	Business Entity with a policy interest	Yes	Yes
	nonprofit or unincorporated association with policy interest	Yes	Yes
	person or Business Entity with employment offer	Yes	Yes
<b>CO's spouse or Domestic Partner's</b>	child, step-child, adoptive child	Yes	Yes
	foster child	No	Yes
	parent, step-parent	Yes	Yes
	sibling	Yes	Yes
	parent's sibling	Yes	Yes
	sibling's child	Yes	Yes
	grandparent, step-grandparent	Yes	Yes
	grandchild, step-grandchild	Yes	Yes
	great-grandchild	Yes	No
	great-grandparent	Yes	No
	Employer	Yes	Yes
	Client	No	Yes
	Business Entity with an ownership interest	Yes	Yes
	Business Entity with a policy interest	Yes	No
	nonprofit or unincorporated association with policy interest	Yes	No
	person or Business Entity with employment offer	Yes	Yes
<b>CO's Parent/Child/ Household</b>	Employer	Yes	Yes
	Client	No	Yes
	Business Entity with an ownership interest	Yes	No
	Business Entity with a policy interest	Yes	No
	nonprofit or unincorporated association with policy interest	Yes	No
	person or Business Entity with employment offer	Yes	No
<b>other Relatives</b>	Employer	Yes	No
	Client	No	No
	Business Entity with an ownership interest	Yes	No
	Business Entity with a policy interest	Yes	No
	nonprofit or unincorporated association with policy interest	Yes	No
	person or Business Entity with employment offer	Yes	No