

**City of Los Angeles  
Los Angeles City Employees' Retirement System (LACERS)  
Contractor Disclosure Policy Reporting Form**

**Reporting Period:** \_\_\_\_\_

Pursuant to the LACERS Contractor Disclosure Policy, the following information is required from Contractors that seek or are hired to provide goods and/or services to LACERS.  
The Policy can be found at LACERS.org

Note: All attachments to the reporting form shall be labeled and referenced with the applicable Policy Section

Date \_\_\_\_\_

Contractor/Consultant Name \_\_\_\_\_

Address \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Contact Information \_\_\_\_\_  
(Provide contact information in case Internal Audit has questions on your reported info.)

Contract Number \_\_\_\_\_  
(List contract number. For Private Equity, list the Fund Manager and Fund Number)

\_\_\_\_\_  
\_\_\_\_\_

Contract Description \_\_\_\_\_  
(Describe goods or services being provided to LACERS)

**Type of Filing (please choose from the following)**

- NEW Disclosure Report 1 \_\_\_\_\_
- BI-ANNUAL Disclosure Report 2 \_\_\_\_\_
- ANNUAL Disclosure Report 3 \_\_\_\_\_

- 1 New Disclosure Report is for Contractors with agreements entered into after August 13, 2019 and for all prior agreements that are subsequently extended, have increased commitment of funds or are substantively amended after August 13, 2019.
- 2 Bi-annual Disclosure Report is for Contractors who have already submitted a "New Disclosure Report" and are now submitting a regular, bi-annual report of campaign/other contributions and gifts. Bi-annual Disclosure

Reports are required for the duration of the agreement, unless otherwise notified by LACERS internal audit staff. This Bi-annual disclosure requirement also applies to Private Equity Consultant.

- 3 Annual Disclosure Report is for the General Investment Consultant, the Real Estate Consultant, and Private Equity Partnerships and their general managers.

Policy  
Section Disclosure Category

**C Campaign Contributions**

Are there campaign contributions to disclose pursuant to Section C of the Policy? Please refer to the list of elected officials, candidates, appointed officials, and applicable City employees at the end of this form.

Yes \_\_\_\_\_ No \_\_\_\_\_

Exemption: Monetary contributions and/or financial benefits given by any person to an Elected Official or Candidate for whom such person was entitled to vote at the time of the contributions AND which in the aggregate do not exceed \$100 to any one Elected Official or Candidate per election are not required to be reported pursuant to this Section C of the Policy. See definition of "Elected Official" or "Candidate" at the end of this form.

If yes, please provide the following information:

- (1). The Name and address of the contributor(s) and the connection to the Contractor.

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- (2). The name and title of each person receiving the contribution and the name of the Elected Official, Candidate, Appointed Official or person for whose benefit the contribution was made.

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- (3).The amount of the monetary contribution or financial benefit.

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- (4).The date of the monetary contribution or financial benefit.

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**D Other Contributions/Payments**

Are there other contributions/payments to disclose pursuant to Section D of the Policy? Please refer to the list of elected officials, candidates, appointed officials, and applicable City employees at the end of this form.

**Yes** \_\_\_\_\_ **No** \_\_\_\_\_

If yes, please provide the following information:

(1). The Name and address of the contributor(s) and the connection to the Contractor.

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(2). The name and title of each person receiving the contribution and the name of the Elected Official, Candidate, Appointed Official or person for whose benefit the contribution was made.

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(3).The amount of the monetary contribution or financial benefit.

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(4).The date of the monetary contribution or financial benefit.

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**F (1) Gifts made by Contractors**

Are there gifts to disclose pursuant to Section F (1) of the Policy? Please refer to the list of elected officials, candidates, appointed officials, and applicable City employees at the end of this form.

**Yes** \_\_\_\_\_ **No** \_\_\_\_\_

If yes, please provide the following information:

(1). The Name and address of each person providing the gift and each such person's connection to the Contractor.

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(2). The Name and title of each person receiving the gift.

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(3).The value of the Gift and description of the Gift.

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(4).The date of the presentation of the gift.

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**F (2) Gifts Received by the Private Equity Consultant, General Investment Consultant, or Real Estate Consultant**

Are there gifts to disclose pursuant to Section F (2) of the Policy? Please note that this question refers only to Private Equity Consultant, General Investment Consultant, or Real Estate Consultant.

**Yes** \_\_\_\_\_ **No** \_\_\_\_\_

If yes, please provide the following information:

(1). The Name and address of each person providing the gift and each such person's connection to the Contractor.

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(2). The Name and title of each person receiving the gift.

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(3).The value of the Gift and description of the Gift.

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(4).The date of the presentation of the gift.

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**G Contractor, Intermediary and Contact Information**

(1). Is there an intermediary information to disclose pursuant to Section G (1) (a) 1 of the Policy?

**Yes** \_\_\_\_\_ **No** \_\_\_\_\_

(2). Is there a person working on behalf of the Contractor, or assigned on behalf of the Contractor to a LACERS' contract, a current or former LACERS Board member, employee, consultant, or family member of any such person?

**Yes** \_\_\_\_\_ **No** \_\_\_\_\_

(3). Describe all compensation provided or agreed to be provided pursuant to Section G (1) (a) 3 of the Policy.

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(4). For new investment and consulting contracts, provide a List of Contacts made by the Contractor with appointed or Elected Officials within either (1) the three month period regarding a new agreement or investment; or (2) the search period; whichever is longer. The List of Contacts shall include the date and names of the contact(s) and the nature of the contact. Please attach additional sheets as necessary.

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(5 Contractors shall also disclose any contacts with Appointed or Elected Officials **during the term of the agreement, contract or investment on a bi-annual or annual basis, as applicable.** The List of Contacts shall include the date and names of the contact(s) and the nature of the contact. Please attach additional sheets as necessary. *Please refer to list of elected officials, candidates, appointed officials, and applicable city employees at the end of this form.*

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(6). With regard to the intermediary identified in Section G (1) (a) 3 above, provide the following information:

- i. A description of the services to be performed by the intermediary and a statement as to whether the intermediary is utilized by the Contractor with all prospective clients or a subset (if a subset, describe the subset). A resume for the intermediaries shall also be provided. See Section G (1) (a) 6 (i) of the Policy for specific disclosure information.

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- ii. A copy of all written agreements between the Contractor and the intermediary and a description of any agreement that is not in writing.

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- iii. List of all contacts for the 24-month period prior to Board approval of a new agreement or investment pursuant to Section G (1) (a) 6 (iii) of the Policy.

Please refer to list of elected officials, candidates, appointed officials, and applicable city employees at the end of this form.

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iv. List the names of all persons who suggested retention of the intermediary and a description of how the intermediary was selected.

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v. For the intermediary and/or any of its affiliates, list the registration with SEC/FINRA/or any similar regulatory agency or self-regulatory organization outside of the US, and either details of such registration or an explanation of why registration is not required.

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vi. For the intermediary and/or any of its affiliates, list registration as a lobbyist with any local, state or national government and the details of such registration.

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**G (1) (b)** The undersigned represents and warrants that the information submitted in this report and related attachments are true and correct. The undersigned must be the Contractor's Chief Executive Officer or head of the business unit that provides, or will be providing the goods or services to LACERS.

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Signature

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Date

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Printed Name

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Title

**Please send the completed form to:**  
**Los Angeles City Employees' Retirement System (LACERS)**  
**Internal Audit Section**  
**Email Address: [Auditor@lacers.org](mailto:Auditor@lacers.org)**



**Disclosures required by Sections C and D of this Policy include, but are not limited to, any monetary contribution or financial benefit to any of the following:**

1. Any Elected Official (and any of his or her controlled committees), Candidate (and any of his or her controlled committees), Appointed Official, or Applicable City employee.
2. Any account or trust set up through motion of the Los Angeles City Council that would seek funds controlled by an Elected Official or Candidate.
3. Any third party at the behest of an Elected Official, Candidate, or Appointed Official or for the purpose of supporting or opposing an Elected Official, Candidate, or City ballot measure.
4. Any Elected Official, Candidate, Appointed Official, or Applicable City Employee for the sale of private property.
5. Any charitable or other organization or individual at the behest of an Elected Official, Candidate, Appointed Official, or Applicable City Employee.

**Definitions are based on current laws. To the extent that Board policies are not updated subsequent to changes in law, each Board Member, LACERS employee and Consultant is responsible to comply with current laws and changes thereto.**

***Applicable City Employee***

(1) A LACERS employee or (2) a lawyer in the Public Pension General Counsel, the Outside Counsel Oversight Division of the Los Angeles City Attorney's Office, or one who is in the direct supervisory chain of command over the lawyers in those divisions

***Appointed Official***

An appointed LACERS Board Member (including a person who has been appointed to the LACERS Board, pending confirmation)

***Candidate***

A person who has filed to run for an Elected Office

***City***

The City of Los Angeles

***Consultant***

A Contractor that is hired to provide advice or recommendations to LACERS on the selection of investment funds/strategies, fund managers, or the procurement of goods and/or services from other firms. All LACERS Consultants are also considered Contractors under the terms of this Policy.

**Contractor**

A person who, or entity that, seeks to be and/or is hired to provide goods and/or services to LACERS. The individuals with reporting responsibility are those at a firm that would have any contract with or responsibility for a LACERS investment or agreement.

**Contractor Disclosure**

Collectively, the information required from Contractors as described in Sections **C through G** of this Policy.

**Elected Official or Office**

Mayor of the City of Los Angeles  
Members of the Los Angeles City Council  
Los Angeles City Attorney  
Los Angeles City Controller  
Elected LACERS Board Member

**Family Member**

The spouse or domestic partner of a Contractor or Intermediary

**Financial Benefits**

Other financial benefits include having direct or indirect financial relationship with or beneficial ownership in securities, investments, funds, companies or products being recommended to LACERS.

**Gift**

Pursuant to **Los Angeles Municipal Code Section 49.5.8 et seq., which references the Political Reform Act and California Constitution, and Section 82028 of the Political Reform Act 2019**, a “Gift” means, except as otherwise provided in this definition, any payment that confers a personal benefit on the recipient, to the extent that consideration of equal or greater value is not received and includes a rebate or discount in the price of anything of value unless the rebate or discount is made in the regular course of business to members of the public without regard to official status. Any person, other than a defendant in a criminal action, who claims that a payment is not a gift by reason of receipt of consideration has the burden of proving that the consideration received is of equal or greater value. The term “gift” does not include:

- (1) Informational material such as books, reports, pamphlets, calendars, periodicals. No payment for travel or reimbursement of any expenses shall be deemed “informational material.”
- (2) Gifts which are not used and which, within 30 days after receipt, are either returned to the donor or delivered to a nonprofit entity exempt from taxation under Section 501(c)(3) of the Internal Revenue Code without being claimed as a charitable contribution for tax purposes.
- (3) Gifts from an individual’s spouse, child, parent, grandparent, grandchild, brother, sister, parent-in-law, brother-in-law, sister-in-law, nephew, niece, aunt, uncle, or first cousin, or the spouse of any such person; provided that a gift from any such person shall be considered a gift if the donor is acting as an agent or Intermediary for any person not covered by this paragraph.

(4) Campaign contributions required to be reported under Chapter 4 of the Political Reform Act of 1974, as amended.

(5) Any devise or inheritance

(6) Personalized plaques and trophies with an individual value of less than two hundred fifty dollars (\$250).

***Intermediary***

A person or entity (1) who is hired, engaged or retained by or acting on behalf of a Contractor as a placement agent, finder, lobbyist, solicitor, marketer, consultant, broker or other type of agent to raise money or investments from or obtain access to LACERS, directly or indirectly, and (2) who engages in, either personally or through an agent, any written or oral direct communication with any LACERS representative in furtherance of obtaining an investment or a contract with LACERS. This definition also includes agents of Intermediaries commonly referred to as subagents.

***Investment Consultant***

LACERS' private equity Consultant, general investment Consultant, and real estate Consultant. Investment Consultants are also considered Contractors under the terms of this Policy.

***LACERS***

The Los Angeles City Employees' Retirement System.

***Officers***

The Chief Executive Officer, Chief Operating Officer, Chief Financial Officer or functional equivalent in the Contractor's firm.

***Undue Influence***

The employment of any improper or wrongful pressure, scheme, or threat by which one's will is overcome and he or she is induced to do or not to do an act which he or she would not do, or would do, if left to do freely.