

CARING FOR DENVER FOUNDATION
AMENDED AND RESTATED CONFLICT OF INTEREST POLICY

SECTION 1 – INTRODUCTORY PROVISIONS

ARTICLE I: PURPOSE AND OVERVIEW

The purpose of this Amended and Restated Conflict of Interest Policy (this “Policy”) is to protect the interests of Caring for Denver Foundation (the “Organization”) when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of the Organization or might result in a possible excess benefit transaction.

Section 1 of this Policy includes this Article I and Article II, which provides definitions relevant to all Sections of this Policy. Section 2 of this Policy, which includes Articles III through VIII, contains the provisions relevant to Section 501(c)(3) organizations generally. Section 3 of this Policy sets forth Articles IX through XV, which contain provisions relating to the Organization’s role as a spending authority for the City and County of Denver.

This Policy is intended to supplement, but not replace, (i) any applicable local, state and federal laws governing conflict of interest applicable to governmental, nonprofit, and charitable organizations, including specifically, but without limitation, the provisions of the Colorado Nonprofit Act and the Denver Revised Municipal Code, and (ii) the existing obligations and standards relating to ethics, disclosure, and conflicts of interest to which a person might be subject in his or her capacity as an officer, official, or employee of the City and County of Denver or any other governmental agency, department, or division, and any amendments thereto or modifications thereof. Specifically, in the event of a conflict as between the provisions of this Policy and Denver Revised Municipal Code, the Denver Revised Municipal Code shall govern. This Policy amends, restates, and supersedes in its entirety the initial Conflict of Interest Policy of the Organization.

ARTICLE II: DEFINITIONS

1. Board

Board means the Board of Directors of the Organization.

2. City

The City means the City and County of Denver, including any divisions, departments, agencies, subdivisions, and other components thereof.

3. Direct Action

Direct action means any action which involves:

(1) Negotiating, approving, disapproving, administering, enforcing, or recommending for or against a contract, purchase order, lease, concession, franchise, grant, business loan or other similar instrument in which the Organization is a party. With regard to “recommending,” direct action occurs only if the person making the recommendation is in the formal line of decision making;

(2) Issuing benefits or payments;

(3) Selecting or recommending vendors, concessionaires, or other types of entities to do business with the Organization;

(4) Appointing and terminating employees, temporary workers, and independent contractors; or

(5) Doing research for, representing, or scheduling appointments for an officer or employee, provided that these activities are provided in connection with that officer’s or employee’s performance of (1) through (4) above.

Direct action does not include acts that are purely ministerial (that is, acts which do not affect the disposition or decision with respect to the matter). A person who abstains from a vote is not exercising direct action.

4. **Donor**

Donor means an individual or entity that has an existing, ongoing, or pending contract, business, or regulatory relationship with the Organization, or a lobbyist or other representative for any such individual or entity. The term “donor” does not include the City, including any department, agency or other unit of the City, or any officer, official or employee of the City (as each such term is defined in Denver Revised Municipal Code (“D.R.M.C.”) Chapter 2, Article IV, Section 2-52), when the gift or donation is paid for by funds appropriated by the City.

5. **Employee**

Employee means any person in the employ of the Organization and any person employed without compensation.

6. **Financial Interest**

A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

- a. An ownership or investment interest in any entity with which the Organization has a transaction or arrangement,
- b. A compensation arrangement with the Organization or with any entity or individual with which the Organization has a transaction or arrangements,
or

- c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Organization is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.

A financial interest is not necessarily a conflict of interest. Under Article III, Section 2, a person who has a financial interest may have a conflict of interest only if the appropriate governing board or committee decides that a conflict of interest exists.

7. Immediate Family

Immediate family means husband, wife, son, daughter, mother, father, step-son, step-daughter, step-mother, step-father, father or mother-in-law, son or daughter-in-law, brother or sister-in-law, aunt, uncle, nephew, niece, grandmother, grandfather, grandchildren, brother, sister, domestic partner, any person with whom he or she is cohabiting, and any person whom he or she is engaged to be married. The term includes any minor children for whom the person or his or her domestic partner provides day-to-day care and financial support. A "domestic partner" is an unmarried adult, unrelated by blood, with whom an unmarried interested person or employee has an exclusive committed relationship, maintains a mutual residence, and shares basic living expenses.

8. Interested Person

Any director, principal officer, or member of a committee with governing board delegated powers, who has a direct or indirect financial interest, as defined below, is an interested person.

SECTION 2 – 501(c)(3) PROVISIONS

ARTICLE III: PROCEDURES

1. Duty to Disclose

In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the directors and members of committees with governing board delegated powers considering the proposed transaction or arrangement.

2. Determining Whether a Conflict of Interest Exists

After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the governing board or committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining board or committee members shall decide if a conflict of interest exists.

3. Procedures for Addressing the Conflict of Interest

- a. An interested person may make a presentation at the governing board or committee meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.
- b. The chairperson of the governing board or committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
- c. After exercising due diligence, the governing board or committee shall determine whether the Organization can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
- d. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the governing board or committee shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in the Organization's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination it shall make its decision as to whether to enter into the transaction or arrangement.

4. Violations of the Conflicts of Interest Policy

- a. If the governing board or committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.

- b. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

ARTICLE IV: RECORDS OF PROCEEDINGS

The minutes of the governing board and all committees with board delegated powers shall contain:

1. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the governing board's or committee's decision as to whether a conflict of interest in fact existed.
2. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

ARTICLE V: COMPENSATION

1. A voting member of the governing board who receives compensation, directly or indirectly, from the Organization for services is precluded from voting on matters pertaining to that member's compensation.
2. A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Organization for services is precluded from voting on matters pertaining to that member's compensation.
3. No voting member of the governing board or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Organization, either individually or collectively, is prohibited from providing information to any committee regarding compensation.

ARTICLE VI: ANNUAL STATEMENTS

Each director, principal officer and member of a committee with governing board delegated powers shall annually sign a statement which affirms such person:

1. Has received a copy of the conflicts of interest policy,
2. Has read and understands the policy,
3. Has agreed to comply with the policy, and

4. Understands the organization is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempted purposes.

ARTICLE VII: PERIODIC REVIEWS

To ensure the Organization operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

1. Whether compensation arrangements and benefits are reasonable, based on competent survey information, and the result of arm's length bargaining.

2. Whether partnerships, joint ventures, and arrangements with the management organizations conform to the Organization's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit or in an excess benefit transaction.

ARTICLE VIII: USE OF OUTSIDE EXPERTS

When conducting the periodic reviews as provided for in Article VII, the Organization may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the governing board of its responsibility for ensuring periodic reviews are conducted.

SECTION 3 – CITY AND COUNTY OF DENVER PROVISIONS

ARTICLE IX: AFFIRMATION

1. This Article IX is intended to supplement Article VI of this Policy.
2. The Organization shall distribute a copy or electronic version of this Policy and the City and County of Denver Ethics Handbook and any updates to each interested person and employee annually, and to each interested person an employee who is new to the Organization, and shall work with the City to provide training to interested persons and employees regarding this Policy.
3. As a condition of serving as an interested person or an employee of the Organization, each such person shall be required to (i) read this Policy and the City and County of Denver Ethics Handbook, and (ii) certify to the Board of Directors that he or she has complied with the provisions of this Article IX, Section 1 of this Policy. Such certification shall be made in substantially the same form as the Amended and Restated Conflict of Interest Policy Acknowledgement and Disclosure Form attached to this Policy.

ARTICLE X: EMPLOYMENT AND SUPERVISION OF FAMILY MEMBERS

1. The Board shall amend this Article from time to time to the extent necessary to substantially conform with D.R.M.C. Chapter 2, Article IV, Section 2-59, to the extent relevant to the Organization.
2. The purpose of this Article is to avoid favoritism by Organization interested persons or employees to their immediate family members.
3. No interested person or employee shall appoint or hire a member of his or her immediate family for any type of employment with the Organization, including, but not limited to, full time employment, part time employment, permanent employment, temporary employment, and contract employment, in each case, for or with the Organization.
4. No interested person or employee shall supervise or be in a direct line of supervision over a member of his or her immediate family within the Organization. If an interested person or employee comes into a direct line of supervision of a member of his or her immediate family within the Organization, he or she shall have six (6) months to come into compliance. The phrase “direct line of supervision” shall mean the supervisor of an employee and the supervisor of an employee’s supervisor.

ARTICLE XI: GIFTS TO INTERESTED PERSONS AND EMPLOYEES

1. The Board shall amend this Article from time to time to the extent necessary to substantially conform with D.R.M.C. Chapter 2, Article IV, Section 2-60, to the extent relevant to the Organization.
2. The purpose of this Article is to avoid special influence by donors who give gifts to interested persons or employees of the Organization.

3. Except when acceptance is permitted by paragraph 4 below, it shall be a violation of this Policy for any interested persons, employees, or any member of their immediate families to solicit or to accept any of the following items if (1) the interested person or employee is in a position to take direct action with regard to the donor; and (2) the Organization has an existing, ongoing, or pending contract, business, or similar relationship with the donor:

- a. Any money, property, service, or thing of value that is given to a person without adequate and lawful compensation;
- b. Any honorarium or payment for participation in an event;
- c. Any loan of goods, equipment, or other items that is not available to the general public on the same terms and conditions;
- d. Any loan of money that is not available to the general public at the same interest rate and on the same conditions;
- e. Any ticket to a sporting, recreational, or cultural event except as provided for in subsection 4.d of this Article
- f. Travel expenses and lodging;
- g. Any reduction in price or any discount that is not similarly available to all interested persons and employees of the Organization on the same terms;
- h. Parking passes except as provided for in subsection 4.d of this Article; and
- i. Meals except as provided for in subsection 4.d of this Article.

This prohibition shall also apply to gifts from a lobbyist or representative of a client if (1) the interested person or employee is in a position to take direct action with regard to the client and (2) the Organization has an existing, ongoing, or pending contract, business, or similar relationship with the client.

4. Interested persons and employees and the members of their immediate family may accept the following even if the interested person or employee is in a position to take direct action with regard to the donor, or, if the donor is a lobbyist or representative, the donor's client:

- a. Gifts from other interested persons or employees and their family members on appropriate occasions;
- b. Campaign contributions as permitted by law;
- c. Nonpecuniary awards that are publicly presented by an organization in recognition of public service if the award is not extraordinary when viewed in light of the position held by the recipient;

- d. The donation of meals, tickets to events for which admission is charged, or free or reduced price admission to events for which a fee is charged, but only under the following conditions:

- (1) The value of any meals, tickets, or free or reduced price admissions accepted from the same donor in any calendar year shall not exceed three hundred dollars (\$300.00) and shall be subject to the reporting requirements set forth in Article XV;

- (2) A donation from an employee of a business or entity shall be counted as a gift from the business or entity;

- (3) The individual or entity which pays for the meal, ticket, or admission shall be considered the donor for purposes of this subsection regardless of whether that individual or entity is reimbursed for the cost;

- (4) Attendance must be reasonably related to the official or ceremonial duties of the interested person or employee;

- (5) The donation of parking for the meal or event shall be allowed on the same terms and conditions;

- (6) Interested persons and employees may accept the following donations of meals regardless of the annual cap on the value of such meals set forth in paragraph (1) of this subsection and without the need to report the donation under Article XV: meals provided to all attendees at a public meeting and consumed while the meeting is in progress, including by way of example “working lunches;” and meals provided to all members of any governmental, civic, or nonprofit board of which the interested person or employee is a member and consumed in conjunction with any meeting of the board;

- (7) Interested persons and employees may accept the following donations of tickets or free admissions to events, regardless of the annual cap on the value of such donations set forth in paragraph (1) of this subsection: tickets or free admission to a charitable event, as long as the ticket or free admission is offered directly by and at the expense of the charitable, other nonprofit, or governmental entity hosting the event and not directly or indirectly offered by any sponsor of the event or other donor to which the gift restriction set forth in paragraph (1) of this section applies. Any ticket or free admission to an event accepted under this paragraph (7) shall be subject to reporting requirements set forth in Article XV.

- e. Unsolicited items of trivial value. “Items of trivial value” means items or services with a value of twenty-five dollars (\$25.00) or less, such as inexpensive tee shirts, pens, calendars, books, flowers, or other similar items and does not mean cash or gift cards;

- f. Gifts while visiting other cities, counties, states, or countries or hosting visitors from other cities, counties, states, or countries when it would be a breach of protocol to refuse the gift;

- g. Reasonable expenses paid by other nonprofit organizations or other governments for attendance at a convention, fact-finding mission or trip, or other meeting if the person is scheduled to deliver a speech, make a presentation, participate on a panel, or represent the Organization in a capacity reasonably related to the recipient's employment by or affiliation with the Organization;
- h. Gifts on special and infrequent occasions if the gift is appropriate to the occasion. These occasions include weddings, funerals, and illnesses;
- i. Gifts to commemorate a public event in which the interested person or employee participated in an official capacity, provided that the gift is appropriate to the occasion. Such occasions include ground-breaking ceremonies and grand openings;
- j. Memberships and passes from the Denver Art Museum, Denver Botanic Gardens, Denver Museum of Nature and Science, and Denver Zoo;
- k. Gifts from family members;
- l. Items which are similarly available to all employees of the City or the general public on the same terms and conditions.

5. It shall not be a violation of this Article for an interested person or employee to solicit or accept donations to the Organization or the City or to solicit, accept, or redirect donations for charitable purposes to another I.R.C. Section 501(c) or other charitable organization or to provide assistance to individuals affected by illness, crime or disaster or who have educational or other charitable needs; provided, however, that:

- a. If an interested person soliciting such a donation is in a position to take direct action with regard to the donor, and the Organization has an existing, ongoing, or pending contract, business, or similar relationship with the donor, any donation that is actually made as a result of the interested person or employee's solicitation is reported by the interested person or employee as required in Article XV; and
- b. The soliciting person, or a member of the soliciting person's immediate family does not keep or use the gift or receive any monetary benefit therefrom.

6. It shall not be a violation of this Article for a member of an interested person's or employee's immediate family to accept a gift which arises from an independent relationship of an adult member, if:

- a. The interested person or employee does not use the gift; and
- b. It cannot reasonably be inferred that the gift was intended to influence the interested person or employee in the performance of his or her duties.

ARTICLE XII: CONFLICT OF INTEREST WHILE AFFILIATED WITH THE ORGANIZATION

1. The Board shall amend this Article from time to time to the extent necessary to substantially conform with D.R.M.C. Chapter 2, Article IV, Section 2-61 and Section 2-62, to the extent relevant to the Organization.

2. The purpose of this Article is to avoid influence on the actions of Organization interested persons and employees by their private or family interests. This Article is intended to supplement the procedures and provisions of Section 2 of this Policy relating to conflicts of interest for I.R.C. Section 501(c)(3) organizations generally. In the event of a conflict between the provisions of this Article and Section 2, the provisions requiring the more stringent standard of conduct shall prevail, but in the event that neither of the conflicting provisions set forth a more stringent standard, the provisions of this Article shall prevail.

3. No interested person or employee shall have any interest arising by contract or other relationship that creates a substantial conflict of interest with respect to his or her duties to the Organization, unless the conflict can be avoided by abstention or disqualification from participating in a transaction without adversely affecting the interests of the Organization. An interested person or employee who is prohibited from taking direct action due to a substantial conflict of interest shall promptly disclose such interest in writing to his or her colleagues on a Board, committee, supervisor, or supervising body, shall not act or vote thereon, shall refrain from attempting to influence the decisions of others in acting or voting on the matter, and shall work with the applicable Board, committee, supervisor, or supervising body to ensure that the matter is determined without the influence of conflicting interests.

4. An interested person or employee shall not take direct action on a matter before the Organization if he or she or a member of the immediate family, a business associate or an employer other than the Organization or the City of the interested person or employee has any substantial employment, contractual, or financial interest in that matter. A substantial interest shall be deemed to exist if:

- a. He or she or a member of the immediate family, a business associate or an employer other than the Organization or the City is the other party in the matter;
- b. He, she, a spouse, a domestic partner or minor children solely or aggregated together, a business associate or an employer owns or own one percent (1%) or more, or a member of the immediate family other than a spouse, domestic partner or minor children own or owns five percent (5%) or more, of another party in the matter;
- c. He or she, a member of the immediate family, a business associate or an employer is a board member or an officer in another party in the matter;
- d. He or she, a member of the immediate family, a business associate or an employer is directly involved in obtaining the Organization's or the City's business for another party in the matter;

- e. He or she, a member of the immediate family, a business associate or an employer is directly involved in negotiating the contract or preparing the bid, proposal, response to a request for qualifications, or similar document for another party in the matter, other than in a purely clerical capacity;
- f. A member of his or her immediate family performs more than a nominal portion of the work in the matter, or supervises or manages more than a nominal portion of the work; or
- g. He or she or a member of his or her immediate family participated personally in providing legal representation, lobbying, or other professional services for another party in the matter or owns five percent (5%) or more of a law firm, lobbying firm, or other professional services firm representing another party in the matter.

5. For purposes of this Article, “business associate” means a person or entity with whom an interested person or employee, or a member of his or her immediate family, is a partner or a co-owner of a business in which the business associate and the interested person or employee or a member of his or her immediate family each own at least one percent (1%) of the business.

6. Although expressly permitted in Chapter 24, Article XIV, Section 24-701(b)(7) of the D.R.M.C., it is the policy of the Organization that an interested person or employee shall not take direct action on a matter before the Organization if he or she or a member of the immediate family of the interested person or employee is employed by or serves as an officer, official, or employee (as each such term is defined in D.R.M.C. Chapter 2, Article IV, Section 2-52) of the potential beneficiary or other contracting party to such direct action, whether such beneficiary or other contracting is the City or any division, department, or agency thereof, or any other organization or entity.

7. Interested persons and employees shall not take any direct action with respect to their former employers for a period of six (6) months from the date of termination of the prior employment. No interested person or employee shall hold or acquire a direct interest in a contract or similar instrument with the Organization if he or she participated in approving or establishing the contract or instrument or its terms or conditions.

ARTICLE XIII: OUTSIDE EMPLOYMENT OR BUSINESS ACTIVITY

1. The Board shall amend this Article from time to time to the extent necessary to substantially conform with D.R.M.C. Chapter 2, Article IV, Section 2-63, to the extent relevant to the Organization.

2. The purpose of this Article is to avoid possible conflicts of interest and time conflicts between Organization jobs and outside employment or business activity.

3. All employees shall report proposed new outside employment (excluding unpaid volunteer activity and further excluding employment with the City) or other new outside business activity annually in writing to the Executive Director prior to accepting such new

employment or outside business activity. The Executive Director, in his or her reasonable discretion, shall determine whether such new employment or business activity could present a conflict with the activities of the Organization, and in the event he or she determines that a conflict could result from such employment or business activity, shall present the information relevant to such potential conflict to the Executive Committee for a determination on the issue.

4. An employee who has received the written permission of the Executive Director or the Executive Committee may engage in outside employment or other outside business activity.

5. Copies of documents arising from this Article shall be retained in the records of the Organization.

6. Resources of the Organization may not be used for any outside employment or outside business activity.

**ARTICLE XIV: SUBSEQUENT EMPLOYMENT;
USE OF OFFICE FOR PRIVATE GAIN;
USE OF CONFIDENTIAL RECORDS; AIDING OTHERS**

1. The Board shall amend this Article from time to time to the extent necessary to substantially conform with D.R.M.C. Chapter 2, Article IV, Section 2-64, Section 2-67, Section 2-68, and Section 2-69, to the extent relevant to the Organization.

2. During six (6) months following termination of employment with the Organization, no former employee shall obtain employment outside of the Organization in which he or she will take direct advantage, unavailable to others, of matters with which he or she took direct action during his or her service with the Organization.

3. For one (1) year following termination of service with the Organization, no former interested person or employee shall engage in any action or litigation in which the Organization is involved, on behalf of any other person or entity, when the action or litigation involves an issue on which the person took direct action while in the service of the Organization.

4. No interested person or employee shall use his or her position or disclose or use confidential information in order to obtain private gain for himself or herself, for his or her immediate family, for any business entity with which he or she is affiliated or for any person or entity with whom the interested person or employee is negotiating or has any arrangement concerning prospective employment.

5. No interested person or employee may disclose any information or records that are not available to the public, which were acquired in the course of duties for the Organization, except in the performance of duties to the Organization or as required by law or court order.

6. No interested person or employee may knowingly aid or assist any interested person or employee in the violation of any provision of this Policy or the Denver Code of Ethics.

ARTICLE XV: GIFT DISCLOSURES

1. Each interested person and each employee shall file a gift disclosure with the Executive Committee on or before January 31 of each year. The January 31 report shall cover the period from January 1 to December 31 of the preceding year.

2. The report shall include the identification, estimated value, and the source of the following:

- a. Any gifts which were accepted under Article XI, Section 4.d, 4.g, 4.i, and 4.j received by the interested person or employee during the reporting period;
- b. Any gifts from persons pursuing funding from the Organization or with whom the Organization has an existing, ongoing, or pending contract, business, or similar relationship and over whom the interested person may take direct action; and
- c. Any charitable donation personally solicited by the interested person or employee during the reporting period, if the interested person or employee soliciting such a donation is in a position to take direct action with regard to the donor, and the Organization has an existing, ongoing, or pending contract, business, or similar relationship with the donor, to the extent the interested person or employee is aware that the donation was actually made.

3. When an interested person or employee fails to file a gift disclosure as required by this Article, the Executive Committee shall send written notice to the interested person or employee for the purpose of obtaining compliance or a correction or completion of the statement; and if the Executive Committee is unable, within ten (10) days following such notification, to obtain compliance, correction or completion, the Executive Committee shall make a recommendation to the Board regarding the action to be taken with respect to such interested person or employee; provided, that the interested person or employee may, for good cause shown in writing, obtain an extension of the ten (10) day period, not to exceed fifteen (15) additional days, from the Executive Committee.

CARING FOR DENVER FOUNDATION

**Amended and Restated Conflict of Interest Policy
Acknowledgement and Disclosure Form**

Date: _____

Name: _____

Position: _____

Please describe below any relationships, activities, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest between Caring for Denver Foundation and your personal interests:

_____ I have no actual or potential conflict of interest to report

_____ I have the following actual or potential conflict of interest to report (attach additional pages if necessary):

1. _____

2. _____

3. _____

I hereby certify that the information set forth herein is true and complete to the best of my knowledge. I have received, reviewed, understood, and agree to comply with, the Amended and Restated Conflict of Interest Policy of Caring for Denver Foundation and the City and County of Denver Ethics Handbook.

Signature: _____

Date: _____