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April 28, 2015

Hon. Dan Johnson, City Manager  
City of Richardson  
411 W. Arapaho Rd.  
Richardson, TX 75080-4551

Re: April 8, 2015, Assignment to Conduct Independent Investigation of Events Surrounding the Approval of the Rezoning for the Development in the City of Richardson Known as "Palisades."

Dear Mr. Johnson:

Our firm has been engaged to investigate and report whether there have been any violations of the Richardson Charter, Code of Ethics, or state law by the Mayor or members of the City Council in the rezoning and approval of the Palisades development; whether the Mayor had a business relationship with Mark Jordan/JP Realty or other developer of the subject property at the time: (i) the zoning change was approved for the Palisades development, (ii) of adoption of the ordinance granting the Palisades zoning change, and (iii) the City Council approved and/or authorized the City Manager to negotiate and/or execute an economic development agreement for the Palisades development; and to include in such report any dates of employment or other business relationship between the Mayor and the Palisades developers.

We have also been asked to determine and report whether there is any evidence that the Mayor's announced intent to decline to serve as Mayor for the 2015-2017 term at the City Council meeting for canvass of votes was done for the purpose of allowing the remaining members of the City Council to determine the next Mayor.

Finally, you asked us to report any other matters deemed relevant to the investigation.

I. Scope of Investigation

It is my understanding and commitment that this investigation and report are made for the City of Richardson, which is our only client in this matter, and we are under no obligation to the Mayor or any Councilmember. We have not and will not be directed except by and through you, as our ethical obligation is to the City, not its elected leaders. This is a necessary ethical obligation that we have under the Texas Disciplinary Rules of Professional Conduct, as attorneys while representing the City in this matter. It is my understanding that you desire completion and submission of this report at the earliest possible time and that this report will be made public by you after receipt.

Our instruction conveyed through Mr. Pete Smith, the Richardson City Attorney, has been to provide a copy of this report to the Public Integrity Unit of the Dallas County District Attorney; therefore, we are sending a copy of this report with attachments to the Public Integrity Unit.

Please understand that while conducting this independent investigation, we had no power to subpoena witnesses or otherwise compel submission of financial documents or other records. The individuals who were interviewed and provided documents or other information in this matter did so voluntarily. We have also received unsolicited telephone and email advice on how to perform this investigation, and responded or tried to respond to each person by asking for any information they might be able to provide. In some cases, the advice and suggestions were followed to the extent time permitted. We did not investigate paths based on conjecture, speculation, or paths that focused on issues irrelevant to a violation of the Charter, Code of Ethics, or state law.

## II. City Charter Section 21.01

Richardson City Charter Section 21.01 is the only Charter provision relevant to actions by the Mayor or City Council insofar as a “financial interest” in a transaction involving the Palisades property or its development is concerned. Section 21.01 of the Charter reads as follows:

“No officer or employee of the city shall have a financial interest, direct or indirect, in any contract with the city, or be financially interested, directly or indirectly, in the sale to the city of any land, materials, supplies or services, except on behalf of the city and any officer or employee guilty thereof shall thereby forfeit such person’s office or position. Any violation of this section, with the knowledge, expressed or implied, of the person or corporation contracting with the city council shall render the contract involved voidable by the city manager or the city council.”

The meaning of the phrase “financial interest” found in the Charter is clarified in Section 2-4 of the Code of Ethics. Taken together, the Charter and Code of Ethics prohibit the Mayor and City Council from receiving an actual financial benefit from a transaction with the city. However, Section 2-4 specifies that an actual financial benefit means the following:

- (1) An ownership in the entity transacting business with the city where the ownership interest is more than ten percent.
- (2) Compensation as an employee, officer or director of the entity transacting business with the city where such compensation is affected by the entity’s transaction with the city.

## III. Code of Ethics

The Code of Ethics is contained in Article I of Chapter 2 of the Richardson Code of Ordinances. It is very similar to Chapter 171 of the Texas Local Government Code, in that it prohibits participation in a decision if a Councilmember or his family (e.g. parent, spouse,

sibling, child, father and mother-in-law, son and daughter-in-law, grandparents, or grandchildren) has a substantial interest in a business entity or in real property. The Code of Ethics defines a "substantial interest" in essentially the same terms as Section 171.002, Texas Government Code:

- (1) ownership of ten percent or more of the voting stock or shares of the business entity affected by the decision, or ownership of ten percent or more or \$15,000 or more of the fair market value of a business entity; or
- (2) if funds received by a person from the business entity exceed 10 percent of that person's gross income for the previous year; or
- (3) ownership of an interest worth \$2,500 or more in real property, and it is reasonably foreseeable that an action on a matter involving the real property will have a special economic effect on the value of the real property distinguishable from its effect on the public.

The Code of Ethics sets out that it "is to be the policy of the city that the proper operation of democratic government requires that public officials be independent, impartial and responsible only to the people of the city; that no officer shall permit any interest, financial or otherwise, direct or indirect, or engagement in any business, transaction or professional activity to conflict with the proper discharge of such person's duties in the public interest; that public office not be used for personal gain; and that the city council at all times shall be maintained as a nonpartisan body." Richardson Code of Ordinances, § 2-1.

The Code of Ethics is broader than Chapter 171 in that it prohibits representation by councilmembers of themselves or others before the City Council or City boards, prohibits acceptance of any gift from any person that might reasonably tend to influence such officer in the discharge of such person's official duties with exceptions for campaign contributions and other stated matters, and prohibits voting on any land use matter, if the member owns land within 200 feet.

As with Chapter 171, the Code of Ethics requires disclosure by affidavit filed with the record keeper of the board involved describing the nature and extent of the substantial interest, and mandates abstention from participation in the proceedings.

It should be noted that an improper vote, that is, a vote on which a Councilmember had a substantial interest as defined, would constitute a Class A misdemeanor, a criminal law under Section 171.003, Texas Local Government Code.

There is no violation defined which makes it an offense to favor one side or the other in a matter brought to the City Council for a vote. Personal relationships are not prohibited nor is there a requirement for abstention from voting unless financial or familial relationships defined in the Code of Ethics are involved.

Code of Ethics Section 2-4(h) makes it a violation of the Code of Ethics to:

“Engage in any outside activities which will conflict with or will be incompatible with such person's official position or duties as an officer of the City.”

The duties of the Mayor are defined in the Charter and she took an oath of office. Neither establishes a duty which would be violated by her actions of communicating with or supporting or opposing the application of a zoning proponent. Zoning is a political issue, and there is no requirement that the Mayor or a member of the City Council refrain from communications with the proponents or opponents of any zoning decision.

#### IV. City Charter Section 3.03

Insofar as the Mayor's decision to refuse to accept another term as Mayor is concerned, Section 3.03 of the Richardson Charter provides that if there is a vacancy in the Mayor's position, the Mayor Pro Tem shall fill the unexpired term and the Mayor Pro Tem's council position then becomes vacant. This Charter provision appears to establish that the Mayor's decision to refuse another term will allow the City Council to select the new Mayor. By selecting from their number a Mayor Pro Tem, the Mayor Pro Tem would automatically fill the vacancy in the office of Mayor, and the City Council seat formerly occupied by the Mayor Pro Tem will then become vacant.

#### V. Documents and other Information Reviewed

We have reviewed the minutes of the 12-9-2013, 1-27-2014, 6-9-2014, and 9-22-2014 City Council meetings. The 12-9-13 minutes reflect the consideration and approval of ZF 13-13 for the rezoning of 58.5 acres to PD with multifamily elements. The 1-27-2014 minutes evidence the passage of Ordinance 4037, which authorized the rezoning 58.5 acres to PD, including apartments. The 6-9-2014 minutes include approval of ZF 14-13 and of rezoning Ordinance 4051, which rezoned 70.11 acres to PD, including multifamily. Mayor Maczka voted with the majority in each case. Finally, the minutes of the September 22, 2014, meeting include the unanimous vote to authorize the City Manager to negotiate and execute an Economic Development Incentive Agreement on behalf of the City of Richardson with JP Realty Partners for a mixed-use project in the US-75 and Palisades Blvd. area. These documents are significant only in that they establish the time during which votes were taken which could constitute a Code of Ethics violation or a violation of Chapter 171 Texas Local Government Code, if any Councilmember had a substantial interest in the property or the business seeking the approvals. A timeline of events, which includes the votes and events concerning Mayor Maczka, is provided herewith to aid in understanding the significance of the actions and dates described above.

We were provided copies of the Conflict of Interest Questionnaire and disclosure statements filed by Mayor Maczka and Mark Jordan (the Palisades developer) with the City Secretary. Texas Local Government Code Sections 176.003 and 176.006, require such statements by governmental officials who enter into an employment or other business relationship with a person whom the governmental entity is considering entering into a contract with, and by persons who have a business relationship with a governmental entity, and have entered into an employment or other business relationship with a local governmental officer or a

family member. These statements were filed on March 19, 2015, and are provided with this report. The statements, which appear on the forms provided by the Texas Ethics Commission, state that Mayor Maczka had an employment relationship with Mark Jordan/JP Realty in March of 2015.

In order to determine whether there were any actions that required the Mayor to abstain from voting due to a substantial interest, we first looked at the minutes of the meetings to determine when the voting on matters involving the Palisades development occurred. As shown by the timeline provided herewith, the latest vote concerning zoning occurred in June of 2014, and the final vote regarding the economic development agreement occurred in September of 2014.

We also requested, received, and reviewed information on the economic development agreement, which is still in the draft stage. We asked for copies of all emails between Mayor Maczka, the City Manager or staff, and the developer concerning the Palisades development, which also included a search for emails from 2015, after the Conflict of Interest Questionnaire and disclosure statements were filed by the Mayor. The City's IT servicer found some emails from 2014 related to the Palisades development, but did not find any emails between the Mayor and the developer concerning the Palisades development after the Mayor became an employee of the developer in 2015.

We have been made aware of an "Open Records" request for communications of the Mayor and family members, Mark Jordan's family members and companies, and the possibility that all such email related to the request was not provided. We have inquired and have been informed by the City's records custodian that although a request was sent to the Mayor, some email communications provided to a reporter by unnamed parties were not provided to the City by the Mayor. The Mayor provided numerous emails relating to the Palisades development; however, several personal emails alleged by the reporter to relate to the Palisades development are not in our possession. We reviewed the emails initially and most recently provided us by the city and none evidence any violation of law or the Code of Ethics. The activities evidenced by the emails do not reflect any activity which would be incompatible with the Mayor's official position or duties as an officer of the City at the time they were taken, nor do they evidence any prohibited financial interest or other violation of the Code of Ethics.

We also researched and reviewed Texas case law, Attorney General Opinions, and other secondary sources concerning the alleged ethics violations that are the subject of this investigation.

Finally, we discussed the timeline of events with the City Manager, which he confirmed as accurate, and discussed the relevant facts with the City Manager to determine if the Mayor or Councilmembers violated the Code of Ethics, City Charter, or state law.

#### VI. Requests for Statements and Interviews

In order to determine whether the Mayor had a substantial interest at the time of the alleged ethics violations, We requested information in writing from Mayor Maczka and Mark Jordan and requested copies of employment agreements and asked if Mayor Maczka had been

paid or given anything of value prior to her employment, which began in March of 2015, as reflected on the conflict and disclosure forms the Mayor and Mark Jordan filed.

We also asked the Councilmembers to respond in writing to the following questions:

Question 1: Were you aware of a financial or business relationship between Mayor Maczka and Mark Jordan/JP Realty, or any other developers of the Palisades development prior to October 2014? If so, please explain in writing when you became aware and provide any details of your understanding of that relationship along with any documents or other evidence supporting the same.

Question 2: If you were aware of a financial or business relationship between Mayor Maczka and Mark Jordan/JP Realty, or any other developers of the Palisades development prior to October 2014, did the Mayor's participation as a member of the governing body of the City of Richardson influence your vote(s) relating to the Palisades development in any way? If so, please explain how you were influenced and provide any documents or other evidence supporting the same.

Question 3: Are you aware of any evidence supporting the allegation that the Mayor's decision not to serve as Mayor for the term beginning in May 2015 was done for the purpose of allowing the remaining members of the Council to determine, by appointment, the next person to hold the office of Mayor? If so, please explain your knowledge regarding this allegation and provide any documents or other evidence supporting the same.

All Councilmembers, either individually or through counsel responded in the negative to the three questions asked. After receiving written responses from all Councilmembers concerning the questions mentioned above, we also interviewed them by telephone to confirm their responses and determine whether they had anything to add.

We were made aware that Mayor Maczka was represented by legal counsel and we requested information from her attorney on when she entered into a financial or other business relationship with Mark Jordan/JP Realty, or other developers of the Palisades development. We requested a copy of any written documentation that memorializes her employment or services, indicating dates, and a description of money or anything of value from such developer, together with the date it was paid or provided to the Mayor. We also asked for information concerning the Mayor's announced intention to decline to serve as Mayor for the term beginning in May 2015, and whether this was done for the purpose of allowing the remaining members of the City Council to determine, by appointment, the next person to hold the office of Mayor, and whether she discussed this with other Councilmembers or their representatives before making her announcement via social media.

We received a detailed written response from Mr. Jim Shepherd, Mayor Maczka's attorney, together with a timeline and redacted copies of her employment offer and agreement with Sooner National Property Management LP, a copy of which is provided with this report. This letter denies the existence of any financial benefit to Mayor Maczka or employment by the developer or his companies at any time prior to her votes concerning the Palisades development. The timeline provided by Mr. Shepherd generally coincides with what we have discovered from City records as far as votes are concerned. It also details the Mayor's reasons for deciding to

refuse another term. We asked for clarification on the issue of whether Mayor Maczka had discussed her intention to decline another term as Mayor with other Councilmembers prior to her announcement on social media, and was told that she did not and that there was no intent to do so in order to allow the City Council to choose her successor.

We spoke by telephone with Mark Jordan at J.P. Realty Partners, Ltd., who confirmed that neither he, nor his company had a financial or other business relationship with the Mayor prior to October 2014. He also informed us that he was not aware of any financial or other business relationship between the other project developers and the Mayor and that the Mayor did not receive any financial or other benefit from him or his company prior to her employment in 2015. Mr. Jordan recalled making a \$500 political campaign contribution to the Mayor for her previous election and made an equal donation to her opponent.

According to Mr. Jordan, one of his employees submitted a two-week's notice in February 2015 and the vacancy was offered to the Mayor. The Mayor's first day of employment was March 15, 2015, with health insurance benefits beginning on April 1, 2015. The Mayor was given a signing bonus of the same amount as was paid to other new hires.

## VII. Conclusion

After considering all of the facts provided in this case and applying them to the City Charter, Code of Ethics, and state law, this investigation has led to the following conclusions:

### i. Decision to Decline New Term as Mayor.

City Charter Section 3.03 governs the process for filling a vacancy in the office of Mayor. According to the publisher's note in the current Charter, Section 3.03 was amended or adopted in 2012, along with other Charter provisions. Section 3.03 is procedural in nature and does not make it a violation to decline to serve in the office of Mayor. The Mayor's decision to decline service as Mayor for another term is not a violation of any state law or the Code of Ethics, nor would there be a violation under any law if other Councilmembers knew of the Mayor's decision to decline to serve for another term or even urged her to do so.

Furthermore, we have found no evidence that Mayor Maczka's decision to decline another term was motivated by a desire to allow the remaining Councilmembers to fill her position by appointment, nor any evidence to support the supposition that other Councilmembers had prior knowledge of her intent to so decline. We have found no evidence of any attempt by any Councilmember to seek to have the Mayor run and then decline the position. We have found no evidence of any attempt by any Councilmember to influence the Mayor to act in a way which would allow them to appoint a new Mayor. Procedurally, the appointment of a new Mayor to fill the vacancy would have occurred under the City Charter whether she resigned or refused the position.

ii. Substantial Interest, Gifts, Political Donation.

None of the affidavits, documents, records, statements or other evidence considered in this investigation provided any proof of a “substantial interest” (as defined in the Code of Ethics and Section 171.002, Texas Local Government Code) held by the Mayor or any other Councilmember during any vote related to the Palisades development. Likewise, the investigation did not uncover evidence of a prohibited gift at any time prior to or after October 2014, which would have impacted votes related to the Palisades development. The investigation revealed that Mark Jordan at J.P. Realty Partners, Ltd., likely made a political contribution to the Mayor and her opponent in the previous election. Yet, lawful campaign contributions are specifically allowed under the Code of Ethics. The latest action by the City Council related to the Palisades development occurred in September 2014; however, none of the facts suggest that the Mayor or any Councilmember was prohibited from voting due to a “substantial interest” or any other prohibited gift. The investigation also revealed that the Mayor and Councilmembers do not appear to own a substantial interest in real property within 200 feet of the Palisades development. The Mayor’s ownership of property approximately 950 feet from the Palisades development (as shown on the attached map) is not a violation of Code of Ethics Section 2-5(c). Therefore, we must conclude that the Mayor and Councilmembers were not required to abstain from voting due to a “substantial interest” under the Code of Ethics or state law.

iii. Financial Interest.

None of the affidavits, documents, records, statements, or other evidence considered in this investigation provided any proof of a “financial interest,” as defined in City Charter Section 21.01 and Code of Ethics Section 2-4. In general, those sections prohibit the Mayor and City Council from receiving an actual financial benefit from a transaction with the City. The City Council authorized the City Manager to negotiate and execute a development agreement with the Palisades developer prior to the Mayor’s employment relationship with the developer, so it cannot be said under the Code of Ethics or City Charter that the Mayor received compensation as an employee related to the agreement, or that she had any other direct or indirect “financial interest” in the development agreement at the time the City Council took action on the Palisades development. Furthermore, there is no evidence to suggest that the Mayor had or has an ownership interest of more than ten percent in her employer’s corporation. The development agreement is still in draft form, and its terms have not been fully negotiated; thus, a contract or transaction that creates a financial benefit for the Mayor under the Code of Ethics and City Charter does not currently exist. Finally, there is no evidence to show that the Mayor has attempted influence or negotiate the terms of the development agreement after disclosing her employment relationship with the developer. Accordingly, a “financial interest” did not exist and does not currently exist, which violates the Code of Ethics or City Charter.



iv. Disclosure of Relationships.

Texas Local Gov't Code Chapter 176 governs the disclosure of certain relationships with local government officers. Specifically, Section 176.003 requires the Mayor to file a conflicts disclosure statement with respect to the Palisades developer if: (1) the City is considering entering into a contract with the Palisades developer; and (2) the Palisades developer has an employment or other business relationship with the Mayor that results in the Mayor receiving taxable income that exceeds \$2,500 during the 12-month period *preceding* the date: (i) that the Mayor becomes aware that the development agreement has been executed, or (ii) the City is considering entering into a contract with the Palisades developer. Subsection 173.003(c) makes it a Class C misdemeanor to knowingly violate Section 176.003. However, Subsections (b) and (d) provide exceptions that prohibit prosecution if a conflicts disclosure statement is filed not later than seven business days after the date on which the officer becomes aware of the facts that require the filing of a conflicts disclosure statement, or if the conflicts disclosure statement is filed not later than seven days after the Mayor receives notice from the City of an alleged violation. Certain gifts, including political contributions, are also listed as exceptions that do not require disclosure.

On March 19, 2015, the Mayor and Mark Jordan at J.P. Realty Partners, Ltd., filed a Conflict of Interest Questionnaire and a conflicts disclosure statement on the forms provided by the Texas Ethics Commission for compliance with Chapter 176. More than six months earlier, the City Council authorized the City to enter into an agreement with the Palisades developer on September 22, 2014, but an agreement has not been executed. Therefore, the minutes provided by the City and other documents provided during this investigation clearly show that the City is considering entering into a contract with the Palisades developer. Likewise, the Palisades developer is seeking to enter into a development agreement with the City under Section 176.002, but a fully executed agreement does not exist.

Despite these facts, there is no evidence to suggest that the Mayor received any taxable income from the Palisades developer during the 12-month period before September 22, 2014, which is the date the City officially began to consider entering into a contract with the Palisades developer. Accordingly, facts did not arise that created a need to file a disclosure statement under Chapter 176, and a violation of Chapter 176 has not occurred.

v. Public Information Act.

We have been made aware of an "Open Records" request for communications of the Mayor and her family, Mark Jordan's family members and companies, and the possibility that all such email related to the request was not provided. It is our understanding that a request was sent to the Mayor; however, some email communications provided to a reporter by unnamed parties were not

provided to the City. It is possible that the Mayor's failure to provide such communications, if genuine, may be a violation of the Texas Public Information Act and/or other Texas records retention laws. Under Section 552.002 of the Texas Public Information Act, the phrase "public information" is broadly defined to include emails and other communications made in connection with the transaction of official business made by an individual officer in the officer's official capacity. The Public Information Act includes criminal penalties and possible jail confinement for failing to release certain public information and for the destruction, removal, or alteration of said public information. Furthermore, the Public Information Act declares certain violations to be an act of official misconduct. A final conviction for a criminal offense involving official misconduct would violate Code of Ethics Section 4-2(h), which prohibits City officers from engaging, "in any outside activities which will conflict with or will be incompatible with such person's official position or duties."

There is also a question as to whether the City's records retention rules have been violated, and whether communications responsive to the request still exist. If the Mayor intentionally destroyed, concealed, removed, or otherwise impaired the verity, legibility, or availability of a governmental record, then a violation may have occurred under Texas Penal Code 37.10. The determination of criminal violations related to the Public Information Act and Texas records retention laws would, to our understanding, be a question for the District Attorney, were a formal complaint be filed with that office.

In conclusion, we have found no evidence of any ethical violation under state law, the City Charter, or the Code of Ethics by Mayor Maczka or any member of the City Council with respect to the referenced City Council votes or the Mayor's announced intention to decline another term of office. However, the overriding interest of the Code of Ethics as stated in Section 2-1 is to ensure, "that such officers of the City shall at all times strive to avoid even the appearance of impropriety." While the facts in this case do not reveal a cognizable violation of the Code of Ethics, it is certainly understandable that the sum of the Mayor's actions would be viewed by the public as offending the overriding interest of the Code of Ethics. Nevertheless, a failure to avoid the appearance of impropriety does not constitute a violation of the Code of Ethics, City Charter, or state law.

In reviewing other matters deemed relevant to this independent investigation, we believe that criminal violations relating to the Texas Public Information Act and/or other Texas records retention laws (including Texas Penal Code Sec. 37.10) may exist, but only with respect to the Mayor.

Enclosed herewith are copies of the Code of Ethics; written responses from the Mayor and individual Councilmembers; a map showing the distance between the Mayor's property and the Palisades development; Conflict of Interest Questionnaire and Disclosure forms; a timeline; and minutes we reviewed to determine relevant dates.

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I appreciate the confidence you have shown in me and in our firm with this engagement. I realize that this report will not satisfy everyone, but I am confident that it is accurate.

Yours truly,

George Staples

GAS/kh

cc: Mr. Jeremiah Varney  
Public Integrity Unit  
Dallas County District Attorney  
133 N. Riverfront Blvd., LB 19  
Dallas, Texas 75207

## ARTICLE I. - CODE OF ETHICS

### Sec. 2-1. - Purpose.

It is hereby declared to be the policy of the city that the proper operation of democratic government requires that public officials be independent, impartial and responsible only to the people of the city; that no officer shall permit any interest, financial or otherwise, direct or indirect, or engagement in any business, transaction or professional activity to conflict with the proper discharge of such person's duties in the public interest; that public office not be used for personal gain; and that the city council at all times shall be maintained as a nonpartisan body. To implement such a policy, the city council deems it advisable to enact a code of ethics for officials, as defined in this article, whether elected or appointed, paid or unpaid, to serve not only as a guide for official conduct of the city's public servants, but also as a basis for discipline for those who refuse to abide by its terms, the overriding interest being that such officers of the city shall at all times strive to avoid even the appearance of impropriety.

(Ord. No. 3785, § 1, 9-27-10)

### Sec. 2-2. - Title; application.

- (a) This section shall be known as the code of ethics.
- (b) This code of ethics shall apply to all officials as defined in this article.
- (c) This code of ethics does not apply to employees, including those individuals employed on a full-time, part-time or internship basis (including those who may serve on a city board, committee or commission) nor to independent contractors of the city. The standards of conduct for employees are governed by the City of Richardson Personnel Policies and the City Charter.
- (d) This code of ethics applies to members of all city boards, committees or commissions as defined in this article.
- (e) This code of ethics applies to the conduct or actions of public officers, as defined in this article which occurs in whole or in part after the date of adoption of this article.
- (f) This code of ethics applies to officers only while such persons hold such position or office.

(Ord. No. 3785, § 1, 9-27-10)

### Sec. 2-3. - Definitions.

The following words, terms and phrases, when used in this article, shall have the meanings ascribed to them in this section, except where the context clearly indicates a different meaning:

*Benefit* means anything reasonably regarded as pecuniary or economic gain or pecuniary or economic advantage, including benefit to any other person in whose welfare the beneficiary has a direct and substantial interest.

*Business entity* means any person, entity, corporation (whether for-profit or nonprofit), general or limited partnership, sole proprietorship, joint venture, unincorporated association or firm, institution, trust, foundation, holding company, joint-stock company, receivership, or other entity recognized by law, whether or not organized for profit, which has an economic interest, or seeking such, in conducting business with the city. Business entity also includes any business entity that represents a party conducting or seeking to conduct business with the city.

*City* means the City of Richardson, Texas.

*City council* means the governing body of the city.

*Confidential information* means any information to which an official has access in such person's official capacity which may not be disclosed to the public except pursuant to state and/or federal law and which is not otherwise a matter of public record or public knowledge. Confidential information includes the following information, however transmitted: (i) any information from a meeting closed to the public pursuant to the Texas Open Meetings Act or other law regardless of whether disclosure violates the Texas Open Meetings Act or Texas Public Information Act; (ii) any information protected by attorney client, attorney work product, or other applicable legal privilege; and (iii) any information deemed confidential by law.

*Contract* means any lease, claim, account or demand against or agreement with any entity or person, whether express or implied, executed or executory, oral or written.

*Corporation* means any corporation that has a board of directors appointed in whole or in part by the city council that is operating under the direct authority of or subject to the direct control of the city council.

*Employee* means any person employed by the city, including those individuals on a part-time or internship basis, but does not include independent contractors.

*Gift* means anything of value, regardless of form, offered or given in the absence of adequate and lawful consideration. It does not include the receipt or acceptance of campaign contributions which are regulated by federal, state and/or local laws or ordinances.

*Knowingly* means a person acts knowingly, or with knowledge, with respect to the nature of the person's conduct or to circumstances surrounding the conduct when the person is aware of the nature of the conduct or that the circumstances exist. A person acts knowingly, or with knowledge, with respect to a result of the person's conduct whether the person is aware that the conduct is reasonably certain to cause the result.

*Officer or official* means any member of the city council and any appointed member of a city board, commission or committee established by ordinance, Charter, state law or otherwise, on a temporary or permanent basis, operating either under the direct or indirect authority or subject to either the direct or indirect control of the city council. Such term includes but is not limited to the members of the city plan commission, the board of adjustment, the building and standards commission, the tax increment reinvestment financing zone boards of directors, the civil service board and appeals board, the library board, the parks and recreation board, the arts commission, animal shelter advisory board, the environmental advisory commission. Such term also includes the members of the boards of directors of corporations, such as the Richardson Improvement Corporation.

*Relative* means any person related to an officer within the second degree by consanguinity or affinity. This relationship includes the spouse, parents, children, stepchildren, father and mother-in-law, or son and daughter-in-law, grandparents, grandchildren, sisters and brothers of the officer.

*Special privileges* means a right, advantage or favor of or for a particular person, occasion or purpose not otherwise available to others.

*Substantial interest* means: (i) the ownership of ten percent or more of the voting stock or shares of a business entity; (ii) the ownership of ten percent or more, or \$15,000.00 or more of the fair market value of a business entity; or (iii) funds received from the business entity exceed ten percent of the person's gross income for the previous year, and action on the matter involving the business entity will have a special economic effect on the business entity that is distinguishable from the effect on the public. It is expressly provided herein that an investment or ownership in a publicly held company, in an amount less than \$15,000.00 does not constitute a substantial interest. Substantial interest in real property means the person has an interest in the real property that is equitable or legal ownership with a fair market value of \$2,500.00 or more; and it is reasonably foreseeable that an action on a matter involving the real property will have a special economic effect on the value of the real property distinguishable from its effect on the public. (Ownership includes any partnership, joint or corporate ownership or any equitable or beneficial interest as a beneficiary of a trust.) An officer is considered to have a substantial interest under this code of ethics if a person related to the officer in the second degree of consanguinity or affinity has a substantial interest under this code of ethics.

(Ord. No. 3785, § 1, 9-27-10)

Sec. 2-4. - Standards of conduct.

No officer of the city or a relative thereof shall:

- (a) Have a financial interest, direct or indirect, in any contract with the city, nor shall such person be financially interested, directly or indirectly, in the sale to the city of any land, or rights or interest in any land, materials, supplies or service. The "financial interest" contemplated under this section and under the City Charter section 21.01 requires that such person receive an actual financial benefit from the transaction with the city. An actual financial benefit from the transaction shall include:
  - (1) An ownership in the entity transacting business with the city where the ownership interest is more than ten percent.
  - (2) Compensation as an employee, officer or director of the entity transacting business with the city where such compensation is affected by the entity's transaction with the city.
- (b) Participate in a vote or decision on any matter in which the officer has a substantial interest.
- (c) Represent or appear in behalf of private interests of others before the city council, or any agency, board, commission, corporation, or committee of the city, nor shall represent any private interests of others in any action or proceeding involving the city, nor voluntarily participate on behalf of others in any litigation to which the city is, or might be, an adverse party. The restrictions of this subsection 2-4(c) do not prohibit an officer, or relative of an officer, who is the president, vice president or officer of a homeowner's association from appearing before the city council, or any agency, board, commission, or committee of the city to represent such homeowner's association, except that no such officer or relative of such officer shall appear before the agency, board, commission or committee of the city of which such officer is a member.
- (d) Accept any gift from any person that might reasonably tend to influence such officer in the discharge of such person's official duties. The prohibition against gifts shall not apply to:
  - (1) A lawful campaign contribution;

- (2) An honorarium in consideration for services unless the officer would not have been asked to provide the services but for the officer's position;
  - (3) Meals, lodging, transportation in connection with services rendered by the officer at a conference, seminar or similar event that is more than merely perfunctory;
  - (4) Complimentary copies of trade publications and other related materials;
  - (5) Attendance at hospitality functions at local, regional, state or national association meetings and/or conferences;
  - (6) Any gift which would have been offered or given to the person if such person was not an officer or employee of the city;
  - (7) An occasional item with a value less than \$50.00;
  - (8) Tee shirts, caps and other similar promotional material;
  - (9) Meals, transportation and lodging in connection with a seminar or conference at which the officer is providing services;
  - (10) Gifts on account of kinship or a personal, or professional, or business relationship independent of the officer's status;
  - (11) Complimentary attendance at political or charitable fundraising events; and
  - (12) Meals, lodging, transportation, or entertainment furnished in connection with public events, appearances or ceremonies related to official city business, if furnished by the sponsor of such public events.
- (e) Use such person's official position to secure special privileges or benefits for such person or others.
  - (f) Grant any special consideration, treatment or advantage to any citizen, individual, business organization or group beyond that which is normally available to every other citizen, individual, business organization or group.
  - (g) Disclose confidential information.
  - (h) Engage in any outside activities which will conflict with or will be incompatible with such person's official position or duties as an officer of the city.
  - (i) Use city supplies, personnel, property, equipment or facilities (whether tangible or intangible) for any purpose other than the conduct of official city business, unless otherwise provided for by law, ordinance or city policy.
  - (j) Act as a surety on any official bond required for any officer or employee of the city, or for a business that has a contract, work or business with the city.

(Ord. No. 3785, § 1, 9-27-10)

Sec. 2-5. - Additional standards.

- (a) No member of the city council who is on the board of a nonprofit organization may vote on any funding request by that nonprofit organization, unless the nonprofit organization has a board of directors or trustees appointed in whole or in part by the city council.
- (b) With the exception of those proceedings allowed under this article, no member of the city council shall personally appear in such person's own behalf before the city council, or any city board, commission, corporation or committee but may designate and be represented by a person of such person's choice in any such personal matter.
- (c)

No member of the city council, the city plan commission, or board of adjustment shall participate in, or vote on, any land use matter in which such officer has a substantial interest in any real property within 200 feet of the real property, the subject of the land use matter. For purposes of this subsection 2-5(c) "land use matter" shall mean zoning, plat approval, site plan or other development approvals or permits, variances or exceptions. The term "land use matter" does not include studies or similar matters that are for the benefit of the city and which are not unique to real property within 200 feet of the real property, the subject of the land use matter, in which the officer has a substantial interest.

(Ord. No. 3785, § 1, 9-27-10)

Sec. 2-6. - Disclosure of substantial interest.

Any officer, who has a substantial interest in any matter pending before the body, board, commission, corporation or committee of which the officer is a member, before a vote or decision on such matter, shall file an affidavit stating the nature and extent of the substantial interest, and shall abstain from further participation in such matter. The affidavit shall be on a form provided by the city and must be filed with record keeper for such body, board, commission, corporation or committee.

(Ord. No. 3785, § 1, 9-27-10)

Sec. 2-7. - Complaints against officers.

- (a) All complaints or allegations of a violation of this code of ethics against an officer shall be made in writing on a form provided by the city, sworn to before a notary public, and filed of record with the city secretary. Such complaint shall describe in detail the act or acts complained of and the specific section(s) of this code of ethics alleged to have been violated. A general complaint lacking in detail shall not be sufficient to invoke the investigation procedures contained herein; and anonymous complaints shall not be considered. The city secretary shall provide a copy of the complaint to the affected officer and the city council, and immediately refer the complaint to the city attorney, who shall initially review the complaint to determine if the complaint contains sufficient detail and alleges a violation of the code of ethics. The affected officer may file a written response to the complaint within seven business days after the complaint is filed with the city secretary, who shall forward the response, if any, to the city attorney.
- (b) The city attorney shall submit a written report to the city council as soon as possible but not later than 15 business days after the receipt of the complaint, unless an extension is granted by a majority of the non-implicated city council members. The city attorney may contact the complainant, interview witnesses and examine any documents necessary for the report. Such report shall be comprehensive and explain in detail all facts, findings, and conclusions in support of the city attorney's opinion as to whether or not a violation of this code of ethics occurred. When the city attorney receives a vague complaint or one lacking in detail, the city attorney shall contact the complainant to request a written clarification. If the complainant fails to provide the city attorney with written clarification, or if after written clarification is provided, it is the opinion of the city attorney that the complaint is insufficient in detail and/or fails to allege a prima facie violation of the code of ethics, a written report to that effect shall be submitted to the city council. If the city attorney determines that a criminal violation may exist, the city attorney shall refer the matter to the appropriate law enforcement agency.
- (c) If it is determined by the city attorney that the facts as alleged could constitute a violation of this code of ethics, then the city attorney shall, within 15 business days after receipt of the complaint, notify the mayor and city council members of the existence and nature of the complaint. The city council shall



cause a meeting to convene, whether regular or special, within 15 business days after being so notified by the city attorney to further consider said complaint in executive session with mayor or any three members of the city council (excluding the mayor) causing such a meeting to be convened. In any event, the city attorney shall immediately proceed to fully investigate the alleged improprieties. For purposes of this investigation, the city attorney shall have all of the powers of investigation as are given to the city council by reason of the City Charter and shall report back to the city council as soon as possible but in no event more than 15 business days from the date of notification of the city council unless an extension is granted by the city council. Said report shall be comprehensive and explain in detail all facts, findings and conclusions in support of the city attorney's opinion as to whether a violation of this code of ethics occurred.

- (d) The city council shall consider the complaint and the city attorney's report at an executive session of the city council. The affected officer may request that the complaint be considered in a public meeting. At such meeting, the city attorney shall present a written report to the city council describing in detail the nature of the complaint and the city attorney's findings and conclusions as to a possible violation of this code of ethics. The affected officer shall have the right to a full and complete hearing before the city council with the opportunity to call and cross-examine witnesses and present evidence in such person's behalf. The non-implicated city council members in attendance shall conduct a hearing and review the complaint. The city council may reject the complaint or take action authorized under section 2-8, violations.
- (e) No action or decision with regard to the complaint shall be made except in a meeting which is open to the public.
- (f) The city council may appoint outside legal counsel, or may direct the city attorney to appoint outside legal counsel, or the city attorney in the city attorney's discretion, may appoint outside legal counsel, to perform the duties and responsibilities of the city attorney under subsections (b), (c) and (d) of this section.
- (g) A complaint or allegation of a violation of this article may only be made against an officer while such person holds such position or office. A complaint made against an officer pursuant to this section shall be processed and resolved even if such person resigns from, or ceases to hold such position or office, prior to resolution of the complaint.

(Ord. No. 3785, § 1, 9-27-10)

#### Sec. 2-8. - Violations.

The city council may take any one or more of the following actions in an open meeting concerning a complaint:

- (1) Issue a statement finding the complaint is totally without merit, brought for the purpose of harassment, or brought in bad faith.
- (2) Issue a letter of notification when the violation is unintentional. A letter of notification shall advise the officer of any steps to be taken to avoid future violations.
- (3) Issue a letter of admonition when the violation is minor or may have been unintentional, but calls for a more substantial response than a letter of notification.
- (4) Issue a reprimand when a violation has been committed knowingly or intentionally.
- (5) Remove from office an officer, other than a city council member, for a serious or repeated violation of this code of ethics. Removal shall be, to the extent by and allowed, in compliance with the Charter and state law.

- (6) Pass a resolution of censure or a recommendation of recall when the city council finds that a serious or repeated violation of this code of ethics has been committed intentionally by a member of the city council.

(Ord. No. 3785, § 1, 9-27-10)

Sec. 2-9. - Interpretation of content.

Any officer may request and the city attorney shall issue, a verbal or written opinion (as deemed appropriate) concerning the meaning or effect of any section, word, or requirement of this code of ethics as it affects such person.

(Ord. No. 3785, § 1, 9-27-10)

Sec. 2-10. - Review.

The city council shall review this article once every two years following its adoption on September 27, 2010.

(Ord. No. 3785, § 1, 9-27-10)

Secs. 2-11—2-25. - Reserved.

**Laura Maczka  
Time Line**

Palisades is the name used for a project in Richardson. It is owned by J.P. Realty Partners, Ltd and managed by Sooner Management, the managing partner of each being Mark Jordan. Laura Maczka presided as Mayor over Richardson City Council meetings and voted on matters brought before the City Council.

<b>Date</b>	<b>Action</b>
May 2013	City of Richardson local election. Laura Maczka was elected as Mayor.
December 9, 2013	A request (ZF 13-13) for Zoning Change from LR-M(2) Local Retail, PD Planned Development and TO-M Technical office to PD Planned Development for the development of a pedestrian-oriented, mixed-use development with multifamily elements on approximately 58.5 acres (Palisades) came before the Council and was approved with Mayor Maczka voting with the majority.
January 27, 2014	By a vote of 5-2, a request for Zoning File 13-13 was approved by the Richardson City Council with instruction to staff to bring back a Phasing Plan for Phase 1 and 2A to include the development of single family homes first. Ordinance #4037 was approved by a 5-2 vote of the Richardson City Council and included the phasing plan. Mayor Maczka voted in favor of the ordinance. Mayor Maczka voted in favor of the zoning.
June 9, 2014	JP Partners requested a zoning modification to include approximately 20 additional acres of land to be purchased. The request was to rezone all 80 acres from LR-M(2) Local Retail, TO-M Technical Office, and PD Planned Development to PD Planned Development for the development of a pedestrian-oriented, mixed-use development. By a vote of 5-2, a modified zoning request of the 80 acre tract was approved by Richardson City Council. Zoning File 14-13, Ordinance# 4051. Mayor Maczka voted with the majority.
September 22, 2014	By a unanimous vote, the Richardson City Council authorized City Manager Dan Johnson to negotiate and enter into a development agreement with JP Realty partners.
February 14, 2015	Tor Erickson gave verbal notice to Mark Jordan that he would be leaving Sooner Management effective February 27, 2015. Sooner Management HR recorded the notification on Monday, February 17, 2015.

February 27, 2015	Last day to file for Richardson City Council/Mayor's election in May.
March 2, 2015	Employment offered to Laura Maczka by Sooner National Property Management, LLC beginning April 1, 2015.
March 13, 2015	Due to workload and project deadlines, a revised employment letter was issued to Laura Maczka with start date of March 15 <sup>th</sup> and health insurance effective April 1, 2015.
March 18, 2015	In weekly meeting with Dan Johnson (City Manager), Laura advised the City Manager of her employment status change.
March 19, 2015	Conflict of Interest forms were completed by Laura Maczka and Sooner Management.

# CONFLICT OF INTEREST QUESTIONNAIRE

# FORM CIQ

For vendor or other person doing business with local governmental entity

This questionnaire reflects changes made to the law by H.B. 1491, 80th Leg., Regular Session.

This questionnaire is being filed in accordance with Chapter 176, Local Government Code by a person who has a business relationship as defined by Section 176.001(1-a) with a local governmental entity and the person meets requirements under Section 176.006(a).

By law this questionnaire must be filed with the records administrator of the local governmental entity not later than the 7th business day after the date the person becomes aware of facts that require the statement to be filed. See Section 176.006, Local Government Code.

A person commits an offense if the person knowingly violates Section 176.006, Local Government Code. An offense under this section is a Class C misdemeanor.

### OFFICE USE ONLY

Date Received

3-15-15 P04:25 RCVD  
W

1 Name of person who has a business relationship with local governmental entity.

Mark Jordan / JPR Realty Partners & Sommer National Property Management

2  Check this box if you are filing an update to a previously filed questionnaire.

(The law requires that you file an updated completed questionnaire with the appropriate filing authority not later than the 7th business day after the date the originally filed questionnaire becomes incomplete or inaccurate.)

3 Name of local government officer with whom filer has employment or business relationship.

Laura Maczka

Name of Officer

This section (item 3 including subparts A, B, C & D) must be completed for each officer with whom the filer has an employment or other business relationship as defined by Section 176.001(1-a), Local Government Code. Attach additional pages to this Form CIQ as necessary.

A. Is the local government officer named in this section receiving or likely to receive taxable income, other than investment income, from the filer of the questionnaire?

Yes  No

B. Is the filer of the questionnaire receiving or likely to receive taxable income, other than investment income, from or at the direction of the local government officer named in this section AND the taxable income is not received from the local governmental entity?

Yes  No


C. Is the filer of this questionnaire employed by a corporation or other business entity with respect to which the local government officer serves as an officer or director, or holds an ownership of 10 percent or more?

Yes  No

D. Describe each employment or business relationship with the local government officer named in this section.

Leasing, Marketing and Communications

4

  
Signature of person doing business with the governmental entity

3-19-2015  
Date

# LOCAL GOVERNMENT OFFICER CONFLICTS DISCLOSURE STATEMENT

FORM CIS

(Instructions for completing and filing this form are provided on the next page.)

This questionnaire reflects changes made to the law by H.B. 1491, 80th Leg., Regular Session. This is the notice to the appropriate local governmental entity that the following local government officer has become aware of facts that require the officer to file this statement in accordance with Chapter 176, Local Government Code.

**OFFICE USE ONLY**

Date Received

03-19-15P04:25 RCVD

*aw*

1 Name of Local Government Officer

LAURA MACZKA

2 Office Held

MAYOR, CITY OF RICHARDSON

3 Name of person described by Sections 176.002(a) and 176.003(a), Local Government Code

JP PARTNERS / SCORER MANAGEMENT

4 Description of the nature and extent of employment or other business relationship with person named in item 3

LEASING, MARKETING & COMMUNICATIONS

5 List gifts accepted by the local government officer and any family member, excluding gifts described by Section 176.003(a-1), if aggregate value of the gifts accepted from person named in item 3 exceed \$250 during the 12-month period described by Section 176.003(a)(2)(B)

Date Gift Accepted \_\_\_\_\_ Description of Gift \_\_\_\_\_

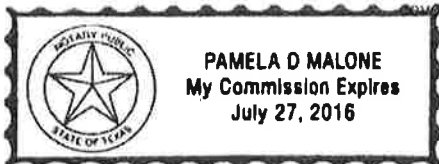
Date Gift Accepted \_\_\_\_\_ Description of Gift \_\_\_\_\_

Date Gift Accepted \_\_\_\_\_ Description of Gift \_\_\_\_\_

(attach additional forms as necessary)

6 AFFIDAVIT

I swear under penalty of perjury that the above statement is true and correct. I acknowledge that the disclosure applies to a family member (as defined by Section 176.001(2), Local Government Code) of this local government officer. I also acknowledge that this statement covers the 12-month period described by Section 176.003(a), Local Government Code.



*Laura Maczka*  
Signature of Local Government Officer

AFFIX NOTARY STAMP / SEAL ABOVE

Sworn to and subscribed before me, by the said LAURA MACZKA this the 19 day of MARCH, 2015, to certify which, witness my hand and seal of office.

*Pamela D Malone*  
Signature of officer administering oath

Pamela D Malone  
Printed name of officer administering oath

Office Manager  
Title of officer administering oath

City of Richardson, Council Member  
Paul Voelker  
3308 Callaway Court, Richardson, Texas 75082  
Tel (972) 890-1085  
paul.voelker@cor.gov  
www.cor.net



APRIL 14, 2015

**Dean Roggia**

**Taylot, Olson, Adkins, Sralla & Elam, L.L.P.**

6000 Western Place, Suite 200, Fort Worth, Texas 76107

Dear Mr. Roggia,

This is my response to your letter dated April 10, 2015.

With regards to Question 1, I was not aware of any financial or business relationship between Mayor Maczka and Mark Jordan/IP Realty, or any other developers of the Palisades development prior to October 2014.

With regards to Question 2, see question 1.

With regards to Question 3, I am not aware of any evidence supporting the allegation that the Mayor's decision not to serve as Mayor for the term beginning in May 2015 was done for the purpose of allowing the remaining members of the Council to determine, by appointment, the next person to hold the office of Mayor.

Regards,

**Paul Voelker**

COUNCIL MEMBER, PLACE 5

## Kristi Howard

---

**From:** George Staples  
**Sent:** Wednesday, April 22, 2015 10:46 AM  
**To:** Kristi Howard  
**Subject:** FW: City of Richardson Ethics Investigation; City Council



TAYLOR OLSON ADKINS SRALLA ELAM  
ATTORNEYS AT LAW

George Staples  
6000 Western Place, Suite 200  
Fort Worth, Texas 76107  
817 806 5222  
817 319 3962 (cell)  
817 427 6042 (NRH)  
817 332 4740 (fax)

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---

**From:** Dean Roggia  
**Sent:** Tuesday, April 14, 2015 4:34 PM  
**To:** Kendal Hartley  
**Cc:** George Staples  
**Subject:** RE: City of Richardson Ethics Investigation; City Council

Mr. Hartley,

Thank you for your willingness to cooperate with this investigation. We will contact you if we have any further questions. Please feel free to contact me at any time if you have any questions or concerns regarding this matter.

Sincerely,

Dean Roggia  
Taylor, Olson, Adkins, Sralla & Elam, L.L.P.  
6000 Western Place, Suite 200  
Fort Worth, Texas 76107  
Phone: 817-332-2580  
Fax: 817-332-4740  
Email: [droggia@toase.com](mailto:droggia@toase.com)

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**From:** Kendal Hartley [<mailto:khartleycor@gmail.com>]  
**Sent:** Tuesday, April 14, 2015 4:27 PM  
**To:** Dean Roggia  
**Subject:** Re: City of Richardson Ethics Investigation; City Council

Dean

I have recieved the letter regarding the City of Richardson Ethics Investigation: Mayor and City Council

I have read them and below are the answers

The answer to all 3 questions is NO

Thanks Kendal Hartley

On Tue, Apr 14, 2015 at 2:53 PM, Dean Roggia <[droggia@toase.com](mailto:droggia@toase.com)> wrote:

Dear City Council Members:

On April 10, 2015, we sent you an inquiry letter concerning a complaint filed against the Mayor and City Council for alleged violations of the Richardson Code of Ethics; however, the second question in that letter incorrectly referenced the City of Richland Hills. We have corrected this error and humbly ask that you provide a written response to the questions in the attached letter. We sincerely apologize for any inconvenience this error may have caused. Please respond to the questions in the letter in writing at the address below or via email at [droggia@toase.com](mailto:droggia@toase.com) by April 20, 2015.

For those of you who have already provided a written response to the inquiry letter, we appreciate your cooperation in this matter. Please note that the corrected inquiry letter should not change your response to the original letter unless you answered "yes" to the first question.

Please let us know if you have any questions or concerns.

Sincerely,

Dean Roggia

Taylor, Olson, Adkins, Sralla & Elam, L.L.P.

6000 Western Place, Suite 200

Fort Worth, Texas 76107

Phone: 817-332-2580

Fax: 817-332-4740

Email: droggia@toase.com

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--  
Kendal Hartley  
Richardson City Council  
Place 4  
[Kendal.Hartley@cor.gov](mailto:Kendal.Hartley@cor.gov)

## Kristi Howard

---

**From:** George Staples  
**Sent:** Wednesday, April 22, 2015 10:46 AM  
**To:** Kristi Howard  
**Subject:** FW: Response to CoR Ethics Investigationl



George Staples  
6000 Western Place, Suite 200  
Fort Worth, Texas 76107  
817 806 5222  
817 319 3962 (cell)  
817 427 6042 (NRH)  
817 332 4740 (fax)

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---

**From:** Dean Roggia  
**Sent:** Tuesday, April 14, 2015 4:47 PM  
**To:** Scott Dunn  
**Cc:** George Staples  
**Subject:** RE: Response to CoR Ethics Investigationl

Mr. Dunn,

Thank you for your willingness to cooperate with this investigation. We will contact you if we have any further questions. Please feel free to contact me at any time if you have any questions or concerns regarding this matter.

Sincerely,

Dean Roggia  
Taylor, Olson, Adkins, Sralla & Elam, L.L.P.  
6000 Western Place, Suite 200  
Fort Worth, Texas 76107  
Phone: 817-332-2580  
Fax: 817-332-4740  
Email: [droggia@toase.com](mailto:droggia@toase.com)

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not the intended recipient or an agent responsible for delivering it to the intended recipient you are hereby notified that you have received this communication in error, please notify us immediately by e-mail and delete the original message.

---

**From:** Scott Dunn [mailto:sdunn.place3@att.net]  
**Sent:** Tuesday, April 14, 2015 4:44 PM  
**To:** Dean Roggia  
**Cc:** George Staples  
**Subject:** Response to CoR Ethics InvestigationI

Mr. Roggia, thank you and I welcome the ethics investigation. Here are my responses:

- 1) No, I am not aware of any financial or business relationship between Mayor Maczka and Mark Jordan/JP Realty or other developers of Palisades development prior to October 2014.
- 2) No, I am not aware of any relationship between Mayor Maczka and Mark Jordan/JP Realty that would have influenced my vote(s) on any Palisades development in the City of Richardson.
- 3) No, I am not aware of any evidence to support allegations Mayor Maczka would not serve as mayor for the purpose of the next Council to select the next mayor.

Scott Dunn  
CoR Councilman Place#3

---

**From:** Dean Roggia <droggia@toase.com>  
**To:** "bob.townsend@cor.gov" <bob.townsend@cor.gov>; "mark.solomon@cor.gov" <mark.solomon@cor.gov>; "scott.dunn@cor.gov" <scott.dunn@cor.gov>; "kendal.hartley@cor.gov" <kendal.hartley@cor.gov>; "paul.voelker@cor.gov" <paul.voelker@cor.gov>; "steve.mitchell@cor.gov" <steve.mitchell@cor.gov>  
**Cc:** Pete Smith <psmith@njdhs.com>; George Staples <gstaples@toase.com>  
**Sent:** Tuesday, April 14, 2015 2:53 PM  
**Subject:** City of Richardson Ethics Investigation; City Council

Dear City Council Members:

On April 10, 2015, we sent you an inquiry letter concerning a complaint filed against the Mayor and City Council for alleged violations of the Richardson Code of Ethics; however, the second question in that letter incorrectly referenced the City of Richland Hills. We have corrected this error and humbly ask that you provide a written response to the questions in the attached letter. We sincerely apologize for any inconvenience this error may have caused. Please respond to the questions in the letter in writing at the address below or via email at [droggia@toase.com](mailto:droggia@toase.com) by April 20, 2015.

For those of you who have already provided a written response to the inquiry letter, we appreciate your cooperation in this matter. Please note that the corrected inquiry letter should not change your response to the original letter unless you answered "yes" to the first question.

Please let us know if you have any questions or concerns.

Sincerely,

Dean Roggia  
Taylor, Olson, Adkins, Sralla & Elam, L.L.P.  
6000 Western Place, Suite 200  
Fort Worth, Texas 76107  
Phone: 817-332-2580

Fax: 817-332-4740

Email: [droggia@toase.com](mailto:droggia@toase.com)

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## Kristi Howard

---

**From:** George Staples  
**Sent:** Wednesday, April 22, 2015 10:48 AM  
**To:** Kristi Howard  
**Subject:** FW: City of Richardson Ethics Investigation, Mayor and City Council



TAYLOR OLSON ADKINS SRALLA ELAM  
ATTORNEYS AT LAW

George Staples  
6000 Western Place, Suite 200  
Fort Worth, Texas 76107  
817 806 5222  
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---

**From:** Dean Roggia  
**Sent:** Wednesday, April 15, 2015 2:39 PM  
**To:** [BLTRICH@aol.com](mailto:BLTRICH@aol.com)  
**Cc:** George Staples  
**Subject:** RE: City of Richardson Ethics Investigation, Mayor and City Council

Mr. Townsend,

Thank you for your willingness to cooperate with this investigation. We will contact you if we have any further questions. Please feel free to contact me at any time if you have any questions or concerns regarding this matter.

Sincerely,

Dean Roggia  
Taylor, Olson, Adkins, Sralla & Elam, L.L.P.  
6000 Western Place, Suite 200  
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Phone: 817-332-2580  
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**From:** BLTRICH@aol.com [mailto:BLTRICH@aol.com]  
**Sent:** Wednesday, April 15, 2015 2:27 PM  
**To:** Dean Roggia  
**Subject:** City of Richardson Ethics Investigation, Mayor and City Council

Dear Mr. Roggia,

Following are my responses to your questions:

1. Were you aware of a financial or business relationship between Mayor Maczka and Mark Jordan/JP Realty, or any other developers of the Palisades development prior to October 2014? If so, please explain in writing when you became aware and provide any details of your understanding of that relationship along with any documents or other evidence supporting the same.

No.

2. If you were aware of a financial or business relationship between Mayor Maczka and Mark Jordan/JP Realty, or any other developers of the Palisades development prior to October 2014, did the Mayor's participation as a member of the governing body of the City of Richardson influence your vote(s) relating to the Palisades development in any way? If so, please explain how you were influenced and provide any documents or other evidence supporting the same.

Not applicable. See No response to question 1.

3. Are you aware of any evidence supporting the allegation that the Mayor's decision not to serve as Mayor for the term beginning in May 2015 was done for the purpose of allowing the remaining members of the Council to determine, by appointment, the next person to hold the office of Mayor? If so, please explain your knowledge regarding this allegation and provide any documents or other evidence supporting the same.

No.

Sincerely,

Bob Townsend

## Kristi Howard

---

**From:** George Staples  
**Sent:** Wednesday, April 22, 2015 10:44 AM  
**To:** Kristi Howard  
**Subject:** FW: Ethics investigation responses - City of Richardson - from Steve Mitchell

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Print for File



TAYLOR OLSON ADKINS SRALLA ELAM

George Staples  
6000 Western Place, Suite 200  
Fort Worth, Texas 76107  
817 806 5222  
817 319 3962 (cell)  
817 427 6042 (NRH)  
817 332 4740 (fax)

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---

**From:** Dean Roggia  
**Sent:** Wednesday, April 15, 2015 5:14 PM  
**To:** Steve Mitchell  
**Cc:** George Staples  
**Subject:** RE: Ethics investigation responses - City of Richardson - from Steve Mitchell

Mr. Mitchell,

Thank you for your willingness to cooperate with this investigation. We will contact you if we have any further questions. Please feel free to contact me at any time if you have any questions or concerns regarding this matter.

Sincerely,

Dean Roggia  
Taylor, Olson, Adkins, Sralla & Elam, L.L.P.  
6000 Western Place, Suite 200  
Fort Worth, Texas 76107  
Phone: 817-332-2580



Fax: 817-332-4740

Email: [droggia@toase.com](mailto:droggia@toase.com)

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**From:** Steve Mitchell [<mailto:steve.mitchell@hotmail.com>]

**Sent:** Wednesday, April 15, 2015 4:59 PM

**To:** Dean Roggia

**Subject:** Ethics investigation responses - City of Richardson - from Steve Mitchell

Dean, in response to your letter concerning the City of Richardson ethics investigation, below are my responses to your questions:

1. No
2. N/A - see response to question #1
3. No

Please feel free to contact me if you have any further questions.

Regards,  
Steve

Steve Mitchell  
Richardson City Council, Place 6

**IVIE ♦ LAW ♦ FIRM**  
ATTORNEYS AND COUNSELORS

April 15, 2015

Taylor, Olson, Adkins, Sralla, Elam, LLP  
6000 Western Place, Suite 200  
Fort Worth, TX 76107  
Attn: Dean Roggia

Re: City of Richardson Ethics Investigation; Mayor and City Council

Dear Mr. Roggia,

My law firm represents Mark Solomon, Richardson City Councilman, with regard to the above-referenced ethics investigation (the "Investigation"). I am in receipt of your letter dated April 10, 2015, in which you request that Mr. Solomon provide written responses to questions pertaining to the subject of your investigation. After conferring with my client regarding your questions, Mark Solomon has instructed me to make the following responses on his behalf:

Question 1: Were you aware of a financial or business relationship between Mayor Maczka and Mark Jordan/JP Realty, or any other developers of the Palisades development prior to October 2014? If so, please explain in writing when you became aware and provide any details of your understanding of that relationship along with any documents or other evidence supporting the same.

Response: Mark Solomon was not aware of any financial or business relationship between Mayor Maczka and Mark Jordan/JP Realty, or any other developers of the Palisades development prior to October 2014.

Question 2: If you were aware of a financial or business relationship between Mayor Maczka and Mark Jordan/JP Realty, or any other developers of the Palisades development prior to October 2014, did the Mayor's participation as a member of the governing body of the City of Richardson influence your vote(s) relating to the Palisades development in any way? If so, please explain how you were influenced and provide any documents or other evidence supporting the same.

Response: Mark Solomon was not aware of any financial or business relationship between Mayor Maczka and Mark Jordan/JP Realty, or any other developers of the Palisades development prior to October 2014. Accordingly, no vote relating to the Palisades development was influenced by this information.

Question 3: Are you aware of any evidence supporting the allegation that the Mayor's decision not to serve as Mayor for the term beginning in May 2015 was done for the purpose of

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972.770.2156 (f)  
john@ivielawfirm.com

Dean Roggia  
April 15, 2015  
Page 2

allowing the remaining members of the Council to determine, by appointment, the next person to hold the office of Mayor? If so, please explain your knowledge regarding this allegation and provide any documents or other evidence supporting the same.

Response: Mark Solomon is not aware of any evidence supporting the allegation that the Mayor's decision not to serve as Mayor for the term beginning in May 2015 was done for the purpose of allowing the remaining members of the Council to determine, by appointment, the next person to hold the office of Mayor.

If you have any questions regarding the responses contained herein or if there is any further assistance that Mark Solomon or I can provide you, please do not hesitate to contact me.

Sincerely,

IVIE LAW FIRM



John Ivie

Two Lincoln Centre  
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**SHEPHERD LAW FIRM**  
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RICHARDSON, TEXAS 75080-3528

JAMES E. SHEPHERD  
ATTORNEY AT LAW

Tel: (972) 234-3117  
Fax: (972) 889-3827

[Jim@JShepherdLaw.com](mailto:Jim@JShepherdLaw.com)

April 17, 2015

George Staples  
Attorney at Law  
Taylor Olson Adkins Sralla Elam  
6000 Western Place, Suite 200  
1-30 at Bryant Irving Road  
Fort Worth, TX 76107

sent by email: [gstaples@toase.com](mailto:gstaples@toase.com)  
and by Regular USPS Mail

Re: City of Richardson Investigation: Laura Maczka

Dear Mr. Staples:

This letter is written in response to yours of April 9, 2015, regarding the request to you by the City of Richardson to review alleged conflicts of interest by the Mayor. My services have been retained by Mayor Maczka to assist her with her response, and we do so at this time.

Your first question is when the Mayor entered into a financial or other business relationship with JP Realty or any other developers of the Palisades development.

Attached we have provided a complete timeline of the votes by the City Planning Commission and the City Council on the Palisades project between November 5, 2013 and June 9, 2014. Each vote made by the City Council during that time period on the Palisades project passed by a vote of 5 to 2. At no time during that time was there any suggestion of, offer of, acceptance, or any implication that any form of personal financial benefit would be provided to the Mayor, nor would it have been accepted had it been made. And, as a practical matter, it should be noted that each of those votes would have passed with a vote of 4 to 3, rather than 5 to 2, had the Mayor voted in opposition.

There is an additional vote on September 22, 2014 regarding the economic development incentive which passed not by a 5 to 2 vote, but by a unanimous vote.

The point of the timeline through September is to show that all relevant votes which relevant to your investigation long proceeded the real reasons and urgent need for the Mayor to obtain employment.

In January of 2015, six months after the June 9<sup>th</sup> vote on the modified zoning request of the Palisades, a rather crushing sequence of events occurred in the Mayor's life, all of which pointed

then, and not before, to an immediate need to acquire gainful employment, combined with an excellent healthcare policy. Those events included a divorce decree of January 8, 2015 in which the Mayor was required to remove her husband from the mortgage obligation on the home on or before April 1<sup>st</sup>. While it was originally thought that she could do so by having her parents appear as co-signers, it was determined that in addition to them becoming co-signers on the note, the mortgage company would require that her income be sufficient to pay the monthly mortgage payment and taxes. Her ex-husband confirmed that he would grant no extension to the April 1<sup>st</sup> deadline to remove him as an obligor on the mortgage.

In addition, in January of 2015, the Mayor began a 12 week medical treatment for cancer (melanoma), a condition she has been dealing with for eight years. Her health insurance provided through her former husband's company would have terminated January 31<sup>st</sup>. The deadline for the COBRA option was March 31, 2015. To avoid the loss of her home, she had to have a salary sufficient to pay the mortgage and taxes. In order to pay the significant costs of her medical care, she needed to acquire excellent health coverage for herself, immediately.

On February 14, 2015 an employee of Sooner Management Company, LLC ("Sooner") in the Leasing Department gave verbal notice to Mark Jordan that he would be leaving Sooner effective February 27, 2015.

The Mayor did file for re-election on February 27, 2015, the last day to file for Richardson City Council and Mayor's election. On March 2, 2015, employment, for the first time, was offered to the Mayor by Sooner. That employment would have been effective April 1, 2015, as per the employment offer letter, a copy of which is attached as Exhibit A.

The Mayor was requested to start work on March 15, and, because of her health situation, her health benefits were negotiated to commence April 1, 2015. A copy of that revised employment offer is attached hereto as Exhibit B.

On March 16, 2015 the Mayor began working for Sooner Management, a fact she advised the City Manager of on March 18<sup>th</sup> at their normal weekly meeting.

In summary, the relevant votes on the Palisades development occurred on or before September 22, 2014. However, in the six months that followed those votes, the issues of a dramatically changed financial situation for the Mayor, and the need to acquire immediate significant employment with which to afford the refinancing of her home, and the need to obtain health insurance, arose.

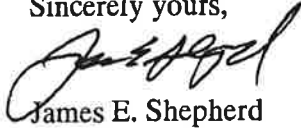
The attached timeline should make it clear the distinct separation between the votes on the Palisades matter, and the unexpected and significant need to acquire employment in March 2015.

You also asked about the Mayor's decision to file for office on the last day available to do so, February 27, 2015. I don't know of any City Council during election time that doesn't discuss who is running, who is not running, and who may have an opponent. I don't doubt that would have occurred for the 2015 elections. It is my understanding that a number of the council members then, and continuing to today, have urged the Mayor to not only run, but not to resign. As you can see from the comments above, the Mayor's life has changed dramatically in the early months of

2015. It is understandable that she would have a difficult choice between her commitment to the City and the desire to continue to serve, versus a new and demanding job which together with the needs of her family. Certainly there was nothing beneficial to her in being pressed to run for re-election and recognizing ultimately that the demands of the City, her job, and most importantly, her family, may not be compatible.

Please feel to contact me for any additional clarification you might need. We look forward to a prompt finding that no ethical violations have occurred and the closing of this file.

Sincerely yours,



James E. Shepherd

JES/jc

enclosures

### Palisades Time Line

Palisades was acquired as part of a portfolio purchase by JP Partners/Sooner Management which included two existing buildings and a parking garage on 58.5 acres of land in Richardson. The purchase also included Greenway I, Greenway II, and Greenway III – all in Richardson as well.

<b>Date</b>	<b>Action</b>
Fall 2012	In an effort to involve the adjacent neighborhood in the visioning process for the development, three community charrettes were held. Following the charrettes, JP Partners took the input received and began work on design and vision which included a traffic impact study
May 2013	City of Richardson local election. Laura Maczka was elected as Mayor.
June 27, 2013	JP Partners submitted an application for a zoning change on the 60 acre tract of land which included two existing buildings and a parking garage...Palisades
November 5, 2013	Zoning File 13-13 came before the City Plan Commission. The request was to rezone approximately 58.5 acres from LR-M(2) Local Retail, TO-M Technical Office and PD Planned Development to PD Planned Development for the development of a pedestrian-oriented, mixed –use development. The City Plan Commission continued the zoning case to the November 19, 2013 meeting to allow the applicant time to address the comments made by residents and Commissioners.
November 19, 2015	A revised proposal for Zoning File 13-13 was presented to the CPC and included several changes including a reduction in the number of multi-family units, prohibited multi-family units in Dallas County, providing minimum unit sizes for dwelling units, prohibition on wood-framed multi-family units along US-75, and the dedication of land area for a future pedestrian bridge over US-75. By a vote of 7-0 the zoning request was approved by the City Plan Commission.
December 9 2013,	A request for Zoning Change from LR-M(2) Local retail, PD Planned Development and TO-M Technical office to PD Planned Development for the development of a pedestrian-oriented, mixed –use development on approximately 58.5 acres (Palisades) came before the Council.  By a vote of 5-2, a request for Zoning File 13-13 was approved by the Richardson City Council with instruction to staff to bring back a Phasing Plan for Phase 1 and 2A to include the development of single family homes first.
January 27, 2014	Ordinance #4037 was approved by a 5-2 vote of the Richardson City Council and included the phasing plan.
April 17, 2014	JP Partners requested a zoning modification to include approximately 20 additional acres of land to be purchased. The request was to rezone all 80 acres from LR-M(2) Local Retail, TO-M Technical Office, and PD Planned Development

to PD Planned Development for the development of a pedestrian-oriented, mixed-use development.

May 20<sup>th</sup>, 2014 Zoning File 14-13 came before the City Plan Commission. The request made use of a form-based code and included the entirety of the existing 58.5-acre plus approximately 19 additional acres. The overall size of the request was just under 80 acres including rights of way. The City Plan Commission continued the public hearing to its June 3, 2014 meeting to allow the applicant time to address the comments made by residents and Commissioners.

June 3, 2015 A revised proposal for Zoning file 14-13 was presented by the applicant which included a reduction in the number of multi-family units from 1,400 to 1,200; the requirement that 140 multi-family units be located in Dallas County and be of Type I/II Construction; a minimum floor area requirement of 1200 square feet for 3-bedroom units; changes to building frontage requirements along Palisades Creek Drive; and modification to the Phasing Plan.

By a vote of 5-2, a modified zoning request of the 80 acre tract was approved by the Richardson City Plan Commission. Zoning File 14-13, Ordinance #4051

June 9<sup>th</sup>, 2014 By a vote of 5-2, a modified zoning request of the 80 acre tract was approved by Richardson City Council. Zoning File 14-13, Ordinance # 4051.

September 22, 2014 By a unanimous vote, the Richardson City Council authorized City Manager Dan Johnson to enter into a 380 agreement with JP Realty partners. The agreement is to provide reimbursement for infrastructure expenses associated with the development of the 79.11-acre tract of land, a planned development that will possibly include single family residences, multi-family, multi-family high rise, office buildings, retail and a hotel.

January 8, 2015 Final divorce granted between Laura Gibbs Maczka and Michael Joseph Maczka. As part of the divorce agreement, Laura was awarded the home located at 301 Overcreek in Richardson. Additionally, per the divorce decree Mike Maczka was to be removed from the mortgage obligation on the home by April 1<sup>st</sup>.

January 2015 Laura Maczka began the process of refinancing the mortgage from the lender – Wells Fargo with David and Jackie Gibbs (parents) as co-borrowers and guarantors.

January 2015 Laura Maczka began 12 week medical treatment. Health Insurance provided through former husband's company through January 31<sup>st</sup>. Deadline for COBRA option – March 31, 2015

February 14, 2015 Tor Erickson gave verbal notice to Mark Jordan that he would be leaving Sooner Management effective February 27, 2015. Sooner Management HR recorded the notification on Monday, February 17, 2015

February 27, 2015 Last day to file for Richardson City Council/Mayor's election in May.

February 27, 2015 Tor's last day with Sooner Management



Late February 2015 Laura Maczka was notified by Wells Fargo that as primary resident of the home, her salary must cover the mortgage despite significant assets available that could cover the value of the mortgage.

March 2, 2015 Employment offered to Laura Maczka by Sooner National Property Management, LLC. Effective April 1, 2015 (Letter attached). Health care benefits effective 60 days after employment began.

March 13, 2015 Due to workload and project deadlines, a revised employment letter was issued to Laura Maczka with start date of March 15<sup>th</sup> and health care benefits effective April 1, 2015. (Letter attached).

March 16, 2015 Laura Maczka began working for Sooner Management.

March 18, 2015 In weekly meeting with Dan Johnson (City Manager), Laura advised the City Manager of her employment status change.

March 19, 2015 Conflict of Interest forms were completed by Laura Maczka and Sooner Management.

# SOONER NATIONAL

Property Management L.P.

March 13, 2015

Ms. Laura Maczka

Dear Ms. Maczka:

This letter will serve to confirm the offer of an employment opportunity with Sooner National Property Management, LP as a Leasing Agent, beginning , March 15, 2015. Your employer is Sooner National Property Management, LP.

Sooner National Property Management, LP has offered to compensate you at an annual rate of [REDACTED]. You will be paid on the 15<sup>th</sup> and last day of the month. You will receive a performance and compensation review during the first year, and annually thereafter. The annual reviews may be timed to coincide with the calendar year, the property's budget cycle, or the date of the last review.

In addition to your direction compensation, as an employee you will be eligible to receive other benefits of employment with Sooner Management, LLC. Among them are:

1. You are eligible for additional benefits including paid time off and enrollment in the company 401K plan after the required waiting period.
2. You are eligible for health, vision, and dental insurance April 1, 2015.
3. Discretionary and year end bonuses will be paid based upon performance and property success.
4. We are pleased to offer you a signing bonus of [REDACTED]. This bonus will be paid in one lump sum in a separate check on March 15, 2015. The signing bonus is taxable, and all regular payroll taxes will be withheld. In the event that you leave Sooner National Property Management within 12 months of your date of hire, you will be responsible for reimbursing the company for the entire signing bonus.

Your continued employment with Sooner National Property Management, LP is contingent upon your providing satisfactory proof of your identity and legal authorization to work in the United States. If you fail to submit this proof within three (3) days of the commencement of your employment, Federal Law requires Sooner National Property Management, LP to terminate your employment. To fulfill Federal requirements, please bring two of the following pieces of identification with you: birth certificate, current passport, drivers' license, or social security card.

Laura, we are extremely pleased to have you join our team and look forward to working with you. Welcome!

Sincerely,



Jill Jefferson  
Human Resources

ACCEPTED:  
Laura Maczka  
Date:

# SOONER NATIONAL

Property Management L.P.

---

March 2, 2015

Ms. Laura Maczka

Dear Ms. Maczka:

This letter will serve to confirm the offer of an employment opportunity with Sooner National Property Management, LP as a Leasing Agent, beginning April 1, 2015. Your employer is Sooner National Property Management, LP.

Sooner National Property Management, LP has offered to compensate you at an annual rate of [REDACTED]. You will be paid on the 15<sup>th</sup> and last day of the month. You will receive a performance and compensation review during the first year, and annually thereafter. The annual reviews may be timed to coincide with the calendar year, the property's budget cycle, or the date of the last review.

In addition to your direction compensation, as an employee you will be eligible to receive other benefits of employment with Sooner Management, LLC. Among them are:

1. You are eligible for additional benefits including paid time off and enrollment in the company 401K plan after the required waiting period.
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3. Discretionary and year end bonuses will be paid based upon performance and property success.
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Your continued employment with Sooner National Property Management, LP is contingent upon your providing satisfactory proof of your identity and legal authorization to work in the United States. If you fail to submit this proof within three (3) days of the commencement of your employment, Federal Law requires Sooner National Property Management, LP to terminate your employment. To fulfill Federal requirements, please bring two of the following pieces of identification with you: birth certificate, current passport, drivers' license, or social security card.

Laura, we are extremely pleased to have you join our team and look forward to working with you. Welcome!

Sincerely,



Mark Jordan  
President

ACCEPTED:  
Laura Maczka  
Date:

## Kristi Howard

---

**From:** don.magner@cor.gov  
**Sent:** Tuesday, April 21, 2015 7:26 AM  
**To:** George Staples  
**Cc:** Dean Roggia; Pete Smith  
**Subject:** Re: Ethics investigation

George

I received confirmation last night that no emails exist. IT conducted a thorough search of the appropriate mailboxes.

Thanks,

Don Magner  
Assistant City Manager  
City of Richardson

Composed on a handheld device

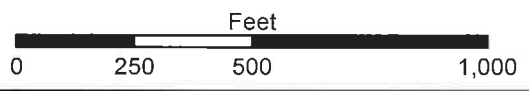
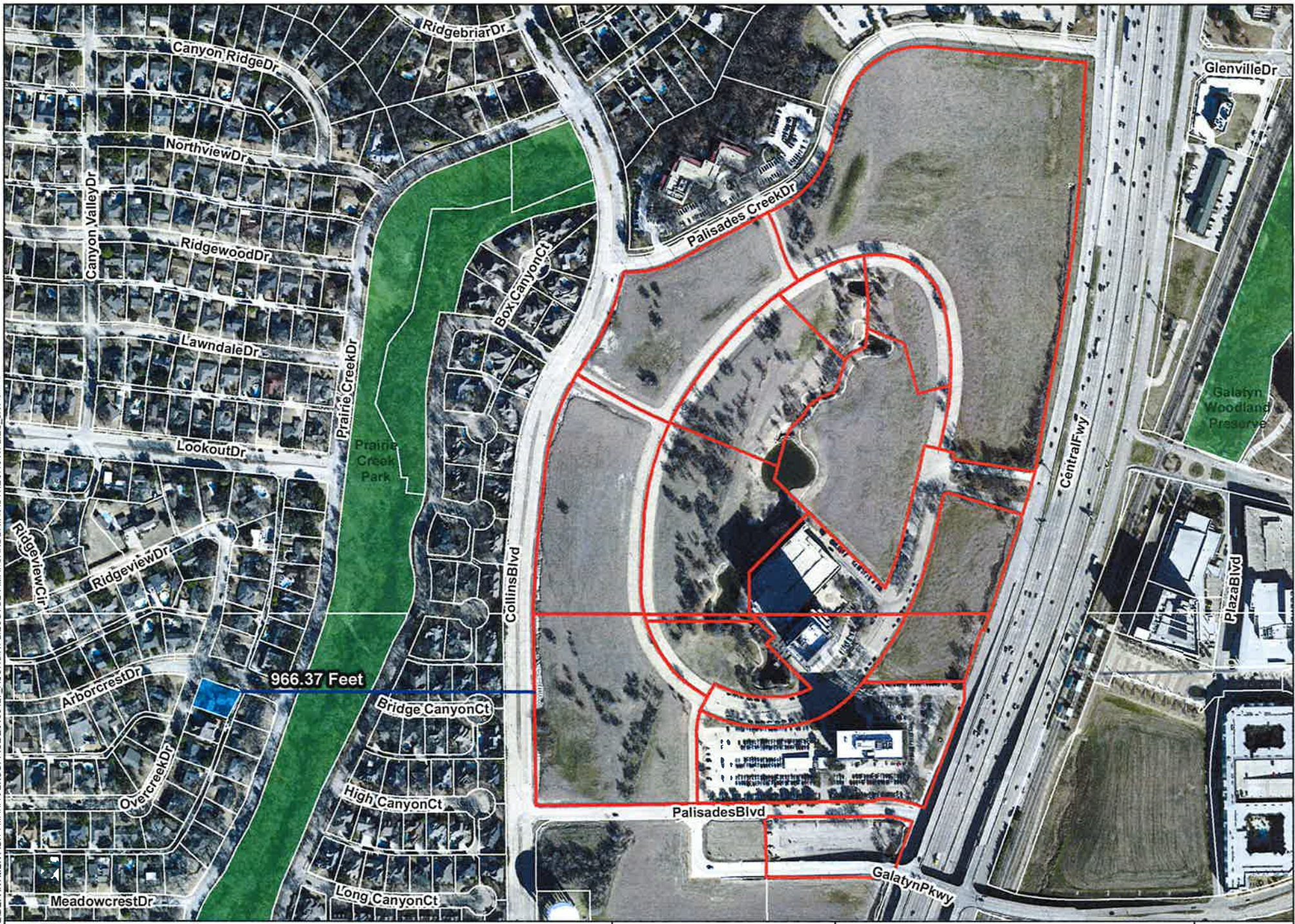
On Apr 21, 2015, at 7:02 AM, George Staples <[gstaples@toase.com](mailto:gstaples@toase.com)> wrote:

Please email me and tell me whether there were any emails from Mayor Maczka to the city manager or staff concerning the economic development agreement with the Palisades developer or owner during calendar 2015 and if there were, provide me copies. I need to reference this in my report which will be finished today or tomorrow.

<M2.jpg>  
George Staples  
6000 Western Place, Suite 200  
Fort Worth, Texas 76107  
817 806 5222  
817 319 3962 (cell)  
817 427 6042 (NRH)  
817 332 4740 (fax)

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### As The Crow Flies Study

Legend	
	Mayor's Home
	JP-Palisades Owned Parcels

April 2015