

**INSTRUCTIONS FOR COMPLETING
THE CITY OF PHILADELPHIA STATEMENT OF FINANCIAL INTERESTS (“CITY FORM”)**

GENERAL INSTRUCTIONS

Who Must File

All officials who now hold, or at any time during the current or the previous calendar year held, the following positions are required to file a statement setting forth all financial interests held during the previous calendar year:

Mayor	Director of Commerce
City Councilmembers	Fire Commissioner
Managing Director	Personnel Director
Director of Finance	Procurement Commissioner
City Solicitor	City Treasurer
Water Commissioner	Commissioner of Records
Streets Commissioner	City Controller
Human Services Commissioner	Sheriff
Health Commissioner	City Representative
Police Commissioner	District Attorney
Revenue Commissioner	City Commissioners
Commissioner of Licenses & Inspections	City Board and Commission Members (and alternates), whether or not compensated
Parks & Recreation Commissioner	
Commissioner of Public Property	

When and Where To File

A Statement of Financial Interests must be filed with the Philadelphia Board of Ethics **no later than May 1 of each year you hold office and of the year after you leave office** or within 30 days of being appointed to office if you are appointed after April 1 of any calendar year. The City Form may be filed electronically at <https://fds.phila-records.com/FDS/FDLogin.aspx>.

A paper version of the City Form is also available on the Board of Ethics [website](#), or may be obtained by calling the Board at 215-686-9450. If you file a paper form, sign and date the form, and mail or deliver it to Financial Disclosure Statements, c/o Department of Records, Room 156, City Hall, Philadelphia, PA 19107 by 5 p.m. on May 1. Do **not** file the City Form with the State Ethics Commission or the Philadelphia County Board of Elections.

General Information

1. You must address each disclosure category. You must disclose the financial interests held by you at any time during the previous calendar year. Do not leave blanks. If no financial interest exists or the category does not apply, you should check the box where indicated. If the same financial interest is required to be disclosed in more than one category, cross references are acceptable.

2. As used in these instructions, “**business**” means any corporation, partnership, sole proprietorship,

firm, enterprise, franchise, association, organization, self-employed individual, holding company, joint stock company, receivership, trust or legal entity organized for profit.

3. You have “**received**” payment or property if (a) you actually received it during the previous calendar year; (b) it was paid or given to another on your behalf during the previous calendar year; or (c) during the previous calendar year, you earned the right to receive it.

4. If you file a paper form, additional sheets may be attached to the City Form if more space is required. Also, please sign and date the form, and fill in the blank indicating the prior calendar year to which the City Form is applicable.

INSTRUCTIONS FOR COMPLETING THE CITY FORM

If this is an amended statement, please check the corresponding box on the form.

SPECIFIC CATEGORIES OF DISCLOSURE *(Numbers Correspond to Numbers on the Form)*

1 – 5. You must list your full name, address, all City positions or offices you hold/held and your occupation or profession. You do not need to list your home address. You may use your City Department, Board, or Commission address.

6. Real estate interests

A. Disclose an interest in real estate only if it was subject to the interactions with the City described below. Specifically, you are required to disclose a direct or indirect interest in real estate that you held during the previous calendar year that was:

- (1) sold or leased to the City of Philadelphia or any of its departments, boards, commissions, authorities or other agencies;
- (2) purchased or leased from the City of Philadelphia or any of its departments, boards, commissions, authorities or other agencies; or
- (3) subject to any condemnation proceeding by the City of Philadelphia or any of its departments, boards, commissions, authorities or other agencies.

B. The disclosure shall specify the address and the nature of the interest held.

C. A real estate interest includes, but is not limited to, ownership by title, option or sales agreement, easement or constructive ownership or as a trustee or trustor (*creator of a trust*).

D. For purposes of this reporting requirement, you have held an indirect interest in real estate that must be disclosed if you held an interest in any business entity, the assets of which are 80 percent or more in real property that was subject to the interactions with the City described above.

7. Creditors

A. You are required to disclose the name and address of each creditor to whom you owed in excess of \$5,000 at any time during the previous calendar year and the interest rate thereon, except that

you do not have to disclose any mortgages on your principal residence.

B. You are not required to disclose loans or credit extended to you by members of your immediate family, including your spouse or life partner, parents, children, brothers, sisters, and like relatives-in-law.

8. Sources of income

A. You are required to disclose by name and address all direct and indirect sources of income from which you received a total of \$500 or more in money or value during the previous calendar year. Income includes any money or thing of value received, or to be received, for services or as compensation. It includes investment and business income. Examples of reportable income include a fee, salary, expense, allowance, forbearance, forgiveness, interest, dividend, royalty, rent, and capital gains. Be sure to include the City of Philadelphia as a source, if applicable.

B. **Securities Income:** If you received income of \$500 or more from securities held in a particular business, the name and address of the business must be identified as the source of that income. For each business in which securities are held, the \$500 threshold must be determined by adding both capital gains and dividends received without subtracting any losses attributable to the securities.

C. **Mutual Fund Income:** If you received income of \$500 or more from any mutual fund, only the name and address of the mutual fund need to be disclosed. You are not required to disclose the individual investments of the mutual fund.

D. **Trust Income:** If you received income of \$500 or more as the beneficiary of a trust, you must disclose as a source of that income the name and address of the trust.

E. **Business Income:** If you received income of \$500 or more from a business, you are generally required to disclose only the name and address of the business. If in addition to your salary a business gives you a bonus, commission, referral fee, or some other method of payment of \$500 or more that is attributable to fees or payments received from specific clients, customers, or patients, these must be disclosed as sources of income.

If disclosure of the identity of a client, customer or patient would reveal information that is confidential pursuant to law or a code of professional ethics, such disclosure is not required. You may, by letter to the Board of Ethics and accompanying the Statement of Financial Interests, indicate that certain information has not been disclosed and explain why the information must be kept confidential.

9. Gifts

A. You are required to disclose the name and address of any individual or organization that gave you gifts during the prior calendar year that were worth \$200 or more in the aggregate. For example, if during the year the same person treated you to eight \$25 lunches, that total gift of \$200 must be reported. For each gift you must disclose the name and address of the source as well as the value and the circumstances of the gift.

B. You are **not** required to disclose gifts you received from your spouse or life partner or from the following relatives of either you or your spouse or life partner: parents, children, brothers, sisters, grandparents, grandchildren, great-grandparents, great-grandchildren, siblings of parents, children of siblings, and the spouses or life partners of any of these relatives.

C. Gifts include anything of value, such as services, loans, entertainment, meals, tickets to sporting events, flowers, etc. Gifts also include any transaction in which the amount of money or property value you receive exceeds the money or property value that you paid or exchanged. For example, if you sold someone property which, at the time of the sale, had a fair market value of \$200, and you received \$500, you must report the transaction as a gift in the amount of \$300. For purposes of this reporting requirement, gifts do not include a political contribution received by you that is otherwise reportable as required by law or a commercially reasonable loan made to you in the ordinary course of business.

10. Honoraria

A. You are required to disclose each source from which you received an honorarium in excess of \$100 during the previous calendar year.

B. An honorarium is a gratuitous payment for services as distinguished from owed compensation for services

11. Office, directorship or employment in any business entity, including non-profits

You are required to disclose any office, directorship or employment of any nature held in any non-profit or for-profit business entity, regardless of whether the entity actually made any profit during the previous calendar year.

12. Financial interest in any legal entity engaged in business for profit

A. You are required to disclose any financial interest held by you, regardless of the percentage of your holdings, in any legal entity engaged in business for profit, regardless of whether the entity actually made any profit during the previous calendar year.

B. Financial interests include interests held by you in either the equity (e.g., stock) or in the indebtedness (e.g., bonds, mortgages, loans) of a business.

PENALTIES

Making inaccurate or incomplete disclosures or failing to file your City Form by May 1 of each year you hold office and of the year after you leave office, or within 30 days of being appointed to office if appointed after April 1 of any calendar year, is a violation of Section 20-610 of the Philadelphia Code and may subject you to enforcement and civil monetary penalties.

INFORMATION

If you have any questions regarding the interpretation of a particular line of the City Form or for other legal advice concerning the City's Financial Disclosure requirement, please call the Board of Ethics at (215) 686-9450.