

Independent Ethics Commission – Formal Complaint Form

Before the Independent Ethics Commission
of the State of Colorado

For Commission Use Only

Received date: 21-Dec-2021

Case. No.: 21-31

The Complainant is: Defend Colorado

(name)

Mailing Address: 9615 E County Line Rd, Ste B-294

Centennial, CO 80112

Daytime telephone number: _____

Email address: Defend@defendcolo.org

The Respondent is: Dan Gibbs

(name)

Mailing Address: 1313 Sherman St. #718

Denver, CO 80203

Daytime telephone number: 303-866-3311

Email address: dan.gibbs@state.co.us

When did the alleged violation occur: April 22, 2021


Describe the specific acts or things complained of, with facts that provide a full understanding of the alleged violation(s). If possible, cite the specific ethical standards alleged to have been violated and describe how the violation(s) occurred. Use additional pages if necessary. Attach any documentary evidence you wish to submit.

Please see attached complaint and exhibits.

Description of acts or things complained of (continued):

Advisement regarding remedies and penalties: Pursuant to Colo. Const. art. XXIX, § 6, a covered individual found to have breached the public trust for private gain is liable for double the amount of the financial equivalent of any benefits obtained by such actions. The manner of recovery and additional penalties may be provided by law. The Commission does not assess criminal penalties, award injunctive relief, or award damages to complainants.

I hereby acknowledge that the facts presented herein are true to the best of my knowledge, and I will cooperate in the process regarding this complaint and will appear at any proceeding of the Independent Ethics Commission if the complaint is scheduled for a hearing.

Signature: 

Attorney (if applicable): George Brauchler

Dated at Denver (City), Colorado, this 21 day of December, 2021.

Created by Article XXIX of the Colorado Constitution, the Independent Ethics Commission may review and hold hearings on matters falling within its jurisdiction as outlined in Article XXIX.



December 21, 2021

Colorado Ethics Commission
1300 Broadway, Suite 240
Denver, Co. 80203

Commissioners:

This Complaint is filed on behalf of Defend Colorado and provides specific evidence demonstrating that Dan Gibbs (Gibbs), Executive Director of the Colorado Department of Natural Resources, violated Article XXIX of the Colorado Constitution ("Amendment 41") and specific state statutes and regulations related to ethics and financial improprieties.

Specifically, while serving as the Executive Director of the Colorado Department of Natural Resources, Gibbs directed a state contract award worth nearly \$500,000 to his wife's employer and failed to disclose the conflict of interest as required by law. Instead, Gibbs filed false Conflict of Interest Disclosures stating that his Department has not retained a consultant or contractor in which a member of his immediate family is employed. As a result of this conduct, Gibbs has violated specific provisions of the state constitution and state statutes.

This Complaint is timely, non-frivolous, qualifies under the jurisdiction of the Colorado Independent Ethics Commission (the "Commission"), and documents conclusive violations of Amendment 41 and C.R.S. §§ 24-18-103, 24-18-105, 24-18-108, and 24-18-201.

I. Commission Jurisdiction

The Commission has jurisdiction over both the person and the subject matter of the Complaint.

Personal: pursuant to Article XXIX of the Colorado Constitution, the Commission has jurisdiction over employees of the executive branch. At all times relevant to this complaint, Dan Gibbs was an employee of the executive branch of the State of Colorado as defined by Colo. Const. art. XXIX, §2(1) and CRS §24-18-102(3).

Subject Matter: pursuant to Article XXIX, Section 3, the Commission has jurisdiction over violations of Colorado's code of ethics, as codified at CRS §§ 24-18-103, 24-18-105, 24-18-108, and 24-18-201. Here, the allegations are that Dan Gibbs, an executive branch employee oversaw an agency that granted to his wife's employer a contract of nearly \$500,000 without disclosing such personal interest or conflict of interest.

II. Summary of Violations

Gibbs, in his role as a state employee - Executive Director of the Colorado Department of Natural Resources - breached his fiduciary duty to the State of Colorado by overseeing the awarding of a



contract from the State of Colorado to his wife's employer, while failing to disclose the conflict of interest and, further, denying the same. Such conduct violated multiple provisions of law specifically designed to prevent such conflicts of interest, self-dealing, and violations of public trust in state government.

III. Summary of Facts

Gibbs is the Executive Director of the Colorado Department of Natural Resources. Colorado Parks and Wildlife is an agency of the Colorado Department of Natural Resources.

Gibbs' wife, Johanna Raquet Gibbs, is a senior policy director for Keystone Policy Center. (Staff Roster for Keystone Policy Center attached as **Exhibit A**).

On April 22, 2021, Colorado Parks and Wildlife awarded a \$496,000 contract to Johanna Raquet Gibbs' employer, Keystone Policy Center. The contract was for services related to public outreach on wolf reintroduction in Colorado.

Keystone Policy Center was not the lowest bidder for that contract. The second-place bidder, CDR Associates, bid \$270,000, 45% lower than the bid by Johanna Raquet Gibbs' employer. (Selection Memo attached as **Exhibit B**).

Since July 2019, the Colorado Department of Natural Resources has paid Keystone Policy Center over \$230,000 in state funds according to fiscal records made available by the state. (Colorado's Transparency Online Project documentation attached as **Exhibit C**).

Gibbs never disclosed any personal interest or conflict of interest related to his wife's employer receiving a \$496,000 contract from his Department. In fact, Gibbs filed mandatory conflict of interest statements that omit this clear conflict of interest. Members of the Governor's cabinet, like Gibbs, are required to fill out an annual Conflict of Interest Disclosure Form. The form contains the following specific question:

Are you, or is a member of your immediate family, an officer, director, trustee, partner, (general or limited), employee or regularly retained consultant of any company, firm, organization, or municipality which might reasonably be expected to have business dealings with the Governor's Office or your department/agency in the coming year?

In 2020 and 2021, Mr. Gibbs answered "No." to this specific question. (Gibbs Completed Conflict of Interest Disclosure Forms attached as **Exhibit D**). The ethics affirmation that Gibbs provided in both 2020 and 2021 were false based on the fact that his wife's employer in fact received a \$496,000 contract from his Department.

The still-undisclosed relationship between Gibbs, as Executive Director of the Colorado Department of Natural Resources, and his wife, Johanna Raquet Gibbs, who was employed by a



vendor who does regular business with Gibbs' Department creates both an actual conflict of interest and an unequivocal appearance of impropriety.

Additionally, as a senior policy director at Keystone Policy Center, Johanna Raquet Gibbs almost certainly rendered services that Gibbs was ultimately responsible for directing, supervising, reviewing, and evaluating.

Not only did Gibbs file inaccurate Conflict of Interest Disclosure Forms based on his Department's retention of his wife's employer, but this arrangement also violated CRS § 24-18-105(5) which specifically provides "Public officers, local government officials, and employees are discouraged from assisting or enabling members of their immediate family in obtaining employment, a gift of substantial value, or an economic benefit tantamount to a gift of substantial value from a person whom the officer, official, or employee is in a position to reward with official action or has rewarded with official action in the past."

IV. Statutory and Constitutional Violations

A. CRS § 24-18-108. Rules of conduct for public officers and state employees:

C.R.S. § 24-18-108 requires that each public officer and state employee shall comport with basic fiduciary duties. Specifically, it provides that:

[a] public officer or a state employee shall not:

- (a) Engage in a substantial financial transaction for his private business purposes with a person whom he inspects, regulates, or supervises in the course of his official duties;
- (b) Assist any person for a fee or other compensation in obtaining any contract, claim, license, or other economic benefit from his agency;
- (c) Assist any person for a contingent fee in obtaining any contract, claim, license, or other economic benefit from any state agency; or
- (d) *Perform an official act directly and substantially affecting to its economic benefit a business or other undertaking in which he either has a substantial financial interest or is engaged as counsel, consultant, representative, or agent.*

C.R.S. § 24-18-108(2) (*emphasis added*).

Gibbs was a state employee who oversaw the awarding of a nearly \$500,000 contract—an economic benefit—to his wife's employer, an employer who was not the lowest bidder to the significant state contract.



B. CRS § 24-18-201(1): Interests in contracts

CRS § 24-18-201(1) prohibits a state employee from being involved with a self-dealing contract. Specifically, it provides that:

(1) ... public officers...or employees shall not be interested in any contract made by them in their official capacity or by any body, agency, or board of which they are members or employees. Here, Gibbs' interest is obvious: his wife's employer received a near-half-million dollar contract from the agency he oversees.

CRS § 24-18-201(1)(b)(I) provides a definitional exception for contracts "awarded to the lowest responsible bidder based on competitive bidding procedures." That is inapplicable here, as the lowest bid was 46% lower than the bid made by Dan Gibbs' wife's company. Nonetheless, Ms. Gibbs' employer was awarded the contract by Mr. Gibbs' agency.

C. CRS § 24-18-105: Ethical Principles

CRS § 24-18-105 sets out guidance for ethical conduct by officials and employees. Specifically, it provides:

(2) A public officer, a local government official, or an employee should not acquire or hold an interest in any business or undertaking which he has reason to believe may be directly and substantially affected to its economic benefit by official action to be taken by an agency over which he has substantive authority.

(5) Public officers, local government officials, and employees are discouraged from assisting or enabling members of their immediate family in obtaining employment, a gift of substantial value, or an economic benefit tantamount to a gift of substantial value from a person whom the officer, official, or employee is in a position to reward with official action or has rewarded with official action in the past.

Here, Gibbs violated the law by awarding a significant state contract controlled a member of his immediate family, through her employer.

D. CRS § 24-18-103: Public Trust

CRS § 24-18-103 establishes the standard for a breach of fiduciary duty. Specifically, it provides:

(1) The holding of public office or employment is a public trust, created by the confidence which the electorate reposes in the integrity of public officers, members of the general assembly, local government officials, and employees. A



public officer, member of the general assembly, local government official, or employee shall carry out his duties for the benefit of the people of the state.

In overseeing the awarding of the contract to his wife's company—at considerable additional expense (nearly 50% more) compared to the lowest bidder – and choosing not to disclose the clear conflict of interest as required, Gibbs breached his fiduciary duty to the State of Colorado.

E. Gibbs Violated Provisions of the Colorado Constitution.

Article XXIX, Section 1 of Colorado's Constitution states that the public should have respect for and confidence in public employees, who should "avoid conduct that is in violation of their public trust or that creates a justifiable impression among members of the public that such trust is being violated." Article XXIX, section 1 provides:

The people of the state of Colorado hereby find and declare that: (a) The conduct of public officers, members of the general assembly, local government officials, and government employees must hold the respect and confidence of the people; (b) They shall carry out their duties for the benefit of the people of the state; (c) They shall, therefore, avoid conduct that is in violation of their public trust or that creates a justifiable impression among members of the public that such trust is being violated; (d) Any effort to realize personal financial gain through public office other than compensation provided by law is a violation of that trust; and (e) To ensure propriety and to preserve public confidence, they must have the benefit of specific standards to guide their conduct, and of a penalty mechanism to enforce those standards.

Gibbs' is the Executive Director of the state agency that awarded his wife's employer a \$500,000 contract. This action is a violation of "public trust" and creates an impression that such trust has been violated. The "specific standards to guide their conduct" included a requirement that Gibbs publicly disclose this financial transaction on an annual Conflict of Interest Disclosure Form. Gibbs chose not to disclose the fact that his Department retained a company in which his wife is employed in clear violation of these standards.

V. Conclusion

Colorado has specific provisions of law governing ethical conduct by state public officials. These laws are designed to stringently maintain public trust in government. Having a Director of a state agency award a \$496,000 contract to his wife's employer, over a competing bid that was nearly 50% lower, and refusing to publicly disclose this clear conflict of interest, specifically violates multiple provisions of the Colorado Constitution, state statute, state regulations, and the Governor's Office Executive Orders. This Complaint provides clear evidence of these violations for a Commission investigation and ruling.



Thank you for your attention and review of this matter

Sincerely,

A handwritten signature in black ink, appearing to read "GB", written over the word "Sincerely,".

George Brauchler

Exhibits

Exhibit A

Staff Roster for Keystone Policy Center



Bio

Over the past 15 years at Keystone, Johanna's work has focused primarily on projects related to public health and preparedness, emerging technologies, and leadership development. She has worked with diverse groups of federal, state, and local agencies as well as the private sector, citizens, and advocates to help build common understanding, forge new partnerships, and work to build shared solutions to complex problems. Her projects have ranged from large and small public involvement processes to consensus-based stakeholder groups and international summits. Johanna has designed and led engagement processes across the country in partnership with local communities and stakeholders to bring community voices to bear in policy discussions and decision-making on issues including pandemic planning and scarce resource allocation, vector control, vaccine safety, and national public health goals.

Johanna Raquet Gibbs
Senior Policy Director



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3 days ago



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Abramson
Senior Policy
Director &
Director,
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Program



Sarah Stokes
Alexander
Vice President,
Programs

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Kim Andersen
Coordinator,
Strategic
Partnerships



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Brianna
Brumbaugh
Program
Coordinator &
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Office Manager



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Communications
and Marketing,
Policy Director



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Yesica Chavez
Policy Fellow



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Yoni Dobie-
Geffen
Senior Policy
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Trace Faust
Senior Project
Director



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Jonathan
Geurts
Senior Project
Manager



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Johanna
Raquet Gibbs
Senior Project
Director



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Millie Hamner
Senior Policy
Director



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Rachel Helbig
Policy Fellow



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Ernest House
Senior Policy
Director &
Director,
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Indian/Alaska
Native Program



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Mallory
Huggins
Senior Project
Director &
Director of the
Keystone
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Celia Johnson
Controller



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Matthew
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Cally King
Newman
Senior Project
Manager



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Judy O'Brien
Director,
Development
and Strategic
Partnerships



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Christine M.
Scanlan
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Julie Shapiro
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Director,
Natural
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Emerging
Technologies
Program



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Brad Sperber
Senior Policy
Director &
Director,
Leadership &
Capacity
Building
Program



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Jonathan
Tyrrell
Policy Fellow



[Biography](#)



Tori Thompson
Project
Manager



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Sue Wilcox
Vice President,
Business &
Administration



[Biography](#)



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So far we've conducted listening sessions with teachers, parents, community orgs, & students. Our next listening se...
[twitter.com/i/web/status/1...](#)
5 hours ago



Principals and school admin - Join us tomorrow, Wednesday,

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July 14, to
make your
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Exhibit B
Project Selection Memo

REQUEST FOR PROPOSALS SELECTION MEMORANDUM
Project Management and Facilitation of a Wolf Restoration and Management Plan Public Outreach
For the Division of Colorado Parks and Wildlife
RFP PMAA 2021*009

In section 5.0, Evaluation and Award of the Request for Proposals (RFP PMAA 2021*009) for the **Project Management and Facilitation of a Wolf Restoration and Management Plan Public Outreach for the Division of Colorado Parks and Wildlife**, the evaluation factors for award of this contract are as follows:

- 5.2 Proposal Form/VSS Registration/Location of project work/Bidder Preferences (Pass/Fail)**
- 5.3 Qualifications and Experience**
- 5.4 Staff**
- 5.5. Planning Process Approach**
- 5.6 Schedule**
- 5.7 Writing Samples**
- 5.8 Price**

Background

Seven proposals were received and all proposals were responsive and received a passing score on section 5.2. Initial requests were reviewed and scored by the Evaluation Team in detail. Four firms: Meridian Institute, Keystone Policy Center, Wellstone Strategies, and CDR Associates were determined to be in the competitive range due to their strong proposals, straightforward approaches and experienced local staff. All four were asked clarifying questions and invited to give presentations to the Evaluation Team, the Director of the Division of Parks and Wildlife and the Chair of the Colorado Parks and Wildlife Commission.

After presentations and question and answer sessions with the four proposals in the competitive range, the Evaluation Team submitted an analysis to the Director and Chair for their decision:

Keystone Policy Center

PRICE - \$496,000

PROS

- Solid proposal and presentation given - perhaps the most specific and detailed of all those given
- Well established Western Slope presence
- Strong team members
- Price - reasonable, seems feasible, and a good value to State
- Well-structured plan/approach

CDR Associates

PRICE - \$270,000

PROS

- Well thought out/structured plan
- Not a ton of detail in plan, but this might be a benefit to CPW as it would allow for more input in the approach design
- “Well polished” during presentation

Wellstone Strategies

PRICE - \$741,651.12

PROS

- All team members seemed passionate about the project and have relevant experience
- It could be helpful to the process to have a wildlife biologist with human dimensions experience leading the technical group. These skill sets could help bridge understanding between the technical group and the stakeholder advisory group.
- The organizational design could provide a variety of perspectives and each person represents their own company and approach.

Meridian

PRICE - \$1,411,352

PROS

- Familiarity with wolf topics and stakeholders from facilitating the 2004-2005 wolf process
- Colorado based company with the staff resources to do this work

Rationale for Selection

The proposal of Keystone Policy Center was determined to be the most advantageous to the state based upon the evaluation criteria set forth in the request for proposals. Keystone's experience was relevant and included past experience with contentious issues in Colorado. Their staff had excellent experience. The approach was high quality and included ways to include diverse voices in the process. The schedule allows CPW to meet required deadlines and reports were well-written. The price offered a good value to the State of Colorado.

This determination was approved by all members of the Evaluation Committee on

Katie Lanter	Reid DeWalt
Jeff Ver Steeg	Dave Klute
Lauren Truitt	Bill deVergie

Purchasing Agent: Jeanette Barrow

Exhibit C

Colorado Transparency Online Project Documentation

Entity Name	Fiscal Year	Fiscal Period	Journal Date	Type	Vendor Legal Name - Not Redacted	Vendor Invoice
State of Colorado	2019	201912	7/8/2019	Expenditure	KEystone CENTER (VC00000000013274)	3201.0000-0000001
State of Colorado	2020	202003	9/12/2019	Expenditure	KEystone CENTER (VC00000000013274)	3201.0000-0000002
State of Colorado	2020	202004	10/8/2019	Expenditure	KEystone CENTER (VC00000000013274)	3201.0000-0000003
State of Colorado	2020	202005	11/1/2019	Expenditure	KEystone CENTER (VC00000000013274)	3201.0000-0000004
State of Colorado	2020	202006	12/10/2019	Expenditure	KEystone CENTER (VC00000000013274)	3201.0000-0000005
State of Colorado	2020	202006	12/26/2019	Expenditure	KEystone CENTER (VC00000000013274)	3201.0000-0000006
State of Colorado	2020	202007	1/31/2020	Expenditure	KEystone CENTER (VC00000000013274)	3201.0000-0000007
State of Colorado	2020	202008	2/26/2020	Expenditure	KEystone CENTER (VC00000000013274)	3201.0000-0000008
State of Colorado	2020	202009	3/25/2020	Expenditure	KEystone CENTER (VC00000000013274)	3201.0000-0000009
State of Colorado	2020	202010	4/29/2020	Expenditure	KEystone CENTER (VC00000000013274)	3201.0000 - 0000010
State of Colorado	2020	202010	4/30/2020	Expenditure	KEystone CENTER (VC00000000013274)	3198.0000-0000018
State of Colorado	2020	202011	5/19/2020	Expenditure	KEystone CENTER (VC00000000013274)	3198.0000-0000019
State of Colorado	2020	202012	6/22/2020	Expenditure	KEystone CENTER (VC00000000013274)	3198.0000-0000020
State of Colorado	2020	202012	7/1/2020	Expenditure	KEystone CENTER (VC00000000013274)	3201.0000 - 0000011
State of Colorado	2021	202104	10/21/2020	Expenditure	KEystone CENTER (VC00000000013274)	3198.0000-0000025
State of Colorado	2021	202104	10/21/2020	Expenditure	KEystone CENTER (VC00000000013274)	3198.0000-0000023
State of Colorado	2021	202106	12/14/2020	Expenditure	KEystone CENTER (VC00000000013274)	3198.0100-0000001
State of Colorado	2021	202107	1/15/2021	Expenditure	KEystone CENTER (VC00000000013274)	1 B
State of Colorado	2021	202108	2/18/2021	Expenditure	KEystone CENTER (VC00000000013274)	2 B
State of Colorado	2021	202110	4/12/2021	Expenditure	KEystone CENTER (VC00000000013274)	3198.0100-0000002
State of Colorado	2021	202110	4/12/2021	Expenditure	KEystone CENTER (VC00000000013274)	3198.0100-0000003
State of Colorado	2021	202110	4/12/2021	Expenditure	KEystone CENTER (VC00000000013274)	3198.0100-0000004
State of Colorado	2021	202110	4/14/2021	Expenditure	KEystone CENTER (VC00000000013274)	3B
State of Colorado	2021	202110	4/26/2021	Expenditure	KEystone CENTER (VC00000000013274)	3198.0100-0000005
State of Colorado	2021	202111	5/13/2021	Expenditure	KEystone CENTER (VC00000000013274)	4B
State of Colorado	2021	202111	5/20/2021	Expenditure	KEystone CENTER (VC00000000013274)	3198.0100-0000006
State of Colorado	2021	202112	6/22/2021	Expenditure	KEystone CENTER (VC00000000013274)	3198.0100-0000007
State of Colorado	2021	202112	6/25/2021	Expenditure	KEystone CENTER (VC00000000013274)	3208.0000 - 0000001
State of Colorado	2021	202112	6/25/2021	Expenditure	KEystone CENTER (VC00000000013274)	3208.0000 - 0000001
State of Colorado	2021	202112	7/2/2021	Expenditure	KEystone CENTER (VC00000000013274)	3208.0000 - 0000002
State of Colorado	2021	202112	7/2/2021	Expenditure	KEystone CENTER (VC00000000013274)	3208.0000 - 0000002
State of Colorado	2021	202112	7/7/2021	Expenditure	KEystone CENTER (VC00000000013274)	3198.0100-0000008

Commodity Description	Cabinet
CONSULTING SERVICES (91800)	Dept of Natural Resources (P)
CONSULTING SERVICES (91800)	Dept of Natural Resources (P)
CONSULTING SERVICES (91800)	Dept of Natural Resources (P)
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CONSULTING SERVICES (91800)	Dept of Natural Resources (P)
NOT ENTERED	Dept of Natural Resources (P)
NOT ENTERED	Dept of Natural Resources (P)
NOT ENTERED	Dept of Natural Resources (P)
CONSULTING SERVICES (91800)	Dept of Natural Resources (P)
NOT ENTERED	Dept of Natural Resources (P)
NOT ENTERED	Dept of Natural Resources (P)
MISCELLANEOUS SERVICES, NO. 2 (NOT OTHERWISE CLASSIFIED) (96200)	Dept of Natural Resources (P)
Grant Commodity (G1000)	Dept of Natural Resources (P)
Grant Commodity (G1000)	Dept of Natural Resources (P)
MISCELLANEOUS SERVICES, NO. 2 (NOT OTHERWISE CLASSIFIED) (96200)	Dept of Natural Resources (P)
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MISCELLANEOUS SERVICES, NO. 2 (NOT OTHERWISE CLASSIFIED) (96200)	Dept of Natural Resources (P)
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MISCELLANEOUS SERVICES, NO. 2 (NOT OTHERWISE CLASSIFIED) (96200)	Dept of Natural Resources (P)
CONSULTING SERVICES (918)	Dept of Natural Resources (P)
CONSULTING SERVICES (918)	Dept of Natural Resources (P)
CONSULTING SERVICES (918)	Dept of Natural Resources (P)
CONSULTING SERVICES (918)	Dept of Natural Resources (P)
MISCELLANEOUS SERVICES, NO. 2 (NOT OTHERWISE CLASSIFIED) (96200)	Dept of Natural Resources (P)

[illegible]

[illegible]

[illegible]

[illegible]

Account Category	Account Name	Jrnl Doc Code
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
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Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Purchased Services (2820)	General Accounting Expense/Expenditure (GAX)
Operating and Travel (OE02)	Purchased Services (2820)	General Accounting Expense/Expenditure (GAX)
Operating and Travel (OE02)	Purchased Services (2820)	General Accounting Expense/Expenditure (GAX)
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Purchased Services (2820)	General Accounting Expense/Expenditure (GAX)
Operating and Travel (OE02)	Purchased Services (2820)	General Accounting Expense/Expenditure (GAX)
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Grants To Nongovernmental Organizations (5781)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Grants To Nongovernmental Organizations (5781)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Grants To Nongovernmental Organizations (5781)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Grants To Nongovernmental Organizations (5781)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)
Salaries and Benefits (OE01)	Personal Services - Professional (1920)	Matching PR - Normal (PRM)
Salaries and Benefits (OE01)	Personal Services - Professional (1920)	Matching PR - Normal (PRM)
Salaries and Benefits (OE01)	Personal Services - Professional (1920)	Matching PR - Normal (PRM)
Salaries and Benefits (OE01)	Personal Services - Professional (1920)	Matching PR - Normal (PRM)
Operating and Travel (OE02)	Purchased Services (2820)	Matching PR - Normal (PRM)

Jrnl Doc (Code,Dept,ID,Vers)	Record ID	Amount	Budgeted
PRM,PMAA,20200000000000001849,1	SOC-CORE211769115	22,723	Yes
PRM,PMAA,202000000000000014233,1	SOC-CORE219657400	11,000	Yes
PRM,PMAA,202000000000000018812,1	SOC-CORE221610641	11,000	Yes
PRM,PMAA,202000000000000023095,1	SOC-CORE224430116	11,000	Yes
PRM,PMAA,202000000000000029359,1	SOC-CORE227840371	11,000	Yes
PRM,PMAA,202000000000000032336,1	SOC-CORE230044137	11,000	Yes
PRM,PMAA,202000000000000038820,1	SOC-CORE233314822	11,000	Yes
PRM,PMAA,202000000000000043463,1	SOC-CORE236134651	5,000	Yes
PRM,PMAA,202000000000000048670,1	SOC-CORE239084715	5,000	Yes
PRM,PMAA,202000000000000055087,1	SOC-CORE242277198	2,000	Yes
GAX,PMAA,20200000000000007788,1	SOC-CORE242300491	1,263.92	Yes
GAX,PMAA,20200000000000008170,1	SOC-CORE244422984	1,000	Yes
GAX,PMAA,20200000000000009028,1	SOC-CORE247454854	2,015	Yes
PRM,PMAA,20210000000000000228,1	SOC-CORE248188395	8,743	Yes
GAX,PMAA,20210000000000002499,1	SOC-CORE259934944	1,250.54	Yes
GAX,PMAA,20210000000000002499,1	SOC-CORE259934946	2,630	Yes
PRM,PMAA,202100000000000030631,1	SOC-CORE265798852	4,255	Yes
PRM,PDAA,202100000000000036336,1	SOC-CORE268925812	9,850	Yes
PRM,PDAA,202100000000000042953,1	SOC-CORE272234712	2,700	Yes
PRM,PMAA,202100000000000053044,1	SOC-CORE277640103	3,702.50	Yes
PRM,PMAA,202100000000000053045,1	SOC-CORE277640107	2,196.25	Yes
PRM,PMAA,202100000000000053046,1	SOC-CORE277640113	2,457.50	Yes
PRM,PDAA,202100000000000053520,1	SOC-CORE277965646	1,125	Yes
PRM,PMAA,202100000000000056277,1	SOC-CORE278735069	2,112.50	Yes
PRM,PDAA,202100000000000059896,1	SOC-CORE280941584	10,750	Yes
PRM,PMAA,202100000000000061395,1	SOC-CORE281441065	2,630	Yes
PRM,PMAA,202100000000000068050,1	SOC-CORE284675269	3,952.50	Yes
PRM,PMAA,202100000000000069183,1	SOC-CORE284929673	30,000	Yes
PRM,PMAA,202100000000000069183,1	SOC-CORE284929669	5,000	Yes
PRM,PMAA,20220000000000000531,1	SOC-CORE285382674	2,089.61	Yes
PRM,PMAA,20220000000000000531,1	SOC-CORE285382678	30,000	Yes
PRM,PMAA,20220000000000001334,1	SOC-CORE285561254	3,359.50	Yes
		233,806	

Exhibit D

Gibbs Completed Conflict of Interest Disclosure Forms

Timestamp	Email Address	Are you engaged in any employment outside of your duties as a member of the Governor's Staff or Cabinet?	If yes, please disclose all outside employment, including a disclosure of all income earned from the outside employment. In addition, please confirm that the outside employment is not conducted during state time or using state resources.	Are you, or is a member of your immediate family, an officer, director, trustee, partner, (general or limited), employee or regularly retained consultant of any company, firm, organization, or municipality which might reasonably be expected to have business dealings with the Governor's Office or your department/agency in the coming year?	If yes above, please describe the nature of the employment, the length of the employment, and the percentage of time associated with fulfilling those duties.
6/2/2020 12:44:18	jbarela@state.co.us	No		No	
6/2/2020 13:00:04	shoshana.lew@state.co.us	No		No	
6/2/2020 13:17:32	kate.siegelshimko@state.co.us	No		No	
6/2/2020 13:34:01	david.oppenheim@state.co.us	No	N/A	No	N/A
6/2/2020 14:03:24	lkaufmann@state.co.us	No		No	
6/2/2020 14:10:53	danielle.oliveto@state.co.us	No		No	
6/2/2020 16:11:45	jill.hunsakerryan@state.co.us	No		No	
6/2/2020 16:33:12	michelle.barnes@state.co.us	No		Yes	In my husband's business (Lefever Building Systems, Inc) is owned by us and he serves as the CEO. I am not involved in the business in any way. My business which I ran prior to this appointment, Interim Leadership Solutions, Inc. has been mothballed and has no revenue.
6/2/2020 17:35:56	kara.veitch@state.co.us	No		No	
6/2/2020 19:20:32	benjamin.s.henderson@state.co.us	Yes	I occasionally serve as a coach and consultant for marching bands around the world. Most of the time that work is voluntary, but sometimes it includes a small stipend. On an annual basis I receive a total of ~\$2,000 total from various marching bands around the country.	No	
6/2/2020 21:28:22	lu.cordova@state.co.us	Yes	I am on the board of directors of the Kansas City Southern Railroad which has no operations in Colorado, which is a paid position outside of State hours. I also chair and volunteer at various organizations in unpaid positions outside of my work hours.	Yes	I volunteer in an unpaid position in an organization that has applied to the Colorado Relief Fund (not accepted yet).
6/2/2020 23:27:12	crestina.martinez@state.co.us	Yes	Ranch. Outside employment is not conducted during state time or using state resources.	No	
6/3/2020 8:59:26	dean.williams@state.co.us	No		No	
6/3/2020 11:32:01	maria.decambra@state.co.us	No		No	
6/4/2020 7:33:48	betsy.markey@state.co.us	No		Yes	My husband is a volunteer business consultant with the Small Business Development Center in Larimer County. OEDIT oversees the SBDC network.
6/8/2020 13:01:02	will.toor@state.co.us	No		Yes	My wife is an instructor at CU Boulder
6/8/2020 13:16:11	dan.gibbs@state.co.us	No		No	
6/8/2020 13:39:20	patty.salazar@state.co.us	No		Yes	Paul Lopez, Denver City and County Clerk and Recorder (no business with DORA however with General Assembly, Secretary of State and Governor's Office)
6/8/2020 14:31:42	stan.hilkey@state.co.us	No	n/a	No	n/a
6/8/2020 18:03:54	beth.bean@state.co.us	No	N/A	No	N/A
6/11/2020 18:04:19	kate.greenberg@state.co.us	Yes	Part of a 4th generation family commercial real estate business in Minnesota. \$1,500/mo in 1099 earnings. I do not participate in the family business during state time or using state resources.	No	
6/14/2020 13:35:09	kim.bimestefer@state.co.us	No		No	
6/15/2020 12:51:58	gerri.bragdon@state.co.us	No	N/A	No	N/A

Timestamp	Email Address	Are you engaged in any employment outside of your duties as a member of the Governor's Staff or Cabinet?	If yes, please disclose all outside employment, including a disclosure of all income earned from the outside employment. In addition, please confirm that the outside employment is not conducted during state time or using state resources.	Are you, or is a member of your immediate family, an officer, director, trustee, partner, (general or limited), employee or regularly retained consultant of any company, firm, organization, or municipality which might reasonably be expected to have business dealings with the Governor's Office or your department/agency in the coming year?	If yes above, please describe the nature of the employment, the length of the employment, and the percentage of time associated with fulfilling those duties.
6/17/2020 11:11:08	michael.conway@state.co.us	No		Yes	My wife is employed by the WilmerHale law firm. Her title is "Legal Personnel and Practice Management Coordinator." Members of the firm may interact with the Governor's office on policy matters. However, none of my wife's duties with the firm would entail working on matters that the firm would be interacting with the Governor's office about.
6/20/2020 12:05:54	lauren.larson@state.co.us	No		Yes	My husband is employed full-time as the Executive AUSA for the US Attorney's Office, District of Colorado. He has worked for that office since 2010.
6/27/2020 15:13:41	michael.loh@state.co.us	Yes	Part-Time Pilot for United Airlines and employment is NOT conducted during state time or using state resources. Approximate annual earnings - \$120K	No	
6/29/2020 12:20:35	angie.paccione@state.co.us	No		No	
6/29/2020 13:31:49	jackie.melmed@state.co.us	No		Yes	My husband is a physician with Kaiser Permanente in Colorado. He is on the board of directors for the Colorado Permanente Medical Group. Kaiser Permanente Health Plan is a separate entity that does business directly with the state. My husband is not employed by that entity, but in an abundance of caution I wanted to make his position known.

Timestamp	Email Address	Are you engaged in any employment outside of your duties as a member of the Governor's Staff or Cabinet?	If yes, please disclose all outside employment, including a disclosure of all income earned from the outside employment. In addition, please confirm that the outside employment is not conducted during state time or using state resources.	Are you, or is a member of your immediate family, an officer, director, trustee, partner, (general or limited), employee or regularly retained consultant of any company, firm, organization, or municipality which might reasonably be expected to have business dealings with the Governor's Office or your department/agency in the coming year?	If yes above, please describe the nature of the employment, the length of the employment, and the percentage of time associated with fulfilling those duties.
6/29/2020 14:42:33	tszczurek@state.co.us	Yes	I occasionally speak through my consulting firm, Technology and Management Solutions (see www.TMSworld.com for more information). Almost all is pro-bono. Occasionally, I might be offered a stipend, however since my employment 1/9/2019 with the State of Colorado I have not done any speaking except in my official CIO role and for free. I occasionally write a column for free for COBizMag.com, TelecomReseller.com, and BizWest.com. Since my employment 1/9/2019 with the State of Colorado I have written two articles for free for BizWest.com (which is sometimes carried by their media outlets). I write a periodic e-newsletter "Szczurek Success Strategies" (and distribute for free) which is sometimes posted on the radishsprouts.typepad.com blog, however since my employment 1/9/2019 with the State of Colorado I stopped publishing it for a year and have just in 2020 begun publishing it periodically. I will likely only occasionally have time to write this e-newsletter. Note, I have published three books prior to my employment with the State of Colorado -- two are for sale and available on Amazon and at www.PursuitofPassionatePurpose.com. I may receive a small royalty from these book sales. No state resources are used and no state time. As per approval by Jacki Melrod, I use my unique approach with regards to Pursuit of Passionate Purpose in leading my OIT organization without selling books / speaking or	Yes	Theresa Szczurek is NOT involved since my 1/9/2019 employment as officer, director, trustee, partner, employee, or consultant with any firm that might do business with the State of Colorado. My husband, Dr. Richard A. Davis, is the Chairman and CTO and shareholder of Radish Systems, LLC since 2009, which offers ChoiceView as a platform for 'voice with visuals' communications. Radish has had discussions with HCPF and SIPA, but has nothing going on with them now. Since my employment, Radish cut everything off with them. Radish has an active application under development with Mile High United Way and its 2-1-1 line. Radish has had some participation with OeHI about possible telehealth and state call center applications, based on Ben Henderson approving these discussions in the time of COVID-19. Nothing has come of this that I know. There could be possible applications within state agencies, especially those with service desks or call centers, which could save the state money and improve customer experience. As a shareholder of Radish Systems, I occasionally serve as an unpaid advisor during after hours or weekends.
7/6/2020 15:59:34	eve.lieberman@state.co.us	No		No	
7/6/2020 16:28:17	cary.kennedy@state.co.us	No		No	
1/12/2021 8:21:53	mark.ferrandino@state.co.us	No		No	

Email Address	Additionally, please list the name of the company, firm, organization, or municipality, the position held, and the nature of the business which is currently being conducted or which may reasonably be expected to be conducted in the coming year.	Have you, or has an immediate family member, accepted gifts, gratuities, lodging, dining, or entertainment that might reasonably appear to influence your judgement or actions as a member of the Governor's Staff or Cabinet?	If yes, please describe below.	Do you have any other interest or role in a firm, organization, or municipality where that interest or relationship might reasonably be expected to create an impression or suspicion among the public having knowledge of your acts that you engaged in conduct in violation of your position as a member of the Governor's Staff or Cabinet?	Are you aware of any reason (including those listed above) which could be perceived as a conflict of interest, or feel you have engaged in any other activity which should be disclosed regarding a potential conflict of interest?
jbarela@state.co.us		No		No	No
shoshana.lew@state.co.us		No		No	No
kate.siegelshimko@state.co.us		No		No	No
david.oppenheim@state.co.us	N/A	No	N/A	No	No
lkaufmann@state.co.us		No		No	No
danielle.oliveto@state.co.us		No		No	No
jill.hunsakerryan@state.co.us		No		No	No
michelle.barnes@state.co.us		No		No	No
kara.veitch@state.co.us		No		No	No
benjamin.s.henderson@state.co.us		No		No	No
lu.cordova@state.co.us	Dream Worthy, DBA CTEK, based in Boulder. Charitable organization.	No	I do have friends in industries we regulate but nothing exchanged that would be outside of the bounds of normal friendship.	No	No
crestina.martinez@state.co.us		No		No	No
dean.williams@state.co.us		No		No	No
maria.decambra@state.co.us		No		No	No
betsy.markey@state.co.us		No		No	No
will.toor@state.co.us	My wife is an instructor at CU Boulder	No		No	No
dan.gibbs@state.co.us		No		No	No
patty.salazar@state.co.us		No		No	No
stan.hilkey@state.co.us	n/a	No	n/a	No	No
beth.bean@state.co.us	N/A	No	N/A	No	No
kate.greenberg@state.co.us		No		No	No
kim.bimestefer@state.co.us		No		No	No
gerri.bragdon@state.co.us	None	No	N/A	No	No

Email Address	Additionally, please list the name of the company, firm, organization, or municipality, the position held, and the nature of the business which is currently being conducted or which may reasonably be expected to be conducted in the coming year.	Have you, or has an immediate family member, accepted gifts, gratuities, lodging, dining, or entertainment that might reasonably appear to influence your judgement or actions as a member of the Governor's Staff or Cabinet?	If yes, please describe below.	Do you have any other interest or role in a firm, organization, or municipality where that interest or relationship might reasonably be expected to create an impression or suspicion among the public having knowledge of your acts that you engaged in conduct in violation of your position as a member of the Governor's Staff or Cabinet?	Are you aware of any reason (including those listed above) which could be perceived as a conflict of interest, or feel you have engaged in any other activity which should be disclosed regarding a potential conflict of interest?
michael.conway@state.co.us	The name of the law firm my wife is employed by is WilmerHale. I am not aware of any specific policy matters that the firm may be interacting with the Governor's office over the coming year and I am not personally aware any business currently being conducted that involves the law firm.	No		No	No
lauren.larson@state.co.us	The nature of the business between the US Attorney's Office and the Governor's Office is typically informal in nature and limited.	No		No	No
michael.loh@state.co.us	None - leaving in July for Active Duty Military position	No		No	No
angie.paccione@state.co.us		No	I selected "no" however, I attended sporting events at MSU-Denver, CU-Boulder, UNC and accepted housing in Greeley (because of inclement weather) to provide "inservice faculty development" the following morning for Aims Community College. I don't think it creates the appearance of influence on judgement. In addition, I have made site/campus visits to Adams State Univ, Colorado Mesa Univ, UNC, Pueblo Community College, AIMS Community College, UCDenver, CU Boulder, Community College of Denver, CSU-Pueblo, and UCCS. On each of those visits, lunch was provided.	No	No
jackic.melmed@state.co.us	Colorado Permanente Medical Group (see above)	No		No	No

Email Address	Additionally, please list the name of the company, firm, organization, or municipality, the position held, and the nature of the business which is currently being conducted or which may reasonably be expected to be conducted in the coming year.	Have you, or has an immediate family member, accepted gifts, gratuities, lodging, dining, or entertainment that might reasonably appear to influence your judgement or actions as a member of the Governor's Staff or Cabinet?	If yes, please describe below.	Do you have any other interest or role in a firm, organization, or municipality where that interest or relationship might reasonably be expected to create an impression or suspicion among the public having knowledge of your acts that you engaged in conduct in violation of your position as a member of the Governor's Staff or Cabinet?	Are you aware of any reason (including those listed above) which could be perceived as a conflict of interest, or feel you have engaged in any other activity which should be disclosed regarding a potential conflict of interest?
tszczurek@state.co.us	My husband, Richard A. Davis, and I have an ownership stake in Radish Systems and in Montuno Software. Those firms are not doing any business with State of Colorado. Note, my husband and I own stock in some firms and in many mutual funds. Some of those are public companies which may be doing business with the State of Colorado. I am not aware at this point in time of any specific names of firms.	No		No	No
eve.lieberman@state.co.us		No		No	No
cary.kennedy@state.co.us		No		No	No
mark.ferrandino@state.co.us		No		No	No

Email Address	If yes, please describe below all conflicts or potential conflicts of interest, which you may have. If you are uncertain whether your situations present a conflict of interest or potential conflict, contact the Governor's Office of Legal Counsel.	Based on the information above and all information known to you, do you believe that the potential for a conflict of interest should limit your participation as a member of the Governor's Staff or Cabinet in any way?	By typing my name below and submitting this form, I state that I have read Colorado Revised Statutes § 24-18-103, 104, 105 & 109-110, and will abide by the Code of Ethics and Disclosure requirements set forth therein.	Position
jbarela@state.co.us		No	Joe m Barela	Executive Director Colorado Department of Labor and Employment
shoshana.lew@state.co.us		No	Shoshana Lew	Executive Director, CDOT
kate.siegelshimko@state.co.us		No	Kate Siegel Shimko	Director of Boards and Commissions
david.oppenheim@state.co.us	N/A	No	David Oppenheim	Legislative Director
lkaufmann@state.co.us		No	Lisa Kaufmann	Chief of Staff
danielle.oliveto@state.co.us		No	Danielle Oliveto	Deputy Chief of Staff
jill.hunsakerryan@state.co.us		No	Jill Hunsaker Ryan	Executive Director, Colorado Dept of Public Health and Environment
michelle.barnes@state.co.us		No	Michelle Barnes	Exec Director CDHS
kara.veitch@state.co.us		No	Kara Veitch	Department of Personnel & Administration Executive Director
benjamin.s.henderson@state.co.us		No	Ben Henderson	Director of Operations and Cabinet Affairs
lu.cordova@state.co.us	Even minor or potential issues are disclosed.	No	Lu Cordova	Executive Director, Department of Revenue
crestina.martinez@state.co.us		No	Crestina Martinez	Chief of Staff to the Lt. Governor
dean.williams@state.co.us		No	Dean Williams	Executive Director
maria.decambra@state.co.us		No	Maria De Cambra	Director of Communications and Community Engagement
betsy.markey@state.co.us		No	Betsy Markey	Executive Director, Office of Economic Development and International Trade
will.toor@state.co.us		No	Will Toor	Executive Director, Colorado Energy Office
dan.gibbs@state.co.us		No	Dan Gibbs	DNR Executive Director
patty.salazar@state.co.us		No	Patty Salazar	Executive Director, Department of Regulatory Agencies
stan.hilkey@state.co.us	n/a	No	Stan Hilkey	Executive Director, Public Safety
beth.bean@state.co.us	N/A	No	Beth Bean	Policy Director
kate.greenberg@state.co.us		No	Kate Greenberg	Commissioner of Agriculture
kim.blmestefar@state.co.us		No	Kim Blmestefar	Executive Director, CO Dept of Health Care Policy and Financing
gerri.bragdon@state.co.us	N/A	No	Rick M. Garcia	Executive Director, DOLA

Email Address	If yes, please describe below all conflicts or potential conflicts of interest, which you may have. If you are uncertain whether your situations present a conflict of interest or potential conflict, contact the Governor's Office of Legal Counsel.	Based on the information above and all information known to you, do you believe that the potential for a conflict of interest should limit your participation as a member of the Governor's Staff or Cabinet in any way?	By typing my name below and submitting this form, I state that I have read Colorado Revised Statutes § 24-18-103, 104, 105 & 109-110, and will abide by the Code of Ethics and Disclosure requirements set forth therein.	Position
michael.conway@state.co.us		No	Michael Conway	Commissioner of Insurance
lauren.larson@state.co.us	I was elected to the Executive Committee of the National Association of State Budget Officers (NASBO) in 2019, an organization to which OSPB pays dues.	No	Lauren Larson	Director, Office of State Planning and Budgeting
michael.loh@state.co.us		No	Michael Loh	The Adjutant General & Exec Dir DMVA
angie.paccione@state.co.us		No	Angie Paccione	Executive Director - Department of Higher Education
jackie.melmed@state.co.us		No	Jacki Cooper Melmed	Chief Legal Counsel

Email Address	If yes, please describe below all conflicts or potential conflicts of interest, which you may have. If you are uncertain whether your situations present a conflict of interest or potential conflict, contact the Governor's Office of Legal Counsel.	Based on the information above and all information known to you, do you believe that the potential for a conflict of interest should limit your participation as a member of the Governor's Staff or Cabinet in any way?	By typing my name below and submitting this form, I state that I have read Colorado Revised Statutes § 24-18-103, 104, 105 & 109-110, and will abide by the Code of Ethics and Disclosure requirements set forth therein.	Position
tszczurek@state.co.us		No	Theresa Szczurek	Chief Information Officer and Executive Director of the Governor's Office of Information Technology
eve.lieberman@state.co.us		No	Eve Lieberman	Chief Policy Advisor
cary.kennedy@state.co.us		No	cary kennedy	senior fiscal advisor
mark.ferrandino@state.co.us	While I do not feel these are a conflict, I currently serve on the Boards of the Rocky Mountain Humans Services (works with HCPF, DHS, CDE), and the Denver Library Friends Foundation. I also currently serve on the Board of the Office of the Child Representative, but am in the process of resigning from the board.	No	Mark Ferrandino	Executive Director, Dept of Revenue

Are you engaged in any employment outside of your duties as a member of the Governor's Staff or Cabinet?	If yes, please disclose all outside employment, including a disclosure of all income earned from the outside employment. In addition, please confirm that the outside employment is not conducted during state time or using state resources.	Are you, or is a member of your immediate family, an officer, director, trustee, partner, (general or limited), employee or regularly retained consultant of any company, firm, organization, or municipality which might reasonably be expected to have business dealings with the Governor's Office or your department/agency in the coming year?	If yes above, please describe the nature of the employment, the length of the employment, and the percentage of time associated with fulfilling those duties.	Additionally, please list the name of the company, firm, organization, or municipality, the position held, and the nature of the business which is currently being conducted or which may reasonably be expected to be conducted in the coming year.	Have you, or has an immediate family member, accepted gifts, gratuities, lodging, dining, or entertainment that might reasonably appear to influence your judgment or actions as a member of the Governor's Staff or Cabinet?	If yes, please describe below.	Do you have any other interest or role in a firm, organization, or municipality where that interest or relationship might reasonably be expected to create an impression or suspicion among the public having knowledge of your acts that you engaged in conduct in violation of your position as a member of the Governor's Staff or Cabinet?	Are you aware of any reason (including those listed above) which could be perceived as a conflict of interest, or feel you have engaged in any other activity which should be disclosed regarding a potential conflict of interest?	If yes, please describe below all conflicts or potential conflicts of interest, which you may have. If you are uncertain whether your situation presents a conflict of interest or potential conflict, contact the Governor's Office of Legal Counsel.	Based on the information above and all information known to you, do you believe that the potential for a conflict of interest should limit your participation as a member of the Governor's Staff or Cabinet in any way?	By typing my name below Position and submitting this form, I state that I have read Colorado Revised Statutes § 24-18-103, 104, 105 & 109-110, and will abide by the Code of Ethics and Disclosure requirements set forth therein.	Position
Yes	I am a manager and controlling member of P&S LLC, which acts as a manager for my family office investments and activities. P&S has no third-party clients. No P&S activity will occur during state time and will not use state resources. P&S pays me \$50,000 per year.	No			No		No	No	No		Patrick Meyers	ED OEDIT and Chief Economic Recovery Officer
No		No		I serve on the board of Rocky Mountain Human Services, and of the Friends Foundation of the Denver Library. Neither have impact on my role with the Dept of Revenue	No		No	No	No		Mark Ferrandino	Executive Director
No		No			No		No	No	No		Shoshana Lew	CDOT director
No		No			No		No	No	No		Michelle Barnes	ED of CDHS
No		No			No		No	No	No		Kara Veltch	DPA Executive Director
Yes	I am a professor of Computer Science at Colorado State University Global	No			No		No	No	No		Anthony Neal-Graves	CIO & ED Office of Information Technology
No		No			No		No	No	No		Kate Siegel Shimko	Director, Boards and Commissions
No		No			No		No	No	No		Ben Henderson	Director of Operations and Cabinet Affairs
No		No			No		No	No	No		Kim Binestefor	Gov's Cabinet, Exec Dir, CO Dept of Health Care Policy & Financing
No		No			No		No	No	No		Joe M Barela	Executive Director/Colorado Department of Labor and Employment
Yes	Member of small Minnesota-based family commercial real estate business. My engagement in this business is conducted only outside of state time and not using state resources.	No			No		No	No	No		Kate Greenberg	Commissioner of Agriculture
No		Yes	Paul Lopez, Denver County Clerk and Recorder.		No		No	No	No		Patty Salazar	Executive Director, Department of Regulatory Agencies
No		No			No		No	No	No		Dan Gibbs	ED Dept of Natural Resources
No		No			No		No	No	No		Will Toor	Executive Director, Colorado Energy Office
No		No			No		No	No	No		Dean Williams	Executive Director
No		No			No		No	No	No		Rick M. Garcia	Executive Director, Colorado Dept of Local Affairs
No		No			No		No	No	No		Maria De Cambra	Director of Communications and Community Engagement
No		No			No		No	No	No		STAN HILKEY	EXECUTIVE DIRECTOR, OF DEPT. OF PUBLIC SAFETY
No		Yes	My husband is employed full-time as the Deputy US Attorney for the District of Colorado. He has worked for the US Attorney's Office since 2010.	The nature of the business between the US Attorney's Office and the Governor's Office is typically informal in nature and limited.	No		No	No	In 2020 I was elected President-elect of the National Association of State Budget Officers (NASBO), an organization to which OSPB pays dues. Also in 2020, I was elected a Fellow in the National Academy of Public Administration (NAPPA). I am not aware of any business dealings between the State and NAPPA, and I paid my dues out of personal resources.	No	Lauren Larson	State Budget Director
No		No			No		No	No	No		Dr. Angie Paccone	Executive Director, CDHE
No		No			No		No	No	No		Jill Hunsaker Ryan	Executive Director, CDPHE
Yes	I am employed by the US Army as a CO National Guard member- I make ~ 50K/year in that job. My state job requires that I am in the National Guard.	No			No		No	No	No		Laura Cletan	Executive Dir DMAVA
No		Yes	My wife works for the law firm WilmerHale. She manages the Denver office's practice management and legal recruitment. She has been in her current role about a year and with the firm for six years. While the firm may have business dealings with the Governor's Office on a variety of issues, I do not believe that my wife ever will participate in them in her role.	The firm is worldwide and could have any number of different issues to discuss with the Governor's Office.	No		No	No	No		Michael Conway	Commissioner of Insurance
No		Yes	My husband, Ari Melmed, is a physician and shareholder with Colorado Permanente Medical Group (CPMG). He is also on the board of directors for CPMG and serves as Regional Medical Director for Telehealth Services. He is employed full-time by CPMG, and has been there for 21 years. The state has a business relationship with Kaiser Foundation Health Plan, not CPMG, but any dealings with have with the health plan could affect CPMG, so I am disclosing his position here.	see above	No		No	No	No		Lisa Kaufmann	Chief of Staff
No		No			No		No	No	No		Jacqueline Cooper Melmed	Chief Legal Counsel
No		Yes	My husband, Kiel Brunner, is employed with Deloitte as of June 21, 2021, as a Solution Senior Consultant.		No		No	No	No		Mark Honnen	Chief of Staff, Lt. Governor Primavera
No		No			No		No	No	No		Danielle Oliveto	Deputy Chief of Staff
No		No	While I do not have any direct outside employment, out of an abundance of caution, I am disclosing that I own preferred membership interests - or units - of Bended Page, LLC, which recently purchased the Tattered Cover Bookstore. I am not an officer, director, trustee or partner of the company, nor am I retained to consult for the company. I have no control or influence over the day-to-day operations or long range business strategy of the organization. I am disclosing this here out of an abundance of caution after conversations with the Governor's Legal Counsel, Jacki Cooper Melmed. I am not aware of any business the LLC or the Tattered Cover has before the state. If that were to change, I would notify legal counsel and recuse myself from any relevant conversations.	Bended Page, LLC, which owns and operates Tattered Cover Bookstore	No		No	No	I have discussed the issue indicated above at length with the Governor's Legal Counsel and have an agreed-to approach to mitigate any conflicts that would arise.	No	cary kennedy David Oppenheim	senior advisor Legislative Director
No		No			No	No	No	No	No		Eve Lieberman	Chief Policy Advisor