

RESOLUTION NO. 26-06

A RESOLUTION OF THE EAST LOOP COMMUNITY IMPROVEMENT DISTRICT TO ESTABLISH A PROCEDURE TO DISCLOSE POTENTIAL CONFLICTS OF INTEREST AND SUBSTANTIAL INTERESTS FOR CERTAIN DISTRICT OFFICIALS AND OFFICERS; AND AUTHORIZING CERTAIN ACTIONS IN CONNECTION THEREWITH

WHEREAS, pursuant to the Community Improvement District Act, Sections 67.1401 to 67.1571 of the Revised Statutes of Missouri, as amended (the “*CID Act*”), the East Loop Community Improvement District (the “*District*”) was formed on June 30, 2016, by Ordinance No. 70322 (the “*Ordinance*”) passed by the Board of Aldermen of the City of St. Louis, Missouri; and

WHEREAS, pursuant to the Ordinance, the District was established for the purpose of undertaking certain public improvements and services within the boundaries of the District through the imposition of, among other things, a special assessment pursuant to Section 67.1521 of the CID Act; and

WHEREAS, on June 18, 2026, the Board of Directors of the District adopted Resolution No. 26-05, approving a conflict of interest policy (the “*Policy*”); and

WHEREAS, for purposes of Sections 105.450 to 105.496 of the Revised Statutes of Missouri, as amended, the District is a “political subdivision” of the State of Missouri; and

WHEREAS, the District reasonably anticipates that, in one or more future fiscal years, its annual operating budget may be in excess of one million dollars; and

WHEREAS, the Board of Directors of the District desires to supplement the Policy and provide additional procedures to disclose potential conflicts of interest and substantial interests for certain of its officials and officers in order to comply with the requirements of state law regarding such disclosure.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE EAST LOOP COMMUNITY IMPROVEMENT DISTRICT, AS FOLLOWS:

Section 1. Declaration of Intent. The proper operation of a political subdivision (as such term is defined in Section 105.450(9) of the Revised Statutes of Missouri, as amended) requires that the District’s officials and employees be independent, impartial and responsible to the people; that the District’s decisions and policy be made in the proper channels of its organizational structure; that public office not be used for personal gain; and that the public have confidence in the integrity of the District. In recognition of these goals, there is hereby established a procedure for disclosure by certain officials and employees of private financial or other interests in matters affecting the District.

Section 2. Conflicts of Interests. The Chair or any member of the District’s Board of Directors who has a substantial personal or private interest, as defined by state law, in any resolution shall disclose on the records of the Board of Directors of the District the nature of his or her interest and shall abstain from voting on any matters relating to such interest.

Section 3. Disclosure Reports.

a. Each official, the Executive Director, and the general counsel (if employed full-time) shall disclose the following information by May 1 if any such transactions were engaged in during the previous calendar year:

1) For such person, and all persons within the first degree of consanguinity or affinity of such person, the date and the identities of the parties to each transaction with a total value in excess of \$500, if any, that such person had with the political subdivision, other than compensation received as an employee or payment of any tax, fee or penalty due to the political subdivision, and other than transfers for no consideration to the political subdivision; and

2) The date and the identities of the parties to each transaction known to the person with a total value in excess of \$500, if any, that any business entity in which such person had a substantial interest, had with the political subdivision, other than payment of any tax, fee or penalty due to the political subdivision or transactions involving payment for providing utility service to the political subdivision, and other than transfers for no consideration to the political subdivision.

b. The Executive Director and each person serving on the District's Executive Committee shall disclose by May 1 for the previous calendar year the following information:

1) The name and address of each of the employers of such person from whom income of \$1,000 or more was received during the year covered by the statement;

2) The name and address of each sole proprietorship that s/he owned; the name, address and the general nature of the business conducted of each general partnership and joint venture in which s/he was a partner or participant; the name and address of each partner or co-participant for each partnership or joint venture unless such names and addresses are filed by the partnership or joint venture with the secretary of state; the name, address and general nature of the business conducted of any closely held corporation or limited partnership in which the person owned 10% or more of any class of the outstanding stock or limited partnership units; and the name of any publicly traded corporation or limited partnership that is listed on a regulated stock exchange or automated quotation system in which the person owned 2% or more of any class of outstanding stock, limited partnership units or other equity interests; and

3) The name and address of each corporation for which such person served in the capacity of a director, officer or receiver.

Section 4. Filing of Reports. Each report, in substantially the form set forth as **Exhibit A**, attached hereto and incorporated herein by reference (each, a "**Financial Disclosure Statement**"), shall be filed with the District's Secretary and with the Missouri Ethics Commission. Each Financial Disclosure Statement shall be available for public inspection and copying during normal business hours.

Section 5. When Filed. Financial Disclosure Statements shall be filed at the following times, but no person is required to file more than one Financial Disclosure Statement in any calendar year:

a. Each person appointed to office shall file the statement within 30 days of such appointment or employment; and

b. Every other person required to file a Financial Disclosure Statement shall file the statement annually not later than May 1 and the statement shall cover the calendar year ending the immediately preceding December 31; provided, that any member of the Board of Directors of the District

may supplement the Financial Disclosure Statement to report additional interests acquired after December 31 of the covered year until the date of filing of the Financial Disclosure Statement.

Section 6. Filing of Resolution. The Secretary or his or her designee shall send a certified copy of this Resolution to the Missouri Ethics Commission within 10 days of its adoption.

Section 7. Conflict with Policy. The District intends for the Policy, as supplemented by the procedures set forth in this Resolution, to be its primary written policies and procedures for monitoring and reporting conflicts of interest. The procedures set forth in this Resolution are intended to be consistent with the Policy. In the event of any inconsistency between the terms of the Policy and this Resolution, the terms of this Resolution will govern.

Section 8. District Officers to Execute Resolution. The Chair or Vice Chair of the Board of Directors of the District is hereby authorized and directed to execute this Resolution for and on behalf of and as the act and deed of the District and the Secretary or Assistant Secretary of the Board of Directors of the District is hereby authorized and directed to attest to this Resolution.

Section 9. Further Authority. All actions heretofore taken by the authorized representatives, agents and employees of the District in connection with the transactions contemplated by this Resolution are hereby ratified and confirmed, and the District shall, and the representatives, agents and employees of the District are hereby authorized and directed to, take such further action and execute and deliver such other documents and instruments as may be necessary or desirable to carry out and comply with the intent of this Resolution.

Section 10. Severability. The sections, paragraphs, sentences, clauses and phrases of this Resolution shall be severable. If any such section, paragraph, sentence, clause or phrase of this Resolution is found by a court of competent jurisdiction to be invalid, the remaining portions of this Resolution are valid, unless the court finds the valid portions of this Resolution are so essential to and inseparably connected with and dependent upon the void portion that it cannot be presumed that the District has enacted the valid portions without the void one, or unless the court finds that the valid portions, standing alone, are incomplete and are incapable of being executed in accordance with the legislative intent.

Section 11. Governing Law. This Resolution shall be governed exclusively by and construed in accordance with the applicable laws of the State of Missouri.

Section 12. Effective Date. This Resolution shall take effect and be in full force upon its passage by the District's Board of Directors and shall remain in effect until amended or repealed by the District's Board of Directors.

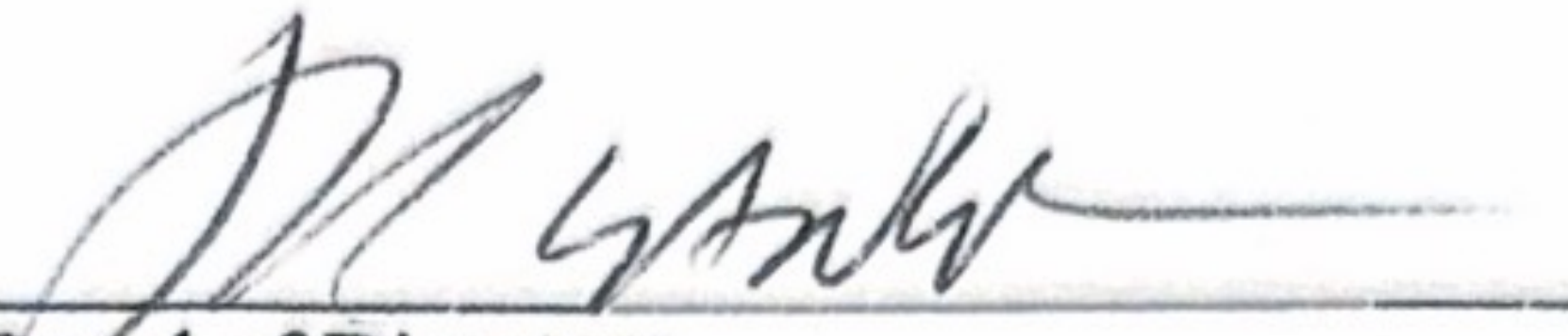
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Passed this 14th day of July, 2026.

I, the undersigned, Chair of the East Loop Community Improvement District, hereby certify that the foregoing Resolution was duly adopted by the Board of Directors of the District at a meeting held, after proper notice, on July 14, 2026.



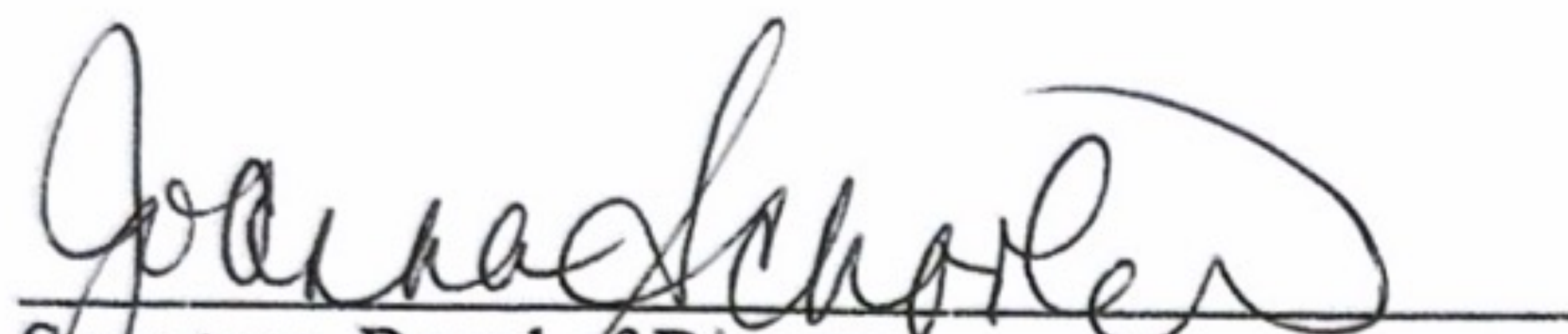
**EAST LOOP COMMUNITY IMPROVEMENT
DISTRICT**



Chair, Board of Directors

WITNESS my hand and official seal this 14th day of July, 2026.

ATTEST:



Secretary, Board of Directors

EXHIBIT A

FORM OF FINANCIAL DISCLOSURE STATEMENT FOR POLITICAL SUBDIVISIONS

(Attached hereto.)



Missouri Ethics Commission (MEC)

PO Box 1370, Jefferson City MO 65102, Fax: 573-526-4506, pfdonline@mec.mo.gov

Office Use:

Financial Disclosure Statement for Political Subdivisions

105.485(4), RSMo

1. Statement Information (select one)

Type: ☐ New ☐ Amended

2. Filing Status & Time Period Covered (select one & insert time period)

A. Filing Status

- ☐ **Annual Filer:** file from Jan 1 to Dec 31 of prior year (if no longer serving, enter the time period served), due by May 1
- ☐ **Newly Appointed/Employed:** file for calendar year before start date, due within 30 days
- ☐ **Incumbent Candidate:** file from Jan 1 of prior year to closing date for candidacy (may be longer than 12-month period), due within 14 days of closing date for candidacy
- ☐ **New Candidate:** file for the 12-month period before the closing date for candidacy, due within 14 days of closing date for candidacy

B. Time Period Covered: From ____/____/____ to ____/____/____ (mm/dd/yyyy)

3. Filer Information

Filer's name (First, Middle, Last)

Spouse's name (First, Middle, Last)

Mailing address

City, State, Zip

Dependent child's name* (First, Middle, Last)

Dependent child's name* (First, Middle, Last)

Name of Political Subdivision or State Agency

Title (Position/Office Seeking)

☐ Check if spouse is filing separate from yourself (if your spouse is not required to file a PFD, this statement MUST disclose his/her information).

*Includes all children, stepchildren, foster children and wards under the age of eighteen residing in the person's household and who receive in excess of 50% of their support from the person.

4. Transaction Information

- A. List the transactions, valued at more than \$500, you, your spouse, or any relative within the first degree of blood or marriage had with the political subdivision listed above. *Do not include* compensation received as an employee, payment of taxes, fees or penalties or transfers for no consideration.

Date (mm/dd/yyyy)

Parties involved in transaction

Date (mm/dd/yyyy)

Parties involved in transaction

- B. List the transactions for any business entity, in which you, your spouse, or dependent child(ren) held a substantial interest, that conducted business with the political subdivision listed above valued at more than \$500. *Do not include* payments of taxes, fees or penalties due to the political subdivision or transactions involving payment for providing utility service to the political subdivision or transfers for no consideration. (NOTE: Substantial interest includes ownership of 10% of the business entity or interest valued at \$10,000 or more, or from which a salary, gratuity or other compensation of \$5,000 or more is paid per calendar year).

Date (mm/dd/yyyy)

Name of Business

Parties involved in transaction

Date (mm/dd/yyyy)

Name of Business

Parties involved in transaction

5. Signature (select one, sign & date)

- ☐ I affirm and attest under penalty of perjury that information and facts in this report are complete, true, and accurate. I further acknowledge that I am aware that any false statement or declaration made herein is punishable under Ch. 575 RSMo.
- ☐ I affirm and attest under penalty of perjury that information and facts in this report are complete, true, and accurate and that my spouse has refused or failed to provide information concerning his or her financial interest and that I have no working knowledge of such interests. I further acknowledge that I am aware that any false statement or declaration made herein is punishable under Ch. 575 RSMo.

Filer's Signature (Required)

Date (mm/dd/yyyy)

This form is required to be filed with the Missouri Ethics Commission **and** with the governing body of your political subdivision. All elected and appointed officials as well as employees of a political subdivision must comply with §105.454 RSMo., on conflicts of interest and their own local code of ethics.

NOTE: The following information is required from the **Chief Administrative Officer** and **Chief Purchasing Officer only**. Include information for filer, spouse and dependent child(ren).

6. **Employment**

List the name and address of each employer from whom you, your spouse, or dependent child(ren) received income of \$1,000 or more during the time period covered by this statement.

Employer Name	Employer Address/City/State/Zip	Person's name whom received income
Employer Name	Employer Address/City/State/Zip	Person's name whom received income

7. **Sole Proprietorships**

List each sole proprietorship owned by you, your spouse or dependent child(ren) during the time period covered by this statement.

Sole Proprietorship Name	Sole Proprietorship Address/City/State/Zip
Sole Proprietorship Name	Sole Proprietorship Address/City/State/Zip

8. **General Partnerships, Joint Ventures**

List each general partnership and joint venture in which you, your spouse or dependent child(ren) were a partner or participant, and the names of partners or co-participants, unless such names and addresses are filed with the Secretary of State, during the time period covered by this statement.

General Partnership or Joint Venture Name	Address/City/State/Zip	Nature of Business	Partner/Coparticipant's Name & Address	Party Involved
General Partnership or Joint Venture Name	Address/City/State/Zip	Nature of Business	Partner/Coparticipant's Name & Address	Party Involved

9. **Stocks, Bond & Other holdings**

EXCEPTION: Interest in any qualified plan or annuity pursuant to the Employees Retirement Income Security Act (ERISA) is not required to be listed.

A. *Limited Partnerships, Closely-held Corporations:* List the name of any closely-held corporation/limited partnership in which you, your spouse, or dependent child(ren) own ten percent (10%) or more of any class of the outstanding stock or units during the time period covered by this statement.

Limited Partnership/Closely-held Corporation Name	Address/City/State/Zip	Nature of business	Party Involved
Limited Partnership/Closely-held Corporation Name	Address/City/State/Zip	Nature of business	Party Involved

B. *Publicly Traded Corporation or Limited Partnership:* List the name of any publicly traded corporation or limited partnership which is listed on a regulated stock exchange or automated quotation system in which you, your spouse or dependent child(ren) own two percent (2%) or more of any class of outstanding stock, units or other equity interests during the time period covered by this statement.

Corporation/Limited Partnership Name	Party Involved
Corporation/Limited Partnership Name	Party Involved

10. **Corporations**

List the name and address of each corporation for which you, your spouse, or dependent child(ren) served in the capacity of a director, officer or receiver during the time period covered by this statement.

Corporation Name	Corporation Address/City/State/Zip	Person's name who served in this capacity
Corporation Name	Corporation Address/City/State/Zip	Person's name who served in this capacity

If you are a Veteran in the state of Missouri and are interested in learning more about benefits and resources available to you and your dependents, visit <https://mvc.dps.mo.gov/MoVeteransInformation/Survey/MEC>