Committee on Contracts

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**THE COUNCIL OF THE CITY OF NEW YORK**

**COMMITTEE REPORT OF THE GOVERNMENTAL AFFAIRS DIVISION**

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**COMMITTEE ON CONTRACTS**

*Hon. Benjamin Kallos, Chair*

**October 25, 2021**

**INT. NO. 2401:** By Council Members Kallos and Yeger

**TITLE:** A Local Law to amend the administrative code of the city of New York, in relation to a public procurement database

**INT. NO. 1686:** By Council Members Barron, Miller and Kallos

**TITLE:** A Local Law to amend the administrative code of the city of New York, in relation to the disclosure of information regarding past engagement in slavery by city contractors

1. **INTRODUCTION**

On October 25, 2021, the Committee on Contracts, chaired by Council Member Ben Kallos, will hold a hearing on Introduction Number 2401-2021, sponsored by Council Member Ben Kallos, in relation to a public procurement database; and Introduction Number 1686-2019, sponsored by Council Member Inez Barron, in relation to the disclosure of information regarding past engagement in slavery by city contractors. The Committee has invited the Mayor’s Office of Contract Services (MOCS), good government groups, and other interested stakeholders to testify on this bill.

1. **BACKGROUND ON OPEN CONTRACTING**

At its core, the concept of open contracting means bringing transparency to the government procurement process. According to the Open Contracting Partnership, an international non-profit working towards transparency in government procurement, “[o]ne in every three dollars spent by government is on a contract with a company. Public contracting is the world’s largest marketplace, covering $13 trillion of spending every year.”[[1]](#footnote-2) However, less than three percent of these public contracts are openly published.[[2]](#footnote-3) Furthermore, government contracts are frequently considered the “most prone to waste, collusion, inefficiency and corruption.”[[3]](#footnote-4) To protect against bribery and promote accountability and fairness in accessing these huge government budgets, it is therefore vital that the contracting process is as transparent and accessible as possible. Data sharing and civil engagement are key elements in working towards these goals.

In partnership with good government organizations and data sharing advocates, governments around the world have been implementing various procurement strategies to encourage open contracting. At a global level, for example, 48 countries have signed on to the World Trade Organization’s (WTO) Agreement on Government Procurement (GPA), which facilitates open and transparent procurement opportunities across international borders.[[4]](#footnote-5) Meanwhile, the Open Contracting Partnership has partners in over 50 countries.

Utilizing data and making this data readily accessible is key to the approaches by both organizations. However, the data itself is not enough to ensure broad participation and transparency in the procurement process. “The sheer scale of the public procurement market requires that data coming from government is machine-readable to enable systematic analysis and oversight. Automating publication and sharing of data frees up administrative time and enables the market to consume and innovate around it.”[[5]](#footnote-6)

Countries such as the Ukraine, which has one of the highest (97 percent) Transparent Public Procurement (TPP) ratings,[[6]](#footnote-7) saved over $900 million after it established its open contracting program.[[7]](#footnote-8) Meanwhile, in Colombia, the data that came to light once open contracting was implemented exposed a $15 million price-fixing scheme that may otherwise fallen through the cracks.[[8]](#footnote-9)

**Open Contracting in New York City**

Recognizing the importance of data sharing in the procurement process, in 2012, the City Council enacted Local Law 11 of 2012, which required the publication of various City agency data sets. According to the law, “[m]aking city data available online using open standards will make the operation of city government more transparent, effective and accountable to the public. It will streamline intra-governmental and inter-governmental communication and interoperability, permit the public to assist in identifying efficient solutions for government, promote innovative strategies for social progress, and create economic opportunities.”[[9]](#footnote-10) However, over the years, several stakeholders and industries have raised concerns about the City’s procurement process – mainly its reliance on paper processes, burdensome oversight, lack of standardized practices amongst agencies, and late payments. The City has sought to innovate and improve the procurement process through several methods, including the creation of the HHS Accelerator in 2013 for human service providers and the launch of the first phase of the Procurement and Sourcing Solutions Portal (PASSPort) in 2017.

**PASSPort**

PASSPort is a “technology solution designed to create visibility into the contracting process, enhance collaboration, and facilitate timely contract registration.”[[10]](#footnote-11) The new online portal aims to make procurement easier for vendors and agencies by making it the primary platform where business is done with the City.[[11]](#footnote-12) When building this platform, MOCS identified guiding principles and objectives to build a system that streamlined the process while also maintaining integrity and fairness.[[12]](#footnote-13) These principles and objects laid out the intentions of the system and were organized in the following areas: Process Improvement, Smart Use of Technology, Transparency & Accountability, and Planning & Management.[[13]](#footnote-14) Across these areas, MOCS identified several goals of PASSPort, including: shortening the procurement cycle times, creating a comprehensive vendor management system, internal and public-facing interfaces, business integrity controls, and the ability to manage risk.[[14]](#footnote-15)

**Limitations of Existing Transparency Systems**

 Despite the many strides made by MOCS in the roll-out and implementation of PASSPort for city vendors, public transparency nonetheless remains an issue for city contracts. Just before the pandemic, MOCS announced the launch of a public inspection terminal at its office on the 9th Floor of 253 Broadway where any member of the public can access information on city contracts.[[15]](#footnote-16) While this updated in-person terminal was a welcome step towards improving contract transparency, it suffered from two primary limitations: First, the utility of an in-person terminal in Manhattan is restricted by the ability of a member of the public to visit 253 Broadway – an issue which was only exacerbated by the office closures, travel restrictions and social distancing rules in place during the pandemic; and second, the information offered at the public inspection terminal is most useful for referencing established contracts, but not as effective for solicitations or contracts undergoing bidder selection but where a bid had not yet been awarded.

**Existing Procurement Transparency Laws**

In 2012 the City Council passed Local Law 5 of 2012, which required the mayor to establish and maintain a “public online searchable database” that would include “summaries of the material terms of city contracts.”[[16]](#footnote-17) This public online database was meant to address some of the transparency lacking in the city’s contracting processes with respect to general information regarding city contracts. Unfortunately, such database has not been made publicly available beyond the access terminal at 253 Broadway – a feature notably not envisioned by the Council.

Similarly, in 2017 the City Council passed Local Law 76 of 2017, which modified an existing provision of the City Charter[[17]](#footnote-18) requiring the Mayor to maintain a centralized contract database to ensure public access to certain “standard information regarding each city contract and contractor.”[[18]](#footnote-19) The earlier Charter provision required the information to be “computerized to the extent feasible,”[[19]](#footnote-20) and Local Law 76 expanded upon this computerization provision to require “access . . . [to] be provided to the public through the City's website.”[[20]](#footnote-21) However, similar to the “public online searchable database” required by Local Law 5 of 2012,[[21]](#footnote-22) the Administration has not yet made the computerized information available on the City’s website.

The transparency measures envisioned by a public procurement database would ideally permit public access to information to any computer connected to the internet, and expand upon the requirements of Local Laws 5 and 76 with which the Administration remains out of compliance. This public procurement database would make certain information available at each stage of the contracting process, beginning with solicitation planning and ending with final agency expenditures and completion of the contract terms.

1. **BACKGROUND ON MUNICIPAL SLAVERY DISCLOSURE ORDINANCES**

Over the last twenty years, several major American companies have revealed that they or their predecessor companies had engaged in and/or profited from the trade or use of the labor of enslaved Africans during the period of the Trans-Atlantic Slave Trade, from approximately 1441 to 1888.[[22]](#footnote-23) Several of the world’s largest insurance companies including the predecessors of Aetna, AIG and New York Life all contained some policies protecting slaveholder interests in slaves in the case of a slave’s death or damage.[[23]](#footnote-24) Aetna issued a public apology in 2000, but offered no reparations.[[24]](#footnote-25) As a result a class-action lawsuit was filed in 2002 against Aetna and other major American companies such as the now-defunct Lehman Brothers and R.J. Reynolds Tobacco.[[25]](#footnote-26) That suit was ultimately dismissed in federal court.[[26]](#footnote-27)

In 2005 J.P. Morgan Chase issued a letter of apology after it discovered that two of its predecessor companies had participated in the slave trade and owned slaves it had taken as collateral for loans.[[27]](#footnote-28) J.P. Morgan Chase attributed the discoveries to a 2002 Chicago city ordinance requiring city contractors to disclose “records of investments or profits from slavery or slaveholder insurance policies”[[28]](#footnote-29) to the city. As a result of the discovery, J.P. Morgan Chase established a $5 million dollar scholarship fund for African-American students in Louisiana – notable because it appears to have been the first time an American company paid any reparations for its participation in the slave trade.[[29]](#footnote-30)

Several other notable American cities followed Chicago’s lead and developed their own slavery disclosure ordinances for city contractors, including Los Angeles in 2003,[[30]](#footnote-31) Milwaukee in 2005[[31]](#footnote-32) and San Francisco in 2006.[[32]](#footnote-33) Oakland passed a similar ordinance in 2005,[[33]](#footnote-34) but there was no record of compliance until 2020, when the city reaffirmed the 2005 ordinance with specific implementation requirements.[[34]](#footnote-35)

The contractor slavery disclosures envisioned by the proposed legislation would be similar to those required by other American cities—creating a certification process for vendors with contracts in excess of $100,000 detailing the nature and extent of how such vendors or their predecessors engaged in or profited from the trade or use of slaves.

1. **LEGISLATIVE ANALYSIS**

**Int. 2401 - in relation to a public procurement database**

Int. 2401 would require the establishment and maintenance of a searchable public procurement database to contain information from all stages of the contracting process for every mayoral agency procurement that exceeds the small purchase limits.

Specifically, the bill would require appropriate information to be made publicly available in the database at each of five stages of procurement.

The five stages contemplated by the bill are: (1) prior to solicitation; (2) upon production of a solicitation document; (3) upon selection of a bidder for an award; (4) upon award of a contract; and (5) upon agency expenditures pursuant to a contract.

The information published on the public procurement database would be free and accessible to the public.

 The proposed legislation would take effect 120 days after it becomes law.

**Int. 1686 - in relation to the disclosure of information regarding past engagement in slavery by city contractors**

 Int. 1686 would prohibit City agencies from entering into or renewing any contract for more than $100,000 with a proposed contractor that does not certify as a material condition of such contract that the proposed contractor has searched its records and relevant history to determine whether it or any predecessor or affiliated company every engaged in or profited from the trade or use of slaves.

The certification would include a statement of the results of such search. If the proposed contractor determines that it or its predecessor or affiliated companies engaged in or profited from slavery, then the proposed contractor would also need to provide a statement detailing the nature and extent of such engagement or profit, including relevant historical and other documentation.

The proposed legislation would take effect 120 days after it becomes law.

Int. No. 2401

By Council Members Kallos and Yeger

A Local Law to amend the administrative code of the city of New York, in relation to a public procurement database

Be it enacted by the Council as follows:

Section 1. Chapter 1 of Title 6 of the administrative code of the city of New York is amended by adding a new section 6-142 to read as follows:

§6-145 Public procurement database. a. The mayor shall establish and maintain a searchable public online database containing the following information for each agency procurement exceeding the small purchase limits established pursuant to section 314 of the charter:

1. a unique contracting process identifier;

2. details of the purchasing agency, including the name of such agency, such agency address, and point of contact;

3. prior to a solicitation, a summary outlining the requirements of a procurement, including, but not limited to, statements explaining:

(a) the purpose of the procurement and rationale;

(b) the planned method of evaluating proposals;

(c) the proposed term of the contract;

(d) the procurement timeline, including, but not limited to, the anticipated start date for new contracts, anticipated solicitation release date, approximate proposal submission deadline and anticipated award announcement date;

(e) funding information, including, but not limited to, total funding available for the procurement and sources of funding, anticipated number of contracts to be awarded, average funding level available for such contracts, anticipated funding minimums, maximums or ranges per award, if applicable; and

(f) proposed vendor performance reporting requirements.

4. upon production of a solicitation document, a summary outlining the information contained within such document including, but not limited to, statements explaining:

(a) the procurement method and purpose;

(b) the category of the procurement;

(c) a description in plain language of the scope of goods or services to be procured;

(d) the submission method and period for bids;

(e) the eligibility criteria of the bidder;

(f) the evaluation and award criteria;

(g) the estimated award date or period;

(h) the estimated starting and scheduled completion date of the contract;

(i) the public comment period; and

(j) the date and reason for any modification or amendment to the solicitation document, if applicable.

5. upon selection of a bidder for an award, a summary outlining such award, including, but not be limited to, statements explaining:

(a) the award date, description, and value;

(b) details of the selected bidder; including legal name, address, and point of contact;

(c) a description in plain language of the scope of goods or services to be provided pursuant to such award;

(d) the estimated starting and completion dates of the contract;

(e) the date and reason for any modification or amendment to such award; and

(f) the number and list of other responding bidders not selected for such award.

6. upon award of a contract, a summary outlining the basic information of such contract including, but not limited to, statements explaining:

(a) the contract date, type, and category;

(b) the name of the agency that awarded such contract;

(c) identifying details of the contractor, including such contractor’s legal name, organization identification, address, and contact point;

(d) a description in plain language of the scope of goods or services to be provided pursuant to the contract;

(e) the method of such award;

(f) the dollar amount of the maximum expenditure authorized under such contract;

(g) the starting and anticipated completion date of such contract;

(h) the date and reason for any modification or amendment to such contract, if applicable; and

(i) the registration number assigned to such contract by the comptroller.

7. upon agency expenditures pursuant to a contract, details of each spending transaction against the contract, including:

(a) the date, value, payer, and payee of such transaction;

(b) a list of key milestones for contract implementation pursuant to such expenditure, including the status of such milestones;

(c) warrants for work completed or supplies furnished including relevant vouchers rendered by the commissioner or director of the contracting agency pursuant to such expenditure;

(d) any subcontract relating to such expenditure;

(e) any order of additional work relating to such expenditure, if any; and

(f) information regarding contractor performance pursuant to such expenditure as required by section 6-116.1;

§ 2. This local law takes effect 120 days after it becomes law.

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Int. No. 1686

By Council Members Barron, Miller and Kallos

..Title

A Local Law to amend the administrative code of the city of New York, in relation to the disclosure of information regarding past engagement in slavery by city contractors

..Body

Be it enacted by the Council as follows:

 Section 1.  Declaration of legislative intent and findings. In recent years, companies in existence today have discovered and revealed that they had engaged in and/or profited from the commerce generated by the trade or use of the labor of enslaved Africans during the period of the Trans-Atlantic Slave Trade, from approximately 1441 to 1888. It has been reported that some large companies, for example, Aetna, a company that apparently insured slaveholder interests in slaves in the case of their death or damage, have been found to have directly profited from such commerce. J.P. Morgan Chase issued a letter of apology after it discovered that two of its predecessor companies actually participated in the slave trade and owned slaves it had taken as collateral for loans. J.P. Morgan Chase attributed the discoveries to the requirement of disclosure for contractors of the City of Chicago.

While it is specifically not the intent of this legislation that the question of past links to slavery serve as a litmus test to determine who the city should do business with, such information is important for the city and the country as they reappraise the history of slavery as a result of these new findings. Accordingly, this local law would require companies doing business with the city to search their pasts and reveal whether they have engaged in or profited from slavery.

§ 2. Chapter 1 of title 6 of the administrative code of the city of New York is amended by adding a new section 6-115.2 to read as follows:

§ 6-115.2 Disclosure of profit from or engagement in slavery. a. Definitions. For purposes of this section, the following terms have the following meanings:

Affiliated company. The term “affiliated company” means the parent company of a contractor and any subsidiaries of the contractor.

Contract. The term “contract” means any written agreement, purchase order or instrument whereby the city is committed to expend or does expend funds in return for an interest in real property, work, labor, services, supplies, equipment, materials, construction, construction-related service or any combination of the foregoing.

Contracting agency. The term “contracting agency” means a city, county, borough or other office, position, administration, department, division, bureau, board or commission, or a corporation, institution or agency of government, the expenses of which are paid in whole or in part from the city treasury.

Contractor. The term “contractor” means any individual, sole proprietorship, partnership, joint venture, corporation or other form of doing business that enters into a contract with any contracting agency.

Predecessor company. The term “predecessor company” means an entity whose ownership, title and interest, including all rights, benefits, duties and liabilities, were acquired in an uninterrupted chain of succession by a contractor.

Subsidiary company. The term “subsidiary company” means an entity that is controlled directly or indirectly through one or more intermediaries by a contractor or such contractor’s parent company.

b. No contracting agency shall enter into or renew any contract for an amount in excess of $100,000 with any proposed contractor who does not certify as a material condition of such contract that the proposed contractor has searched its records and relevant history to determine whether it or any predecessor or affiliated company ever engaged in or profited from the trade or use of slaves. Such certification shall also include a statement of the results of such search. If the proposed contractor determines that it or its predecessor or affiliated companies engaged in or profited from slavery, then the contractor shall also provide a statement detailing the nature and extent of such engagement or profit, including relevant historical and other documentation, to the contracting agency which shall forward such information to the council.

c. The requirements of this section do not apply: (i) to emergency contracts entered into pursuant to section 315 of the charter and for which no entity that will comply with the requirements of this section and which is capable of fulfilling such contract is immediately available; or (ii) where such compliance would violate or be inconsistent with the terms or conditions of a grant, subvention or contract with a public agency or the instructions of an authorized representative of any such agency with respect to any such grant, subvention or contract.

§ 3. This local law takes effect 120 days after it becomes law, except that city agencies, including but not limited to the procurement policy board, may take such actions as are necessary for the implementation of this local law, including the promulgation of rules, before such date.

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Int. 697/2011

Int. 469/2006

Int. 300/2004

08/13/19

1. Open Contracting Partnership, “Public Contracts Matter,” <https://www.open-contracting.org/what-is-open-contracting/> (last visited Oct. 20, 2021). [↑](#footnote-ref-2)
2. *See* Open Contracting Partnership, “How Governments Spend: Opening up the Value of |Global Public Procurement” (2020) at 3, *available at* <https://www.open-contracting.org/wp-content/uploads/2020/08/OCP2020-Global-Public-Procurement-Spend.pdf>. [↑](#footnote-ref-3)
3. Marcela Roza, Felipe Estefan, and Luis Vélez Pretelt, “Open Contracting Data Standard: Better Data for Better Decisions,” World Bank Blogs, Dec. 4, 2014, *available at* <https://blogs.worldbank.org/governance/open-contracting-data-standard-better-data-better-decisions>. [↑](#footnote-ref-4)
4. *See* Open Contracting Partnership, “How Open Data Helps WTO GPA Objectives,” (2019) *available at* <https://www.open-contracting.org/wp-content/uploads/2019/11/OCP2019wtogpaguidance.pdf>; *see also* World Trade Organization, “What is the GPA?” *available at.* <https://www.wto.org/english/tratop_e/gproc_e/gp_gpa_e.htm>. [↑](#footnote-ref-5)
5. Open Contracting Partnership “Open up Public Contracting,” (2018) at 4, *available at* <https://www.open-contracting.org/wp-content/uploads/2018/03/Open-contracting_FA_v1_for_web.pdf>. [↑](#footnote-ref-6)
6. *See* Transparent Public Procurement Rating, “An Interactive Comparison of Countries Based on Various Indicators,” <https://www.tpp-rating.org/page/eng/rating/> (last visited Oct. 20, 2021). [↑](#footnote-ref-7)
7. *See* Open up Public Contracting, *supra* note 5 at 5. [↑](#footnote-ref-8)
8. *Id.*  [↑](#footnote-ref-9)
9. *See* N.Y.C. Admin. Code §§23-501- §23-506; *see also* N.Y. City Council, Local Law 11 of 2012, A local law to amend the administrative code of the city of New York, in relation to publishing open data, *available at* <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=649911&GUID=E650813B-B1E9-4E56-81BA-58261487DA4A> [↑](#footnote-ref-10)
10. Jillian Jorgensen “More Than 100 Nonprofits Want Change to City Charter to Help Them get Paid on Time,” NY Daily News, Jan. 7, 2019 *available at* <http://www.nydailynews.com/news/politics/ny-pol-nonprofits-contracts-deblasio-city-charter-20190104-story.html>. [↑](#footnote-ref-11)
11. *See* Mayor’s Office of Contract Services, “PASSPort,” <https://www1.nyc.gov/site/mocs/systems/about-go-to-passport.page>, (last visited Oct. 20, 2021). [↑](#footnote-ref-12)
12. *Id.*  [↑](#footnote-ref-13)
13. New York City Council Internal Staff Meetings with the Mayor’s Office of Contract Services. [↑](#footnote-ref-14)
14. *See* PASSPort, *supra* note 11. [↑](#footnote-ref-15)
15. *See* Ethan Geringer-Sameth,“City's $20 Billion in Contracting Takes Another Step into Modernity,” Gotham Gazette, Feb. 9, 2020, *available at* <https://www.gothamgazette.com/city/9120-city-s-20-billion-in-contracting-takes-another-step-into-modernity>. [↑](#footnote-ref-16)
16. *See* N.Y.C. Admin Code §6-131; *see also* N.Y. City Council, Local Law 5 of 2012, A Local Law to amend the administrative code of the city of New York, in relation to the posting of material terms of contracts entered into by the city on a newly created public, online searchable database, *available at* <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=1017906&GUID=06B51A8D-BF12-4A19-B69A-3AB1993FF514> [↑](#footnote-ref-17)
17. N.Y.C. Charter §1064(d); *see also* N.Y. City Council, Local Law 76 of 2017, A Local Law to amend the New York city charter, in relation to requiring information about city contracts and contractors to be available online for public access, *available at* <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=2867857&GUID=3B3CB394-8DD4-4850-A638-16E14DF4EA36> [↑](#footnote-ref-18)
18. N.Y.C. Charter §1064(a) [↑](#footnote-ref-19)
19. *Id.* [↑](#footnote-ref-20)
20. Local Law 76 of 2017, *supra* note 17. [↑](#footnote-ref-21)
21. Local Law 5 of 2012, *supra* note 15. [↑](#footnote-ref-22)
22. *See* Zoe Thomas, “The Hidden Links Between Slavery and Wall Street,” BBC News, Aug. 29, 2019, *available at* <https://www.bbc.com/news/business-49476247>. [↑](#footnote-ref-23)
23. *See* Michael Ralph and William Rankin, “Decoder: The Slave Insurance Market,” Foreign Policy, Jan/Feb 2017, *available at* <https://foreignpolicy.com/2017/01/16/decoder-slave-insurance-market-aetna-aig-new-york-life/> [↑](#footnote-ref-24)
24. *See* “Aetna Apologizes for Slave Insurance” L.A. Times, Mar. 11, 2000, *available at* <https://www.latimes.com/archives/la-xpm-2000-mar-11-fi-7637-story.html> [↑](#footnote-ref-25)
25. *See* Peter Viles, “Suit seeks billions in slave reparations” CNN, Mar. 27, 2002, *available at* <https://edition.cnn.com/2002/LAW/03/26/slavery.reparations/> [↑](#footnote-ref-26)
26. *See* *In re African-American Slave Descendants Litigation*, 375 F.Supp.2d 721 (N.D. Ill., 2005); *aff’d by In re African-American Slave Descendants Litigation*, 471 F.3d 754 (C.A.7 (Ill.), 2006). [↑](#footnote-ref-27)
27. *See* “An Update on Corporate Slavery” N.Y. Times, Jan. 31, 2005, *available at* <https://www.nytimes.com/2005/01/31/opinion/an-update-on-corporate-slavery.html> [↑](#footnote-ref-28)
28. City of Chicago Mun. Code. § 2-92-585 (“This section shall be known and cited as the ‘Business, Corporate and Slavery Era Insurance Ordinance’. The purpose of this section is to promote full and accurate disclosure to the public about any slavery policies sold by any companies, or profits from slavery by other industries (or their predecessors) who are doing business with the city.

Each contractor with whom the city enters into a contract, whether subject to competitive bid or not, must complete an affidavit verifying that the contractor has searched any and all records of the company or any predecessor company regarding records of investments or profits from slavery or slaveholder insurance policies during the slavery era. The names of any slaves or slaveholders described in those records must be disclosed in the affidavit. The chief procurement officer shall make the information available to the public and provide an annual report to the city council.

Failure to comply with this section shall deem the contract voidable on behalf of the city.”). [↑](#footnote-ref-29)
29. *See* Ken Magill, “From J.P. Morgan Chase, an Apology And $5 Million in Slavery Reparations” The N.Y. Sun, Feb. 1, 2005, *available at* <https://www.nysun.com/business/from-jp-morgan-chase-an-apology-and-5-million/8580/> [↑](#footnote-ref-30)
30. *See* City of Los Angeles Admin. Code. §§ 10.41–10.41.5 [↑](#footnote-ref-31)
31. *See* City of Milwaukee Code of Ordinances § 310-14. [↑](#footnote-ref-32)
32. *See* City of San Francisco Admin. Code. §§ 12Y.1–12Y.7 [↑](#footnote-ref-33)
33. *See* City of Oakland Code of Ordinances § 9.60.010. [↑](#footnote-ref-34)
34. *See* Kenny Choi, “ Oakland Council Revives 2005 Law Requiring Companies To Disclose Historical Ties To Slavery” CBS News (Oct. 8, 2020) *available at* <https://sanfrancisco.cbslocal.com/2020/10/08/oakland-slavery-disclosure-ordinance-revived/> [↑](#footnote-ref-35)