

CITY OF JONESBORO, GEORGIA SURVEILLANCE, VIDEO AND AUDIO MONITORING POLICY

Responsible Departments: City Manager / Information Technology

SECTION 1. PURPOSE AND LEGISLATIVE POLICY OBJECTIVES

A. PURPOSE

The purpose of this Policy is to establish uniform standards governing the installation, operation, access, monitoring, recording, retention, disclosure, and use of City-owned or City-controlled video and audio surveillance systems.

The City recognizes that surveillance technology serves legitimate governmental purposes, including public safety, facility security, emergency response, protection of City property, investigation of suspected misconduct, and preservation of evidence.

The City also recognizes that surveillance technology can create significant privacy, employment, security, and governance concerns if it is used without appropriate limitations and accountability.

This Policy is intended to ensure that surveillance systems are used only for legitimate governmental purposes, that access is appropriately restricted, that activity is auditable, and that no person uses City surveillance technology for personal, political, retaliatory, discriminatory, or otherwise unauthorized purposes.

B. POLICY OBJECTIVES

It is the intent of the Mayor and Council that City surveillance technology remain a tool for security, safety, legitimate governmental investigations, and protection of City property—not a tool for personal, political, retaliatory, or unauthorized monitoring of City employees or other persons.

The City shall maintain appropriate controls so that access to surveillance technology is based upon legitimate governmental need, not merely position, title, or technical ability to access the system.

SECTION 2. SCOPE

This Policy applies to City-owned, City-operated, City-controlled or City-contracted systems used for security or surveillance of City facilities or property, including but not limited to:

1. Security cameras;
2. Video recording systems;
3. Audio recording or monitoring equipment;
4. Cameras or microphones integrated into security systems;
5. Live video or audio monitoring systems;
6. Recorded video or audio;
7. Cloud-based surveillance platforms;
8. Mobile or remote surveillance applications;
9. Surveillance-system administrator accounts;
10. Any future technology capable of capturing, transmitting, recording, storing, or monitoring audio or video within City facilities or on City property.

This Policy applies to all persons with access to City surveillance systems, including elected officials, appointed officials, employees, contractors, vendors, consultants, law enforcement personnel and other authorized users.

A system is covered based on its function and City control, not the department or room where it is located. Fixed cameras serving City Hall and the Police Department in the shared building are covered when used for ordinary facility security.

Excluded activities:

- The use and recording of public meetings remain subject to the Open Meetings Act and shall be allowed as a matter of right by law.
- The use and recording of Municipal Court proceedings remain subject to applicable laws and judicial rules or policies governing those activities.
- Police body cameras, cameras in police vehicles, police drones, traffic cameras, law enforcement interview recordings, operational emergency communications and other systems used primarily for law enforcement operations remain governed by the laws, retention schedules and departmental procedures applicable to those activities. Fixed cameras serving the shared City Hall and Police Department building for ordinary facility security remain covered by this Policy.
- The prohibitions on personal, political or retaliatory use, unauthorized disclosure and credential sharing also apply to City personnel using excluded City systems to the extent consistent with applicable law and the specialized policies governing those systems. The covered surveillance recording remains subject to this Policy's restrictions on use and disclosure if transmitted by email.

SECTION 3. DEFINITIONS

A. “Surveillance System”

Any City-owned or City-controlled technology capable of capturing, transmitting, monitoring, recording, storing, retrieving, or reproducing video or audio, subject to Section 2 of this Policy.

B. “Live Monitoring”

Viewing or listening to a surveillance system in real time, regardless of whether the information is simultaneously recorded.

C. “Recorded Material”

Any video, audio, photograph, image, recording, or other information captured or generated by a surveillance system.

D. “Authorized User”

A person who has been expressly granted access to a surveillance system for a legitimate governmental purpose and whose access is consistent with this Policy.

E. “Administrator”

An individual authorized in writing by the City official with lawful authority over a system covered by this Policy to perform technical administration of that system. The Administrator may be the Information Technology Consultant, an individual designated by the Information Technology Consultant and approved in writing by the responsible City official, or another individual designated by that official. Each Administrator shall use an individual account where technically feasible. Designation as Administrator does not, by itself, authorize monitoring, review or disclosure of recordings, activation of audio or decisions reserved to City officials under this Policy.

F. “Legitimate Governmental Purpose”

A documented governmental purpose reasonably related to public safety, facility security, emergency response, protection of City property, law enforcement, investigation of suspected misconduct, compliance with law, litigation, risk management, or another authorized municipal function.

99 **G. “Employee Monitoring”**

100 The use of surveillance technology to observe, listen to, track, evaluate, or otherwise monitor an
101 employee’s conduct, conversations, workplace discussions, productivity, political activity, or
102 personal activities.

103 **H. “Information Technology Consultant”**

104 The individual or firm engaged by the City under a written agreement to provide information
105 technology services. When the consultant is a firm, an individual assigned by the firm may
106 perform duties under this Policy only within the scope of that agreement and with the City’s
107 approval for the applicable system or task.

108 **SECTION 4. AUTHORIZED PURPOSES**

109 City surveillance systems may be used only for legitimate governmental purposes, including:

- 110 1. Protection of City employees, residents, visitors, and property;
- 111 2. Prevention, detection, and investigation of criminal activity;
- 112 3. Emergency response;
- 113 4. Facility security;
- 114 5. Document investigation of suspected misconduct or violations of law or City policy;
- 115 6. Preservation of evidence;
- 116 7. Response to claims, litigation, or anticipated litigation;
- 117 8. Risk management;
- 118 9. Compliance with legal requirements;
- 119 10. Other lawful municipal purposes specifically authorized by the Mayor, City Manager or
120 City Council within their respective authority. ,

121 Surveillance systems shall not be used merely because an authorized user is curious about the
122 activities or conversations of another person.

123 **SECTION 5. PROHIBITED USES**

124 No person shall use, access, monitor, record, review, download, distribute, or otherwise use City
125 surveillance systems for:

- 126 1. Personal curiosity;
- 127 2. Political purposes;
- 128 3. Campaign activity;
- 129 4. Retaliation;
- 130 5. Harassment or intimidation;
- 131 6. Discrimination;
- 132 7. Personal disputes;

8. Monitoring an employee's private or workplace conversations without a legitimate governmental purpose;
9. Monitoring employees for the purpose of evaluating routine workplace performance unless specifically authorized through an established personnel or investigative process;
10. Monitoring City employees because of their political beliefs, affiliations, protected activities, or exercise of legal rights;
11. Monitoring conversations unrelated to a legitimate governmental purpose;
12. Circumventing established supervisory, personnel, public-records, or investigative procedures;
13. Sharing surveillance information with unauthorized persons; or
14. Any purpose prohibited by federal or state law.

The fact that a person has technical access to a surveillance system shall not, by itself, constitute authorization for any particular use. Surveillance systems shall not be used merely because an authorized user is curious about the activities or conversations of another person.

SECTION 6. ELECTED OFFICIAL ACCESS

Holding elected office shall not, by itself, provide unrestricted access to City surveillance systems.

No elected official, including the Mayor or any member of the City Council, shall use City surveillance systems to conduct independent monitoring or surveillance of City employees or City operations except as specifically authorized under this Policy or otherwise authorized by law.

No elected official may use surveillance access for a personal, political or retaliatory purpose or as a substitute for established personnel and investigative procedures.

An elected official may request access to surveillance information when there is a legitimate governmental purpose. Such requests shall be handled through the procedures established by this Policy and applicable law.

Nothing in this section shall prevent the Mayor, City Council, or an individual elected official from performing duties expressly assigned by the City Charter, ordinance, or state law. Subject to this Policy's limits on purpose, security, auditability and disclosure:

- The Mayor may access information reasonably needed to perform executive duties under Charter Sections 2.26 and 2.27.
- The City Council may obtain recordings and related information through its inquiry and administrative investigation authority under Charter Section 2.15. Such access shall be coordinated through an authorized custodian and documented.

However, access to surveillance technology shall not be used as a substitute for established governmental oversight, personnel, management, investigative, or administrative procedures. Nothing in this policy shall be interpreted to limit or prohibit requests made under the Georgia Open Records Act.

SECTION 7. EMPLOYEE MONITORING

City surveillance systems shall not be used for routine monitoring of employee conversations, workplace discussions, productivity, or conduct.

Surveillance information may be reviewed in connection with a documented investigation involving:

1. Suspected criminal conduct;
2. Alleged misconduct;
3. Violation of City policy;
4. Threats to workplace safety;
5. Theft, fraud, or misuse of City property;
6. Security incidents;
7. Workplace violence;
8. A claim or legal proceeding; or
9. Another legitimate governmental purpose.

Where an employee is the subject of an investigation, surveillance information shall be accessed only by persons with a legitimate need to know.

Nothing in this section prohibits the City from using surveillance systems for legitimate security purposes merely because employees may incidentally appear within the camera's field of view.

SECTION 8. AUDIO SURVEILLANCE

Because audio surveillance may present greater privacy and legal concerns than visual surveillance, audio recording and monitoring shall be subject to heightened controls. A sign or general employee acknowledgment does not by itself establish consent to surveil or audio monitor every conversation.

1. Before any City surveillance system capable of recording or transmitting audio is installed, activated, used or materially modified, the Administrator shall determine:
2. Whether such audio recording is necessary to further a legitimate government purpose;
3. The governmental purpose for any audio recording;
4. Whether less intrusive alternatives are available;
5. Adherence to applicable federal and Georgia law;
6. Whether notice is required;
7. The appropriate retention period of any audio recordings;

8. Who may access the audio recordings;
9. Whether live listening is permitted; and
10. Whether audio should be disabled in areas where it is not necessary for the system's governmental purpose.

Where audio is not necessary to accomplish the legitimate governmental purpose of a surveillance system, the Administrator shall provide a written recommendation to the Mayor and Council to disable the audio function, if feasible. The audio function shall remain disabled unless an official acting lawful authority provides written authorization to the Administrator authorizing the enabling of audio surveillance in writing. The Administrator shall provide contemporaneous notice of such written authorization to Council.

No person shall intentionally listen to, record or retrieve audio conversations through a City surveillance system unless the person is authorized to do so for a legitimate governmental purpose and the activity complies with applicable law and this Policy. This Policy does not authorize interception or recording prohibited by federal or Georgia law.

SECTION 9. EMPLOYEE AND PUBLIC NOTICE

The City shall provide reasonable notice that video and/or audio surveillance is in use in City facilities or areas where surveillance occurs, subject to applicable law and legitimate security considerations.

Notice may include:

1. Signage;
2. Employee notices;
3. Personnel policies;
4. Facility notices;
5. Written acknowledgment forms; or
6. Other appropriate methods.

Notice shall identify, as appropriate, whether the system records video, audio, or both. Notice does not replace a legal basis or consent required for recording.

The City shall review existing facilities and surveillance systems to determine where notice is necessary.

SECTION 10. AUTHORIZED ACCESS

Access to surveillance systems shall be limited to persons who require access for a legitimate governmental purpose.

237 The City shall maintain a current list of all individuals with:

- 238 1. Administrator privileges;
- 239 2. Live monitoring privileges;
- 240 3. Recorded-video access;
- 241 4. Audio access;
- 242 5. Export/download privileges; or
- 243 6. System-management privileges.

244 Access shall be granted according to the principle of least privilege.

245 Users shall receive only the level of access necessary to perform their authorized duties.

246 Shared user accounts shall be prohibited whenever the surveillance platform permits individual
247 user accounts.

248 **SECTION 11. CURRENT ACCESS**

249 **REVIEW**

250 Within sixty (60) days of adoption of this Policy, the Administrator, in coordination with
251 Information Technology, shall conduct a complete review of existing surveillance-system access.

252 The review shall identify:

- 253 1. Every person currently possessing administrator credentials;
- 254 2. Every person capable of viewing live video;
- 255 3. Every person capable of listening to live audio;
- 256 4. Every person capable of reviewing recordings;
- 257 5. Every person capable of exporting or downloading recordings;
- 258 6. The date each person's access was granted;
- 259 7. The authority under which access was granted;
- 260 8. The business or governmental purpose for such access; and
- 261 9. Whether each person's existing access remains necessary.

262 Access that cannot be justified under this Policy shall be removed or modified. The Mayor's
263 access shall be assessed under Section 6 of this Policy and the Charter.

264 **SECTION 12. AUDIT LOGS**

265 To the extent technically available, surveillance systems shall maintain audit records identifying:

- 266 1. User logins;
- 267 2. Live monitoring activity;

- 268 3. Playback or review of recordings;
- 269 4. Audio access;
- 270 5. Downloads and exports;
- 271 6. Changes to system settings;
- 272 7. Changes to user permissions;
- 273 8. Deletion of recorded material; and
- 274 9. Other significant system activity.

275 Audit logs shall be preserved in accordance with the City's applicable records-retention
276 requirements.

277 The City shall periodically review surveillance-system audit logs to identify unauthorized or
278 unusual activity.

279 The City Manager or designated administrator shall establish the frequency and methodology of
280 such reviews.

281 **SECTION 13. PRESERVATION OF AUDIT** 282 **INFORMATION**

283 When a known incident or accident, complaint, investigation, claim, sufficiently identified open
284 records request or reasonably anticipated litigation creates a need to preserve footage, the
285 responsible custodian shall promptly protect relevant existing recordings and audit logs from
286 automatic deletion or overwriting. Potentially responsive footage shall be preserved while a
287 records request is processed in accordance with the Georgia Open Records Act.

288 No person shall intentionally delete, alter, conceal, or destroy surveillance records or audit logs
289 for the purpose of preventing an authorized investigation.

290 **SECTION 14. INVESTIGATIONS OF** 291 **SUSPECTED MISUSE**

292 Any person may report suspected misuse of a City surveillance system. Any person may report
293 suspected misuse of a City surveillance system to the City Clerk, Mayor, City Manager or Police
294 Chief.

295 The recipient shall promptly notify the City Attorney and the Administrator so that relevant
296 recordings and logs are preserved.

297 An official with authority under the Charter shall direct an appropriate administrative
298 investigation. If the complaint concerns the Mayor or a councilmember, the City Attorney shall

299 advise the Council on the lawful process. A person who is the subject of a complaint shall not
300 control preservation or selection of the investigator.

301 A complaint alleging unauthorized surveillance, monitoring, access, or use shall be referred to an
302 appropriate investigating authority or subject to an administrative investigation.

303 Where the complaint involves the City Manager, Mayor, Councilmember, Police Chief,
304 department head, or another person who would ordinarily participate in the investigation, the
305 governing authority in consultation with the City Attorney, or other appropriate independent
306 authority shall determine the appropriate investigative process.

307 Where appropriate, the City may retain independent outside counsel, an independent
308 investigator, or another qualified third party.

309 No person shall retaliate against an individual for making a good-faith complaint regarding
310 suspected surveillance-system misuse.

311 **SECTION 15. SURVEILLANCE** 312 **INVOLVING CITY OFFICIALS**

313 Nothing in this Policy shall be interpreted to prevent the City from lawfully collecting,
314 preserving, or reviewing surveillance information concerning an elected or appointed official
315 when such information is relevant to a legitimate governmental investigation, legal proceeding,
316 security matter, or other authorized governmental purpose.

317 Surveillance shall not be selectively used to target an official or employee for political,
318 retaliatory, personal, or discriminatory reasons.

319 **SECTION 16. EXPORTING AND** 320 **SHARING RECORDINGS**

321 Subject to the provisions in Section 17 of this Policy, recorded video or audio may not be
322 downloaded, copied, transmitted, posted, emailed, or otherwise distributed except for an
323 authorized governmental purpose.

324 Any export shall, to the extent technically feasible, identify:

- 325 1. The person making the export;
- 326 2. The date and time;
- 327 3. The material exported;
- 328 4. The reason for the export;
- 329 5. The intended recipient; and

6. The applicable case, incident, claim, investigation, or other governmental purpose.

Surveillance recordings shall not be posted to personal social-media accounts or distributed for political or campaign purposes.

SECTION 17. PUBLIC RECORDS AND LEGAL REQUESTS

Surveillance recordings and related records shall be maintained, disclosed, withheld, redacted or preserved in accordance with Georgia law, including the Open Records Act, applicable exemptions, records retention and legal hold requirements

Nothing in this Policy creates a right of confidentiality where such confidentiality is not authorized by law.

Requests for surveillance recordings shall be handled by the designated records officer under the City's established Open Records Act procedures. The retrieval, review and production of existing responsive recordings shall be documented. An Open Records Act request does not authorize new recording, live monitoring or covert surveillance. Any decision to withhold material must rest on applicable law, not this Policy alone.

SECTION 18. RETENTION AND DELETION

The City, in consultation with the Administrator, shall establish a written retention schedule for surveillance recordings based upon:

1. Applicable law;
2. Records-retention requirements;
3. Operational needs;
4. Security and emergency needs;
5. Litigation requirements;
6. Investigative requirements; and
7. Available system capacity.

No surveillance recording shall be intentionally destroyed when the City has a legal obligation or authorized preservation requirement applicable to the recording.

SECTION 19. SYSTEM SECURITY

The City shall implement reasonable technical and administrative safeguards to protect surveillance systems from unauthorized access.

At a minimum, the City should utilize:

1. Individual user credentials;
2. Strong password requirements;
3. Multi-factor authentication where supported;
4. Periodic access reviews;
5. Removal of inactive accounts;
6. Prompt removal of access upon separation or change in duties;
7. Restricted administrator privileges;
8. Vendor-access controls; and
9. Appropriate cybersecurity protections.

SECTION 20. VENDOR AND CONTRACTOR ACCESS

Vendors, contractors, consultants, and third parties shall not receive surveillance-system access unless the access is necessary to perform authorized services.

Where appropriate, contracts shall require:

1. Confidentiality;
2. Security safeguards;
3. Limited access;
4. Auditability;
5. Prohibition on unauthorized copying or disclosure;
6. Prompt termination of access when services conclude; and
7. Compliance with applicable law and City policy.

SECTION 21. NO SHARED CREDENTIALS

Individual surveillance-system accounts shall be used whenever technically feasible.

No person shall knowingly use another person's credentials or permit another person to use their credentials.

389 Administrator credentials shall be maintained securely and shall not be routinely shared.

390 **SECTION 22. TRAINING**

391 Individuals granted surveillance-system access shall receive training regarding:

- 392 1. This Policy;
- 393 2. Authorized and prohibited uses;
- 394 3. Employee privacy considerations;
- 395 4. Audio-recording restrictions;
- 396 5. Security requirements;
- 397 6. Public-records obligations;
- 398 7. Retention requirements;
- 399 8. Audit logs; and
- 400 9. Consequences of unauthorized use.

401 Access may be suspended or revoked when required training has not been completed.

402 **SECTION 23. COMPLIANCE AND** 403 **ENFORCEMENT**

404 Unauthorized access or misuse of a City surveillance system may result in:

- 405 1. Immediate suspension or removal of system access;
- 406 2. Administrative investigation;
- 407 3. Employee disciplinary action, where applicable;
- 408 4. Contractual consequences;
- 409 5. Referral to law enforcement or another appropriate authority when warranted;
- 410 6. Referral to the City Attorney; or
- 411 7. Other remedies authorized by law.

412 Nothing in this Policy limits any remedy otherwise available under federal or state law.

413 **SECTION 24. PROHIBITION ON** 414 **RETALIATION**

415 No person shall use a City surveillance system to retaliate against an employee, resident,
416 contractor, elected official, or other person for:

- 417 1. Making a good-faith complaint;
- 418 2. Reporting suspected misconduct;

3. Participating in an authorized investigation;
4. Exercising a legal right;
5. Reporting a safety concern; or
6. Opposing conduct reasonably believed to violate law or City policy.

SECTION 25. TRANSPARENCY AND PERIODIC REVIEW

The City Manager, in consultation with the Administrator, shall provide the Mayor and Council with an annual report regarding the surveillance systems covered by this Policy.

The report should include:

1. A current inventory of surveillance systems;
2. Locations and general capabilities;
3. Whether systems record video, audio, or both;
4. The names and number of authorized users;
5. Significant changes to system access;
6. Material security incidents;
7. Confirmed instances of unauthorized access;
8. Alleged policy violations;
9. Major system replacements or expansions; and
10. Recommendations for policy or technology changes.

The report shall not disclose information that would compromise legitimate security interests or violate applicable law and any such information shall be redacted per Georgia law before public dissemination.

SECTION 26. INSTALLATION OR EXPANSION OF SURVEILLANCE SYSTEMS

Before installing a new surveillance system or materially expanding an existing system, the City shall evaluate:

1. The governmental purpose;
2. The necessity of the system;
3. Whether video is sufficient or audio is necessary;
4. The location and field of view;
5. Privacy considerations;
6. Notice requirements;

- 452 7. Data retention;
453 8. Access controls;
454 9. Audit capabilities;
455 10. Cybersecurity requirements; and
456 11. Estimated cost.

457 The City shall not activate audio functionality merely because the technology is available when
458 audio is not necessary for the legitimate governmental purpose. Cameras or microphones shall
459 not be placed in restrooms, changing rooms, locker rooms or other spaces intended for bodily
460 privacy.

461 The Police Chief shall be consulted on systems serving shared City Hall and Police Department
462 spaces before activation.

463 **SECTION 27. SYSTEM INVENTORY**

464 The City Manager, through Information Technology and in coordination with the Police Chief
465 for shared-building systems operated by the Police Department, shall maintain a current
466 inventory of all City surveillance systems.

467 The inventory shall identify, at minimum:

- 468 1. Location;
469 2. Camera/device identification number;
470 3. Video capability;
471 4. Audio capability;
472 5. Recording capability;
473 6. Live-monitoring capability;
474 7. Storage location;
475 8. Retention period;
476 9. Administrator;
477 10. Authorized users; and
478 11. Vendor or system provider, where applicable.

479 The inventory shall be reviewed at least annually.

480 **SECTION 28. INITIAL** 481 **IMPLEMENTATION REQUIREMENTS**

482 Within sixty (60) days of adoption of this Policy, the City Manager shall coordinate the
483 requirements set forth below for systems covered by this Policy. The Information Technology
484 Consultant shall perform the technical tasks within the scope of the City's agreement, either

directly or through an Administrator approved under Section 3(E). The Police Chief shall be consulted concerning covered systems operated by the Police Department in the shared building.

The requirements are:

- Complete a comprehensive inventory of all systems covered by this Policy;
- Classify devices in the shared building according to their facility security or operational law enforcement function;
- Identify which devices have audio capability;
- Identify which devices actively record audio;
- Identify which devices permit live audio monitoring;
- Identify every individual with system access;
- Identify every individual with administrator privileges;
- Determine whether audit logs exist;
- Preserve available historical audit logs;
- Determine the retention period for recordings;
- Review and document existing access authorizations;
- Recommend removal of unnecessary or unauthorized access;
- Establish an employee and public notice process;
- Establish a surveillance-record retention schedule;
- Establish an audit-log review procedure;
- Provide required training to authorized users; and
- Report implementation status to the Mayor and Council.

SECTION 29. EXISTING SYSTEM REVIEW

Within [] days following the completion of the implementation requirements in Section 28, the City Manager shall provide the Mayor and Council with a written report following completion of the initial implementation review.

The report shall specifically identify:

1. The total number of surveillance devices;
2. The number capable of recording video;
3. The number capable of recording audio;
4. The number capable of live audio monitoring;
5. The individuals currently possessing access;
6. The individuals currently possessing administrator access;
7. The system's audit-log capabilities;
8. The period for which audit information is available;
9. Existing retention periods;
10. Existing signage or notice;
11. Existing written procedures;

12. Any identified deficiencies; and
13. Recommendations for corrective action.

SECTION 30. CONSTRUCTION

This Policy shall be interpreted consistently with:

1. The Constitution and laws of the United States;
2. The Constitution and laws of the State of Georgia;
3. The City Charter;
4. Applicable City ordinances;
5. Applicable personnel policies;
6. Applicable public-records requirements;
7. Applicable records-retention requirements; and
8. Any applicable employment obligations.

If any provision of this Policy conflicts with applicable law, the law shall control.

The City Council establishes the standards in this Policy. The Mayor, City Manager, Police Chief and other named officials shall carry out their assigned functions within their respective lawful authority. If any provision conflicts with applicable law or the City Charter, the controlling law or Charter provision governs. This Policy does not authorize recording or disclosure that otherwise requires separate legal authority.

SECTION 31. SEVERABILITY

If any section, subsection, sentence, clause, or provision of this Policy is determined to be invalid or unenforceable, the remaining provisions shall remain in full force and effect to the extent permitted by law.

SECTION 32. EFFECTIVE DATE

This Policy becomes effective upon lawful adoption by the Mayor and Council. The implementation periods in Sections 11 and 28 run from the adoption date. Existing legal duties to preserve evidence or comply with records law apply independently of this Policy.

Adopted this ____ day of October, 2026.

CITY OF JONESBORO, GEORGIA

Donya L. Sartor, Mayor

ATTEST:

Shandrella Jewett, City Clerk

APPROVED AS TO FORM

LaTonya Nix Wiley, City Attorney

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