

APPENDIX “A”

Town of Payson Ethical Standards for Town Employees

PURPOSE

The expectation for all members of the Town’s workforce is that they will promote the highest standards of honesty and integrity in Town government and ensure the quality of Town government through adherence to ethical principles. The purpose of these Ethical Standards is to identify the standards of professional, ethical, legal, and socially responsible behavior expected of Town employees and contract workers (*see Section 3, below*). All Town business should be conducted in a manner that is not only above reproach in fact, but also in appearance.

To identify ethics issues within a legal framework is only the beginning of the process that must be considered in municipal government work. Legal guidelines provide only the initial foundation for ethical issues. As stewards of the public trust, Town employees and contract workers are expected to uphold the highest standard of conduct at all times. An individual employee’s actions will be viewed and regarded by the community, customers, and fellow staff persons, as a reflection of the Town of Payson and its values.

These Ethical Standards for Town Employees are in addition to any other applicable codes of conduct currently or hereafter in effect.

DEFINITIONS

Town employee: Any individual employed by the Town, including full-time, regular employees, part-time, regular employees; part-time, temporary employees; temporary employees; seasonal employees.

Town property: Any Town owned, leased, or controlled property, such as office buildings, parks, preserve areas, and other areas in which the employee may conduct work for the Town.

Town equipment: Any Town owned, leased, or controlled equipment such as vehicles, heavy equipment trucks, mechanical and power devices, hand tools, computers, electronic communication, business machines, etc.

Conflict of interest: A condition that exists when an employee or contract worker participates in or makes a decision that may affect the financial or property interests of the employee, or a close relative of the employee, or as otherwise provided by Arizona law.

Contract worker: An individual who is employed by an outside agency rather than the Town, or who provides services to the Town pursuant to a contract between the individual or agency and the Town for remuneration.

POLICY

Ethical Conduct--Expectations

All Town employees and contract workers must:

1. Uphold and comply with all state and federal laws, and Town ordinances, rules, and policies.
2. Maintain the highest standards of personal integrity, truthfulness, and fairness. See *Attachment A*, Section 1.2.3.
3. Place the interests of the Town, the community, and its citizens before personal or private interests in situations in which they may be in conflict, unless such personal or private interests are clearly more urgent at the time.
4. Promote impartiality, fairness, and equality under the law toward all with whom they may have contact.
5. Support and implement the policy decisions, directions, rules, and regulations established by Town Council and Town management.
6. Comply with the conflict of interest provisions of state law (Arizona Revised Statutes Sections 38-501 through 38-511) and federal law.
7. Comply with all Town Code provisions relating to outside employment, to political activity, and to gifts and gratuities; and these Ethical Standards.
8. Perform the duties and responsibilities of their position in such a manner as to avoid even the appearance of misconduct or impropriety. (For example, would you be proud of your actions if you read about them in the newspaper?)
9. Use Town funds, assets, property, and equipment solely for Town purposes, except for such limited personal uses as are expressly permitted, pursuant to the Town Code or these Ethical Standards.

10. Maintain the confidentiality of information acquired in the performance of governmental duties and not disclose it for any unauthorized purpose, including but not limited to personal, professional, or political benefit or gain. (For example: If you have access to personal information about your coworkers in a Town database, that information should not be shared or otherwise used for unauthorized purposes.)
11. Promote and maintain a work environment free from favoritism or discrimination based on race, color, gender, national origin, religion, age, or physical or mental disability. *See Attachment A, Section 1.2.3, Section 4.2.1.*
12. Promote and maintain a work environment free from sexual harassment or improper sexual conduct or communication (verbal or written). *See Attachment A, Section 6.4.*
13. Promote and maintain a work environment free from foul or abusive language, and from slander and malicious gossip. *See Attachment A, Section 4.2.1.*
14. Promote and maintain a work environment free from undue influence or pressure upon subordinates relating to issues outside the scope of their employment.

Unacceptable Conduct

No Town employee or contract worker shall:

1. Solicit gifts, gratuities, fees, services, discounts, purchases, entertainment, or other benefits or items of value for the performance of their Town duties, or otherwise for personal benefit. *See Attachment A, Section 4.2.1, Section 6.3.1.*
2. Accept monetary gratuities, tips, honoraria, or other payments for services rendered for performing Town employment or official Town duties, other than compensation from the Town or that which is otherwise provided for by law or Town policy. (For example: Financial awards from a professional organization for being a speaker are not acceptable.) *See Attachment A, Section 6.3.1.*
3. Accept any gifts, gratuities, fees, services, discounts, purchases, entertainment, or other personal benefit or items of value (other than what could be made available through the Town's employee benefits programs), if the acceptance could reasonably be

construed as an attempt to exert improper influence on any municipal decision or action, or as a reward for any official action, including those related to hiring, appointment, or promotion. *See Attachment A, Section 4.2.1, Section 6.3.1.*

4. Solicit Town employees for non-work related products and services on behalf of outside vendors during regular work hours. Solicitation for charitable, non-profit fund-raising events is permissible only with the prior approval by the department manager, or equivalent position, and shall not disrupt or negatively impact normal business activities. *See Attachment A, Section 6.3.1.*
5. Engage in political activities during working hours, except that employees may exercise their rights as a citizen to vote and to express opinions as an individual citizen, but may not use their Town position for political purposes. (This rule does not apply to employees who are also elected officials.) *See Attachment A, Section 1.2.7, Section 4.2.1.*
6. Engage in conduct, either during or outside of regular duty hours, which is in violation of the following: *Attachment A, Section 4.2.1.*
7. Use Town resources not available to the public in general, such as Town staff time, funds, equipment, supplies, or facilities, for private or personal gain; use of such resources for personal purposes shall not be permitted unless authorized in writing by a department head or the Town Manager. (For example: use of Town equipment, vehicles, materials, or time to start or operate your own business.) *See Attachment A, Section 4.2.1.*
8. Participate in the consideration, award, or administration of any contract, or in a Town business decision, when to do so constitutes a conflict of interest. (For example: allowing personal relationships to influence Town business decisions or actions.)
9. Knowingly allow themselves, their uniforms, equipment, or other indicators of Town employment to be used to promote any commercial activity. This prohibition does not apply to the filming, photographing, or otherwise capturing the likeness of Town employees or contract workers, while engaged in their normal working activities by the news media, or during activities presented or sponsored by the Town that are open to the public. *See Attachment A, Section 6.3.1.*
10. Engage in Town business-related issues that involve a member of the employee's or contract worker's family, or with which the Town employee or contract worker has a business or personal relationship, unless permitted by law or Town policy, even if the profit or gain is non-monetary in nature.
11. Engage in outside employment, including self-employment or family businesses when to do so conflicts with Town duties and/or responsibilities. *See Attachment A, Section 6.3.1.*

12. Engage in conduct that constitutes or contributes to favoritism or discrimination based on race, color, gender, national origin, religion, age, or physical or mental disability. (For example: serving on a selection panel and influencing disparate treatment of candidates; or favoring the hiring or promotion of persons based on their religion.) *See Attachment A, Rule 29; Section 6.4.*
13. Engage in conduct, while on duty, that constitutes or contributes to any form of sexual harassment or improper sexual conduct (verbal or written). (For example: telling sexually oriented jokes; inappropriate touching; or making sexual advances.) *See Attachment A, Section 6.4.*
14. Engage in foul, abusive, or profane language, while on duty, that demeans, embarrasses, offends, or threatens others. (For example: directing profane remarks at someone; profaning religious beliefs.) *See Attachment A, Section 4.2.1.*
15. Engage in slander or malicious gossip, while on duty, that demeans, embarrasses, offends, or threatens others. *See Attachment A, Section 4.2.1.*
16. Engage in conduct, either while on duty or off-duty, that may put undue influence or pressure upon subordinates, either in relation to official duties or personal involvement. (For example: asking to spend time alone ["dating"]; sharing personal information of an intimate nature; seeking opportunities to make personal sales of any type.) *See Attachment A, Section 6.4.*

RESPONSIBILITIES

All Town employees and contract workers are responsible for complying with these Ethical Standards. In addition, all employees and contract workers who have experienced, observed, or have knowledge of a violation of these Ethical Standards are encouraged to report the violation to the Human Resources Director, or the Town Manager. Complaints regarding any member of the Human Resources department will be filed with the Town Manager. Investigative reports for all complaints will be reviewed by both the Human Resources Director and the Town Manager.

Town of Payson department heads and supervisors are expected to exhibit behavior that upholds excellence in personal and professional conduct. Additionally, all department heads and supervisors, with the advice and assistance of the office of the Human Resources Director, are responsible for enforcing these Ethical Standards.

Staff members who believe they may have a conflict of interest in regard to a Town business matter, after review with the Town Manager, should consult with the Town Attorney's office, which will evaluate the facts and provide guidance on the issue.

EDUCATION AND TRAINING

To provide consistent and up-to-date guidance for Town employees and to protect the public trust, the Town shall provide:

1. Public Service Ethics Training to all Town employees to be conducted no less than annually. New employee orientation shall include a review of the "Ethical Standards Policy". Training sessions will be comprehensive and meaningful, such that they will:
 - Explain the letter and spirit of public service ethics laws regulating service to the Town;
 - Use case studies or examples illustrating the application of the public service ethics laws to general behavior and specific situations; and
 - Examine and illustrate the approved process to follow should employees have questions or concerns regarding their activities or those of others in Town service.

Upon completion of each public service training program, attendees shall sign (1) a statement confirming they have completed the training and acknowledging they are aware of the public service ethics laws and will abide by them, and (2) the Personal Interest Disclosure Form for Employees (*Attachment C* hereto).

2. Educational materials are to be updated periodically to reflect any changes in applicable laws and to incorporate fresh illustrative examples. The Town Attorney shall update annually, or more frequently if necessary, both *Attachment B* (the annotated matrix of public service ethics laws) and *Attachment C* (Personal Interest Disclosure Form) to the Code of Ethical Behavior to ensure the documents present accurate information. The Town Manager shall ensure that each Town employee receives and agrees to follow the Town's Administrative Regulation on ethical standards at new employee orientations.

PROGRAM/PROCESS CONTROLS

Employees in violation of these Ethical Standards will be subject to disciplinary action up to and including termination.

PROCEDURES

Disclosure Procedure

Any employee who is or may be called upon to participate in a decision-making process, in which the employee's participation would constitute a conflict of interest, or the appearance of a conflict of interest or impropriety, must immediately notify his or her supervisor. If a conflict of interest exists, the law requires that the affected employee remove himself or herself from the decision-making process and not participate in the decision, or attempt to influence it in any way. The Town Attorney's office should be called upon, as necessary, to assist in determining whether the specific facts constitute a conflict of interest.

Complaint Procedure

An employee or contract worker who has experienced, observed, or has knowledge of a violation of these Ethical Standards must report it to the Human Resources Director. If any violation is by the Human Resources Director it must be reported to the Town Manager. Information relating to the violation must be formally reported in writing on an Ethics Complaint Form that is available from the Human Resources department. Following an investigation, substantiated complaints will result in corrective action or discipline in accordance with Town Personnel Policies and Procedures. An employee receiving discipline for a violation of these Ethical Standards will be afforded such rights of appeal as are provided by Town Code. Information acquired in the course of an ethics investigation will be accorded the highest degree of confidentiality permitted by the circumstances and by law, but may be subject to disclosure under the Public Records Act.

If the complaint is against the Town Manager or the Town Attorney, the complaint procedure shall follow the procedure set forth in Section 2 of the Town of Payson Code of Ethical Behavior for Town Officials.

Confidentiality of complaints and the disposition thereof is subject to adjudication by the Town.

Retaliation against any person who reports and/or participates in the investigation of a violation of these Ethical Standards is prohibited. Retaliation includes, but is not limited to, unlawful discrimination, refusing to recommend an employee for an opportunity for which he or she qualifies, spreading rumors about the employee, encouraging hostility from co-workers, any other negative, tangible employment action done intentionally, or any action done in the course of employment designed to or resulting in a detriment to the reporting or the participating party. An employee engaging in retaliation will be subject to disciplinary action, up to and including dismissal.

False or Misleading Complaints

If, after reviewing the ethics complaint and investigation, it is determined that the complaint has been filed in bad faith, or for the purpose of harassment, or that false or malicious information has intentionally been provided, the complaining party will be subject to disciplinary action.

ATTACHMENT A

TOPIC	TOWN OF PAYSON PERSONNEL RULES & PROCEDURES
<p>Section 1.2.3 Fair Employment</p>	<p>The Town of Payson is an equal employment opportunity employer and does not discriminate against applicants or employees who meet all qualifications and requirements of Town service on the basis of race, color, gender, national origin, age, disability or any other status protected by law. The Town is committed to its obligations under State and Federal laws against discrimination and will not tolerate retaliation against individuals who oppose unlawful discrimination or participate in investigations concerning claims of discrimination. The Town also prohibits and will not tolerate harassment of applicants or employees on the basis of race, color, religion, gender, national origin, age or disability.</p> <p>Employees and other individuals may address concerns or complaints about alleged, perceived, or actual discrimination to the Personnel Officer or the Town Manager without fear of retaliation. Complaints of unlawful discrimination shall be reported and thoroughly investigated. All employees must comply with the Town's fair employment policies. Any employee, including managers and supervisors, who violates the Town's policies or laws against discrimination shall be subject to discipline, up to and including termination.</p>
<p>Section 1.2.7 Improper Political Activity</p>	<p>No person elected or employed by the Town shall orally, in writing, electronically,, or otherwise solicit or assist in soliciting any assessment, subscription or contribution for any political party or political purpose whatsoever from any Town employee.</p> <p>Any authorized solicitations shall not be conducted during working hours.</p> <p>No employee shall make, solicit or receive any contribution to the campaign funds of any candidate for municipal office of the Town of Payson, or take any part in the management, affairs or political campaign of any such candidate, but he/she may exercise any other rights of a qualified elector.</p>
<p>Section 4.2.1 Reasons For Dismissal</p>	<p>#1 The employee is incompetent or inefficient in the performance of his/her duties.</p> <p>#2 The employee has been abusive in his/her attitude, language, conduct or has caused physical harm or injury to employees or the public.</p>

- #3 The employee violates any reasonable direction and/or written departmental regulation given by the supervisor.
- #4 The employee has violated the substance abuse policy.
- #5 The employee takes anything of value in exchange for providing a favor or better treatment to another person.
- #6 The employee is convicted of a felony.
- #7 The employee has made false statements, written or oral, attempting to conceal any past or present criminal activity.
- #8 The employee fails to notify Human Resources of being arrested or charged with a criminal offense.
- #9 The employee fails to cooperate with any internal investigation by the Town and the failure does not result from the employee's invocation of his/her rights.
- #10 The employee willfully or recklessly causes damage to public property or waste of public resources.
- #11 The employee has been absent without leave, or has failed to report after a leave of absence has expired, or after such leave of absence has been disapproved, revoked, or cancelled by the Town Manager.
- #12 A non-exempt employee engages in outside business activities on Town time.
- #13 An employee uses Town property not otherwise available to the public for personal use.
- #14 The employee has engaged in improper political activities, as prohibited by this Manual.
- #15 The employee deliberately gave incorrect information on his/her employment application.
- #16 The employee has been chronically tardy and/or failed to maintain prescribed working hours.
- #17 The employee has committed any action, on or off the job, which reasonably tends to bring discredit to the Town service.
- #18 The employee has failed to meet the terms of a disciplinary probation period.
- #19 The employee has violated any provision of this Manual.
- #20 The employee has committed any other conduct of equal gravity to the reasons enumerated in this section.

<p>Section 6.3.1 Outside Employment</p>	<p>An employee may engage in outside employment at the employee's discretion. Prior to accepting outside employment, the employee shall first discuss the matter with his/her immediate Supervisor and Department Head.</p> <p>The employee may be asked to choose between his/her position with the Town and any outside employment if it is found that the outside employment interferes with the employee's duties with the Town.</p> <p>Activities performed by licensed attorneys employed by the Town, including mandatory arbitration, pro-bono, and similar activities as required by the Arizona Rules of Court are exempt from this policy.</p> <p>Employees of the Police Department performing law enforcement related activities shall be governed by operations, orders, and directives of the Police Department.</p> <p>Outside employment activities shall not interfere with Town employment, and there shall be no conflict with the hours of the outside employment and the Town position. The following questions are set forth to assist in evaluating the type of activities that would be considered incompatible with Town employment. The list, however, is not intended to be all inclusive:</p> <ol style="list-style-type: none"> 1. Does the outside employment involve receipt or acceptance of any money or other consideration from anyone other than the Town for performance of an act which the employee should be required or expected to render in the course of Town employment? 2. Does the outside employment involve performance of an act or function which may be subject to the control, inspection, review, or enforcement by the employee or the department in which the employee is employed? 3. Does the outside employment affect an employee's attendance, performance or observations of safety precautions on his/her Town job? 4. Is the outside employment with any business or organization from which the Town purchases supplies or services; or with which the Town has a lease or rental property agreement or another contractual relationship?
<p>Section 4.2.1 Gifts & Gratuities</p>	<p>#5 The employee takes anything of value in exchange for providing a favor or better treatment to another person.</p>

Section 6.4
Sexual Harassment
Policy Statement

The Town of Payson wishes to provide its employees with an environment that encourages efficient, productive, and creative work, and which is free of discrimination, including all forms of harassment based upon race, color, religion, age, gender, national origin, or disability. The Town of Payson will not tolerate discrimination or verbal or physical conduct by any employee which harasses, disrupts, or interferes with another person's work performance or which creates an intimidating, offensive, or hostile environment.

... any employee who retaliates against someone for filing a complaint, or for assisting someone who has filed a complaint, alleging or reporting any instance of sexual harassment, will be subject to appropriate discipline up to and including termination.

ATTACHMENT B

TOWN OF PAYSON - Sampling of Public Service Ethics Laws

CAUTION: These brief descriptions are provided for quick introductory purposes and cannot and do not present the full scope of these laws.

*Violations of these laws may expose a Town official or employee to a variety of sanctions, including criminal penalties, personal financial liability (for damages and fines, as well as payment of costs and attorney's fees - both prosecution and defense), cancellation of contracts, and public embarrassment (for the official and her or his family and employer, and removal from office). For example, a Town official convicted of a felony may be fined up to \$150,000 for each violation and sent to prison for several years. A.R.S. § 13-801, -701. Conviction of a misdemeanor may result in a fine up to \$2,500 for each violation and jail sentence of up to six months. A.R.S. § 13-802, -707. This information is presented not to scare Town officials, but to help them by underscoring the seriousness of conducting the public's business properly.

TOPIC	ARIZONA LAW	GENERAL SUMMARY * (see above)	PENALTIES & SANCTIONS
Bribery	A.R.S. § 13-2602; 38-444	It is illegal for you to solicit, accept, or agree to accept any benefit upon an understanding that it may influence your official conduct, or to ask for or receive any gratuity or reward (or promise thereof) for your official act.	Felony
Conflicts of interest (general)	A.R.S. § 38-501 thru -511	If you or any relative could benefit from your taking official action, then you must (1) <i>disqualify</i> yourself by not participating "in any manner" - not voting, not discussing, not anything, and (2) <i>disclose</i> that personal interest.	Felony or misdemeanor; more
Contracting with the Town	A.R.S. §§ 38-503, 34-1406 thru -1477	If you or any relative has a substantial interest in "any contract, sale, purchase or service" to the Town, then you must disclose that interest and "refrain from voting upon or participating in any manner."	Felony or misdemeanor, cancel contract
Conduct after Leaving Town Position ("Anti-Revolving Door")	A.R.S. § 38-504(A)	For 12 months after your Town service, you cannot represent another person for compensation before the Town in connection with any matter in which you personally participated in a substantial and material way.	Felony or misdemeanor

Confidential Information (Disclosure/Use of)	A.R.S. § 38-504(B)	During and for two years after your Town service, it is illegal for you to disclose or use for personal profit any confidential information you learned in the course of your duties.	Felony or misdemeanor; more
Discrimination and Favoritism	Constitutions, plus statutes; A.R.S. § 38-231(G)	It is illegal to discriminate based on race, color, gender, national origin, religion, age, or physical or mental disability; plus, in your Loyalty Oath you pledged to "faithfully and <i>impartially</i> discharge the duties of ... office."	Attorney's fees, damages, more
E-mail	A.R.S. § 39-12-1; 38-431 <i>et seq.</i>	Your e-mail communications are subject to the Public Records Law, and improper e-mail involving a quorum of the members of a public body may violate the Open Meeting Law.	Attorney's fees, costs, more
Employment of Relatives ("Nepotism")	A.R.S. § 38-481	You may not be involved in the appointment or hiring of a relative (which is defined broadly to include your parents, siblings, spouse, children, grandchildren, grandparents, and all in-laws).	Misdemeanor
Employment - Discussion of Future Employment	A.R.S. § 38-503, -504(C)	If you engage in certain discussions about future employment, then it might trigger bribery or conflict of interest laws.	Felony or misdemeanor
Employment - Incompatible	A.R.S. § 38-505	Certain outside employment could trigger conflict of interest laws.	Depends on the facts
Employment - Representing Others Before the Town	A.R.S. § 38-504	During your Town service, it is illegal for you to represent another person for compensation in connection with any matter in which you will personally participate in a substantial and material way as a Town official.	Felony or misdemeanor

Entertainment (attending or participating in a cultural or sporting event)	A.R.S. § 41-1232.08(B) [only applies to Town Council]	It is illegal for the Mayor or a Council member to accept from a "compensate lobbyist" "an expenditure or single expenditure for <i>entertainment</i> " (defined broadly to mean not only <i>attending</i> any sporting or cultural event, but also <i>participating</i> in any cultural or sporting event, such as golf).	Misdemeanor
Extra compensation	A.R.S. § 38-505	It is illegal for any Town official to receive any money (except the salaries the Town pays the Mayor and Council members) or anything of value for any service rendered in connection with performing their official duties.	Felony or misdemeanor
Financial Disclosures (NOTE: Council only)	A.R.S. § 38-545 (which requires Town adopt same)	It is illegal for Council members to fail to file, or knowingly file an incomplete personal financial disclosure statement (which IS designed to help you identify and avoid potential conflicts of interest).	Misdemeanor
Gifts and Things of Value		Gifts worth more than \$25 must be reported to the Town Clerk.	Ethics Code investigation and public report
Misuse of Public Resources (see "Theft" below)	A.R.S. § 13-1802, -2310, -2316	Town officials may use Town resources only to the extent those resources are available to the public (e.g., if the public is charged \$2.00 per page for copying, then a Town official must pay the same). Otherwise, it is theft (see below).	Felony or misdemeanor
Open Meetings	A.R.S. § 38-431 thru -431.09	"It is the policy of this state that meetings of public bodies be conducted openly and interpretations of this [law] shall construe any provision in favor of open and public meetings."	Action null and void; attorney's fees; more
Political Activities	A.R.S. § 9-500.14	It is illegal to use Town personnel, resources to influence non-bond elections.	

Public Monies	A.R.S. § 35-301	If you handle or spend public monies, then you need to be extra cautious and recognize that special rules and regulations apply, including the Town's procurement processes.	Felony
Public Records - Access to	A.R.S. § 39-121, <i>et seq.</i> , plus more	Arizona law has a strong presumption that records shall be open to public inspection, but with hundreds of exemptions. You should seek immediate help from the Town Attorney if you get a public records request.	Range; attorney's fees and costs
Public Records - Tampering with	A.R.S. § 13-2407	It is illegal to "tamper with a public record" by making a false document purporting to be a public record, altering or making a false entry, destroying, removing, hiding, or otherwise impairing a public record.	Felony
Solicitation of Gifts and Things of Value	A.R.S. § 38-504(C)	It is illegal to use or attempt to use your official position to get any valuable thing or benefit that you would not ordinarily get. (See also "Bribery" and "Gifts" above.)	Felony or misdemeanor
Theft of Town Property, Resources, or Services	A.R.S. § 13-1802	Unauthorized (such as personal) use of Town resources (facilities, equipment, personnel, supplies) can be considered "theft," which is the taking or unauthorized use of another person's property (including the Town's).	Felony or misdemeanor
Travel	A.R.S. § 13-1803, -2407	Unauthorized use of a Town vehicle can constitute "unlawful use of means of transportation," and submitting a false travel or expense report is "tampering with a public record."	Felony

ATTACHMENT C

Town of Payson Personal Interest Disclosure Form for Employees

Pursuant to the Town of Payson Ethical Standards for Town Employees, all Town employees must complete and submit this Personal Interest Disclosure Form to the Human Resources department annually upon the occasion of their annual ethics training. The purpose of the form is to help Town employees by alerting and reminding them of their need to avoid participating in any manner on behalf of the Town of Payson when a conflict arises between their official Town duties and their personal interests.

Two definitions are very important because violating Arizona's conflicts of interest laws is a criminal offense and can lead to serious consequences.

1. Arizona law requires that if a Town employee or his or her relative has a substantial interest (as defined by state law) in an official decision, then that employee "shall make known that interest in the official records of the public agency and shall refrain from *participating in any manner* as an employee" regarding that matter. (A.R.S. § 38-503). By listing "otherwise participating in any manner", the Legislature has made clear that if you have a conflict, then you must immediately refrain from taking *any* action in your official position; you may not do anything - talk, discuss, write, wink, or nod - to try to influence the decision or any decision-makers.

2. The definition of "relative" includes your "spouse, child, child's child [grandchildren], parent, grandparents, brother or sister [and step-brother or step-sister], and their spouses and the parent, brother, sister or child of a spouse." A.R.S. § 38-502(9).

If, after you complete this form, another substantial interest surfaces that was not anticipated, then you are obligated to immediately refrain from participating in the decision-making process and, within three business days, update this form to disclose the interest in the Town Clerk's Office. If you have any questions, please contact the Town Attorney's Office with as much lead time as possible.

1. Identify the decision or other matter in which you or a relative may have a substantial interest. (Attach another page if more space is needed.)

2. Describe each substantial interest referred to above. (Attach another page if more space is needed.)

Statement of Disqualification

To avoid any possible conflict of interest, I will refrain from participating in any manner in the matter(s) identified above.

Name (please print)

Signature

Date