Board of Ethics
Town of Greenwich, Connecticut

Instructions for
On-line Financial Interest Disclosure Form
for Town Officers
To be filed no later than 30 days after the end of each year.

Who has to file?
All Town Officers are covered by the requirements of the Code of Ethics with respect to the filing of statements disclosing their financial interest in Town Transactions. If the aggregate amount received is $200 or more, a statement must be filed for each transaction with the Town in any fiscal year (July 1 to June 30) that a Town Officer (or family member) has a direct or indirect personal financial interest in. If a Town Officer doesn't have a substantial personal interest in any transaction with the Town during the fiscal year, no filing is required.

What is a Town Officer?
A Town Officer is any official, employee or agent of the Town, any consultant to the Town or any member of any board, department, commission, committee, legislative body or other agency of the Town, whether elected or appointed. Persons serving as employees, officers or directors or corporations or other entities owned and controlled by the Town are considered Town Officers. However, officers, directors and employees of non-profit organizations established for the benefit of the Town are not considered Town Officers unless the Town controls the membership or funds of the organization.

What has to be reported?
Transactions aggregating less than $200 a year do not need to be reported. The Code requires that Town Officers report both the nature of their interest in a Town transaction and the amount received during the fiscal year as a result of that interest.

What transactions are covered?
A transaction is defined broadly under the Code to include the sale or furnishing of any real or personal property, materials, supplies or services to the Town directly as a vendor or prime contractor, or indirectly as a subcontractor, beneficial owner, family member or otherwise. Transactions include offers, even if they are not accepted, but do not include gifts and similar arrangements where no valuable consideration is paid by the Town. Town employees and contractors are not required to report on the contract for services which makes them a Town Officer. Transactions with the Town include all Town boards, commissions, agencies or other entities owned or controlled by the Town.

Line by Line Guidance

Following are explanations of the information required to be provided on each line of the on-line filing form approved by the Board of Ethics.

1. **Name:** Give your full name as it appears in the Town's official records with respect to the position you hold. If you are a town employee, agent or consultant, use the name that appears on your paycheck. If you are an elected official, use the name registered for your position with the registrar of voters. If you are an appointed official use the name associated with your appointment. If your signature is significantly different, please explain in the box provided in Section 8.

2. **Town Position and Fiscal Year:** List the title of your position as a Town Officer. If you have more than one appointed or elected position or are employed by more than one department or agency of the Town, list each position. Select the fiscal year corresponding to the receipts you are reporting on. If you are reporting on a period prior to the implementation of the on-line filing system use 2020-2021 as the default.
3. **Description of the Transaction, Transaction Date and Transaction Value:** A separate form is required for each transaction. Where the Town enters into a single arrangement for a series of sales or engagements under the same terms, it should be considered a single transaction. Provide a brief description of the transaction including the name of the Town department or other agency involved and the materials, supplies or services furnished or to be furnished or the real or personal property otherwise involved. For contracts subject to a formal procurement process, give the date of the contract if entered into or the date of bid submission if the contract has not yet been formalized. For transactions that do not involve written submissions or contracts, use the date on which formal approval was given and/or the date on which the town first became obligated to provide value in connection with the transaction. If reporting on a contract entered into prior to the 2020-2021 fiscal year, the default date of June 30, 2021 may be used. For total transaction value, provide the exact (if known) or estimated amount of payments to be made by the Town or other value to be given by or received from the Town. If actual amount varies significantly in the future, you should file an amended disclosure.

4. **Transacting Party:** Individuals providing goods or services to the Town directly should enter "Self." If you are not the direct contractor with the Town, please provide the legal name used by the person or legal entity entering into the above transaction with the Town and also indicate the names of any persons or entities through which you have an indirect interest in the transaction. In the drop down menu, select the description that best describes your relationship to the contractor.

5. **Nature of Interest:** Describe the nature of your interest in the transaction, such as contracting party or an owner, general or limited partner in or employee of the contracting party (or family member thereof). Family members include parents, spouses, siblings, children, nieces and nephews, grandchildren, in-laws and any other person legally entitled or reasonably expected to receive substantial financial support. If your interest in the transaction is as a family member of the contracting party indicate the nature of the relationship (e.g. spouse, child, parent, sibling, aunt, uncle, cousin, in-law, legal guardian, civil partner).

6. **Value Received:** Indicate the total value of the contract to the contracting party expected to be received during the Town fiscal year being reported on. An aggregate value of less than $199 does not need to be reported. Value does not need to be received in cash payments in order to be considered. Credits, concessions, re-valuations, allowances, expense sharing, tax abatements, licenses, provision of facilities or services and other similar items should be reported. If the amount of the payments to be received is not certain, a best estimate may be used and an amended filing may be made if the final value is significantly different than the estimate. Where the amount of value is difficult to estimate, indicate such and explain the circumstances.

7. **Value to You:** If you do not expect to benefit from all or any of the value received by contractor, you may enter the portion of value you expect to receive above. You may indicate a percentage, a fraction or a dollar amount, or simply state "none" or "to be determined." If you are a direct contractor or subcontractor, you may estimate the net profit that you expect to receive. A response to this question is optional and for the use of those who feel it may be useful.

8. **Other Information:** Provide any additional information as appropriate. This area is provided to allow filers to provide additional details with regard to the value of the transaction, pertinent details concerning relationships or other indirect interests or explanations concerning the estimated value of a transaction. A response to this question is optional and for the use of those who feel it may be useful. You may also use the provided drop-boxes to show if the transaction is being aggregated with a transaction reported in another filing or is an amended filing.

**Signature:** Use your normal written signature.