

How to File Your Annual Ethics Disclosure Form

Step 1: Determine whether you are subject to the filing requirement

Are you a **Town Officer**?

You are subject to the filing requirement if you are:

- a. A **Town employee** (including employees of the Board of Education and any other entity whose principal funding is provided by the Town)
- b. An **elected official** of the Town, whether or not you receive compensation
- c. An **appointed official**, such as a member of a board or commission, whether or not you receive compensation
- d. An individual, corporation or other entity that serves as an **agent** for the Town
- e. An individual, corporation or other entity that serves as a **consultant** to the Town

Step 2: Become familiar with the Town's financial transactions

The Code of Ethics requires you to report on any Town transaction in which you have an interest. This obligates you to become familiar with the Town's financial transactions. In order to assist you in discharging this obligation the Town Controller posts a listing of the many of the Town's principal payments on the Town website after the close of each fiscal year. You can access this list at:

http://www.greenwichct.org/upload/medialibrary/4f2/ethics_Listing_of_Town_Payments.pdf

Please bear in mind that this list is not comprehensive. It is provided to help Town Officers determine if they have an interest in a Town transaction. Payments that are below the threshold for the report or that are not handled directly by the Controller's office will not appear on the list. In addition, the Code of Ethics requires you to report your interest in transactions, which are usually initiated before payments are made. The listing of payments only provides after the fact evidence of a transaction and is therefore informational only. Your obligation to disclose an interest is not limited to payments on the listing.

Step 3. Determine if you have a personal financial interest in a Town transaction

Is your interest an excluded interest?

A personal financial interest is only required to be reported if it is a *direct or indirect* financial interest that is **not**:

- a. Common to the other citizens of the Town (such as taxes)
- b. Of nominal value (e.g. worth less than \$25)

- c. An interest in your compensation as an employee, official, agent or consultant of the Town

Do you have an indirect interest?

Examples of **indirect interests** are:

- a. An interest as an *owner, part owner, employee* of any partnership, corporation or other entity that enters into a transaction with the Town;
- b. An interest as a *subcontractor* for any partnership, corporation or other entity that enters into a transaction with the Town (whether the subcontracting relationship relates to the Town transaction or not),
- c. The interest of a family member that is:
 - i. employed by the Town
 - ii. providing materials, supplies or services to the Town
 - iii. receiving assistance from the Town,

Please note that family members include grandparents, parents, siblings, spouses, in-laws, children (including foster and adopted children) and anyone who relies on you for material support. Remember that, even though your own interest as an employee of the Town is excluded from the reporting requirement, the interest of a family member as a Town employee is not. You must file a disclosure statement with respect to your spouse, child or other family member and they must file one with respect to you.

Is your interest in a transaction relating to the Fiscal Year covered by the report?

You are required to file a report only if you had a personal financial interest in a Town transaction between July 1, 2012 and June 30, 2013.

Step 4. Obtain the official Disclosure Form and Review the Instructions

The report is required to be filed on the current form prescribed by the Board of Ethics. The Town Clerk, the Department of Law or a supervisor may be able to provide you with a copy of this form, or you may obtain one by contacting the Board of Ethics. The form includes detailed instructions and can be also be downloaded from the Town website at:

<http://www.greenwichct.org/upload/medialibrary/380/ethicsAnnualDisclosureForm.pdf>

Step 5. Complete the required number of forms

You may need to obtain more than one copy of the report. The instructions provide that a separate form is to be filed for each transaction or series of transactions in which you have an interest. For example, if you have more than one family member who is employed by the Town, you will need to file a separate form for each family member.

PLEASE NOTE THAT THE INSTRUCTIONS ARE A PART OF THE FORM. YOU DO NOT NEED TO FILE THE INSTRUCTIONS, BUT YOU ARE RESPONSIBLE FOR COMPLYING WITH THEM. FORMS WITH BLANKS WHERE INFORMATION IS REQUIRED OR WHICH CONTAIN INFORMATION OTHER THAN THAT REQUIRED IN THE INSTRUCTIONS ARE NOT FILED IN COMPLIANCE WITH THE CODE. WHERE THE VALUE OF YOUR INTEREST IS REQUESTED YOU HAVE A GOOD FAITH OBLIGATION TAKE REASONABLE STEPS TO DETERMINE THE VALUE. STATING THAT YOU ARE UNAWARE OF THE VALUE DOES NOT FULFILL THE CODE'S REQUIREMENTS.

Step 6. Sign the form and have it notarized.

The form must be notarized. You may have it notarized by the Town Clerk, a duly licensed notary or an officer of the Connecticut courts. A form that is not notarized does not meet the requirements of the Code. If you've properly signed the form and had it notarized, you don't need to deliver the form personally to the Town Clerk. If you are filing with the Town Clerk personally and need an attestation, remember to ask for the form to be notarized when you are filing it.

Step 7. File the Form with the Town Clerk

The form must be filed no earlier than July 1 or later than July 31st. If you miss the deadline, you will be best served to make a late filing rather than no filing. Where a failure to file is not intentional, the Board is unlikely to find that a late filing constitutes a violation of the Code. If you later discover that any part of your filing was incorrect or incomplete, you may file an amended form.