TOWN OF
GREENWICH
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**Board of Ethics**

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# Annual Report of the Board of Ethics

## Fiscal Year 2009-2010

Pursuant to Section 2.12 (c) of the Greenwich Code of Ethics (the "Code"), the Board of Ethics is required to prepare and submit an annual report of its activities to the Board of Selectmen and the Representative Town Meeting. The Board is pleased to submit the following report for the fiscal year ending June 30, 2010.

## Executive Summary

During the past several years, the Board has worked closely with the Selectmen and various Town departments to improve awareness and understanding of the Code by Town employees, elected and appointed officials and members of the general public. During the 2007-2008 Fiscal Year, we worked with the Department of Information Technology to provide additional content concerning the Code on the Town's website and implemented a hotline system to receive ethics complaints. In the 2008-2009 Fiscal Year, we worked with the Town Purchasing and Administrative Services Department to increase the awareness of participants in the proposal and bid processes about the requirements of the Code of Ethics and increase the responsibility of bidders and contractors for compliance with the Code. The Department implemented provisions in the Town's Purchasing Policy Manual and revised its bid and proposal forms. We also upgraded our hotline system, adopted a new Ethics Disclosure Form and provided training for Town Officers about the provisions of the Code in the 2008-2009 Fiscal Year.

In the 2009-2010 Fiscal Year, the Board continued these efforts. With the assistance of the Department of Human Resources, we surveyed Town employees and appointed and elected officials to assess their awareness of the resources available to them regarding ethical issues and to determine the areas that they felt would be most helpful to have additional information about. A report concerning the results of this survey was prepared for the Selectmen and is attached to this report. We have also worked with the Human Resources Department to provide assistance in connection with an ongoing project to update the Human Resources Policy Manual. In connection with

that project and at the direction of the 1st Selectman, the Department is working to prepare a new Town wide Ethics Policy, to be submitted for consideration by the Selectmen, which will incorporate both the provisions the Code of Ethics as well as other administratively adopted ethical guidelines and standards. We have been working with the Director of the Department and the Department of Law to facilitate the proper integration of the Code and the functions of the Board into the proposed policy.

The Board benefited from the continuation of budgeted funds to support its operations in the amount of approximately $2,000. Although we feel that increased funding for the activities or the Board would allow it to operate more effectively, we were pleased with the continuation of our funding level during a difficult budget period. The funds were used to support the Board's upgraded hotline system. This communications system is independent of the Town's phone system and provides a toll free number with a virtual switchboard, where persons can leave messages on the hotline, be connected directly to the various members of the Board or leave messages in their individual voicemail boxes. The number is (888) 432-2777 and is posted on the Town Website.

We are pleased to report that there were no complaints concerning a violation of the Code filed with the Board of Ethics during the 2009-2010 Fiscal Year. There were two requests for advisory opinions, one of which was withdrawn when the issue became moot. A copy of the Advisory Opinion submitted in connection with the other request is attached to this report in accordance with Section 2.12(c) of the Code.

For the past few years, the Board has been working on a project to locate and summarize the previous advisory opinions and other official statements of the Board since its inception. We have now completed this project and plan to make the opinions available on the Town website. We would also like to be able to publish these reports so that physical copies of the reports can be provided to the Town's Department heads and made available in the Department of Law, the office of the Town Clerk, various Town libraries and for the use of the members of the Board. The Board is currently seeking funding for the publication of these reports.

After reviewing its operations during the 2009-2010 Fiscal Year, the Board has the following recommendations to the Selectmen: 1) continue with the implementation of a Town wide Ethics Policy that integrates the provisions of the Code and the operations of the Board into the broader administrative mechanisms used by the Town to promote and enforce ethical standards for Town employees and other officials, consultants and other contractors; 2) consider enhanced financial reporting by key officers and employees, and 3) explore ways to increase the orientation and training of appointed officials with respect to the provisions of the Code and the ethical issues attendant upon their service to the Town.

## Complaints of Violations of the Code

We received no complaints of violations of the Code during the 2009-2010 Fiscal Year. However, the Board did receive several submissions that either were copies of

complaints made to other Town officials or communications intended to advise the Board of circumstances that might involve violations of the Code. The Board acknowledged the receipt of these communications and responded to those that were not anonymous, providing advice to the senders about the provisions of the Code and the procedures for the filing of a complaint. The Board also reviewed each of these submissions and, where the person(s) submitting or affected by the information was known, advised them of the date, time and place of the meeting at which the review was being made. The purpose of the review was to determine whether the submissions contained information that could serve as the basis for a complaint of a violation of the Code. For this purpose, the Board, without further investigation, assumed that all the allegations made in the submissions were credible. However, after carefully considering these allegations, the Board could not find a basis for believing that a violation of the Code may have occurred and thus determined that they should not be treated as formal complaints.

As described elsewhere in this report, the Board has been active in efforts to increase awareness of both the requirements of the Code and the procedures for filing complaints. Due to the high level of cooperation and support that the Board has experienced in connection with these efforts, we are inclined to believe that the lack of complaints is indicative of a high level of ethical behavior in Town Government.

## Annual Disclosure Statements

*Requirements of the Code.* Section 2.9 of the Code requires Town Officers to file disclosure statements if they have a substantial financial interest in any transaction with the Town totaling $100 or more. Where an officer has such an interest, the annual disclosure statement is required to:

- be filed within the 30 days following the end of the Fiscal Year
- be filed with the Town Clerk
- be filed on the form prescribed by the Board of Ethics
- be signed under oath
- disclose the position of the filer as a Town Officer
- state the nature of the interest
- state the total amount received from the transaction

The Code does not require that a reminder of these requirements be sent to all Town Officers. However, for many years it has been the practice to send a reminder, signed by the Chairman of the Board of Ethics, to all Town employees and to members of the RTM. This year an effort was also made to send the reminder to the heads of various boards, commissions, agencies, consultants and some other elected officials who fall within the broad definition of Town Officer under the Code and to ask them to pass it on to the Town Officers that they work with. This effort was largely unsuccessful, as it has seemed to be in the past, in reaching the Town's various appointed officials.

*Compliance.* Since Town Officers are only required to file a statement when they have had an interest in a Town transaction, there is no way to know (without independently receiving specific information) whether the failure of a Town Officer to file a statement reflects a deliberate decision not to comply with the Code or is merely due to the absence of any substantial interest in a Town transaction on the part of the Town Officer. Therefore, a review of the statements that are filed does not permit the Board to judge the degree of compliance with the Town's financial disclosure policy with any degree of certainty. If the filing of these statements is considered a key control process of the Town, it may at some point be useful for the Town to conduct a more detailed survey of a representative sample of Town Officers in order to better assess compliance. This assessment could then be used as a basis for determining whether the existing system is successful or should be modified in some way. The Board continues to believe that a system of reporting that requires disclosures on an ongoing basis when an interest arises, rather than retroactively at year end, would be a more efficacious system for all concerned.

The Board's review of the annual disclosure statements that were filed with the Town Clerk this year shows a very low percentage of Town Officers reporting interests in transactions with the Town, and those interests that were reported were for the most part insubstantial. Of the 14 forms filed with the Town Clerk, 6 were anomalous in that they contained no information concerning financial interests. Of the remaining 8, only 4 were fully compliant with the Code, since the others contained various errors, including the failure to include attachments or provide other required information.

The following chart summarizes the results of a review of the disclosure forms filed for the 2009-2010 fiscal year as of August 28, 2010:

| | **RTM** | **Town Employee** | **Other** | **Total** |
|---|---|---|---|---|
| **Nothing to Declare** | | | | |
| Timely, Notarized | | | 1 | 1 |
| Untimely, Notarized | | 4 | | 4 |
| Untimely, Not Notarized | 1 | | | 1 |
| | | | | **6** |
| **Something to Declare** | | | | |
| Timely, Notarized | 1 | 3 | 2 | 6 |
| Untimely, Notarized | 2 | 0 | 0 | 2 |
| | | | | **8** |

Although the 14 persons filing Disclosure Statements with the Town Clerk for the 2009-2010 Fiscal Year was a reduction from 39 for the 2008-2009 Fiscal year and 48 in the previous year, the decline was principally related to a decrease (from 20 to 6) in the number of apparently unnecessary filings, where the filer indicated that he or she had no interest to declare. At the same time, the number of persons reporting an interest in one or more transactions increased from seven to eight. Thus the reduction in the number of reporting persons filed can be seen in part as the result of an improved understanding of the requirements of the Code, rather than a decrease in compliance.

It should be noted that two of the persons who filed to disclose an interest failed to disclose the actual amount involved in the transaction. While one of those who filed made notations to the effect that he had "no knowledge" of the amount at issue, it was not readily apparent why he could not have obtained the required information with a minimum of effort. The other estimated the amount involved, which was not substantial.

In the last few years, a far higher percentage of forms has been in compliance with the requirements of the Code than in previous years. However, the review suggests that, despite efforts to improve the instructions provided with the form, additional training would be useful to ensure that all persons who file are aware of how to complete the required form. While we take satisfaction in the fact that reporting has improved, it seems obvious that there is still work to be done.

As noted in our previous annual reports, the filing of statements that show nothing to declare may be an expression of more than just excessive zeal and may be considered of particular significance due to the positions of the persons filing these reports. This year, almost all of these reports were filed by the heads of Town Departments. Among the remainder of these reports, many were filed by persons with particular responsibility for financial matters or who have involvement in the ethics disclosure process. By filing forms that show nothing to declare these individuals may be suggesting that they feel that a mandatory filing system should be implemented.

As noted above, the Code of Ethics currently requires reporting on an exceptions only basis. By not asking all Town Officers to file a report whether or not they have something to disclose, the Town avoids being buried by a blizzard of paper that contains no significant information. However, by using an exceptions reporting system, the Town cannot be sure that all Town Officers are aware of the requirements. In addition, a Town Officer who neglects to disclose an interest can only be held accountable for failing to file a form.

As stated in our 2007-2008 and 2008-2009 Annual Reports, the Board feels that the current reporting system could be enhanced. The Board believes that key officials should be provided with confidential questionnaires and asked to complete those questionnaires for their own guidance before making the filing required under the Code or determining that a filing is not required. The Board does not believe that this level of detail is appropriate for all Town Officers, however, nor does it believe that the detailed questionnaires should be filed publicly.

## Requests for Advisory Opinions

We received two requests for Advisory Opinions, one of which was withdrawn. The other request was occasioned by concern over the impact of a recent case (*Frank v. Westport*, 2005 WL 2435841 (Conn. Super.) on the actions of Town Boards and Commissions. In our opinion (Advisory Opinion No. 10-01), we provided guidance on the involvement of board and commission members in matters that may affect personal vs. community interests. A copy of this Advisory Opinion is attached to this report in accordance with Section 2.12(c) of the Code.

In addition, members of the Board and the Board as a whole provided informal guidance to various Town Officers who requested such assistance.

## Other Activities

*Proposed Changes to Code of Ethics.* In 2009, the League of Women Voters completed a multi-year ethics study in Greenwich and adopted a Statement on Ethics after it held a series of meetings to solicit comments. The members of the Board did not feel it was appropriate for the Board to officially endorse proposals to expand the scope or change the requirements of the Code, preferring to limit its role to carrying out the requirements of the Code as it may be adopted by the RTM from time to time. However, we have provided continuing assistance with regard to technical issues to the Selectmen and the Department of Law, as the Town continues to evaluate the best methods to respond to the proposals of the League.

*Budgetary Authorization.* During the 2009-2010 Fiscal Year, the Board used funds allocated under the Town's budget to fund its Ethics Hotline. The current amounts allocated to the Board do not allow the Board to implement all of its program goals. However, we understand the current constraints on the budget. In the future, the Board expects to reapply for funding to support its outreach and training efforts, as well as to provide funds for contingencies that may arise.

*Coordination with Town Departments.* In the 2009-2010 Fiscal Year, the Board met with the 1st Selectman and agreed to work with the Department of Human Resources to better integrate the operations of the Board into the Town's administrative mechanisms for achieving ethics compliance. We met with the Director of the Department and representatives of the Department of Law to review these issues generally and have provided follow up assistance in connection with the Department's efforts to prepare a revised Ethics Policy for adoption by the Selectmen and inclusion in the Human Resources Policy Manual. We also received assistance from the Department in surveying Town Officers to assess their awareness of the resources available to them regarding ethical issues and to determine the areas that they felt would be most helpful to have additional information about. A summary of the results of this survey is attached to this report. We also have continued to coordinate with the Town's Purchasing Manager and the Department of Law to evaluate the impact of the changes that were made to the procedures used by the Purchasing Department in connection with Town contracts. We were pleased to hear that these changes have been implemented smoothly and do not appear to have caused any difficulties for Town contractors.

*Compilation of Prior Opinions.* With the assistance of several volunteers, the Board has been working to retrieve and organize the records of the Board, including its prior Advisory Opinions. The Board was able to retrieve records for all but a few of the years that the Board has been in existence and has been able to prepare reports of the advisory opinions and other major decisions of the Board. During the 2009-2010 Fiscal Year, we compiled a topical index for these reports and sought the review of these reports by a number of former members of the Board to check them for accuracy. The Board is hoping that its future budget allocations will be sufficient to allow these reports to be

published in a volume for use by the Board, the Town Attorney, and various department heads and to be made available though local libraries for the use of the general public, as well as Town employees and its elected and appointed officials.

## Plans and Recommendations

Continuing Initiatives. During the 2010-2011 Fiscal Year, the Board expects to continue its initiatives in meetings with Town managers to discuss ethics issues and with Town Officers and the community at large to inform them about the requirements of the Code. The Board plans to implement further training sessions to assist Town Officers in better understanding the who, why, what, where and when of the disclosure process as well as the ways in which the provisions of the Code affect them generally. In particular, we plan to continue providing assistance to the Director of the Department of Human Resources and the Department of Law with respect to the DepartmentÕs initiative to revise its Policy Manual and prepare a new Town-wide ethics policy for adoption by the Selectmen.

Recommendations. Following a review of its activities and experiences in the 2008-2009 Fiscal Year, the Board wishes to make the following recommendations to the Board of Selectmen and the RTM:

1. <u>Continue Work on the Adoption of a New Ethics Policy</u>. The Town can benefit from a new Ethics Policy that integrates the provisions of the Code and the operations of the Board into the broader administrative mechanisms used by the Town to promote and enforce ethical standards for Town employees and other officials, consultants and other contractors.

2. <u>Consider Further Disclosures for Key Officials and Employees</u>. The Board believes that mandatory reporting and public filing of extensive forms by all Town Officers is not appropriate. However, it also feels that the completion of detailed disclosure forms by certain key officers and employees of the Town would improve the chances that the requirements of the Code would be properly adhered to. Such detailed forms should not be publicly filed, but should be retained and reviewed by a limited number of persons on a confidential basis. However, the individuals completing these detailed questionnaires should be reminded that, if they become aware of an interest that is required to be reported by the Code as a result of filling out the form, they should prepare and file a disclosure form with the Town Clerk. In this way, the reports filed with the Town Clerk will continue to be limited to relevant information, but the chances of inadvertent non-compliance will be significantly reduced.

3. <u>Make Further Enhancements to the TownÕs Orientation and Training Programs for Appointed Officials</u>. The Board feels that additional training and orientation for appointed official could be useful to them in understanding the provisions of the Code that are applicable to them. The

# Advisory Opinion No. 10-01

**Date:** 12/8/09

**Topics:** Boards and Commissions: Substantial Financial Interest: Common Interests: Participation

**Code Section:** Subsection 2(a)(2), Sections 4 and 5

**Statement of Facts:**

A person who is a principal in an engineering firm is also a member of the Greenwich Flood Erosion Control Board (the "FECB"). The FECB was established by the RTM in 1957 and consists of five members, the First Selectman and four members appointed by the RTM. The FECB establishes policies for the Department of Engineering with respect to erosion and flood control, including master plans and criteria for selection and prioritization of storm water management and drainage control projects, and is responsible for monitoring and making recommendations concerning storm water utilities, erosion and flood control matters generally.

The engineering firm that the FECB member is a principal in provides a variety of engineering services, including topographic, hydrographic and other property surveys, various environmental studies, such as flood, pond and lake studies, planning for stream and wetlands restoration and mitigation and environmental and flood management, and engineering for storm water management, runoff, coastal projects, septic systems, sanitary sewers, pumping stations and sediment and erosion control systems. The firm also assists in applications for local, state and federal planning and zoning, inland wetlands, health department, traffic and other permits.

The firm's clients are both private individuals and public agencies and have included the Town of Greenwich. Services for private clients have included representation before the Planning and Zoning Commission, the Board of Zoning Appeals and the Inland, Wetlands and Watercourses Agency in Greenwich. Services for the Town have included various surveying and civil engineering projects. During the last fiscal year, the firm provided engineering services on two projects for the Department of Parks and Recreation and received compensation from the Town of over $100. The member's interest in these projects was disclosed in an annual disclosure form filed in accordance with Section 5 of the Code of Ethics.

The FECB is currently requesting clarifications about the precise scope of its authority from the RTM, but it has never been suggested that the FECB's role would include the selection of contractors, including engineering firms, for the Town's flood control projects. Such selection would normally be done by the Town department responsible for the project, in conjunction with the Town's Department of Purchasing and Administrative

Services. Recently, the Town's Department of Public Works has identified flood control as an urgent need and the FECB has been actively working with the Department to prioritize a number of flood control projects whose scope of work and estimated cost have been identified

This process has involved review and refinement of the criteria used by the Town for prioritizing projects, as well as review of specific projects and groups of that the system identifies as priorities at the time that the Town makes a formal decision to fund and proceed with them. The criteria being used to prioritize projects are general and not site specific and were based on the recommendations of an independent third party engineering firm. The Board has never voted on a specific schedule of prioritized projects or on the overall list of projects that the Town has under consideration. Rather, the FECB has made recommendations concerning those projects that are identified as having the highest priority after applying the criteria being used by town after consultation with the Board.

One of the higher priority projects will provide storm water drainage for a street in the general neighborhood where the member lives, but the project will not affect the street on which the member's residence is located or any of the streets that serve the immediate neighbors of the member. The member has participated in the discussions and recommendations concerning this project.

Another lower priority diversion project will impact flood hazard areas that include or are near several properties that the FECB member either owns or has responsibility for managing. Although this project would be expected to improve conditions relating to those properties, it is not expected that the Town will be proceeding with it in the foreseeable future due to budget constraints. The member expects to avoid any involvement with the approval of this diversion project. The Board has been advised that the member will disclose the interest in these properties to the FECB at any time that the FECB plans to either approve the diversion project specifically, include it in any list of projects under consideration or consider a re-prioritization that would affect the priority of this project.

In the request for an advisory opinion, the FECB member indicated that the votes taken by the FECB "have not pertained directly to our client's projects" and indicated that the FECB works "to establish design criteria for flood control projects and to prioritize the order in which flood control projects get done. I am not aware of any instance where a client's property has benefited by the projects that have been voted to move forward." The member also indicated that the firm had recently stopped providing services to the Town in connection with smaller drainage systems in order to avoid the appearance of a conflict, because the FECB had begun to be more involved with those issues, where in the past it had been involved only in larger flood control issues.

The member had read the unpublished recent decision in *Frank v. Westport*, 2005 WL 2435841 (Conn. Super.) and had discussed it with Special Counsel to the Law Department, who had suggested that an Advisory Opinion from the Board of Ethics might be obtained concerning whether the member should continue to be on the FECB in view of the member's potential representation of clients before the Planning and Zoning

Commission, the Board of Zoning Appeals and the Inland, Wetlands and Watercourses Agency. It was noted that in Westport, the Planning and Zoning Commission refers all applications to the Westport Flood & Erosion Control Board for comments, while the Planning and Zoning Commission in Greenwich does not refer applications to the FECB.

**Questions Presented:**

Is an owner or employee of a firm that provides professional services to the Town or to its residents or businesses disqualified from service as a Town Officer?

Does the Code of Ethics require a Town Officer to refrain from participating in matters that might affect the financial interests of persons to whom the Town Officer (or a firm that the Town Officer has substantial ownership interest in) provides or may provide services to?

May a Town Officer vote on the prioritization of Town projects when one of the projects affects a street in the neighborhood where the Town Officer lives?

Does the Code of Ethics invalidate approvals given by Town Board's and Commissions where a Town Officer participated, directly or indirectly, in the proceedings related to the approval in a manner contrary to the requirements of the Code?

**Discussion and Conclusion:**

**SERVING AS A TOWN OFFICER**

The Board has frequently been asked to provide advisory opinions as to whether a particular individual is prevented from serving as a Town Officer because private business interests may result a conflict with his or her duties as a Town Officer. Such potential conflicts are particularly likely in the case of engineers, accountants, lawyers and other professionals who live and work in the Town, since the skills that make them valuable to a Town board, commission or agency are likely to be the same skills that they use in their profession.

Section 4 of the Code of Ethics prohibits elected or appointed officials, employees, consultants and agents of the Town from using their position as a Town Officer to exert influence or vote on matters in which they have a substantial financial interest. The Board has frequently noted, however, that this provision does not prohibit persons from serving as Town Officers because of the *potential* for a conflict of interest; it only prohibits participating in *specific actions or transactions* in which the individual has a substantial direct or indirect financial interest.

In some situations, the possibility of repeated conflicts could seriously impair the ability of the individual to perform his or her duties as a Town Officer effectively. The Board has encouraged persons responsible for hiring or appointing Town Officers to consider the potential for such situations when selecting persons to serve as Town employees or appointed officials. The Code itself, however, addresses the standards of behavior to which all Town employees and elected and appointed officials must adhere. It does not

assume that only those without conflicts will be hired, elected or appointed. Rather it assumes that all Town Officers may experience situations in which they have a conflict of interest and attempt to provide them with guidance as to what they should do or not do as a consequence.

The Town of Greenwich relies heavily on members of the public to provide the Town with the benefit of their expertise by serving as volunteer members of its various boards and commissions. In many cases, if all those persons who might have a potential conflict of interest were precluded from serving on a board or commission there would be hardly anyone available to perform their important tasks. Thus, in Advisory Opinion 04-01, the Board noted that the Code of Ethics did not disqualify an attorney from serving as a member of the Condemnation Commission, while noting that potential conflicts could arise. Similarly, in Advisory Opinion 01-01, it found no prohibition against a resident of public housing serving on the RTM, as long as the individual did not participate in matters that directly or indirectly affected the resident's rent or the unit that the resident occupied.

In the present case, when the FECB's work has concentrated on matters that might affect potential clients for a certain type of project in a defined geographic area, the member's firm has been careful to avoid the appearance of a conflict by adopting a policy to not represent such clients. Such a policy shows a proper regard for the integrity of the FECB and Board commends both the willingness of the individual to place the interests of the Town ahead of the interest of the firm and the sensitivity that the individual has shown to avoid the potential for a conflict.

## PARTICIPATING IN MATTERS AFFECTING CLIENTS

While the Code of Ethics *permits* persons to serve on boards and commissions notwithstanding the potential for a conflict of interest, it does not make it easy. Where Town Officers represent clients in the areas that involve their duties as Town Officers, they must be careful to avoid violations of the Code. The Town Officer requesting this opinion indicated, in discussions with the Board, that it had been difficult to find clear guidance as to what the Code required in connection with the representation of private clients. As a result, the Board will attempt to clarify in this opinion the provisions of the Code that can apply when a Town Officer becomes involved in a matter that may affect a client or customer of the Town Officer's business.

*Direct Involvement in Matters the Town Officer Participates In.*

There are two provisions of the Code that affect a Town Officer's representation of clients. The first, Section 4, affects the ability of Town Officers to represent clients in matters that the individual may influence or vote on in their capacity as a Town Officer. Section 4 of the Code prohibits Town Officers from voting on or otherwise participating in matters that they have a substantial financial interest in so as to influence the decision that is made. Thus, in Decision 89-02, the Board found that a violation of the Code occurred when an attorney that privately represented landowners participated as an Assistant Town Attorney in matters before the Planning and Zoning Commission that affected those owners. Similarly, in Advisory Opinion 98-02, the Board has advised a member of the Historic District Commission not to participate in Commission

consideration of the designation of a Historic Overlay Zone that would affect a client that the member served as an architectural consultant for.

In these cases, it should be noted that the representation of the client existed before the matter was taken up for official consideration. In those circumstances, disclosure of the interest and refraining from participation should be sufficient to avoid a violation of the Code, as recently outlined by the Board in Advisory Opinion 09-04. Where a Town Officer is requested to represent a client in a matter that the Town Officer has already begun to participate in, it is not possible to avoid influencing the decision, so the only possible way to avoid a conflict is to decline to undertake the engagement. We understand that this was the potential that the individual requesting this opinion wished to avoid and commended the individual for proper judgment in determining not to seek or obtain involvement in Town drainage projects that might be affected by the decisions of the FECB.

*Attempts to Influence a Town Officer.*

Direct representation in matters that the Town Officer is involved with is not the only way that the Code may affect a Town Officer's ability to work for a client, however. A second consideration arises from Section 3 of the Code of Ethics, which provides that:

> "No town officer shall accept any valuable gift, thing, favor, loan or promise which might tend to influence the performance or non-performance of his official duties".

Section 2 (a) (1) of the Code defines indirect interest to include the interest of any person or his immediate family in any corporation, firm or partnership, which has a direct or indirect interest in any transaction with the Town. As a result, Town Officers must be careful to avoid involvement with customers or clients who are involved with matters that the Town Officer may influence or vote on, even where the work is done by other persons in the firm or is unrelated to the matter that the client has before the Town. If, during the period that a prospective or existing client has (or is expecting to have) an interest in such a matter, the Town Officer is provides services to the client for a fee, the payment may be viewed as a "favor" under Section 3 of the Code, particularly if it is not disclosed.

Clearly, the most preferable result in these circumstances from the point of view of the Town is for the Town Officer to decline the engagement. While circumstances may not always permit this result, as where the individual has performed extensive or unique prior services with respect to the subject matter of the engagement and the cost of finding a replacement would be prohibitive to the client, the Board can be expected to apply strict scrutiny to such circumstances. Accordingly, Town Officers must take pains to document that any such engagement is necessary under the circumstances, was undertaken strictly the ordinary course of business and that it did not in fact influence the Town Officer's judgment in the matter before the Town.

## PERSONAL VS. COMMUNITY INTERESTS

In the instant case, the area of Town in which the person requesting this opinion resides in, owns and manages several properties in the areas that will be most heavily impacted by the flood control projects that are currently being considered by the Town. It is the

Board's understanding that one project in the area that has received specific consideration by the FECB, with the involvement of the member, relates to drainage of a street that is several blocks away from the member's residence and is not expected to improve any of these properties, or to any of the other properties that is owned or managed by the member or any properties adjoining these properties.

Section 2 of the Code of Ethics defines the interests that are treated as personal interests under the Code. It excludes interests that are "common to other citizens of the Town". In Advisory Opinion 02-02, the Board considered whether a member of the Condemnation Commission should refrain from voting on matters relating to a sewer project that would affect areas whose residents the member represented as a member of the RTM. Absent any showing that the member or the member's family were particularly affected by the decisions of the Commission relating to the project, the Board considered the Commissioner's interest common to the interest of other citizens of the Town. In Advisory Opinion 04-03, however, the Board found that a member of the Condemnation Commission would be particularly affected by sewer assessments in a particular area because the Commissioner and members of the Commissioner's family owned a substantial portion of the land in the area.

Based on the information provided to us concerning the street drainage project, that the Board does not believe that FEDB member's participation in establishing the priorities for this project violates the Code of Ethics because the member has no interest in connection with that project that is not common to the interest of other citizens of the Town.

The FECB member has, however, identified a lower priority diversion project that could improve properties owned by the member or properties adjacent to those properties. This project has not received specific attention from the FECB because it is not among the higher priority projects being considered by the Town. The Board appreciates that the member is fully aware of the potential for a violation of the Code in connection with this project and has suggested that the member follow the procedures outlined in Advisory Opinion 09-

decision has not been articulated. In that case, the Planning and Zoning Commission of the Town of Westport approved the construction of a single-family residence on property that was within a "coastal area" as defined by Section 22a-94 of the General Statutes. Adjacent landowners appealed the approval on the grounds that the Planning and Zoning Commission had accepted an environmental report from an expert, hired by the party seeking the approval, who was also a member of the Westport Flood and Erosion Control Board.

Judge Lewis upheld the appeal, but provided only an unpublished opinion explaining the decision. This opinion indicated that, by accepting the report prepared by a member of the Westport FECB, the Planning and Zoning Commission had denied the plaintiff's "common law right to fundamental fairness" in the Commission's proceedings. The opinion did not articulate exactly how the inclusion of the report resulted in a denial of fundamental fairness, but cites as a relevant fact that the acceptance of the report was inconsistent with an opinion rendered by the Westport Town Attorney recommending that the Commission not allow the member of the Westport FECB to represent the applicant before the Commission due to the appearance of a conflict of interest.

It is beyond the scope of the Board's jurisdiction to suggest whether or how the *Frank v. Westpor*t decision might be applied to other similar situations. We appreciate that the implications of the decision may have a chilling effect on the participation of qualified individuals on various Boards and Commissions, and that the Town could thereby lose the services of these individuals.

The ultimate articulation of standards for fundamental fairness is a matter of common law and therefore within the exclusive purview of the courts. In the event of a challenge to the actions of a Town Board or Commission on the basis of a denial of fundamental fairness, however, the Board considers it likely that court would find persuasive the fact that a Town Officer adhered to the standards articulated in the Code and in the Board's advisory opinions.

In order to assist Town Officers in meeting these standards, the Board has tried to articulate the requirements of the Code of Ethics and de other useful guidance for

# Town of Greenwich

## Board of Ethics

### Report on 2010 Ethics Survey

In May and June of this year, the Board of Ethics, working with the Department of Human Resources, conducted a survey of Town Officers. The Board has been exploring ways to better inform the Town employees and its elected and appointed officials about the Town's Code of Ethics and the resources that are available to them to assist in handling ethical issues. As a first step in this process, the Department assisted the Board in preparing and distributing a questionnaire requesting information about the ethical areas that these individuals were most interested in having information about. The survey also solicited the respondent's opinions about the sources of information about ethical issues that might be available to them, including their judgments about the usefulness of those sources and the convenience with which they were available.

This report summarizes the results of the survey and provides background information about its methods and scope. A copy of the survey questionnaire and a compilation of the responses received are attached.

**Persons Surveyed**

It was the intention of the Board to obtain information for all persons covered by the Code of Ethics. The Code defines these individuals as "Town Officers", including Town employees, elected and appointed officials, consultants and agents. There was no readily available means for contacting all of these individuals. The Town has made it a practice in recent years to provide an annual reminder in June of the Town's requirement for filing an ethics disclosure statement. This reminder goes to many Town employees and elected officials, but does not necessarily reach all Town Officers. For example, it is not clear that it reaches members of the Town's uniform services, volunteer firefighters who are not otherwise Town employees or members of the Town's many boards and commissions.

The Board and the Director of the Department agreed that this reminder, which is usually sent out by the Chair of the Board, would be a

practical means for distributing the survey to a broad group of Town Officers. In addition, the Director of the Department made a special effort to distribute the reminder and the attached questionnaire to the heads of the various Boards and Commissions with a request that they forward it to their various members. Despite this effort, the Board received no responses from either the heads or the members of the Town's appointed boards and commissions. Also, one employee has indicated to the Board that he understood that the reminder was only sent to supervisors and that the general understanding in his department was that other employees were not required to file annual disclosure statements. This may explain, in part, why there was a much lower percentage of responses from employees than from supervisors, although the number of responses from non-supervisory employees was sufficient to indicate that this view was not shared by all employees.

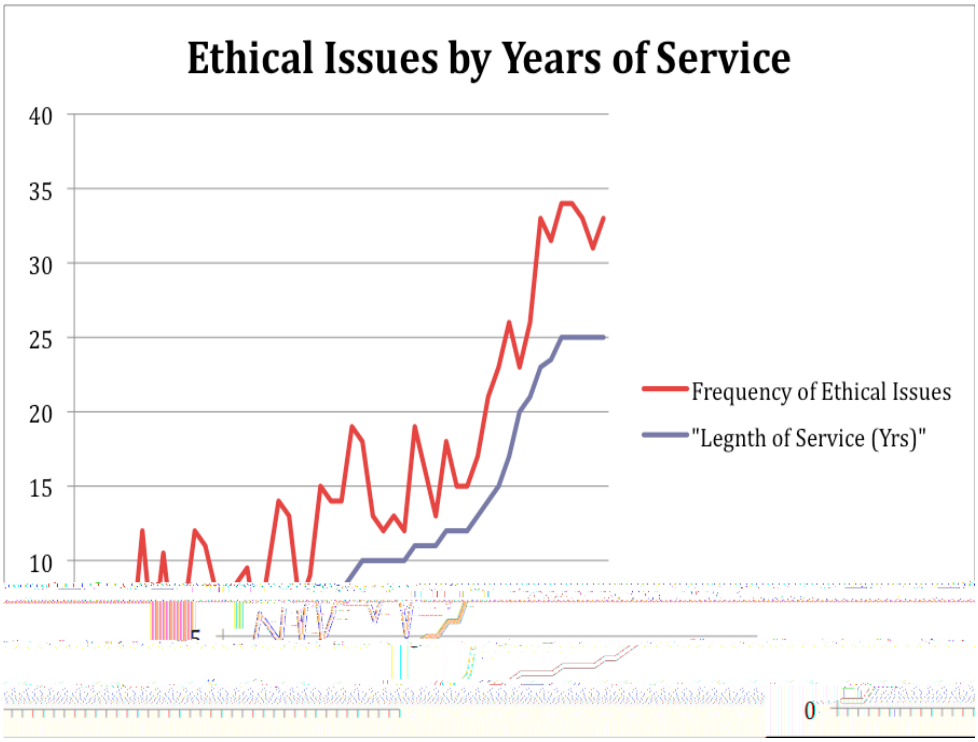
As a result, it should be borne in mind that the results of this survey bear most directly on the Town's employees and elected officials, although it may be assumed that some of the responses that apply to these two groups will also apply to the Town's appointed Commissions. The responses from supervisors may also be more broadly reflective of the views of that group of employees than the responses from other employees.

**Respondents**

The Board received 52 responses to its questionnaire, 18 of which were from elected officials and 34 of which were from Town employees. Of the employees, 11 were identified as being supervisory level employees. Respondents were not asked to give identifying information unless they chose to do so, but were asked to indicate whether they were an elected official, Town employee, appointed official or consultant. Where a respondent indicated that they were both a consultant and an employee, they were classified as an employee. Similarly, where a respondent indicated that they were and elected official and an employee, they were classified as an employee. Accordingly, a few employees also had additional perspectives to offer in providing their responses.

Respondents were also asked to indicate how many years of service they had provided to the Town and to indicate their general perception of how often they encountered ethical issues in connection with their work for the Town. Respondents who had more years of service indicated that they

experienced a greater frequency of dealing with ethical issues and nearly 30% of the respondents indicated that they dealt with ethical issues very frequently.




It might be expected that persons in supervisory positions would be both longer serving and have a greater frequency of dealing with ethical issues. Among supervisory employees, less than 20% indicated that they dealt with ethical issues only infrequently or sometimes. However, several respondents who indicated that they dealt with ethical issues frequently were among the respondents who had three or less years of service with the Town.

**Areas of Interest**

Respondents were asked to rate their degree to which they would be interested in having additional information about 30 potential ethical issues that could arise under the Code. The following were the top areas of interest indicated by respondents overall in order of the degree of interest expressed:

**Top Areas of Interest – All Respondents**

1. Outside Employment - Dealings with the Public
2. Outside Employment - Moonlighting
3. Undue Influence – Referrals
4. Financial Interests – As an Employee
5. Disclosure Requirements – What to disclose
6. Undue Influence – Pressure
7. Outside Employment – With Contractors
8. Undue Influence – Discussion
9. Undue Influence – Side Agreements
10. Gifts - (Various subjects tied)

Supervisors found financial interests as an employee and gifts to charity and from vendors and applicants of greater concern than other respondents, but expressed less interest in issues related to dealing with the public and information about their disclosure requirements. The top five areas of interest among supervisors were as follows:

**Top Areas of Interest – Supervisors**

1. Financial Interests – As an Employee
2. Outside Employment – Moonlighting
3. Undue Influence – Referrals
4. Undue Influence – Discussions
5. Gifts -- to Charities

As might be expected, employees other than supervisors were more concerned about ethical issues dealing with the general public. However, both supervisors and other employees expressed a significant interest in issues relating to undue influence over Town transactions. The top five areas of interest among employee who were not supervisors were as follows:

**Top Areas of Interest – Line Employees**

1. Outside Employment - Dealings with the Public
2. Financial Interests – As an Employee
3. Disclosure – What needs to be Disclosed
4. Undue Influence – Pressure
5. Undue Influence – Referrals

Elected Officials expressed less interest in issues relating to moonlighting, undoubtedly due to the fact that it would have less applicability to them personally. But they the expressed a significantly greater interest in the subject of indirect interests than other respondents and also expressed greater than average interest in disclosure requirements and undue influence. The top five areas of interest among elected officials were as follows:

**Top Areas of Interest – Elected Officials**

1. Disclosure Requirements – What to disclose
2. Financial Interests – Indirect Interests
3. Undue Influence – Voting
4. Outside Employment – With Contractors
5. Outside Employment – Services to the Public

Overall, respondents expressed a moderate degree of interest in all thirty subjects listed in the survey. Both services to the public and moonlighting as issues related to outside employment had a response at a level 25% above average, while four of the five categories under undue influence: pressure, referrals, discussions and side agreements, were approximately 20% above average, just slightly below the level of interest expressed in financial interests as an employee. Only two subjects: gifts from clients and gifts in the form of entertainment, elicited a significantly less interested response than the average. However there was higher than average interest in the remaining gift categories, particularly gifts from vendors and applicants and charitable gifts.

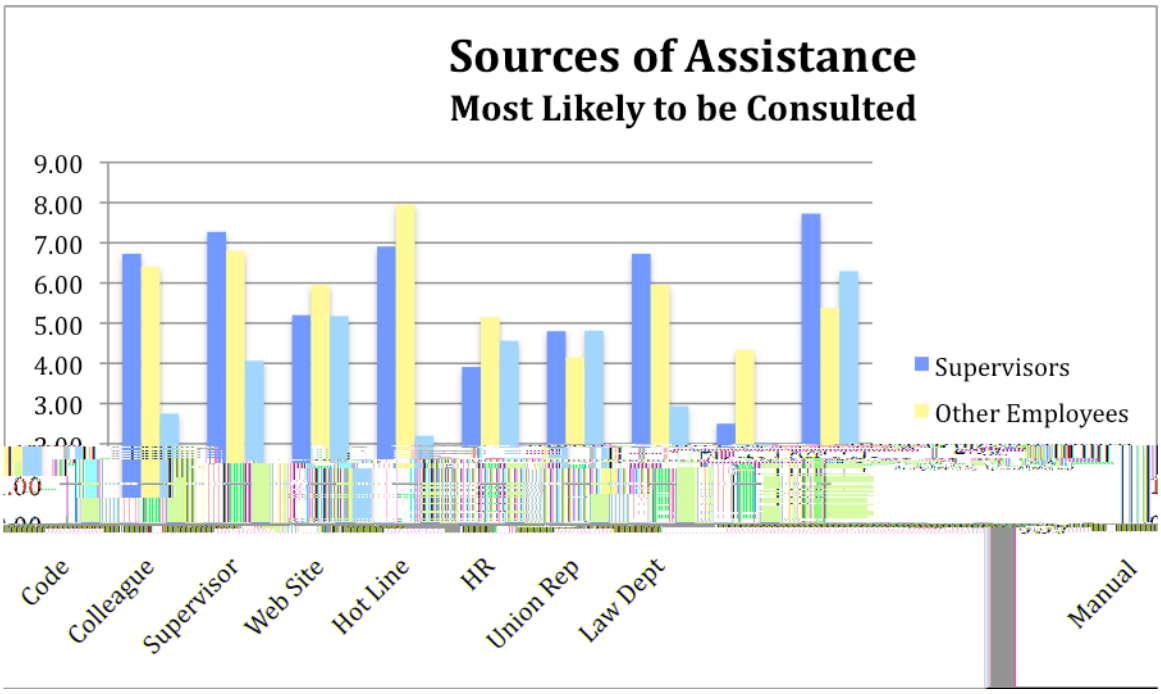
The survey clearly indicates that the subjects of moonlighting and financial interests as an employee are issues of considerable interest for employees (although not for elected officials). In exploring additional ethics resources, the survey results indicate that these interrelated issues should be a primary focus. Another related area that employees are interested in is outside employment in dealing with the public. The fact that all of these areas are among the top areas of interest on the part of employees indicates that outside employment generally is an area that would be useful to develop resources for. Within this area, the topics of moonlighting and working for members of the public that an individual interacts with as a Town employee should clearly be addressed.

The other primary area of interest that the survey results indicate is the subject of undue influence. The matters of referrals, discussions and pressure being exerted with respect to Town transactions are of particular concern to the Town's employees and the ground rules with respect to voting on matters in which an individual has an interest were of particular interest to elected officials.

**Sources of Assistance**

In addition to determining the areas in which the respondents were interested in having information, the survey attempted to determine the best methods for making the information available to them. Respondents were asked to rate to various sources of assistance as to the likelihood that they would be consulted, as well as the convenience and perceived usefulness of consulting them.

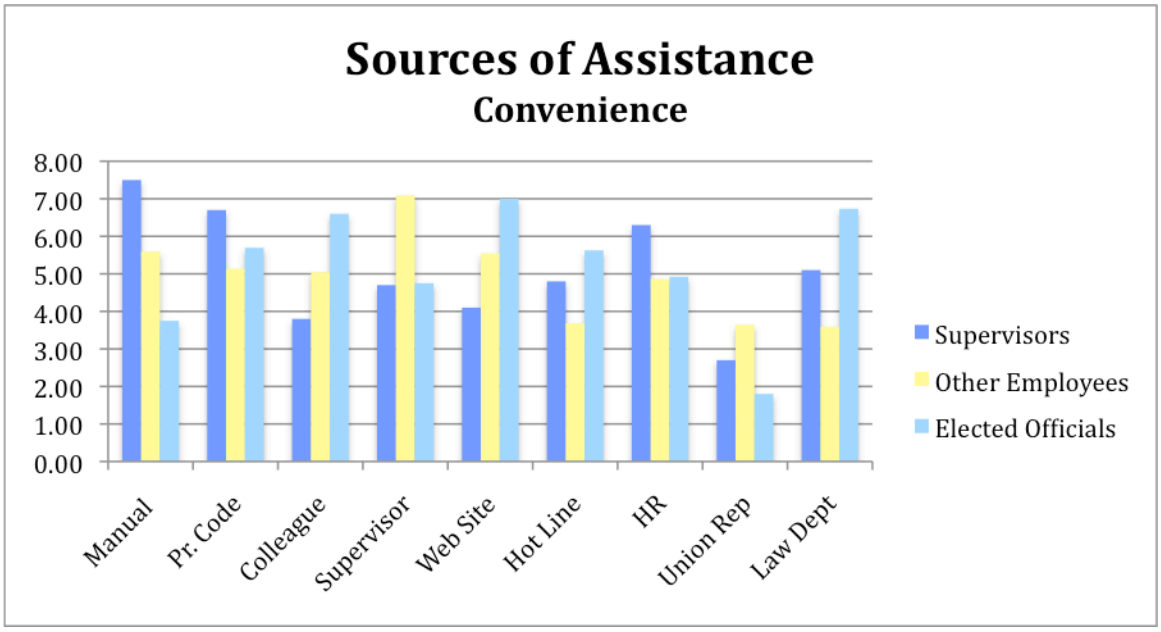
*Likelihood of Being Consulted.* The following table shows the likelihood of consulting various sources rated on a scale from 1 to 10, with 1 being the least likely and 10 being the most likely:



There was an understandable variation among the various groups of respondents with regard to the sources of assistance most likely to be consulted. Elected officials and supervisors indicated that the Department of Law would be the most likely source of assistance, while non-supervisory employees indicated that a supervisor would be the most likely person to be consulted about an ethical issue. Both supervisors and other employees considered the code of ethics for their profession as the second most likely source to consult and the Human Resources Policy Manual the third most likely resource to consult, while preferring to consult a colleague before consulting either the Town web site or use the Ethics Hotline.

It is interesting to note that the second most likely source that an elected official would turn to was a colleague, perhaps suggesting that elected officials did not find sources other than the Department of Law particularly in tune with the issues they face as elected officials. They did, however, consider the Ethics Hotline and the Town web site as the third and fourth most likely source to consult, while these sources were reported as among the least likely for non-supervisory employees.

*Convenience.* Respondents were also asked to rate the convenience with which they felt that they could consult various sources of assistance. The following table shows the convenience of consulting various sources rated on a scale from 1 to 10, where 1 is the least convenient and 10 is the most convenient:



The differences in the circumstances of elected officials and employees were also reflected in their responses concerning the perceived convenience of various sources of assistance with respect to ethical issues. Elected officials considered the Town web site to be the most convenient resource, followed closely by the Department of law and consulting with a colleague. Supervisors considered the Human Resources Policy Manual to be the most convenient source, followed closely by their professional code and the Department of Human Resources.

The Ethics Hotline was relatively low on the list for convenient sources. There may, however, have been some confusion over what the survey was referring to in this regard. Follow up interviews with respondents indicated that, for a period of time several years ago, the Human Resources Department had maintained a form of help line or whistleblower facility and that they thought that the question referred to that facility. According to these respondents, there was confusion over who was responsible to respond to calls on the prior line and what the number was for. It was also believed that the individual assigned to be responsible for the facility left the Department and that no one was assigned to maintain the facility thereafter. For example, in the margin next to a reference to the Hotline, one respondent penned in "We have one?" and another "Didn't know we had one!" Further indicative of the possible confusion among Town employees is the fact that elected officials, who would not have been aware of the prior help line, ranked the Hotline as the fourth most convenient source, with an average convenience rating 33% higher than line employees.

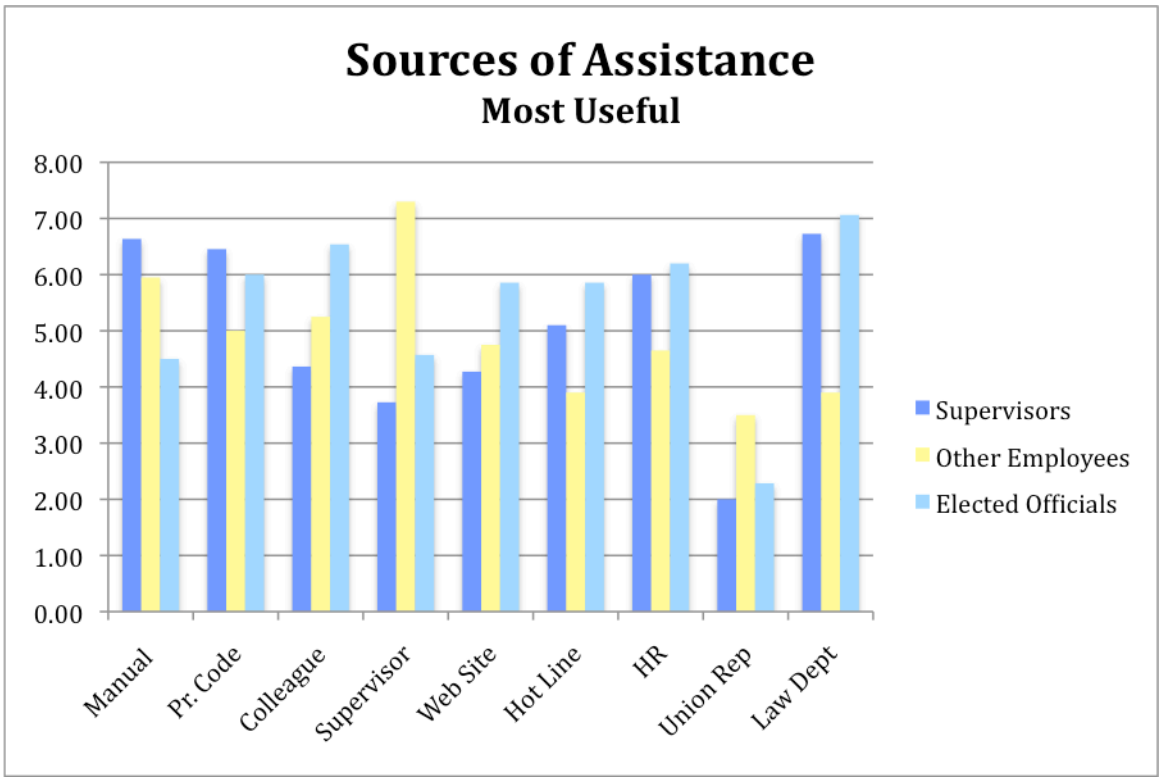
Although the number for the Ethics Hotline has been posted on the Board of Ethics pages of the Town Website, the Board has never undertaken to make a formal announcement to Town Officers about the availability or purpose of the Hotline. It is possible that an outreach effort in the form of a simple mailing to Town Officers that provided the number and a brief description of its purpose would help offset the perception is not convenient to use.

The survey results indicate another possible reason that the Ethics Hotline is perceived as less convenient (and to some extent less useful) than other sources of information. Some responses could be read to indicate that

the Board is not considered sufficiently knowledgeable about the particulars of the respondent's working environment to serve as a useful reference point in dealing with ethical issues. In that regard, it should be noted that all respondent groups rated a professional code as more convenient resource than using the Hotline. That includes elected officials, even though there is no specific professional code that would seem to apply, as there would be with regard to such respondents as health care, social work, legal, architectural and other professionals and members of uniformed services. This suggests that the nominating authorities might consider naming persons with experience as Town Officers to the Board in future, rather than continuing the past practice of nominating predominantly lawyers. Since the Code of Ethics prohibits members of the Board from holding any other Town Office, it would be necessary to find retired or former Town employees and elected or appointed officials. However, it may be possible to find respected retired or former employees and officials that would be valuable additions to the Board.

Another interesting response in terms of convenience is the fact that supervisors indicated that consulting a colleague was among the more inconvenient sources of ethical guidance, while other employees found it to be one of the most convenient. Elected Officials found consulting a colleague to be the second most convenient sources. As will be shown, these responses may be in part due to the perception of the usefulness of a colleague as a source, since elected officials and non-supervisory employees found colleagues to be a highly useful source, while supervisors tended to consider them as among the least useful sources.

*Usefulness.* Respondents were also asked to rate the usefulness of the information that they expected from the various sources of assistance to provide. The following table shows the perceived usefulness of consulting various sources rated on a scale from 1 to 10:




Both supervisors and elected officials considered the Department of Law to be the most useful source of information about ethical issues. While non-supervisory employees rated the usefulness of the Department as much lower, it should be noted that employees rated their supervisors as the most useful source of information and that supervisors ranked the Department of law as a the most likely source that they would refer to. Thus, it seems likely that some employees may have received ethical advice from the Department of Law indirectly through their supervisors. Similarly, elected officials tended to treat the Ethics Hot Line and Town website as more useful sources of information than Town employees, but they do not have as ready access to manuals, supervisory officials and the Department of Human Resources to the same extent that employees do.

*Outreach Implications.* What the survey results indicate with respect to sources of assistance is particularly revealing. Although, for obvious reasons, supervisors and elected officials indicated that the Department of Law would be the most likely source of assistance, non-supervisory employees indicated that a supervisor would be the most likely person to be consulted about an ethical issue. Respondents also considered supervisors both useful and convenient. This suggests that efforts to make additional

resources available to supervisors will be one of the most effective ways of making information conveniently available to employees.

In examining the overall responses with regard to sources of information, it was interesting to note that usefulness, more than convenience, appears to be the key factor in likelihood of use. This suggests that respondents believed ethical issues to be sufficiently serious that they would prefer to use a more reliable source than a convenient one. As the Town makes efforts to make information available on a convenient basis, it must also take care to assure that the information that is being provided is perceived as useful. Incorporating the materials into training sessions and conducting focus groups with the materials could be ways to obtain the feedback necessary to make sure the materials being provided are readily perceived as useful.

The correlation between responses also suggests that those Town Officers who are aware of and have used the materials with regard to ethics on the Town website have considered the materials that exist there to be very useful, but that many are unaware of this resource and also, perhaps, of the availability of the Ethics Hotline.

Also interesting to note is that, although respondents overall indicated a relatively low likelihood that they would consult the Town website or use the Ethics Hotline, they also responded overall that these resources would be among the least convenient and, paradoxically, the most useful to use. A more detailed analysis of the data was useful here, since there was a high degree of variation in connection with these responses. Some respondents ranked the information on the Town website highly convenient and useful, while others ranked them correspondingly low, and there appears to be a correlation between those who considered these resources easy to use and those who found them highly useful. Conversely, those who found them least convenient also reported that they were unlikely to use them and did not find them useful.

Thus it is likely that the data is showing that those respondents who had had prior experience with using the Ethics Hotline and Town website found them convenient and useful, while those who were either not aware of them or had been unsuccessful in prior attempts to use them had no reason to consider them useful or convenient. For example, in the margin next to a reference to the Hotline, one respondent penned in “We have one?” and

another "Didn't know we had one". In addition, one respondent noted at the end of the questionnaire that he or she "Couldn't find information about ethics on the Town website". This seemed to be confirmed by follow up interviews with respondents who were willing to share their contact information with us, as described below. Other sources have reported difficulty in locating ethics materials on the web site that are in fact available. Clearly, efforts to make sure that Town Officers are aware of these resources and know how to access them would seem appropriate, as well as efforts to make them a more visible resource in the layout of the Town's website.

**Additional Comments**

A number of respondents provided comments in addition to filling out the questionnaire. The following summarizes the information received from these respondents either in written comments at the end of the survey or through follow-up interviews:

The survey permitted respondents to indicate other sources of information that they considered might be useful in resolving ethics issues. Among the sources suggested were: professional associations, clergy, training sessions, the State Fire Marshall, the Town Administrator and the RTM Moderator. It would seem appropriate in light of this to include a listing of other sources of information about ethics in the written materials made available to Town Officers about ethics issues and among the resources made available on the Town website.

The survey also permitted respondents to address any other ethics issues that they had a concern about on a separate page at the end of the questionnaire. Among the items that are not mentioned elsewhere in this report were:

1. An observation that one respondent "found the TOG's seminar on workplace ethics helpful";
2. A suggestion that the Town "needs to address inequalities of treatment in the workplace" in order to "clean house before we discuss where to go for help";
3. An opinion expressed that "paid employees who are also RTM members should not serve on RTM Committees that review the Department they are employed in";

4. A suggestion that there is a "need to define moonlighting and place some standards for 'conflict of interest' for employees engaged in professional work outside the office with representatives of firm's doing business with that employee";
5. A request for a "more specific definition of 'Conflict of Interest' issues and how influence may play a role in this issue";
6. A request for "distinctions (1) between elected representation (common to group) and personal interests, and which takes precedence, and (2) that clearly presents an undivided responsibility to the Town office held, especially if one holds several governmental and NFP positions"; and
7. An observation that "for an RTM member, most of the questions are irrelevant".

At the end of the survey, respondents were encouraged to provide contact information if they had questions or comments regarding the survey. Four respondents provided contact information and were contacted by members of the Board, although not all had comments beyond those that they had written on the survey.

In one follow up interview, the RTM member who felt that most of the questions were irrelevant indicated that he would appreciate resources that were more targeted to elected officials. He also indicated that he had only a vague awareness of the Ethics Hotline and believed that greater familiarity with the availability of the Ethics Hotline would be useful for elected officials, as it was a way to explore ethical issues without having to put potentially controversial matters in writing. Knowing of the availability of the Ethics Hotline would seem to be particularly useful for RTM members who, unlike Town employees, do not necessarily have contact with a supervisor or colleague on a daily basis.

Another follow up interview was with a Town supervisor who had participated in distributing the survey to members of a Town commission. The supervisor was not surprised to learn that no appointed official had responded to the survey. He speculated that, at least in the case of the commissioners that the supervisor was personally familiar with, the lack of response was due to a general feeling that very little would change, with respect to the issues that they were concerned about, as a result of the survey. In particular, the supervisor felt that the commissioners had been

disappointed with a prior advisory opinion of the Board. They felt that the opinion had approved outside employment of a kind that had the potential to undermine the public's perception of the integrity of the Commission's work. This suggests that at least one group of appointed officials would have concurred with the overall responses to the survey that placed outside employment at the top of the list of areas that information was needed on.

**Overall Conclusions**

A review of the survey results indicates that additional efforts to provide ethics information would be useful to Town Officers in performing their duties. Many of the employees and elected officials who responded indicated that they deal with ethical issues frequently and the frequency with which they felt that they dealt with ethical issues increased the longer they had served, regardless of whether they were in supervisory positions or not.

*Areas of Greatest Interest.* The survey indicated there were several subject areas of particular interest to the respondents. Of these, outside employment (particularly moonlighting and providing services to the public), undue influence and certain gift areas were rated as of greatest importance. All employees expressed a high degree of interest in the subject of moonlighting and were also were highly interested in obtaining information about the role of referrals, discussions and pressure in the exercise of undue influence. Elected Officials also were highly interested in the subject of undue influence, particularly as it related to voting and side agreements. As a result, these are the subject areas where it would appear to be most useful for the Town to improve the quality and availability of the information resources available to Town Officers.

*The Role of Supervisors.* Since the survey respondents indicated that they considered supervisors to be a convenient and reliable source for obtaining ethics related information, it would appear that efforts to provide resources to supervisors would be a highly effective way to provide them to Town employees generally. In that regard, it should be noted that supervisors considered the Human Resources Policy Manual to be considerably more convenient as a source of information than most other sources, suggesting that the Town's current effort to enhance the ethical information in the Manual will be a particularly effective means of providing them with information.

*Improving the Visibility of Ethics Resources.* The survey data and follow-up interviews also suggest that efforts should be made to give Town Officers greater familiarity with the resources already available from the Board, including the Ethics Hotline and the Town website. These efforts could include (1) the preparation of a brochure concerning the resources available to Town Officers, which could be sent to all Town Officers, (2) the inclusion of information about ethics resources in orientation materials used for Town officers, (3) the inclusion of information about the Ethics Hotline and web based resources in training sessions and (4) the strategic placement of links to ethics information in various places on the Town website, in addition to the Board of Ethics pages, where Town Officers might be inclined to look for such information.

The survey suggests that there are quite a few Town Officers who find reference to professional codes useful in dealing with ethical issues. The information provided about ethics issues on the Town website should be supplemented to include links to sites which can provide access to the up-to-date professional codes and other ethics resources specific to the profession. In addition, the web site should be enhanced to include additional information more specific to the needs of elected and appointed officials as well as Town employees.

*Enhancing the Perceived Usefulness of Available Resources.* The survey results showed not only that respondents were interested in receiving additional information about the ethical issues they faced in their jobs, but that the information most likely to be consulted was the information that they considered most useful. Care must be taken to ensure that the resources made available are organized and presented in a way that will be perceived as useful to the users. Information should be organized in a way that allows users to quickly locate the material that is relevant to their particular situation and should be presented in a colloquial manner, without excessive of either legalese or jargon.

The survey results may also suggest that a number of respondents may not have felt that the Board of Ethics had the ability to understand the true dimensions of the ethical issues that they might be faced with. To prevent that perception, if it exists, former or retired Town employees, elected officials and appointed commissioners might be considered for appointment as members of the Board. These members should be perceived as having a deeper understanding of the issues from having faced them themselves. Having one or two persons on a five member Board with broad experience

in Town government should not reduce public confidence in the independence of the Board.

The members of the Board believe that the survey has been useful in showing both the ethical subjects that Town Officers may be interested in and the means in which it might be provided to them. We would be pleased to discuss the results of the survey in further detail with the Selectmen or other Town managers.

September 20, 2010

**Ethics Information Survey**

This survey is for informational purposes only. We appreciate your participation and are interested in your candid responses to these questions and any other feedback that you think would be useful. You are not required to identify yourself. However, if you have an interest in assisting us further with the project or have responses that you feel may be best dealt with through discussion with a member of the Board, we have provided an optional section where you may give us contact information.

We are aware that a number of individuals serve the Town in more than one capacity, which may include a full time paid position as well as a volunteer appointed position. If it would make the answers to the questions contained in this survey clearer, you may submit a separate response for each position.

1. Please indicate whether you are a:

   Town Employee _____

   Appointed Official _____

   Elected Official _____

   Consultant _____

   *(If more than one apply, you may submit multiple responses and check the one item that applies to each response, or you may check all that apply and submit a single response. Multiple responses would likely be more helpful to the Board.)*

2. Please indicate the approximate number of years that you have served the Town in your current position:

   _____

3. If you are a Town employee, please indicate whether you are a member of a licensed profession (doctors, nurses, lawyers, accountants, etc.) that has its own ethical code or standards.

   Yes ____ No _____

4. Please indicate whether your duties are:

   Paid Full Time _____

   Paid Part Time _____

   Volunteer _____

5. Indicate how often your responsibilities cause you to deal with ethical issues:

| FREQUENTLY | | | | SOMETIMES | | | | NEVER | |
|---|---|---|---|---|---|---|---|---|---|
| 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |

6. Based on your experience in your current position, please indicate the areas in which information would be most helpful to you:

| | VERY HELPFUL | | | HELPFUL | | NOT MUCH | | NEEDED | | |
|---|---|---|---|---|---|---|---|---|---|---|
| *Gifts, Loans and Favors* | | | | | | | | | | |
| From Vendors | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| From Applicants | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| From Clients | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Dollar Limits | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Valuing | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Gifts to Town | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Conferences | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Trade Shows | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Entertainment | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Charitable Gifts | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Contributions | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| *Financial Interests* | | | | | | | | | | |
| Types of Interests | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Family Members | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Indirect Interests | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| As an Employee | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Services to Clients | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |

Continued on next page

| | VERY HELPFUL | | | HELPFUL | | NOT | MUCH | | NEEDED | |
|---|---|---|---|---|---|---|---|---|---|---|
| *Financial Interests (Cont.)* | | | | | | | | | | |
| In a Non-Profit | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| As a Taxpayer | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| As a Resident | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| *Undue Influence* | | | | | | | | | | |
| Referrals | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Voting | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Discussions | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Pressure | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Side Agreements | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| *Disclosure Statement* | | | | | | | | | | |
| Annual Due Date | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Forms: Instructions | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| What to Report | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| *Outside Employment* | | | | | | | | | | |
| Services to Public | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Contractor Offers | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Moonlighting | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |

PLEASE NOTE: For the purposes of the following questions, a "supervisor" refers to a department head, supervisor, or manager, the chair or moderator of a Board, Commission or elected body, the director of an agency or a similar person.

7. Please indicate the **likelihood** that you would refer to one of the following for guidance if you had a serious ethical concern in connection with *your own* responsibilities related to the Town:

| | VERY LIKELY | | | | SOMEWHAT | | | NOT VERY LIKELY | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Employee Manual | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Professional Code | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Colleague | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Supervisor | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Town Web Site | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Ethics Hotline | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Human Resources | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Union Rep | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |
| Law Department | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 |

8. Is there any other resource that you would consider using to help you resolve a serious ethical concern regarding your own responsibilities?

If yes, please specify: _____

9. Please number the following in order from 1 to 9 (or 10) according to how **convenient** it would be to refer to them for guidance if you had an ethical concern in connection with *your own* responsibilities related to the Town (1 being most convenient and 9 or 10 being least convenient):

a. Employee Manual _____
b. Professional Code _____
c. Colleague _____
d. Supervisor _____
e. Town Web Site _____
f. Ethics Hotline _____
g. Human Resources _____
h. Union Representative _____
i. Law Department _____
j. Other (Please specify): _____
(_____)

10. Please number the following in order from 1 to 9 (or 10) according to your impression of their **usefulness** if you were to refer to it for guidance on an ethical concern that related to *your own* responsibilities related to the Town (1 being most useful and 9 or 10 being least useful):

a. Town Web Site _____
b. Employee Manual _____
c. Professional Code _____
d. Colleague _____
e. Supervisor _____
f. Ethics Hotline _____
g. Human Resources _____
h. Union Representative _____
i. Law Department _____

j. Other (Please specify): _____
(_____)

11. Please number the following in order from 1 to 9 (or 10) according to your impression of their **usefulness** if you were to refer to it for guidance on an ethical concern that related to *another person's* ethical responsibilities to the Town (1 being most useful and 7 or 8 being least useful):

k. Employee Manual _____

l. Professional Code _____

m. Colleague _____

n. Supervisor _____

o. Town Web Site _____

p. Ethics Hotline _____

q. Human Resources _____

r. Union Representative _____

s. Law Department _____

t. Other (Please specify): _____
(_____)

12. On the following page, or a separate sheet, please indicate any ethics information that you would find helpful in addition to the items listed in item 6 above. We would also appreciate any other information that you think would be useful on the subject of communications about ethical standards.

**ADDITIIONAL COMMENTS**

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

**YOU ARE NOT REQUIRED TO IDENTIFY YOURSELF. HOWEVER, IF YOU HAVE FURTHER INFORMATION THAT YOU WOULD LIKE TO DISCUSS, OR THAT YOU FEEL WOULD BE HELFUL TO THE BOARD, PLEASE PROVIDE US WITH YOUR NAME AND PREFERRED METHOD OF CONTACT:**

NAME _____ PHONE _____

POSITION _____ E-MAIL _____

Town Of Greenwich CT
Ethics Survey

Respondent Information

| | Status<br>E= Employee<br>A= Appointed<br>O= Elected<br>C=Consultant | Yrs of Service | Liscenced<br>Y=Yes<br>N=No | Type<br>F=Full Time<br>P=Part Time<br>V=Volunteer | Question 5<br>1 through 10 |
|---|---|---|---|---|---|
| Town Employees | | | | | |
| 1 | E | 11 | N | F | 8 |
| 2 | E | 10 | Y | F | 8 |
| 3 | E | 21 | Y | F | 5 |
| 4 | E | 10 | N | F | 3 |
| 5 | E | 1.5 | Y | F | 5 |
| 6 | E | 1.5 | Y | F | 4 |
| 8* | E | 14 | Y | F | 7 |
| 9 | E | 3 | Y | F | 9 |
| 10 | E | 5 | N | F | 9 |
| 11 | E | 25 | N | F | 9 |
| 12 | E | 3.5 | Y | F | 5 |
| 13 | E | 3 | N | P | 8 |
| 14 | E | 8 | N | F | 7 |
| 15 | E | 25 | N | F | 9 |
| 16 | E | 5 | N | F | 8 |
| 17 | E | 3.5 | N | P | 6 |
| 18 | E | 0.5 | N | F | 1 |
| 19 | E | 2.5 | N | F | 8 |
| 20 | E | 4 | N | F | 1 |
| 21 | E | 25 | Y | F | 8 |
| 22 | E | 20 | Y | F | 3 |
| 23 | E | 9 | Y | F | 10 |
| 24 | E | 23.5 | N | F | 8 |
| 25 | E | 10 | N | F | 2 |
| 26 | E | 2 | Y | F | 10 |
| 27 | E | 12 | N | F | 6 |
| 28 | E | 17 | N | F | 9 |
| 29 | E | 23 | Y | F | 10 |
| 30 | E | 13 | N | P | 4 |
| 31 | E | 11 | N | F | 5 |
| 32 | E | 8 | N | F | 6 |
| 33 | E | 15 | Y | F | 8 |
| 34 | E | 3 | N | F | 5 |
| 35 | E | 25 | N | F | 6 |
| Elected Officials | | | | | |
| 1 | O | 1.5 | N | P | 3 |
| 2 | O | 2.5 | N | V | 2 |
| 3 | O | 8 | N | V | 6 |
| 4 | O | 12 | N | V | 3 |
| 5 | O | 12 | N | V | 3 |
| 6 | O | 11 | N | V | 2 |
| 7 | O | 0.5 | N | V | 1 |
| 8 | O | 10 | N | V | 3 |
| 9 | O | 25 | N | V | 8 |
| 10 | O | 6 | N | V | 1 |
| 11 | O | 0.5 | N | V | 2 |
| 12 | O | 6 | N | V | 3 |
| 13 | O | 3 | N | V | 3 |
| 14 | O | 2.5 | N | V | 4 |
| 15 | O | 26 | N | V | 5 |
| 16 | O | 10 | N | 2 | 2 |
| 17 | O | 4.5 | Y | V | 5 |
| 18 | O | 2.5 | N | V | 2 |
| 19 | | | | | |
| **AVERAGE OVERALL** | | | | | **5.35** |
| *Variance* | | | | | *7.76* |
| **All Employees** | | | | | **6.47** |
| *Variance* | | | | | *6.56* |
| **Supervisory** | | | | | **6.55** |
| *Variance* | | | | | *7.62* |
| **Line Employees** | | | | | **6.43** |
| *Variance* | | | | | *7.62* |
| **Elected Officials** | | | | | **3.29** |
| *Variance* | | | | | *3.35* |

*Original #7 was misclassified and has been moved to #18n for Elected Officials.

Town Of Greenwich CT
Ethics Survey

Areas of Information

| | Gifts | | | | | | | | | | Financial Interests | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Applicants | Clients | $ Limits | Valuing | Gifts to Town | Conferences | Trade Shows | Entertainment | Charity | Contributions | Types | Family | Indirect | Employee | Clients | Non-Profits | Taxpayer |
| | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 |
| es | | | | | | | | | | | | | | | | | |
| | 1 | 1 | 5 | 7 | 1 | 1 | 1 | 5 | 8 | 5 | 10 | 1 | 10 | 10 | 10 | 10 | 1 |
| | 9 | 1 | 9 | 1 | 9 | 9 | 9 | 1 | 9 | 1 | 1 | 1 | 1 | | 1 | 8 | 1 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| | 1 | 1 | 6 | 2 | 1 | 8 | 8 | 1 | 1 | 1 | 5 | 1 | 7 | 7 | 1 | 1 | 1 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| | 1 | 2 | 2 | 2 | 5 | 2 | 2 | 2 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 4 | 4 |
| | 8 | 3 | 7 | 7 | 7 | 7 | 2 | 7 | 7 | 2 | 2 | 8 | 8 | 9 | 2 | 2 | 5 |
| | 8 | 1 | 1 | 1 | 10 | 9 | 9 | 1 | 9 | 6 | 1 | 1 | 1 | 7 | 1 | 1 | 1 |
| | 2 | 2 | 6 | 6 | 6 | 6 | 5 | 5 | 8 | 8 | 7 | 6 | 6 | 8 | 2 | 7 | 7 |
| | 8 | 4 | 5 | 5 | 9 | 5 | 5 | 5 | 5 | 5 | 7 | 6 | 4 | 7 | 6 | 5 | 8 |
| | 6 | 10 | 10 | 6 | 6 | 10 | 6 | 10 | 10 | 10 | 10 | 1 | 5 | 10 | 10 | 6 | 10 |
| | 1 | 1 | 1 | 1 | 1 | 2 | 2 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 4 | 1 | 1 |
| | 7 | 7 | 8 | 8 | 10 | 1 | 1 | 1 | 10 | 10 | 1 | 1 | 5 | 9 | 7 | 7 | 7 |
| | 9 | | 9 | | 7 | | | | 9 | | | 9 | 1 | 8 | 8 | 9 | 9 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 5 | 1 |
| | 5 | 7 | 1 | 5 | 1 | 1 | 1 | 1 | 1 | 5 | | | | 5 | 5 | 5 | 10 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 5 | 1 | 1 | 1 | 1 | 5 | 1 | 5 | 1 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 5 | 1 | 1 | 5 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 5 | 1 | 5 | 8 | 1 | 1 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| | 10 | 10 | 10 | 10 | 1 | 1 | 1 | 1 | 1 | 1 | | 1 | 1 | 1 | 1 | 1 | 1 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 5 |
| | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 |
| | 5 | 1 | 5 | 5 | 5 | 10 | 10 | 5 | 10 | 10 | 10 | 10 | 1 | 10 | 5 | 1 | 10 |
| | 1 | 4 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 5 | 1 | 1 |
| | 9 | 9 | 1 | 1 | 1 | 1 | 9 | 1 | 1 | 1 | 9 | 9 | 9 | 9 | 9 | 9 | 1 |
| | 5 | 1 | 10 | 5 | 7 | 4 | 4 | 5 | 6 | 7 | 6 | 5 | 3 | 5 | 3 | 5 | 7 |
| | 2 | 1 | 1 | 1 | 1 | 3 | 3 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| | 2 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| | 10 | | | | | 9 | | 9 | | | | 8 | | 10 | | | |
| | 1 | 1 | 1 | 1 | 2 | 2 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| | 1 | 2 | 1 | 1 | 1 | 1 | 1 | 2 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| ls | | | | | | | | | | | | | | | | | |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 8 | 1 | 1 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 7 |
| | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 5 | 1 | 6 | 1 | 1 | 1 | 7 |
| | 1 | 1 | 6 | 1 | 5 | 8 | 9 | 6 | 4 | 4 | 2 | 1 | 5 | 1 | 1 | 1 | 2 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| | 1 | 1 | 2 | 2 | 1 | 1 | 1 | 6 | 1 | 1 | 1 | 1 | 3 | 1 | 2 | 2 | 3 |
| | 9 | 9 | 9 | 9 | 6 | 5 | 7 | 9 | 9 | 9 | 9 | 5 | 10 | 4 | 8 | 9 | 7 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| | 3 | 3 | 3 | 3 | 3 | 3 | 3 | 3 | 3 | 3 | 2 | 2 | 2 | 2 | 2 | 3 | 2 |
| | 1 | 1 | 4 | 4 | 4 | 1 | 1 | 1 | 1 | 1 | 5 | 1 | 4 | 1 | 1 | 1 | 3 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 3 | 3 | 3 | 3 | 3 | 3 | 1 | 1 |
| | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 8 | 5 | 5 |
| | 6 | 6 | 6 | 4 | 7 | 2 | 2 | 2 | 5 | 2 | 7 | 8 | 8 | 8 | 8 | 6 | 6 |
| | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 5 | 5 | 5 | 5 | 5 | 5 | 5 |
| | 8 | 2 | 10 | 6 | 6 | 5 | 5 | 7 | 7 | 9 | 10 | 8 | 10 | 8 | 6 | 6 | 8 |
| | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| | **3.49** | **2.65** | **3.56** | **2.92** | **3.24** | **3.12** | **3.00** | **2.76** | **3.54** | **3.08** | **3.45** | **3.02** | **3.31** | **4.10** | **3.46** | **3.20** | **3.54** |
| | *10.77* | *7.98* | *10.95* | *7.28* | *9.08* | *9.33* | *8.75* | *7.41* | *11.19* | *9.41* | *10.64* | *8.88* | *9.18* | *11.52* | *9.27* | *8.24* | *9.64* |
| | **3.91** | **2.81** | **3.69** | **3.03** | **3.44** | **3.47** | **3.19** | **2.63** | **3.97** | **3.23** | **3.34** | **3.13** | **2.90** | **4.84** | **3.53** | **3.50** | **3.56** |
| | *11.96* | *9.03* | *12.03* | *7.97* | *10.96* | *11.29* | *9.83* | *7.34* | *13.19* | *10.45* | *11.66* | *9.98* | *8.42* | *12.72* | *9.93* | *9.48* | *11.61* |
| | **4.18** | **2.45** | **4.82** | **3.55** | **5.09** | **5.36** | **4.45** | **3.55** | **5.82** | **4.09** | **4.55** | **2.91** | **4.45** | **6.50** | **3.64** | **4.18** | **3.64** |
| | *12.18* | *10.32* | *12.39* | *8.72* | *8.36* | *8.16* | *8.58* | *5.93* | *11.60* | *10.62* | *10.13* | *11.69* | *5.84* | *12.28* | *8.96* | *9.03* | *12.26* |
| | **3.77** | **3.00** | **3.10** | **2.75** | **2.57** | **2.48** | **2.50** | **2.14** | **3.00** | **2.75** | **2.61** | **3.24** | **2.05** | **4.09** | **3.48** | **3.14** | **3.52** |
| | *12.18* | *10.32* | *12.39* | *8.72* | *8.36* | *8.16* | *8.58* | *5.93* | *11.60* | *10.62* | *10.13* | *11.69* | *5.84* | *12.28* | *8.96* | *9.03* | *12.26* |
| | **2.82** | **2.47** | **3.47** | **2.82** | **3.00** | **2.59** | **2.76** | **3.12** | **2.88** | **2.94** | **3.76** | **2.94** | **4.18** | **2.88** | **3.47** | **2.76** | **3.65** |
| | *8.53* | *6.76* | *9.76* | *6.65* | *6.13* | *5.88* | *7.44* | *8.11* | *7.49* | *8.31* | *9.69* | *7.56* | *10.28* | *7.36* | *8.76* | *6.19* | *6.62* |

Town Of Greenwich CT
Ethics Survey

Areas of Information

| | Undue Influence | | | | | Disclosure Statement | | | Outside Employment | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Resident | Referrals | Voting | Discussions | Pressure | Side Agrmts | Due Date | Instructions | What | Services2 Pub | Contractors | Moonlighting |
| 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 |
| 1 | 8 | 1 | 6 | 1 | 1 | 1 | 1 | 10 | 10 | 10 | 10 |
| 1 | 8 | 8 | 8 | 8 | 8 | 1 | 1 | 1 | 8 | 8 | 10 |
| 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| 1 | 7 | 1 | 7 | 7 | 7 | 5 | 5 | 5 | 4 | 5 | 5 |
| 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| 4 | 5 | 5 | 5 | 5 | 5 | 2 | 2 | 2 | 5 | 5 | 5 |
| 5 | 7 | 3 | 7 | 7 | 7 | 4 | 4 | 7 | 7 | 7 | 7 |
| 1 | 6 | 6 | 6 | 6 | 6 | 1 | 1 | 1 | 2 | 2 | 7 |
| 7 | 6 | 6 | 6 | 7 | 7 | 5 | 5 | 5 | 6 | 6 | 5 |
| 8 | 7 | 6 | 7 | 4 | 6 | 4 | 4 | 4 | 7 | 7 | 10 |
| 1 | 10 | 1 | 10 | 10 | 10 | 10 | 10 | 10 | 6 | 6 | 6 |
| 1 | 2 | 1 | 2 | 2 | 3 | 1 | 1 | 1 | 2 | 3 | 1 |
| 7 | 1 | 1 | 2 | 1 | 5 | 7 | 7 | 7 | 7 | 7 | 7 |
| 9 | | | | | | | | | 9 | | 8 |
| 1 | 1 | 1 | 5 | 6 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| 10 | 6 | 6 | 6 | 6 | 6 | 3 | 3 | 3 | 10 | 1 | 1 |
| 1 | 1 | 1 | 1 | 1 | 1 | 1 | 6 | 6 | 1 | 1 | 1 |
| | | | | | | | | | | | |
| 1 | 5 | 1 | 5 | 1 | 1 | 5 | 5 | 5 | 5 | 5 | 5 |
| 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 5 | 1 | 1 |
| 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| 1 | 1 | 1 | 1 | 1 | 1 | 5 | 5 | 5 | 1 | 1 | 1 |
| 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 6 | 1 | 4 |
| 5 | 1 | 1 | 1 | 1 | 1 | 1 | 3 | 3 | 1 | 1 | 1 |
| 8 | 8 | 8 | 8 | | 8 | 8 | 8 | 8 | 8 | 8 | 8 |
| 10 | 10 | 10 | 10 | 10 | 10 | 5 | 3 | 6 | 10 | 10 | 10 |
| 1 | 6 | 1 | 1 | 1 | 1 | 5 | 5 | 5 | 1 | 1 | 1 |
| 1 | 9 | 1 | 9 | 9 | 9 | 1 | 1 | 1 | 9 | 9 | 9 |
| 6 | 7 | 5 | 5 | 5 | 6 | 6 | 4 | 7 | 1 | 5 | 7 |
| 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 5 |
| 1 | 1 | 1 | 1 | 7 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| | 9 | 9 | 9 | 9 | 9 | | | 9 | 10 | 10 | 10 |
| 1 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 4 | 1 | 1 | 1 |
| 1 | 1 | 1 | 1 | 7 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| | | | | | | | | | | | |
| 1 | 3 | 3 | 3 | 3 | 3 | 1 | 1 | 1 | 5 | 5 | 5 |
| 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 7 | 1 | 1 |
| 7 | 1 | 7 | 6 | 1 | 1 | 1 | 1 | 5 | 1 | 1 | 1 |
| 2 | 2 | 2 | 2 | 2 | 2 | 3 | 8 | 8 | 3 | 8 | 2 |
| 7 | 1 | 8 | 1 | 8 | 1 | 1 | 1 | 6 | 6 | 6 | 1 |
| 5 | 4 | 2 | 1 | 4 | 3 | 2 | 1 | 5 | 3 | 5 | 5 |
| 1 | 1 | 1 | 1 | 1 | 1 | 5 | 5 | 5 | 1 | 1 | 1 |
| 3 | 3 | 1 | 1 | 1 | 1 | 3 | 3 | 3 | 1 | 1 | 1 |
| 7 | 10 | 10 | 8 | 9 | 10 | 6 | 6 | 6 | 8 | 9 | 10 |
| 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 |
| 3 | 1 | 4 | 4 | 2 | 1 | 1 | 4 | 4 | 4 | 1 | 1 |
| 1 | 5 | 5 | | 7 | 7 | 8 | 8 | 8 | 1 | 1 | 1 |
| 5 | 8 | 8 | 8 | 8 | 8 | 7 | 7 | 7 | 7 | 7 | 7 |
| 6 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 5 | 8 | 8 | 8 |
| 2 | 5 | 2 | 2 | 3 | 3 | 3 | 3 | 3 | 3 | 3 | 3 |
| 8 | 9 | 9 | 5 | 4 | 9 | 9 | 8 | 4 | 8 | 10 | 10 |
| 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| | | | | | | | | | | | |
| **3.26** | **4.12** | **3.36** | **3.90** | **3.98** | **3.82** | **3.14** | **3.33** | **3.98** | **4.29** | **3.98** | **4.18** |
| *8.81* | *10.15* | *8.93* | *8.97* | *9.44* | *10.27* | *6.54* | *6.52* | *7.57* | *10.41* | *10.80* | *11.91* |
| **3.13** | **4.47** | **3.00** | **4.34** | **4.26** | **4.09** | **3.03** | **3.13** | **3.88** | **4.52** | **4.00** | **4.61** |
| *10.24* | *10.90* | *8.39* | *10.10* | *10.53* | *10.80* | *6.37* | *5.98* | *8.89* | *12.01* | *11.10* | *12.37* |
| **2.82** | **6.00** | **3.55** | **5.82** | **5.18** | **5.36** | **3.18** | **3.18** | **4.27** | **5.18** | **5.27** | **6.09** |
| *12.11* | *11.03* | *9.11* | *10.16* | *10.83* | *10.66* | *5.84* | *5.25* | *7.53* | *13.87* | *11.63* | *12.22* |
| **3.29** | **3.67** | **2.71** | **3.57** | **3.75** | **3.43** | **2.95** | **3.10** | **3.67** | **4.18** | **3.33** | **3.86** |
| *12.11* | *11.03* | *9.11* | *10.16* | *10.83* | *10.66* | *5.84* | *5.25* | *7.53* | *13.87* | *11.63* | *12.22* |
| **3.65** | **3.65** | **4.18** | **3.19** | **3.65** | **3.47** | **3.47** | **3.82** | **4.35** | **4.06** | **4.12** | **3.53** |
| *6.62* | *8.87* | *9.78* | *6.30* | *7.74* | *9.76* | *7.26* | *7.65* | *5.24* | *7.68* | *10.99* | *11.01* |

Town Of Greenwich CT
Ethics Survey

Likely Sources of Information

| | Manual | Code | Colleague | Supervisor | Web Site | Hotline | HR | Union | Law Dept | Other |
|---|---|---|---|---|---|---|---|---|---|---|
| | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | |
| | Town Employees | | | | | | | | | Town Employe |
| | 10 | 8 | 1 | 10 | 1 | 1 | 10 | 1 | 7 | |
| | 6 | 8 | 6 | 10 | 6 | 7 | 6 | 8 | 8 | |
| | 5 | 10 | 5 | 6 | 1 | 5 | 5 | 1 | 5 | |
| | 1 | 1 | 1 | 1 | 1 | 10 | 1 | 1 | 1 | |
| | 6 | 6 | 6 | 6 | 2 | 2 | 7 | 1 | 7 | |
| | 1 | 1 | 1 | 1 | 1 | 1 | 8 | 1 | 10 | |
| | 10 | 10 | 9 | 9 | 7 | 7 | 9 | 1 | 10 | |
| | 9 | 10 | 9 | 8 | 1 | 1 | 1 | 1 | 9 | |
| | 8 | 8 | 7 | 8 | 8 | 8 | 9 | 3 | 9 | |
| | 8 | 8 | 7 | 7 | 5 | 6 | 8 | 7 | 9 | |
| | 10 | 10 | | 10 | 10 | | 10 | | 10 | |
| | 5 | 5 | 8 | 9 | 6 | 6 | 9 | 1 | 6 | |
| | 7 | 7 | 1 | 10 | 1 | 3 | 3 | 3 | 7 | |
| | 7 | 8 | 8 | 10 | 1 | 5 | 4 | 5 | 7 | |
| | 1 | 1 | 10 | 10 | 6 | 1 | 7 | 6 | 7 | |
| | 10 | 10 | 10 | 10 | 10 | 10 | 10 | 10 | 10 | |
| | 10 | | 5 | 10 | 8 | 10 | 8 | 1 | 10 | Clergy |
| | 8 | 9 | 10 | 10 | 1 | 1 | 6 | 1 | 1 | Comon Sense |
| | 7 | 8 | 1 | 9 | 7 | 7 | 7 | 7 | 7 | |
| | 6 | 5 | 1 | 1 | 1 | 1 | 1 | 1 | 5 | Prof. Assn. |
| | 1 | 10 | 7 | 7 | 2 | 6 | 1 | 1 | 9 | ",Trainer |
| | 2 | 9 | 2 | 2 | 1 | 1 | 5 | 1 | 1 | |
| | 7 | 1 | 1 | 7 | 7 | 1 | 7 | 10 | 1 | |
| | 1 | 1 | 1 | 1 | 2 | 1 | 2 | 2 | 1 | |
| | 5 | 10 | 10 | 10 | 10 | 10 | 5 | 8 | 5 | |
| | 7 | 8 | 9 | 10 | 9 | 1 | 10 | 1 | 5 | Prof. Assn. |
| | 9 | 7 | 7 | 10 | 1 | 1 | 3 | 4 | 1 | |
| | 10 | | | 10 | | | | | | |
| | 1 | 9 | 3 | 2 | 8 | 7 | 6 | 5 | 4 | |
| | 8 | 7 | 5 | 9 | 7 | 5 | 1 | 1 | 5 | |
| | 10 | 10 | 10 | 10 | 10 | 1 | 10 | 10 | 1 | :ate Fire Marsh: |
| | 9 | 10 | | 8 | | | 10 | | 10 | |
| | 10 | 1 | 10 | 10 | 5 | 5 | 10 | 5 | 10 | |
| | | | | | | | | 8 | | |
| | Elected Officials | | | | | | | | | |
| | 6 | 2 | 2 | 2 | 5 | 2 | 6 | 1 | 6 | State of CT |
| | 1 | 1 | 1 | 1 | 1 | 5 | 1 | 1 | 5 | |
| | 1 | 1 | 1 | 1 | 1 | 7 | 1 | 1 | 1 | |
| | 2 | 2 | 2 | 2 | 8 | 2 | 2 | 2 | 6 | |
| | 1 | 6 | 1 | 1 | 1 | 7 | 1 | 1 | 9 | |
| | 1 | 3 | 9 | 9 | 1 | 5 | 7 | 1 | 3 | Town Adminst. |
| | 1 | 1 | 10 | 1 | 1 | 1 | 1 | 1 | 10 | |
| | 1 | 1 | 5 | 1 | 1 | 10 | 8 | 1 | 9 | BD OF ETHICS |
| | 5 | 5 | 10 | 1 | 8 | 9 | 5 | 5 | 10 | |
| | 1 | 8 | 8 | 1 | 8 | 1 | 1 | 1 | 8 | |
| | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | 2 | |
| | 1 | 5 | 5 | 1 | 6 | 5 | 1 | 1 | 5 | RTM Moderator |
| | 1 | 3 | 5 | | 7 | 5 | 1 | 1 | 3 | |
| | 3 | 9 | 9 | 1 | 8 | 8 | 1 | 1 | 8 | |
| | | | 8 | | | | | | 8 | |
| | 9 | 6 | 9 | 3 | 9 | 5 | 3 | 3 | 5 | |
| | 8 | 10 | 1 | 6 | 6 | 3 | 6 | 1 | 9 | |
| | 3 | 3 | 2 | 2 | 1 | 1 | 5 | 1 | 10 | |
| **AVERAGE OVERALL** | **5.24** | **5.92** | **5.44** | **5.84** | **4.58** | **4.45** | **5.12** | **2.94** | **6.30** | **AVERA** |
| *Variance* | *12.35* | *11.91* | *12.38* | *15.18* | *11.40* | *9.90* | *11.07* | *8.40* | *9.93* | |
| **All Employees** | **6.52** | **6.97** | **5.70** | **7.61** | **4.71** | **4.37** | **6.22** | **3.74** | **6.19** | **A** |
| *Variance* | *10.51* | *10.83* | *12.42* | *10.56* | *12.08* | *11.07* | *10.31* | *10.66* | *11.00* | |
| **Supervisory** | **6.73** | **7.27** | **5.20** | **6.91** | **3.91** | **4.80** | **6.73** | **2.50** | **7.73** | |
| *Variance* | *10.73* | *11.12* | *14.05* | *10.62* | *12.45* | *11.50* | *10.55* | *11.53* | *11.35* | |
| **Line Employees** | **6.41** | **6.80** | **5.95** | **7.95** | **5.15** | **4.15** | **5.95** | **4.33** | **5.38** | **Lin** |
| *Variance* | *10.73* | *11.12* | *14.05* | *10.62* | *12.45* | *11.50* | *10.55* | *11.53* | *11.35* | |
| **Elected Officials** | **2.75** | **4.06** | **5.18** | **2.20** | **4.56** | **4.81** | **2.94** | **1.50** | **6.29** | **Ele** |
| *Variance* | *7.40* | *9.13* | *12.90* | *5.31* | *10.66* | *8.03* | *6.46* | *1.20* | *8.22* | |

Town Of Greenwich CT
Ethics Survey

convenience of Using Sources of Information

| Question 10 | Usefulness for own Problem | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Web Site | Manual | Code | Colleague | Supervisor | Hotline | HR | Union | Law Dept | Other |
| 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 |
| Town Employees | | | | | | | | | |
| 8 | 2 | 3 | 9 | 6 | 5 | 1 | 7 | 4 | |
| 2 | 5 | 3 | 6 | 7 | 9 | 8 | 4 | 1 | |
| 2 | 1 | 7 | 5 | 8 | 3 | 4 | 9 | 6 | |
| 2 | 3 | 9 | 8 | 7 | 1 | 4 | 6 | 5 | |
| 8 | 3 | 4 | 5 | 6 | 7 | 1 | 9 | 2 | |
| 7 | 6 | 2 | 5 | 4 | | 3 | 9 | 1 | |
| 7 | 6 | 1 | 3 | 8 | 5 | 4 | 9 | 2 | |
| 7 | 2 | 1 | 3 | 6 | 5 | 8 | 9 | 4 | |
| 7 | 3 | 4 | 8 | 5 | 6 | 2 | 9 | 1 | |
| 5 | 1 | 2 | 3 | 6 | 4 | 7 | 8 | 9 | |
| 8 | 5 | 3 | 7 | 6 | 4 | 2 | 9 | 1 | |
| 7 | 5 | 6 | 3 | 1 | 8 | 2 | 9 | 4 | |
| 9 | 3 | 2 | 8 | 1 | 5 | 6 | 7 | 4 | |
| 6 | 2 | 3 | 4 | 1 | 7 | 9 | 5 | 8 | |
| 5 | 4 | 3 | 8 | 9 | 1 | 7 | 6 | 2 | |
| 4 | 3 | 9 | 2 | 1 | 7 | 5 | 6 | 8 | |
| 6 | 5 | 10 | 7 | 1 | 3 | 2 | 9 | 4 | 8 |
| 7 | 3 | 4 | 2 | 1 | 8 | 5 | 9 | 6 | |
| 3 | 2 | 8 | 9 | 1 | 7 | 4 | 5 | 6 | |
| 10 | 7 | 8 | 3 | 4 | 9 | 5 | 6 | 1 | 2 |
| 10 | 6 | 2 | 5 | 4 | 3 | 8 | 9 | 7 | 1 |
| 4 | 7 | 8 | 1 | 2 | 3 | 5 | 9 | 6 | |
| 3 | 1 | 8 | 4 | 6 | 5 | 7 | 2 | 9 | |
| 2 | 5 | 4 | 7 | 6 | 8 | 3 | 1 | 9 | |
| 3 | 7 | 5 | 2 | 1 | 4 | 8 | 6 | 9 | |
| 4 | 3 | 1 | 5 | 2 | 9 | 6 | 10 | 7 | |
| 3 | 5 | 4 | 2 | 1 | 6 | 8 | 7 | 10 | |
| 2 | 3 | 4 | 5 | 1 | 6 | 9 | 7 | 8 | |
| 2 | 1 | 5 | 7 | 6 | 8 | 3 | 4 | 9 | |
| 9 | 5 | 1 | 6 | 2 | 8 | 3 | | 4 | |
| 6 | 4 | | 5 | 3 | 7 | 2 | | 1 | |
| Elected Officials | | | | | | | | | |
| 4 | 6 | 7 | 8 | 5 | 9 | 2 | 10 | 3 | 1 |
| 8 | | | | | 1 | | | 2 | |
| 1 | 4 | | 3 | | | | | 2 | |
| 4 | | 3 | | | 2 | | | 1 | |
| 6 | 8 | 1 | 2 | | 7 | 3 | | 5 | 4 |
| | 5 | 4 | 1 | | 3 | 6 | | 2 | |
| | | | 4 | | 3 | 2 | | 1 | |
| 1 | | | 3 | | 2 | | | 4 | |
| 2 | | 3 | 1 | | | | | 4 | |
| 6 | 3 | 7 | 2 | 4 | 5 | 1 | 9 | 8 | |
| 1 | 5 | 4 | 2 | 7 | 3 | 6 | 8 | 3 | |
| 1 | | 2 | | | 3 | | | 4 | |
| 9 | 5 | 4 | 3 | 6 | 2 | 7 | 8 | 1 | |
| 8 | 9 | 3 | 6 | 7 | 4 | 2 | 5 | 1 | |
| 1 | 8 | 9 | 2 | 5 | 7 | 4 | 6 | 3 | |
| 6 | 2 | 1 | 8 | 4 | 7 | 5 | 8 | 3 | |
| 1 | 8 | 7 | 6 | 9 | 2 | 5 | 3 | 4 | |
| **4.93** | **4.31** | **4.40** | **4.62** | **4.36** | **5.13** | **4.62** | **7.08** | **4.35** | **3.20** |
| *7.84* | *4.56* | *6.96* | *5.79* | *6.71* | *5.98* | *5.75* | *5.19* | *7.94* | *8.70* |
| **5.42** | **3.81** | **4.47** | **5.06** | **3.97** | **5.70** | **4.87** | **7.07** | **5.10** | **3.67** |
| *6.78* | *3.49* | *7.43* | *5.33* | *7.03* | *5.25* | *6.25* | *5.35* | *9.09* | *14.33* |
| **5.73** | **3.36** | **3.55** | **5.64** | **6.27** | **4.90** | **4.00** | **8.00** | **3.27** | **-** |
| *7.25* | *3.52* | *7.78* | *5.67* | *5.59* | *5.25* | *5.61* | *6.26* | *7.78* | *-* |
| **5.25** | **4.05** | **5.00** | **4.75** | **2.70** | **6.10** | **5.35** | **6.50** | **6.10** | **3.67** |
| *7.25* | *3.52* | *7.78* | *5.67* | *5.59* | *5.25* | *5.61* | *6.26* | *7.78* | *14.33* |
| **4.14** | **5.50** | **4.00** | **3.46** | **5.43** | **4.14** | **3.80** | **7.71** | **2.94** | **2.50** |
| *9.05* | *5.17* | *6.18* | *5.77* | *1.62* | *5.98* | *4.40* | *2.90* | *3.40* | *4.50* |

Town Of Greenwich CT
Ethics Survey

Usefulness of Sources of Information - Own Ethical Issue

| Question 10 | Usefulness for own Problem | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Web Site | Manual | Code | Colleague | Supervisor | Hotline | HR | Union | Law Dept | Other |
| 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 | 1 though 10 |
| Town Employees | | | | | | | | | |
| 8 | 2 | 3 | 9 | 6 | 5 | 1 | 7 | 4 | |
| 2 | 5 | 3 | 6 | 7 | 9 | 8 | 4 | 1 | |
| 2 | 1 | 7 | 5 | 8 | 3 | 4 | 9 | 6 | |
| 2 | 3 | 9 | 8 | 7 | 1 | 4 | 6 | 5 | |
| 8 | 3 | 4 | 5 | 6 | 7 | 1 | 9 | 2 | |
| 7 | 6 | 2 | 5 | 4 | | 3 | 9 | 1 | |
| 7 | 6 | 1 | 3 | 8 | 5 | 4 | 9 | 2 | |
| 7 | 2 | 1 | 3 | 6 | 5 | 8 | 9 | 4 | |
| 7 | 3 | 4 | 8 | 5 | 6 | 2 | 9 | 1 | |
| 5 | 1 | 2 | 3 | 6 | 4 | 7 | 8 | 9 | |
| 8 | 5 | 3 | 7 | 6 | 4 | 2 | 9 | 1 | |
| 7 | 5 | 6 | 3 | 1 | 8 | 2 | 9 | 4 | |
| 9 | 3 | 2 | 8 | 1 | 5 | 6 | 7 | 4 | |
| 6 | 2 | 3 | 4 | 1 | 7 | 9 | 5 | 8 | |
| 5 | 4 | 3 | 8 | 9 | 1 | 7 | 6 | 2 | |
| 4 | 3 | 9 | 2 | 1 | 7 | 5 | 6 | 8 | |
| 6 | 5 | 10 | 7 | 1 | 3 | 2 | 9 | 4 | 8 |
| 7 | 3 | 4 | 2 | 1 | 8 | 5 | 9 | 6 | |
| 3 | 2 | 8 | 9 | 1 | 7 | 4 | 5 | 6 | |
| 10 | 7 | 8 | 3 | 4 | 9 | 5 | 6 | 1 | 2 |
| 10 | 6 | 2 | 5 | 4 | 3 | 8 | 9 | 7 | 1 |
| 4 | 7 | 8 | 1 | 2 | 3 | 5 | 9 | 6 | |
| 3 | 1 | 8 | 4 | 6 | 5 | 7 | 2 | 9 | |
| 2 | 5 | 4 | 7 | 6 | 8 | 3 | 1 | 9 | |
| 3 | 7 | 5 | 2 | 1 | 4 | 8 | 6 | 9 | |
| 4 | 3 | 1 | 5 | 2 | 9 | 6 | 10 | 7 | |
| 3 | 5 | 4 | 2 | 1 | 6 | 8 | 7 | 10 | |
| 2 | 3 | 4 | 5 | 1 | 6 | 9 | 7 | 8 | |
| 2 | 1 | 5 | 7 | 6 | 8 | 3 | 4 | 9 | |
| 9 | 5 | 1 | 6 | 2 | 8 | 3 | | 4 | |
| 6 | 4 | | 5 | 3 | 7 | 2 | | 1 | |
| Elected Officials | | | | | | | | | |
| 4 | 6 | 7 | 8 | 5 | 9 | 2 | 10 | 3 | 1 |
| 8 | | | | | 1 | | | 2 | |
| 1 | 4 | | 3 | | | | | 2 | |
| 4 | | 3 | | | 2 | | | 1 | |
| 6 | 8 | 1 | 2 | | 7 | 3 | | 5 | 4 |
| | 5 | 4 | 1 | | 3 | 6 | | 2 | |
| | | | 4 | | 3 | 2 | | 1 | |
| 1 | | | 3 | | 2 | | | 4 | |
| 2 | | 3 | 1 | | | | | 4 | |
| 6 | 3 | 7 | 2 | 4 | 5 | 1 | 9 | 8 | |
| 1 | 5 | 4 | 2 | 7 | 3 | 6 | 8 | 3 | |
| 1 | | 2 | | | 3 | | | 4 | |
| 9 | 5 | 4 | 3 | 6 | 2 | 7 | 8 | 1 | |
| 8 | 9 | 3 | 6 | 7 | 4 | 2 | 5 | 1 | |
| 1 | 8 | 9 | 2 | 5 | 7 | 4 | 6 | 3 | |
| 6 | 2 | 1 | 8 | 4 | 7 | 5 | 8 | 3 | |
| 1 | 8 | 7 | 6 | 9 | 2 | 5 | 3 | 4 | |
| **4.93** | **4.31** | **4.40** | **4.62** | **4.36** | **5.13** | **4.62** | **7.08** | **4.35** | **3.20** |
| *7.84* | *4.56* | *6.96* | *5.79* | *6.71* | *5.98* | *5.75* | *5.19* | *7.94* | *8.70* |
| **5.42** | **3.81** | **4.47** | **5.06** | **3.97** | **5.70** | **4.87** | **7.07** | **5.10** | **3.67** |
| *6.78* | *3.49* | *7.43* | *5.33* | *7.03* | *5.25* | *6.25* | *5.35* | *9.09* | *14.33* |
| **5.73** | **3.36** | **3.55** | **5.64** | **6.27** | **4.90** | **4.00** | **8.00** | **3.27** | **-** |
| *7.25* | *3.52* | *7.78* | *5.67* | *5.59* | *5.25* | *5.61* | *6.26* | *7.78* | *-* |
| **5.25** | **4.05** | **5.00** | **4.75** | **2.70** | **6.10** | **5.35** | **6.50** | **6.10** | **3.67** |
| *7.25* | *3.52* | *7.78* | *5.67* | *5.59* | *5.25* | *5.61* | *6.26* | *7.78* | *14.33* |
| **4.14** | **5.50** | **4.00** | **3.46** | **5.43** | **4.14** | **3.80** | **7.71** | **2.94** | **2.50** |
| *9.05* | *5.17* | *6.18* | *5.77* | *1.62* | *5.98* | *4.40* | *2.90* | *3.40* | *4.50* |