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Richard S. Keesecker
Board Chair

MEMO

Tracy Salvagno
Board Vice Chair

TO: Board of Commissioners
All Staff

James W. Brown
Board Member

Judith E. Ferro
Board Member

FROM: Richard S. Keesecker, President of the Board of Commissioners,
Housing Authority of Washington County

Mark Goldsmith
Board Member

SUBJECT: Conflict of Interest and Disclosure of Certain Interests

Tim O'Rourke
Board Member

DATE: June 3, 2011

Vacancy
Board Member

Richard Willson
Executive Director

The Board of Commissioners of the Authority has adopted a Conflict of Interest Policy setting forth certain standards of conduct expected of those involved with the Authority. It requires all Commissioners, and Staff to disclose all interests that could result in a conflict with the interests of the Authority.

Please complete and return the enclosed questionnaire to Richard Willson, Executive Director, within two weeks. Please be assured that the sole purpose of the disclosure requirements is to provide us with a systematic and ongoing method of disclosing and ethically resolving potential conflicts of interest.

To assist you in your review, we wish to point out that a conflict of interest can be considered to exist in any instance where the actions or activities of an individual on behalf of the Authority will result in personal gain or advantage to the individual, or have an adverse effect on the interests of the Authority. Conflicts of interest can arise in other instances. Although it is impossible to list every circumstance giving rise to a possible conflict of interest, the following will serve as a guide to the types of activities that might cause conflicts and that should be fully reported to the Authority:

1. Outside Interests:
 - a. To hold, directly or indirectly, a position or financial interest in any outside concern, including other nonprofit organizations, from which the individual has reason to believe the Authority secures goods or services (including



the services of buying or selling stocks, bonds, or real estate), or that provides services competitive with the Authority.

- b. To compete, directly or indirectly, with the Authority in the purchase or sale of property or property rights, interests, or services. Business outside the region we serve that does not have any impact on the Authority shall be exempted.
- c. To receive federal rental assistance or payments from the Housing Authority of Washington County.

2. Outside Activities:

To render directive, managerial, or consultative services to any outside concern that does business with, or competes with the services of, the Authority, or to render other services in competition with the Authority.

3. Gifts, Gratuities, and Entertainment:

To accept gifts, entertainment or other favors exceeding a nominal amount of \$25 that are meant to directly influence a business decision from any outside concern that does or is seeking to do, business with, or is a competitor of, the Authority.

4. Inside Information:

To disclose or use information relating to the business of the Authority for the personal profit or advantage of the individual or his/her immediate family.

Full disclosure of any situation in doubt should be made so as to permit an impartial and objective determination. It should be particularly noted that disclosure relates not only to yourself but also to your immediate family.

Thank you for your cooperation.

Enclosure: Conflict of Interest Questionnaire

QUESTIONNAIRE

CONFLICT OF INTEREST

Pursuant to the purposes and intent of the Conflict of Interest Policies adopted by the Board of Commissioners of the Housing Authority of Washington County requiring disclosure of certain interests, I hereby state that I or members of my immediate family have the following affiliations or interests and have taken part in the following transactions that, when considered in conjunction with my position with or relation to the Authority, might possibly constitute a conflict of interest. (Check "None" where applicable.)

1. Outside Interests:

- a. Identify any interests or investments, of yourself or your immediate family, that might be deemed "a position or financial interest in any outside concern," as described in Paragraph I-a of the accompanying letter. (Such interests include the ownership of rental property where a tenant receives rental assistance administered by the Housing Authority of Washington County.)

() None

- b. Identify any purchases or sales of property or property rights, interests, or services, by yourself or your immediate family, that might be deemed to have been made in competition with the Authority, as described in Paragraph Ib of the accompanying letter.

() None

2. Outside Activities:

Identify any instances in which you or any members of your immediate family have rendered directive, managerial, or consultative services to any outside concern that does business with, or competes with the services of, the Authority, or have rendered other services in competition with the Authority, as described in Paragraph 2 of the accompanying letter.

() None

3. Gifts, Gratuities, and Entertainment:

I hereby certify that neither I nor any member of my immediate family has accepted gifts, gratuities or entertainment from any outside concern that does, is seeking to do business with, or is a competitor of, the Authority, except as listed below:

() None

4. Inside Information:

I hereby certify that neither I nor any member of my immediate family has disclosed or used information relating to the Authority's business for the personal profit or advantage of myself or my immediate family, except as listed below:

() None

5. Other:

List any other activities in which you or your immediate family are engaged that might be regarded as constituting a conflict of interest, ***including all contractors you have used to do work on your home in the past year and contractors that you anticipate using in the year ahead:***

() None

I hereby agree to report to the President of the Authority any further transaction that may develop before completion of my next questionnaire.

NAME

SIGNATURE

DATE

Position with the Housing Authority of Washington County

NOTE: A copy of the Conflict of Interest Policy for the Housing Authority of Washington County is available upon request