

LOCAL LAW NO. 6 OF THE YEAR 2025

A Local Law Adopting a County Code of Ethics and Requiring Conflict Disclosure by Certain County Officials and Employees; repealing and replacing Resolution 70-94 and 70-101, the prior Code of Ethics for the County

BE IT ENACTED by the Board of Supervisors of the County of Wyoming as follows:

Wyoming County Code of Ethics

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Article I. Purpose and Intent.

Pursuant to the provisions of Article 18 of the General Municipal Law, the Wyoming County Board of Supervisors recognizes that there are rules of ethical conduct for public officers and employees which must be observed if a high degree of moral conduct is to be obtained and if public confidence is to be maintained in our unit of local government.

Wyoming County seeks to establish a high standard of ethical conduct for officers and employees of the County. The proper administration of the government of Wyoming County requires its officers and employees, whether elected or appointed, paid or unpaid, including members of administrative boards, commissions or other agencies, to be impartial and free from conflicts of interest in fulfilling their public responsibilities.

The purpose of this Article is to state, for those officers, employees and appointees of Wyoming County, and for the citizens of the County, standards of conduct necessary to assure these goals, in addition to, and in accordance with, the standards prescribed in Article 18 of the General Municipal Law. Further, it is the purpose of this Local Law to provide the rules and offer clear guidance on the standards for officers, appointees and employees of Wyoming County.

These rules of ethical conduct, as adopted, shall not conflict with, but shall be in addition to, any prohibition of Article 18 of the General Municipal Law or any other general or special law relating to ethical conduct and interest in contracts of municipal officers and employees. This Local Law shall supersede the Resolutions 70-94 and 70-101, the prior Wyoming County Code of Ethics from 1970.

Article II. Definitions.

- (A) Appointed Official - any individual appointed by the Chairperson of the Wyoming County Board of Supervisors, the County Board of Supervisors, or anyone having authority to appoint, derived from either of the foregoing, to any agency, institution, department, district, office, branch, division, council, commission, board or bureau, whether unpaid or paid.
- (B) Board of Ethics - shall mean the Board established in Local Law ____, 2025.
- (C) Chief Elected Official - for the purposes of interpreting this Local Law only, the Chairperson of the Wyoming County Board of Supervisors, or designee.
- (D) Child - any son, daughter, stepson or stepdaughter or foster child of a County officer, employee or elected official.
- (E) County Elected Official - a member of the County's governing body, County Clerk, District Attorney, County Treasurer, Coroner(s) or Sheriff.
- (F) Interest - a direct or indirect pecuniary or material benefit accruing to a county officer, employee or appointed official, spouse, household member or child, whether the result of a contract with the County or otherwise. For the purpose of this Local Law, a County officer, employee or appointed official shall be deemed to have an interest in the contract if (i) with a household member, except a contract of employment with the County; (ii) a firm, partnership or association of which such officer, employee or appointed official or household member is a member or employee; (iii) a corporation of which such officer, employee or appointed official, or household member is an officer or director; and (iv) the outstanding capital stock of a corporation which is owned by an officer, employee or appointed official, or his/her household member.
- (G) Jurisdiction - having authority, capacity, power or right to act with regard to the management and administration of policy and supervision of personnel of the County agency in which she/he is an officer, employee or appointed official.
- (H) Legislation - a matter which appears upon the calendar of the Wyoming County Board of Supervisors, or upon a committee thereof, upon which any official action has been taken including adopted acts, local laws or resolutions.
- (I) Officer or Employee - any officer or employee of Wyoming County, whether paid or unpaid, including elected officials, appointed officials and heads of any agency, institution, department, district, office, branch, division, council, commission, board or bureau of the County.
- (J) Relative - spouse, child, step-child, parent, step-parent, grandparent, step-grandparent, grandchild, step-grandchild, sibling, step-sibling, sibling's spouse, uncle, aunt, nephew, niece, first cousin, foster children or legal guardian of said persons; household members of a municipal officer or employee, and individuals having any of these relationships to the spouse of the officer or employee.
- (K) Reporting Officer, Employee or Appointed Official - an officer, employee, appointed official or candidate for County elected office who is required to complete and file an annual statement of conflict disclosure, pursuant to this Local Law.

- (L) Spouse - the husband or wife of an officer, employee or appointed official subject to the provisions of this Local Law, unless legally separated from such officer, employee or appointed official.
- (M) Supervisor (Person with Supervisory Authority) - shall mean any employee, regardless of job description or title, having authority (or practical power) in the interest of the employer to hire, transfer, suspend, layoff, recall, promote, discharge, assign, reward, or discipline other employees, or responsibility to direct them, or to adjust their grievances, or effectively to recommend this action, if, in the connection with the foregoing, the exercise of this authority is not of a merely routine or clerical nature, but requires the use of independent judgment.

Article III. Code of Ethics.

(A) Prohibited Activities:

It is the policy of the County that all officers and employees must avoid conflicts or potential conflicts of interest. A conflict, or a potential conflict exists, whenever an officer, employee or relative, as defined above, has an interest, direct or indirect, which conflicts with their duty to the County or which could adversely affect an individual's judgment in the discharge of their responsibilities. No officer, employee or relative shall:

1. Take action or participate, in any manner whatsoever, in their official capacity, in the discussion, negotiation or awarding of any contract, or in any business or professional dealings with the County, or any agency thereof, in which the official or employee has, or will have an interest, direct or indirect, in such contract or professional dealings.
2. Have an interest in any contract with the County of which they are an officer or employee as described in Section 801 of General Municipal Law (Appendix A) except in those circumstances described in Section 802 of General Municipal Law (Appendix B).
3. Engage in, solicit, negotiate for or promise to accept private employment or render services for their personal benefit, when such employment or service creates a conflict or impairs the proper discharge of their official duties.
4. Directly or indirectly, solicit any gifts, or receive or accept any gift having the value of SEVENTY-FIVE DOLLARS (\$75.00), or more, whether in the form of money, services, loan, travel, entertainment, hospitality, thing or promise, or in any other form, under circumstances in which it could be reasonably inferred that the gift was intended to influence them, or could reasonably be expected to influence them, in the performance of their official duties, or was intended as a reward for any official action. Complementary attendance offered by the sponsor of a widely attended event, at which at least twenty (20) individuals, other than officers or employees of the County attend or were, in good faith, invited to attend in person, shall not be considered a gift.

5. Disclose confidential information acquired in the course of official duties or use such information to further their personal interest, or use, for profit, information about the property, affairs, finances or government of the County that is not generally available to the public, exclusive of information available to the public under Freedom of Information laws.
6. Take action on a matter before the County or any instrumentality thereof when the performance of that action would provide a pecuniary or material benefit to themselves, their household member, spouse or their child. (Actions due to the negligence or other culpable conduct of the County are not prohibited by this provision).
7. Pursue a course of conduct which will raise suspicion among the public that they may be engaged in acts that are in violation of the public's trust or give the appearance of impropriety or unethical conduct.
8. No person who has served as an officer or employee of the County or any County agency shall, within a period of six (6) months after termination of such service or employment, appear before any board or agency of Wyoming County or receive any compensation for services rendered on behalf of any person (other than for themselves), firm, corporation or association in relation to any case, proceeding or application, with respect to which such person was directly concerned or in which they personally participated during the period of their service or employment or was under consideration.
9. Use of public property/resources. No County officer or employee shall use or permit the use of County property/resources (including land, personnel, vehicles, equipment, materials and/or any other property) for personal convenience or profit, except when such use is available to County citizens, generally, or is provided as a condition of County employment or as a matter of departmental or County policy. The occasional and incidental use during the business day of County telephones and computers for necessary personal matters such as family care and changes in work schedule is permitted. No County officer or employee shall cause the County to spend more than is reasonably necessary for transportation, meals or lodging in connection with official travel.

(B) Disclosure of Interest:

1. Any officer, employee, or relative of such individual who currently has, will have, or intends to acquire a direct or indirect financial or personal interest in any matter or contract under consideration by the Board of Supervisors, or by any other county official, board, agency, or employee, shall be subject to the following disclosure requirements:
 - a. If the individual participates in any discussion of the matter, or provides advice, a recommendation, or an opinion to any board, agency, or official involved in the consideration of the matter, that individual shall, as soon as reasonably practicable, make a public disclosure on the official record stating the nature and extent of the interest.
 - b. If the individual currently has, or subsequently acquires, an interest in any actual or proposed contract with the County, that individual shall disclose, in writing, the nature and extent of the interest to the County Board of

Supervisors and to any other affected Supervisor immediately upon becoming aware of the actual or potential interest.

2. **Process of Recusal:** Whenever a County officer or employee is required to recuse himself or herself under this Ethics Law, that person shall:
 - a. Promptly inform their immediate supervisor in writing
 - b. Promptly file with the Board of Ethics a signed statement disclosing the nature and extend of the conflict which forms the basis of recusal
 - i. If the person is a member of the Board of Supervisors, they shall promptly also file the signed statement from Article (B)(4)(ii) with the Clerk to the Board while satisfying all other requirements of Article (B)(4);
 - c. Immediately refrain from participating further in the particular matter.

(C) **Nepotism:**

1. **Purpose:** This policy is designed to guard against employment relations from which nepotism or charges of nepotism might arise, to assure reliability and appearance of fairness in the best interest of the County, to assure and maintain accountability and to avoid the potential for employment related conflicts of interest.

2. **Policy:** It is the policy of Wyoming County not to discriminate in its employment and personnel actions with respect to its employees and applicants on the basis of marital or familial status. Notwithstanding this policy, no person shall be appointed or employed in any position in the County if such appointment or employment would cause the employee to come under the supervision of a relative, either directly or through a chain of authority. Further, no person shall hold a position where they would be responsible for auditing or evaluating the work of a relative.

3. **Application:** This policy applies to all categories of employment, including full and part time, temporary, casual or seasonal appointments within all departments/divisions of the County. This section does not prohibit the appointment, in the competitive service, of an individual if (1) the individual is within reach for selection from an appropriate certified eligibility list and (2) an equally qualified alternative selection cannot be made from the certified eligibility list.

4. **Procedure:**

(a) The County shall employ no person in any position that places such person under supervision (as defined in Article II(M)) of another employee to whom such person is a relative. Exceptions may be approved, by the County Administrator and Human Resources Director, Director of Civil Service, for employment that would be for the benefit of the County.

(b) Whenever a department head proposes, as an exception to the County's policy, to employ a person or to continue the employment of a person in a position that would fall under the administrative supervision of anyone to whom the person is related in any manner specified in Article II(J), such supervisor shall prepare a written request for approval of each appointment or continuation. This request, which shall include an alternative procedure for

supervision, shall be submitted to his or her immediate supervisor for review and recommendation, through each higher supervisory level, to the County Administrator, for approval. Exceptions will only be permitted where there are unique circumstances and there is a benefit to the County.

(c) When two existing employees marry, and a determination has been made that the potential for creating adverse impact as described above exists, the department head in conjunction with the Human Resources Director, Director of Civil Service, shall make reasonable efforts to minimize problems of supervision, or safety, security or morale through reassignment of duties, relocation or transfer. The proposed plan for accommodation shall be submitted to the County Administrator and Human Resources Director, Director of Civil Service, for approval as soon as possible.

(d) The Human Resources Director, Director of Civil Service, in consultation with the County Administrator, County Attorney and the Chairperson of the Board of Supervisors, shall have the final authority and responsibility for determining if a potential for adverse impact exists or does not exist, and deciding whether to approve the appointment or promotion of the applicant or employee.

(e) The County shall include a requirement for disclosure of family members working for the County on the annual ethics review form as well as job applications.

(D) Solicitation:

1. No County officer or employee shall directly or indirectly compel or induce a subordinate County officer or employee to make, or promise to make, any political contribution, whether by gift of money, service or other thing of value. No County officer or employee may act or decline to act in relation to appointing, hiring, or promoting, discharging, disciplining, or in any manner changing the official rank, status or compensation of any County officer or employee, or an applicant for a position as a County officer or employee, on the basis of the giving or withholding or neglecting to make any contribution of money or service or any other valuable thing for any political purpose.

(E) Limitation upon Filing for Election; Dual Office Holding:

1. No County officer, department head or employees may run for the County Board of Supervisors without first resigning their appointive position. The reason for this prohibition is to avoid the appearance of conflict that inevitably occurs when one in a position to render advice or information to the Board of Supervisors places himself in a position to compete for the elective office to which they render advice or provide information.
2. A County officer shall be deemed to have offered themselves for nomination or election to a County office upon the filing of a nomination paper pursuant to New York State Election Law or formal public declaration of candidacy for such office, whichever occurs first.

3. The resignation of the County officer duly filed in writing with the officer, board or commission having jurisdiction of the office shall, if not accepted within ten (10) days, be deemed to have become effective as of the date of filing.
4. No person shall hold the office of Election Commissioner concurrently with the chairperson of any political party.
5. A person violating any provision of this section is guilty of misfeasance in office and the office held by such person shall be declared vacant.

(F) Annual Code of Ethics Review:

1. Every official and employee, as defined by this legislation, shall attest, on an annual basis, to having reviewed the Code of Ethics of Wyoming County, and such attestation shall be made on or before May 15 of each year.
2. The annual review form will also include that each official and employee, as defined by this legislation, shall list any relatives that work for Wyoming County (including WCHS) and any secondary employment the official/employee has.

(G) Distribution of Code of Ethics:

1. Within thirty (30) days of the effective date of this Local Law, the County Administrator shall cause a copy of this Code of Ethics to be distributed to every officer and employee required to file a Conflict Disclosure Statement and shall further cause a copy of this Local Law to be posted in all County owned or leased buildings. Thereafter, each new officer and employee shall be furnished a copy of this Local Law within thirty (30) days of being elected, appointed, or hired by the County. Each officer and employee required to file a Conflict Disclosure Statement shall complete Code of Ethics training provided by the County Attorney during such officer or employee's initial employee orientation and sign a sworn statement that such officer or employee has received and read the Wyoming County Code of Ethics. Such sworn statement shall be filed with the Board of Ethics, Attn: the Confidential Assistant to the County Administrator by the deadline for filing the Conflict Disclosure Statement (i.e., May 15). Failure to distribute, post, receive or read a copy of this Local Law, attend training, or submit a sworn statement regarding receipt and reading of the Code of Ethics shall have no effect on the duty of compliance of the enforcement of the provisions of this Local Law.

Article IV. Conflict Disclosure.

(A) Positions Required to File:

Attached hereto as "Appendix C", which is fully incorporated into this Local Law by this reference, is a listing of all positions for which Conflict disclosure is required of the persons holding a position (or multiple positions) contained therein. Said "Appendix C" may be amended by the adoption of a Resolution of the Board of Supervisors, as needed, subject to provisions of this Local Law and New York State statutes. Any such amendments shall be effective immediately, and a certified copy thereof shall be filed with the Board of Ethics within five (5) days of adoption.

(B) Filing:

1. Current Officials and Employees: Conflict Disclosure shall be accomplished by completing of a copy of the Conflict Disclosure Form, attached to this Local Law as "Appendix D", which is fully incorporated into this law by this reference. Conflict disclosure shall be required through the discretionary designation of the Board, as stated in Article IV (A) above, and is applicable to those persons as defined in Article II, sections (A), (E), and (I) above, and to those who may not fall within the specific purview of this section but are, with proper discretion, deemed to be "policy making" within the construction of Article 18 of the General Municipal Law, and whose position is listed in Appendix C as amended. This form shall be completed and filed with the Board of Ethics on or before May 15 of each year for which the employment is in effect.
2. New Appointees; Amendments; Candidates: Any person required to file an annual Conflict Disclosure Statement who experiences a change in reporting levels, becomes a candidate for County elected office or is appointed to an office or employment with the County after May 15th, shall file the appropriate annual statement within thirty (30) days of the date upon which the change becomes effective, the candidacy becomes official or the office or employment commences. The Board of Ethics may grant, upon written application, an extension of no more than thirty (30) additional days to a person filing pursuant to this paragraph upon finding that additional time is needed to file. Further extensions may only be granted for cause, upon a request made under the provisions of Article IV(D)(1).

(C) Multiple Filings:

A person subject to Conflict Disclosure filing requirements from more than one (1) municipality may satisfy the requirements of this Local Law by filing only one (1) annual statement of Conflict Disclosure with one (1) municipality, and filing a notice with the appropriate officials of the other(s) that such filing has been made. Such notice shall include the date and place of the filing and a copy of the Conflict Disclosure form so filed.

(D) Extensions of Time to File:

1. Extensions for Cause Shown: Any person required to file an annual Conflict Disclosure Statement may request, prior to May 1, or fifteen (15) days prior to the date the filing would otherwise be due, an extension of time to file for an additional specific period. Such request shall be made in writing to the Board of Ethics, with approval based upon substantiation of justifiable cause or undue hardship. The Board of Ethics may grant or deny the request, by vote of the membership, and extensions shall be for no longer than the specific period of additional time requested.

(E) Exemption of Disclosure:

Any person, required by this Local Law to file an annual Conflict Disclosure Statement, may request an exemption from any requirement to report items of information which pertain to such person's Household Member(s). Such request must be made to the Board of Ethics with appropriate supporting documentation for consideration according to the rules of the Board of Ethics. No exemption may be granted without a finding by a

majority of the total number of members of the Board of Ethics, without vacancies, that:

- (a) the reporting individual's Household Member, individually, or on behalf of an unemancipated child, objects to providing information necessary to make such disclosure, and
- (b) that the information which would otherwise be required to be reported will have no material bearing on the discharge of the reporting individual's official duties.

If such request for exemption is denied, in whole or in part, the Board of Ethics, in its written decision, shall inform the person of their right to appeal the determination pursuant, to Article 78 of the Civil Practice Law and Rules. The Board of Ethics shall adopt rules and regulations governing the procedure for submission of such requests and the issuance of its decisions.

Article V. Ethics Advisory Board.

(A) SEE LOCAL LAW ____ of 2025.

Article VI. Violations of the Code of Ethics.

(A) SEE LOCAL LAW ____ of 2025.

Article VII. Administrative and Legal Support.

(A) SEE LOCAL LAW ____ of 2025.

Article VIII. Records and Meetings of the Board of Ethics.

(A) SEE LOCAL LAW ____ of 2025.

Article IX. Annual Conflict Disclosure Statement.

The Board of Supervisors hereby designates the "Conflict Disclosure Statement" form attached as Appendix D, incorporated by reference, as the annual Conflict Disclosure Statement for the purpose of fulfilling the requirements of this Ethics Local Law and the General Municipal Law.

Article X. Severability

The various elements of this Wyoming County Ethics Law are explicitly intended to be construed within the application of Article 18 of the New York State General Municipal Law. Should any portion of this Local Law be determined to be unconstitutional, improper, or otherwise void by any administrative body or court having jurisdiction, said determination shall have no bearing on the severable remainder of this Local Law.

Article XI. Consistency with Laws.

This Local Law is a policy of the Wyoming County Board of Supervisors, and supersedes all previously adopted Resolutions and Local Laws.

Article XII Effective Date

This local law shall become effective upon the filing with the New York State Department of State.

Appendix A: Section 801 of the General Municipal Law

McKinney's General Municipal Law § 801

§ 801. Conflicts of interest prohibited

Except as provided in section eight hundred two of this chapter, (1) no municipal officer or employee shall have an interest in any contract with the municipality of which he is an officer or employee, when such officer or employee, individually or as a member of a board, has the power or duty to (a) negotiate, prepare, authorize or approve the contract or authorize or approve payment thereunder (b) audit bills or claims under the contract, or (c) appoint an officer or employee who has any of the powers or duties set forth above and (2) no chief fiscal officer, treasurer, or his deputy or employee, shall have an interest in a bank or trust company designated as a depository, paying agent, registration agent or for investment of funds of the municipality of which he is an officer or employee. The provisions of this section shall in no event be construed to preclude the payment of lawful compensation and necessary expenses of any municipal officer or employee in one or more positions of public employment, the holding of which is not prohibited by law.

Appendix B: Section 802 of the General Municipal Law

McKinney's General Municipal Law § 802

§ 802. Exceptions

Effective: July 28, 2009

The provisions of section eight hundred one of this chapter shall not apply to:

1. a. The designation of a bank or trust company as a depository, paying agent, registration agent or for investment of funds of a municipality except when the chief fiscal officer, treasurer, or his deputy or employee, has an interest in such bank or trust company; provided, however, that where designation of a bank or trust company outside the municipality would be required because of the foregoing restriction, a bank or trust company within the municipality may nevertheless be so designated;
- b. A contract with a person, firm, corporation or association in which a municipal officer or employee has an interest which is prohibited solely by reason of employment as an officer or employee thereof, if the remuneration of such employment will not be directly affected as a result of such contract and the duties of such employment do not directly involve the procurement, preparation or performance of any part of such contract;
- c. The designation of a newspaper, including but not limited to an official newspaper, for the publication of any notice, resolution, ordinance or other proceeding where such publication is required or authorized by law;
- d. The purchase by a municipality of real property or an interest therein, provided the purchase and the consideration therefor is approved by order of the supreme court upon petition of the governing board;
- e. The acquisition of real property or an interest therein, through condemnation proceedings according to law;
- f. A contract with a membership corporation or other voluntary non-profit corporation or association including, but not limited to, rural electric cooperatives. For purposes of this paragraph, the term "rural electric cooperative" shall have the same meaning as the term "cooperative" as defined in subdivision (a) of section two of the rural electric cooperative law;
- g. The sale of bonds and notes pursuant to section 60.10 of the local finance law;
- h. A contract in which a municipal officer or employee has an interest if such contract was entered into prior to the time he was elected or appointed as such officer or employee, but this paragraph shall in no event authorize a renewal of any such contract;
- i. Employment of a duly licensed physician as school physician for a school district upon authorization by a two-thirds vote of the board of education of such school district, notwithstanding the fact that such physician shall have an interest, as defined in section eight hundred one of this chapter, in such employment.

j. Purchases or public work by a municipality, other than a county, located wholly or partly within a county with a population of two hundred thousand or less pursuant to a contract in which a member of the governing body or board has a prohibited interest, where:

- (1) the member of the governing body or board is elected and serves without salary;
- (2) the purchases, in the aggregate, are less than five thousand dollars in one fiscal year and the governing body or board has followed its procurement policies and procedures adopted in accordance with the provisions of section one hundred four-b of this chapter and the procurement process indicates that the contract is with the lowest dollar offer;
- (3) the contract for the purchases or public work is approved by resolution of the body or board by the affirmative vote of each member of the body or board except the interested member who shall abstain.

2. a. A contract with a corporation in which a municipal officer or employee has an interest by reason of stockholdings when less than five per centum of the outstanding stock of the corporation is owned or controlled directly or indirectly by such officer or employee;

b. A contract for the furnishing of public utility services when the rates or charges therefor are fixed or regulated by the public service commission;

c. A contract for the payment of a reasonable rental of a room or rooms owned or leased by an officer or employee when the same are used in the performance of his official duties and are so designated as an office or chamber;

d. A contract for the payment of a portion of the compensation of a private employee of an officer when such employee performs part time service in the official duties of the office;

e. A contract in which a municipal officer or employee has an interest if the total consideration payable thereunder, when added to the aggregate amount of all consideration payable under contracts in which such person had an interest during the fiscal year, does not exceed the sum of seven hundred fifty dollars.

f. A contract with a member of a private industry council established in accordance with the federal job training partnership act¹ or any firm, corporation or association in which such member holds an interest, provided the member discloses such interest to the council and the member does not vote on the contract.

Appendix C: Officers and Employees Required to File Conflict Disclosure Statement

County Board of Supervisors
County Administrator
County Auditor
County Coroners
Animal Control Officer – Department Head
Board of Elections Commissioners
Clerk to the Board of Supervisors
Code Enforcement Officer
Commissioner of Public Health / Medical Director
Commissioner Social Services
County Attorney & 1st Assistant County Attorney
County Clerk & Deputy County Clerk
County Highway Superintendent & Deputy
County Historian
County Records Manager
County Treasurer & Deputy
Director Information Technology
Director of Buildings and Grounds
Director of Community Services (Mental Health)
Director of Environmental Health / Director Weights and Measures
Director of Fire and Emergency Management
Director of Planning and Development
Director Office for the Aging / Director Youth Bureau
Director Probation
Director Real Property Tax Services
Director Veteran's Services
District Attorney & 1st Assistant DA
Hospital/WCCHS CEO
Hospital/WCCHS CFO
Hospital/WCCHS Director of Nursing Services
Hospital/WCCHS Director of the Skilled Nursing Facility
Human Resources Director, Director of Civil Service
Public Defender & 1st Assistant PD
Public Health Administrator & Deputy
Reimbursement / Budget Administrator
Sheriff & Under Sheriff
Workers Compensation Program Administrator/ County Insurance

ADVISORY BOARDS AND COMMITTEES

Including, but not limited to:

1. 211 Board
2. Agriculture & Farmland Protection Board
3. Board of Health
4. Wyoming County Business Center (LDC)
5. Wyoming County Planning Board
6. Fire Advisory Board
7. Various GLOW Boards
8. IDA (Wyoming County Industrial Development Corporation)
9. Community Services Board
 - a. Alcohol & Substance Abuse Subcommittee
 - b. Developmentally Disabled Subcommittee
 - c. Mental Health Subcommittee
10. Civil Service Commission
11. OFA (Office for the Aging) Advisory Board
12. Traffic Safety Board
13. WCCHS Board of Managers
14. Wyoming County Water Resource Agency
15. Youth Board

Appendix D: Conflict Disclosure Statement

**ANNUAL STATEMENT OF CONFLICT DISCLOSURE
COUNTY OF WYOMING
FOR FILING 20_____**

- A. Answer each and every one of the following questions completely. If a question does not apply, do not leave it blank, check the “*Not Applicable*” box.
- B. The reporting period for this form shall be the entire calendar year immediately preceding the calendar year in which the Annual Statement of Financial Disclosure is completed. (For example: completing in 2023 for the 2022 calendar year)
- C. Use and attach a separate page if there are not enough spaces to list any information for any subparagraphs herein.

1. Name and Address

_____	_____	_____
Last Name	Middle Initial	First Name

Title		

Department or Agency		

_____	_____	_____
Department or Agency Address	Telephone Number	Email Address

2. Household Members

Provide the name of your household members.

☐ Not Applicable

_____	_____	_____
Household Member	Household Member	Household Member
_____	_____	_____
Household Member	Household Member	Household Member

3. Financial Interests

a) **Business Positions/Not-for-Profit Positions.** List any office, trusteeship, directorship, partnership, or other position in any business, association, proprietary, or not-for-profit organization held by you and household members, if any, and indicate whether these businesses are involved with the County of Wyoming in any manner that you are aware of.

☐ Not Applicable

Name	Position	Organization	County Department or Agency and Nature of Involvement
<hr/>	<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>	<hr/>

b) **Outside Employment.** Describe any outside occupation, employment, trade, business, or profession providing more than \$1,000/year for you and household members, if any.

☐ Not Applicable

Name	Position	Name, Address, and Description of Organization
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>

Having a conflict of interest does not preclude employment with the County, nor does it preclude a board member from continuing on the board. Board members are required to declare the conflict and refrain from voting on the matter. Minutes will reflect the declaration of conflict and abstaining from voting.

c) **Future Employment.** Describe any contract, promise or other agreement between you and anyone else with respect to your employment after leaving your County office or position.

☐ Not Applicable

d) **Past Employment.** Identify the source and nature of any income in excess of \$1,000 received **in this reporting period** from any prior employment, including deferred income, contributions to a pension or retirement funds, profit sharing plan, severance pay, payments under a buy-out agreement, workers compensation, disability payments, unemployment insurance benefits, etc.

☐ Not Applicable

Name	Address of Income Source
<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>

e) **Other Income.** Identify the source and nature of any other income in excess of \$1,000/year from any source not described above, including teaching income, lecture fees, consultant fees, contractual income, or other income of any nature, for you and household members, if any.

☐ Not Applicable

Name	Name and Address of Income Source	Nature of Income
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>

4. Gifts and Honorariums. List the source of all gifts aggregating in excess of \$250.00 received during the reporting period, by you and household members, if any, **excluding gifts from a relative.** The term “gifts” includes gifts of cash, property, personal items, payments to third parties on your behalf, forgiveness of debt, honorariums, and any other payments that are not reportable as income.

☐ Not Applicable

Name	Name and Address of Donor
<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>

Having a conflict of interest does not preclude employment with the County, nor does it preclude a board member from continuing on the board. Board members are required to declare the conflict and refrain from voting on the matter. Minutes will reflect the declaration of conflict and abstaining from voting.

d) **Interest in Contracts.** Describe any interest of you and household members have in any contract involving the County or any municipality located within the County.

☐ Not Applicable

Name

Name and Address of Contract

I hereby attest that I have reviewed the Code of Ethics of the County of Wyoming.

SIGNATURE

DATE

This form must be returned by May 15th to: Wyoming County Board of Ethics

Attn: Assistant to the Wyoming County Administrator

143 North Main Street

Warsaw, New York 14569

PLEASE HAND DELIVER THE FORM IN HARD COPY IN A SEALED ENVELOPE.

Appendix E: Draft Letters

Draft Form for Annual Review



Wyoming County Annual Ethics Review Form

1. *I hereby attest that I have reviewed the Code of Ethics of the County of Wyoming for*
_____ *(year).*

2. I am aware of the following relatives (as defined in the Code of Ethics) who work for
Wyoming County (including the WCCHS).

3. ☐ I have other (secondary) employment. (Fill in): _____

☐ I do NOT have other (secondary) employment.

NAME: _____ **SIGNATURE:** _____

DATE: _____

Return to:

_____, Wyoming County Board of Ethics
_____[@wyomingcountyny.gov](mailto:_____@wyomingcountyny.gov)

Wyoming County Board of Ethics
143 N. Main Street
Warsaw, New York 14569

Draft Annual Letter



DATE

Dear Wyoming County Elected Official, Policy Making Board Member, Employee;

On behalf of the Wyoming County Board of Supervisors and the Wyoming County Board of Ethics, I am writing to request your compliance with **Local Law _____ of 2025**, which requires you to **complete and file a** Conflict Disclosure Statement ("CDS") (see attached CDS via email).

Please **complete, sign and** return a Hard Copy in a Sealed Envelope (hand delivered):

Wyoming County Board of Ethics

Attn: _____

, Wyoming County Board of Ethics

143 N. Main Street

Warsaw, New York 14569

The filing of this form is required by May 15, 20____. This is for the year 20____

Please do not leave blanks; check "Not Applicable" where appropriate.

Please feel free to contact me with questions at 585-786-8817, ext. 1036 or

_____[@wyomingcountyny.gov](mailto:_____@wyomingcountyny.gov)

On Behalf of the Wyoming County Board of Supervisors, *thank you* for your service.

Sincerely,

Secretary to the County Administrator and the Wyoming County Board of Ethics



Wyoming County ETHICS

As a county employee, your job places you in a position of public trust. You must make sure that public resources are used in the best interest of the public; and, in fact and appearance your actions and interests must be above reproach.

As a review, the following actions are prohibited pursuant to the County's Code of Ethics:

- ☐ You cannot use your public position for private gain.
- ☐ You may not disclose confidential County information or use it for any non-County purpose.
- ☐ You cannot use County property for non-County purposes. However, use of municipal resources authorized by County policy is not prohibited.
- ☐ You cannot pursue personal or private activities on County time. Do not operate your side business, catalog or in-home sales parties on county time, using County email or County supplies.
- ☐ You cannot accept gifts worth more than \$75 per year from anyone doing business with the County. Sometimes vendors, clients or consumers send gift baskets and gift certificates. If you don't know the value, either share it with your department or decline the gift.
- ☐ You cannot solicit any gifts (no matter the value), directly or indirectly. You do not want it to be misconstrued that the gift was intended to influence the performance of your official duties or be considered a reward for any official action you may have taken.
- ☐ You cannot have an outside job that conflicts with your county job. "Conflicts with" means you work for a company that contracts with the county and you have influence over that contract on either end. This can also relate to holding a public office. Our Personnel Policy says that a county employee may hold public office as long as it doesn't involve an interest or conflict that interferes with your regular employment.

In addition to the prohibited actions, you should always remember to:

- Avoid conflicts of interest. A conflict of interest is when an individual has divided loyalties, such as when a person has to act on behalf of the public in connection with a matter that affects their personal interest or that of a spouse, Household Member, a relative or any private organization in which he or she is deemed to have an interest.
- Report any interest you have in a County contract in writing to your immediate supervisor and the Board of Ethics. This includes contracts your spouse, Household Member, a relative or any private organization in which you are deemed to have an interest may have with the county. The Ethics Board will determine if your interest in the contract is prohibited. Regardless, the Ethics Board needs

to be notified of your interest. If you fail to notify the Ethics Board and the interest is later discovered, it would make the contract null, void and unenforceable. Also, if you knowingly and willingly fail to disclose, you could be guilty of a misdemeanor. Remember, the public is watching. Be mindful that you are a public employee and are held to a higher standard.

Whistleblower Protections

It is the policy of the County of Wyoming that illegal or unethical activity, including but not limited to corruption, fraud, criminal activity, abuse and conflict of interest by members, officers or employees of any County Department, or any person having dealing with any County Department, will not be permitted, tolerated, or condoned. An employee may not be discharged, or discriminated against, in retaliation for making a complaint, instituting a proceeding, providing evidence or testifying at a proceeding concerning a violation of any law, rule regulation, gross mismanagement, gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety. Any employee or employees who, in good faith, report a false claim are protected against discharge, demotion, suspension, threats, harassment, and other discrimination by their employer.

DATED at Warsaw, New York
July 08, 2025 (Introduced)
August 12, 2025 (Adopted)
Cheryl J. Ketchum, ^{CMC, CLBC}
Clerk to the Board