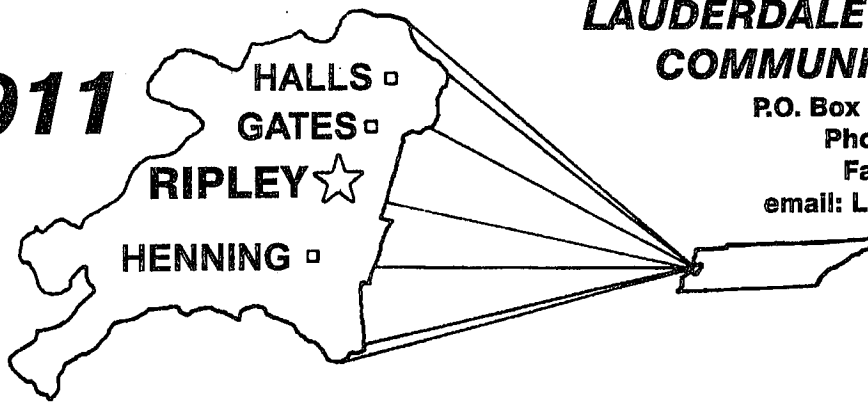


**E-911**



**LAUDERDALE COUNTY EMERGENCY COMMUNICATIONS DISTRICT**

P.O. Box 142 - Ripley, TN 38063  
Phone (731) 635-2278  
Fax (731) 738-5914  
email: Ldale911@bellsouth.net

**ETHICS POLICIES FOR EMERGENCY COMMUNICATIONS DISTRICTS**

**A POLICY CONCERNING ETHICS, CONFLICTS OF INTEREST AND ACCEPTANCE OF GIFTS ON THE PART OF MEMBERS OF THE BOARD OF DIRECTORS, EMPLOYEES AND AGENTS OF THE**

**LAUDERDALE COUNTY EMERGENCY COMMUNICATIONS DISTRICT**

**1. Persons covered.** This Policy applies to all members of the Board of Directors, employees and agents of the Lauderdale County Emergency Communications District (hereinafter "board members, employees and agents").

**2. Board member, employee and agent responsibilities.** Each board member, employee and agent shall avoid any action, whether or not specifically prohibited by statute, regulation, or this Policy, which might result in or create the appearance of:

- i. Using public office for private gain;
- ii. Giving preferential treatment to any person;
- iii. Impeding government efficiency or economy;
- iv. Losing complete independence or impartiality;
- v. Making a government decision outside of official channels; or
- vi. Affecting adversely the confidence of the public in the integrity of the Lauderdale County Emergency Communications District or its Board of Directors.

**3. Gifts.** No board member, employee or agent shall solicit or accept, directly or indirectly, on behalf of himself or herself or any member of the board member's, employee's or agent's household, any gift, including but not limited to any gratuity,

2007 APR 25 AM 9:49  
RECEIVED  
COMMUNICATIONS DISTRICT

service, favor, food, entertainment, lodging, transportation, loan, loan guarantee or any other thing of monetary value, from any person or entity that:

- i. Has, or is seeking to obtain, contractual or other business or financial relations with the Lauderdale County Emergency Communications District or its Board of Directors; or
- ii. Conducts operations or activities that are regulated by the Lauderdale County Emergency Communications District or its Board of Directors; or
- iii. Has interests that may be substantially affected by the performance or nonperformance of the board member's, employee's or agent's official duties.

**4. Exceptions.** The prohibition on accepting gifts in paragraph 3 does not apply to:

- i. A gift given by a member of the board member's, employee's or agent's immediate family, or by an individual if the gift is given for a non-business purpose and is motivated by a close personal friendship and not by the position of the board member, employee or agent. In determining whether a gift falls within this subsection, the factors contained in Tenn. Code Ann. Section 3-6-114(b) (3) (A) and (B) shall apply.
- ii. Informational materials in the form of books, articles periodicals, other written materials, audiotapes, videotapes, or other forms of communication;
- iii. Sample merchandise, promotional items, and appreciation tokens; provided they are routinely given to customers, suppliers or potential customers in the ordinary course of business;
- iv. Unsolicited tokens or awards of appreciation, honorary degrees, or bona fide awards in recognition of public service in the form of a plaque, trophy, desk item, wall memento and similar items; provided that any such item shall not be in a form which can be readily converted to cash;
- v. Food, refreshments, foodstuffs, entertainment, or beverages provided as part of a meal or other event, if the value of such items does not exceed fifty dollars (\$50.00) per occasion; provided that the value of a gift made pursuant to this subsection may not be reduced below the monetary limit by dividing the cost of the gift among two or more persons or entities identified in paragraph 3;
- vi. There may be circumstances where refusal or reimbursement of a gift (such as a lunch or dinner) may be awkward and contrary to the larger interests of the Emergency Communications District. In such circumstances, the board member, employee or agent is to use his or her best judgment, and provide to the board of directors a written disclosure of the gift, including a description, estimated value, the identity of the person or entity providing the gift, and any explanation necessary within fourteen (14) days;
- vii. Food, refreshments, meals, foodstuffs, entertainment, beverages or intrastate travel expenses that are provided in connection with an event where the board member, employee or agent is a speaker or part of a panel discussion at a scheduled meeting of an established or recognized membership organization which has regular meetings; and
- viii. Loans from established financial institutions made in the ordinary course of business on usual and customary terms, so long as there are no guarantees or collateral provided by any person described in paragraph 3.

RECEIVED  
2007 AUG 35 AM 9:49  
ETHICS COMMISSION

**5. Financial Interests.** i. No board member, employee or agent shall enter into or derive any benefit, directly or indirectly, from any contractual arrangement with the Lauderdale County Emergency Communications District with regard to matters related to E911 or emergency communications. In recognition of the fact that many husbands and wives have separate careers, the normal employment compensation of a spouse whose regular, ongoing employer or business has a "benefit" to the board member, employee or agent is excluded from this provision, provided the contract with the Lauderdale County Emergency Communications District was procured without any participation, assistance or influence by the board member.

ii. No board member, employee or agent shall have a direct or indirect financial interest that conflicts substantially, or appears to conflict substantially, with his or her board-related duties or responsibilities. "Indirect financial interest" in this case includes a substantial interest on the part of a parent, spouse, or minor child of the board member, employee or agent. This subsection shall not apply to interests that have been placed into a "blind trust" arrangement pursuant to which the board member, employee or agent does not have knowledge of the retention or disposition of such interests. This subsection also shall not apply to ownership of publicly traded stocks or bonds where such ownership constitutes less than two percent (2%) of the total outstanding amount of the stocks or bonds of the issuing entity. If, at the time the board member, employee or agent begins his or her term on or tenure with the board or at any subsequent time while serving the Board, the board member, employee or agent possesses such direct or indirect financial interests prohibited by subsections (i) or (ii), the board member shall divest such interest within a reasonable time.

**6. Use of information.** No board member, employee or agent shall, directly or indirectly:

i. Use, disclose, or allow the use of official information which was obtained through or in connection with his or her membership on the Lauderdale County Emergency Communications District Board of Directors or service with the Lauderdale County Emergency Communications District and which has not been made available to the general public for the purpose of furthering the private interest or personal profit of any person, including the board member; or

ii. Engage in a financial transaction as a result of, or primarily relying upon, information obtained through his or her membership on the Lauderdale County Emergency Communications District Board of Directors or service to the Lauderdale County Emergency Communications District.

**7. Use of district property.** No board member, employee or agent shall make use of the facilities, equipment, personnel or supplies of the Lauderdale County Emergency Communications District for private use or gain, except to the extent that the use is incidental or *de minimus* or is lawfully available to the general public

## AMENDMENTS

In accordance with Section 2 and Section 4 of the CTAS Model Code of Ethics, the Lauderdale County Emergency Communications District Board and its employees do hereby adopt the following amendments to be included with prior adoption of the TECB's Ethics Policy. In addition and in order for the terminology to coincide with the adopted sections, the following definitions will apply for this purpose.


- i. Officials and Employees means and includes any official, whether elected or appointed, officer, employee or servant, or any member of any board, agency, commission, authority or corporation (whether compensated or not), or any officer, employee or servant thereof, of the District.
- ii. Personal interest means, for the purpose of disclosure of personal interests in accordance with this Code of Ethics, a financial interest of the official or employee, or a financial interest of the official's or employee's spouse or child living in the same household, in the matter to be voted upon, regulated, supervised, or otherwise acted upon in an official capacity.

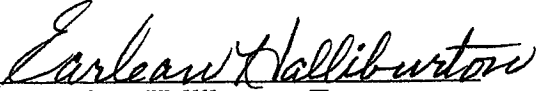
**8. Disclosure of personal interest in voting matters.** An official or employee with the responsibility to vote on a measure shall disclose during the meeting at which the vote takes place, before the vote and to be included in the minutes, any personal interest that affects or that would lead a reasonable person to infer that it affects the official's or employees vote on the measure. In addition, the official or employee may, to the extent allowed by law, recuse himself or herself from voting on the matter

**9. Acceptance of gifts and other things of value.** An official or employee, or an official's or employee's spouse or child living in the same household, may not accept, directly or indirectly, any gifts, money, gratuity, or other consideration or favor of any kind from anyone other than the District:

- i. for the performance of an act, or refraining from performance of an act, that he/she would be expected to perform, or refrain from performing, in the regular course of his/hers duties; or
- ii. That a reasonable person would understand was intended to influence the vote, official action, or judgment of the official or employee in executing District business.

This document, in its entirety, including the Amendments hereto added, has been re-adopted by the Lauderdale County Emergency Communications District Board as witnessed by the signatures set forth below and as included in the official minutes of the Lauderdale County Emergency Communications District Board.

  
Frank Currie, Chairman

  
Earlean Halliburton, Treasurer

Signed this 27<sup>th</sup> day of August, 2007.

A copy of this document, with signatures, will be mailed to the address listed below.

Tennessee Ethics Commission  
SunTrust Bank Bldg.  
201 4th Ave N., Suite 1820  
Nashville, TN 37243  
Phone: 615-253-8634  
Fax: (615) 253-8704

The Lauderdale County E-911 District Board met Monday October 23, 2006 @ 6:00pm in our building located at 132 Dodge Drive as properly advertised in a local newspaper. The following members were present: Frank Currie, Galion Carter, Earlean Halliburton, Norman Hendren, Mary Miller and Celeste Henry. Jonathan Gay was present as was guest, Cecil Crowder and EMA Director, Jim Jarrett.

Norman Hendren opened the meeting with prayer and the presence of a quorum was duly noted.

The minutes from the last meeting were not presented as Pam Laton was unable to attend.

### **Treasurer's Report**

Ms Earlean presented the Treasurer's Report. Ms Mary moved with a second from Galion to accept the Treasurer's Report as presented. Motion carried. Further discussion about the Treasurer's Report was for Ms Earlean to have as many of the bills as possible come out of our account as automatic drafts to cut down on check writing. Ms Earlean will look into this method.

### **Old Business**

GIS Mapping Billing requirements have been fulfilled. Jonathan will gather proper signatures, paperwork, etc., to ensure correct filing for full-cost recovery.

### **New Business**

#### **Agenda Items**

- A. The TECB has recommended each District Board adopt an Ethics Policy similar to Policy #29 of the TECB. Since this Policy is already in place, Celeste moved with a second from Ms Earlean to adopt this Policy. Motion carried.
- B. Annual Audit. The annual audit is in the final stages. Each Board Member needs to make sure all requested paperwork has been filled out completely and returned to the Auditors. This item required no vote of the Board
- C. Jonathan reported on 2 new employees hired to help eliminate the possible need of multiple part-time employees, their unavailability to meet our required hours and to help reduce comp. hours being accrued by our full-time employees (Linda Turner specifically) John Watson has been hired as a full-time employee, beginning that status on 10-15-06. Debra Arnold has been hired as a part-time employee. These positions were advertised for 2-weeks in our local newspaper. This item required no vote of the Board
- D. The TECB has been working on alternative funding proposals in an attempt to give some of the collected cell-phone money back to the Districts. The most prevalent of these will have our District receive a little over \$86,000.00 per year,

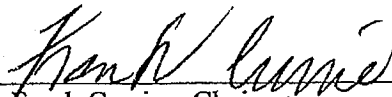
based on our population. The Rural Dispatcher Grant (\$30,000.00), which we currently receive and utilize, will be cut-out, but all other current grants allowed by the TECB will remain available. The vote on the alternative funding will be cast by the TECB, later this month, or in November. This item required no vote of the Board

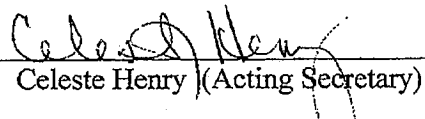
- E. Health Insurance for our full-time employees will be going up again in January, 2007. The Board, in the past has offered to fund entirely, single coverage premiums at HMO rates for those who desire to accept this coverage. Should an employee desire the PPO/POS plan, the employee pays the difference in the premiums. After considerable discussion, Ms Mary moved, with a second by Galion to continue paying the HMO single premium rate (\$458.62) for our full-time employees. Those who desire a different coverage, at a higher premium rate, will pay the difference in the premium price. Motion carried.
- F. Shift differential pay, for our full-time 2<sup>nd</sup>/3<sup>rd</sup> shifts employees was brought up by Jonathan. After much discussion, Norman moved, with a second from Celeste to table this discussion until a later time, possibly when we know for sure about the proposed funding from the TECB. Motion carried.
- G. The annual Christmas Appreciation Dinner date, time, location was discussed. Jonathan will do a call-around for dates, etc. This item required no vote of the Board

Under Item, Other Properly presented Business, Jim Jarrett, EMA Director asked the Board if they had adopted the Federally Managed "NIMS" program. Without further explanation as to what all this entails, no action was taken by the Board.

Also, discussion on NENA Membership was discussed. The general consensus seems to be that three (3) of our board members, on a yearly rotating basis, should become members of NENA. No action was taken by the Board, at this time.

This is a fair and accurate writing of the proceedings of the October 23, 2006 meeting as witnessed by our signatures set forth below.

  
Frank Currie---Chairman

  
Celeste Henry (Acting Secretary)

Signed on this 24<sup>th</sup> day of December, 2006 and by Board approval.

## POLICY NO. 29

## ETHICS POLICIES FOR EMERGENCY COMMUNICATIONS DISTRICTS

Boards of directors of emergency communications districts are strongly encouraged and advised to adopt ethics policies to regulate their activities, including but not limited to contractual obligations and acceptance of gifts, in order to avoid even the appearance of impropriety.

Adopted September 10, 2004.<sup>6</sup>

<sup>6</sup> An Ethics Policy form based upon Executive Order No. 3, issued by the Governor of Tennessee on February 3, 2003, and Policy No. 18, adopted by the Tennessee Emergency Communications Board on January 15, 2004, is provided below solely for your convenience and is available in WORD format upon request by email, to facilitate the drafting of revisions. Districts are of course welcome to adopt this policy form or not, modify this policy form, or create their own ethics policy.

**A POLICY CONCERNING ETHICS, CONFLICTS OF INTEREST AND ACCEPTANCE OF GIFTS ON THE PART OF  
MEMBERS OF THE BOARD OF DIRECTORS, EMPLOYEES AND AGENTS OF THE  
Lauderdale County  
EMERGENCY COMMUNICATIONS DISTRICT**

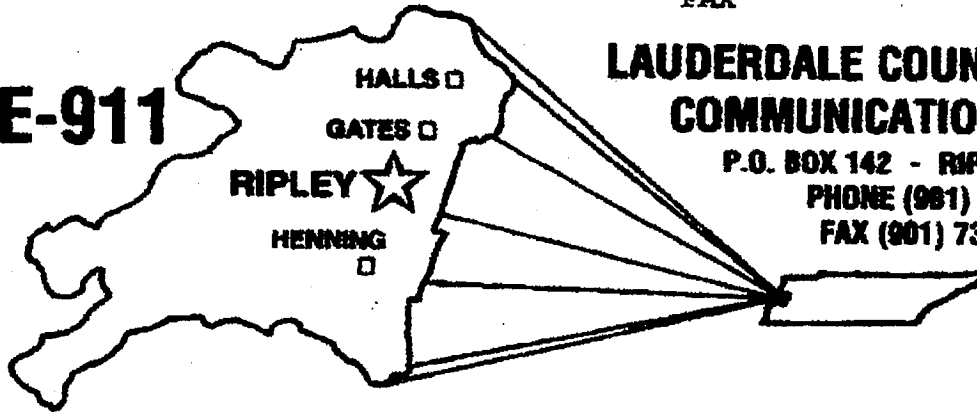
1. Persons covered. This Policy applies to all members of the Board of Directors, employees and agents of the Lauderdale County Emergency Communications District (hereinafter "board members, employees and agents").
2. Board member, employee and agent responsibilities. Each board member, employee and agent shall avoid any action, whether or not specifically prohibited by statute, regulation, or this Policy, which might result in or create the appearance of:
  - i. Using public office for private gain;
  - ii. Giving preferential treatment to any person;
  - iii. Impeding government efficiency or economy;
  - iv. Losing complete independence or impartiality;
  - v. Making a government decision outside of official channels; or
  - vi. Affecting adversely the confidence of the public in the integrity of Lauderdale County Emergency Communications District or its Board of Directors.
3. Gifts. No board member, employee or agent shall solicit or accept, directly or indirectly, on behalf of himself or herself or any member of the board member's, employee's or agent's household, any gift, including but not limited to any gratuity, service, favor, food, entertainment, lodging, transportation, loan, loan guarantee or any other thing of monetary value, from any person or entity that:
  - i. Has, or is seeking to obtain, contractual or other business or financial relations with the Lauderdale County Emergency Communications District or its Board of Directors; or
  - ii. Conducts operations or activities that are regulated by the Lauderdale County Emergency Communications District or its Board of Directors; or
  - iii. Has interests that may be substantially affected by the performance or nonperformance of the board member's, employee's or agent's official duties.
4. Exceptions. The prohibition on accepting gifts in paragraph 3 does not apply to:
  - i. A gift given by a member of the board member's, employee's or agent's immediate family, or by an individual if the gift is given for a nonbusiness purpose and is motivated by a close personal friendship and not by the position of the board member, employee or agent. In determining whether a gift falls within this subsection, the factors contained in Tenn. Code Ann. Section 3-6-114(b) (3) (A) and (B) shall apply.
  - ii. Informational materials in the form of books, articles periodicals, other written materials, audiotapes, videotapes, or other forms of communication;
  - iii. Sample merchandise, promotional items, and appreciation tokens; provided they are routinely given to customers, suppliers or potential customers in the ordinary course of business;
  - iv. Unsolicited tokens or awards of appreciation, honorary degrees, or bona fide awards in recognition of public service in the form of a plaque, trophy, desk item, wall memento and similar items; provided that any such item shall not be in a form which can be readily converted to cash;



- 
- v. Food, refreshments, foodstuffs, entertainment, or beverages provided as part of a meal or other event, if the value of such items does not exceed fifty dollars (\$50.00) per occasion; provided that the value of a gift made pursuant to this subsection may not be reduced below the monetary limit by dividing the cost of the gift among two or more persons or entities identified in paragraph 3;
  - vi. There may be circumstances where refusal or reimbursement of a gift (such as a lunch or dinner) may be awkward and contrary to the larger interests of the Emergency Communications District. In such circumstances, the board member, employee or agent is to use his or her best judgment, and provide to the board of directors a written disclosure of the gift, including a description, estimated value, the identity of the person or entity providing the gift, and any explanation necessary within fourteen (14) days;
  - vii. Food, refreshments, meals, foodstuffs, entertainment, beverages or intrastate travel expenses that are provided in connection with an event where the board member, employee or agent is a speaker or part of a panel discussion at a scheduled meeting of an established or recognized membership organization which has regular meetings; and
  - viii. Loans from established financial institutions made in the ordinary course of business on usual and customary terms, so long as there are no guarantees or collateral provided by any person described in paragraph 3.
5. Financial Interests.
- i. No board member, employee or agent shall enter into or derive any benefit, directly or indirectly, from any contractual arrangement with the Lauderdale County Emergency Communications District with regard to matters related to E911 or emergency communications. In recognition of the fact that many husbands and wives have separate careers, the normal employment compensation of a spouse whose regular, ongoing employer or business has a "benefit" to the board member, employee or agent is excluded from this provision, provided the contract with the Lauderdale County Emergency Communications District was procured without any participation, assistance or influence by the board member.
  - ii. No board member, employee or agent shall have a direct or indirect financial interest that conflicts substantially, or appears to conflict substantially, with his or her board-related duties or responsibilities. "Indirect financial interest" in this case includes a substantial interest on the part of a parent, spouse, or minor child of the board member, employee or agent. This subsection shall not apply to interests that have been placed into a "blind trust" arrangement pursuant to which the board member, employee or agent does not have knowledge of the retention or disposition of such interests. This subsection also shall not apply to ownership of publicly traded stocks or bonds where such ownership constitutes less than two percent (2%) of the total outstanding amount of the stocks or bonds of the issuing entity. If, at the time the board member, employee or agent begins his or her term on or tenure with the board or at any subsequent time while serving the Board, the board member, employee or agent possesses such direct or indirect financial interests prohibited by subsections (i) or (ii), the board member shall divest such interest within a reasonable time.
6. Use of information. No board member, employee or agent shall, directly or indirectly:
- i. Use, disclose, or allow the use of official information which was obtained through or in connection with his or her membership on the Lauderdale County Emergency Communications District Board of Directors or service with the Lauderdale County Emergency Communications District and which has not been made available to the general public for the purpose of furthering the private interest or personal profit of any person, including the board member; or
  - ii. Engage in a financial transaction as a result of, or primarily relying upon, information obtained through his or her membership on the Lauderdale County Emergency Communications District Board of Directors or service to the Lauderdale County Emergency Communications District.
7. Use of district property. No board member, employee or agent shall make use of the facilities, equipment, personnel or supplies of the Lauderdale County Emergency Communications District for private use or gain, except to the extent that the use is incidental or *de minimus* or is lawfully available to the general public.

FAX

**E-911**



**LAUDERDALE COUNTY EMERGENCY COMMUNICATIONS DISTRICT**

P.O. BOX 142 - RIPLEY, TN 38063  
PHONE (901) 635-2278  
FAX (901) 738-5914

**FAX TRANSMITTAL**

**TO:** Tennessee Ethics Commission

**FROM:** Lauderdale County E-911 District Board

**PAGES TO FOLLOW:** 4