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SOUTHERN PARK COUNTY FIRE PROTECTION DISTRICT

Guffey, Colorado • Established 1987

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POLICY NO. 200-2.02

CONFLICT OF INTEREST — ALL PERSONNEL

Southern Park County Fire Protection District • Series 200 — Governance & Administration

Policy Number:	200-2.02	Document Number:	20260408_ADMIN_200-2.02_ConflictOfInterest_DRAFT-v0.4
Effective Date:	May 12, 2026	Adopted:	May 12, 2026
Reviewed / Revised:	—	Next Review:	Annual — Q1 each year
Approved By:	Board of Directors, SPCFPD	Classification:	PUBLIC POLICY DOCUMENT
Supersedes:	None. First adoption of a formal organizational conflict of interest policy. BAM v1.1 § 2.2 governs Director-specific COI at the Board governance level and is supplemented by this policy. Policy 200-2.01 § 6 (Conflicts of Interest conduct standard) is implemented by this policy's procedures.		
Cross-References:	BAM v1.1 (§§ 2.2, 2.2.1, 2.2.2, 2.2.3, 2.3.1) • Policy 100-1.02 (Mission, Core Values & Ethics § 5.3) • Policy 200-2.01 (Code of Ethics § 6) • Policy 200-2.03 (Dual-Role Policy — pending) • Policy 200-2.13 (Citizen Complaint Procedure) • Policy 300-3.13 (Progressive Discipline — pending) • C.R.S. § 24-18-101 et seq. (Colorado Government Ethics Act) • C.R.S. § 24-18-109 (Special district officers and employees) • C.R.S. § 24-18-201 et seq. (Colorado Independent Ethics Commission) • C.R.S. § 32-1-902 (Special district board duties)		

1. PURPOSE

Public trust is the foundation of this District's authority. The community of southern Park County grants this District the power to tax, to contract, to employ, and to regulate in reliance on the expectation that every person associated with the District will exercise their duties impartially and in the public interest. A conflict of interest — whether actual or only apparent — undermines that trust and can expose the District to legal liability, reputational harm, and challenge to the validity of its decisions.

This policy establishes the District's conflict of interest framework for all personnel: the definitions that determine when a conflict exists, the disclosure obligations that ensure conflicts are identified in advance, the recusal procedures that prevent conflicted individuals from participating in affected matters, and the



annual disclosure cycle that keeps the record current. It applies to everyone — Directors, paid staff, volunteers, and contractors — in proportion to their role and authority.

Relationship to the BAM. BAM v1.1 § 2.2 governs conflict of interest for Directors in their Board governance role and controls in the event of any conflict with this policy as to Director conduct. This policy supplements BAM § 2.2 by providing the operational procedures applicable to all personnel and by establishing the annual disclosure cycle and form (Appendix A) that serves both Directors and staff.

2. SCOPE

This policy applies to all persons associated with the District in any capacity, including:

- All members of the Board of Directors, in their capacity as Board members and, where applicable, as operational members;
- The District Chief, Deputy Chief, Captain, and all other paid District employees;
- All active volunteer members, including firefighters, medical volunteers, and reserves;
- Contractors and vendors acting on behalf of the District in a decision-making, advisory, or procurement-facing capacity; and
- Any person serving on a District committee, task force, or advisory body with authority to recommend or act on District matters.

Note on Directors: Directors are subject to both this policy and the additional obligations of BAM § 2.2 and the Colorado Government Ethics Act (C.R.S. § 24-18-101 et seq.). Where the BAM or the Colorado Government Ethics Act imposes a stricter standard than this policy, the stricter standard governs. Directors who also serve in an operational capacity are additionally subject to Policy 200-2.03 (Dual-Role Policy — pending).

3. DEFINITIONS

"Conflict of Interest." An actual or apparent personal, financial, familial, organizational, or other interest held by a person subject to this policy that could reasonably be expected to impair, or appear to impair, that person's ability to act impartially in the performance of their District duties. The standard is objective: whether a reasonable person aware of the facts would perceive a conflict, regardless of the individual's subjective intent.

"Financial Interest." Any ownership interest, employment income, debt obligation, contractual right, or other economic interest that a person or a member of their household holds in an entity or transaction that has or could have a relationship with the District. A financial interest is "material" if it could reasonably be expected to affect the person's judgment or decision-making as to District matters.

"Household Member." A spouse, domestic partner, dependent child, or any other person residing in the same household as the person subject to this policy. For purposes of this policy, the financial and organizational interests of household members are attributed to the person subject to this policy.

"Immediate Family." A spouse, domestic partner, parent, sibling, child, or the spouse or domestic partner of any of the foregoing, whether by blood, marriage, or legal relationship. Immediate family members who are not household members are not automatically attributed but may give rise to a conflict requiring disclosure depending on the circumstances.

"Recusal." The act of removing oneself from participation in a specific matter due to an actual or apparent conflict of interest. Recusal includes abstaining from discussion, deliberation, and voting on the matter, and, for Directors, physically leaving the meeting room during discussion if requested or if the conflict is substantial.

"Disclosure." The act of formally identifying a potential conflict of interest, either on the Annual Conflict of Interest Disclosure Form (Appendix A) or by making a contemporaneous oral or written statement before participating in a matter in which the interest is relevant.



4. TYPES OF CONFLICTS OF INTEREST

The following categories of interests require disclosure under this policy. This list is illustrative, not exhaustive. When in doubt, disclose.

Interest Type	Examples	Disclosure Trigger
Financial interest (direct)	Ownership stake in a business that bids on District contracts; investment in vendor or contractor; personal debt to District vendor	Annual form + immediate disclosure when matter arises
Financial interest (indirect)	Business partner, employer, or entity in which a household member has a material interest; trust in which the member is a beneficiary	Annual form + immediate disclosure when matter arises
Household or family member interest	Spouse, domestic partner, dependent, or household member employed by a District vendor, contractor, or applicant; family member applying for District employment	Annual form + immediate disclosure when matter arises
Outside employment or business	Second job or business that competes with District services; consulting work for entities regulated or contracted by the District; employment by mutual aid partners in matters requiring District action	Annual form; update when circumstances change
Organizational or associational interest	Board membership, officer position, or significant volunteer role with an entity that has a financial or contractual relationship with the District	Annual form + immediate disclosure when matter arises
Personal relationship	Close personal friendship or romantic relationship with a vendor, applicant, or party in a matter that could reasonably appear to influence impartial judgment	Immediate disclosure when matter arises; not required on annual form unless financial interest also present
Prior employment or service	Recent employment or contracting relationship with an entity now seeking a District contract or benefit; within two years of separation	Immediate disclosure when matter arises

The appearance standard: A conflict of interest exists not only when a person’s interest actually affects their judgment, but also when a reasonable person with knowledge of the facts would conclude that it could. The District’s obligation to public trust requires attention to appearances, not just actual impropriety. When in doubt, disclose and recuse.

5. ANNUAL DISCLOSURE OBLIGATION

- a. Who must disclose. All Directors, paid staff, and active volunteers are required to complete the Annual Conflict of Interest Disclosure Form (Appendix A) each calendar year. Contractors and advisory body members shall complete the form upon engagement and must update it promptly when any new interest arises.
- b. Annual deadline. The annual disclosure form shall be submitted to the Secretary/Treasurer by January 31 of each year. New members must submit the form within fifteen (15) calendar days of appointment, hire, or first day of active membership, whichever is earliest.
- c. Amendment obligation. The annual disclosure form reflects interests at the time of submission. Any person who acquires a new interest — or becomes aware of an existing interest that was not previously disclosed — that could constitute a conflict of interest must submit an amended disclosure form to the Secretary/Treasurer within fifteen (15) calendar days of becoming aware of the interest. Waiting for the next annual cycle is not a substitute for timely amendment.
- d. Public record. Completed disclosure forms are public records subject to inspection under CORA. The Secretary/Treasurer shall maintain all disclosure forms in the District’s official records per the



retention schedule in Policy 200-2.11 (five years after submission). The Secretary/Treasurer shall maintain a log of all forms received, noting submitter, role, date received, and any interests disclosed.

e. Non-submission. Failure to submit the annual disclosure form by the January 31 deadline constitutes a policy violation. The Secretary/Treasurer shall notify the Board Chair of any non-submissions by February 15. For paid staff and volunteers, non-submission may result in disciplinary action per Policy 300-3.13. For Directors, the Board Chair shall address the matter with the Director and, if unresolved, present it to the full Board for action.

6. IMMEDIATE DISCLOSURE — BEFORE PARTICIPATING IN A MATTER

Annual disclosure is a baseline. It does not substitute for the obligation to disclose a specific conflict before participating in any particular District matter in which that conflict is relevant.

a. Trigger. Any person subject to this policy who has, or becomes aware of, an interest that could constitute a conflict of interest with respect to a specific agenda item, decision, transaction, procurement, or other District matter must disclose that interest at the earliest practicable time — and in any event before participating in discussion, deliberation, or decision-making on that matter.

b. Method of disclosure for Directors. A Director disclosing a conflict at a Board meeting shall state the disclosure orally for the record before any discussion of the affected matter begins. The disclosure shall be recorded in the minutes. The Director shall then recuse per § 7 unless the Board Chair and a majority of disinterested Directors determine that the interest is de minimis and does not require recusal. A de minimis determination shall be stated on the record and recorded in the minutes.

c. Method of disclosure for staff and volunteers. A staff member or volunteer who identifies a conflict with respect to a specific matter shall notify the District Chief in writing as soon as practicable before the matter is acted upon. The District Chief shall review the disclosure, determine the appropriate response (recusal, reassignment, or other action), and document the determination in the personnel file or operational record.

d. When disclosure is uncertain. If a person is uncertain whether a particular interest requires disclosure, they should disclose it. No adverse action will be taken for disclosing an interest that is ultimately determined not to require recusal. The costs of disclosure are low; the costs of non-disclosure can be severe.

7. RECUSAL PROCEDURE

a. When recusal is required. Recusal is required when: (i) the person has a direct financial interest in the outcome of a matter; (ii) a household member has a direct financial interest in the outcome; or (iii) the Board Chair (for Directors) or District Chief (for staff and volunteers), in consultation with the person, determines that the interest is substantial enough that participation would constitute or appear to constitute a breach of duty. BAM § 2.2.2 governs mandatory recusal for Directors and controls.

b. Recusal for Directors. A Director who recuses themselves from a matter shall: (i) announce the recusal orally on the record before any discussion begins; (ii) refrain from all discussion, deliberation, and voting on the matter; (iii) leave the meeting room during discussion if the matter is sensitive or if requested by the Board Chair; and (iv) not attempt to influence other Directors on the matter through any channel, including outside the meeting. The recusal shall be recorded in the minutes. A recused Director is not counted toward quorum for purposes of the affected matter.

c. Recusal for staff and volunteers. A staff member or volunteer who is recused from a matter shall: (i) not participate in any decision, recommendation, evaluation, or action related to the matter; (ii) not access materials related to the matter beyond what is necessary for general operational awareness; and (iii) be reassigned by the District Chief to a role in which the conflict does not arise, if the matter is sufficiently significant.

d. Documentation. All recusals shall be documented. For Directors: in the Board minutes. For staff and volunteers: in a written record maintained by the District Chief. Documentation shall state the nature of the conflict and the scope of the recusal.

e. Effect of recusal on quorum and voting. For Directors: a recused Director is not counted toward quorum for purposes of the affected matter only. If recusals would reduce available Directors below three, the Board shall consult District Counsel before proceeding. See BAM § 2.2.2.



8. CONFLICTS IN PROCUREMENT AND CONTRACTING

- a. General prohibition. No District personnel shall participate in the evaluation, selection, recommendation, or approval of any contractor, vendor, or service provider in which that person, or a household member of that person, has a financial interest or employment relationship. This prohibition applies to formal competitive bids, sole-source procurements, contract renewals, and change orders.
- b. Disclosure and exclusion. Any person who becomes aware that a procurement involves a conflict shall immediately disclose the conflict to the District Chief (for staff and volunteers) or the Board Chair (for Directors) and be excluded from all aspects of that procurement. The disclosure shall be documented.
- c. Family member employment. No person shall participate in the hiring, compensation determination, or performance evaluation of an immediate family member or household member. Any such situation shall be disclosed to the District Chief, who shall reassign responsibilities as needed. Board approval is required for any employment arrangement that cannot be fully insulated from a conflicted Director or staff member.
- d. Colorado law. Directors are additionally subject to C.R.S. § 24-18-109, which prohibits a special district officer or employee from having a financial interest in any contract made by the Board in their official capacity. Violation of § 24-18-109 may render a contract void and may subject the Director or employee to personal liability. Consult District Counsel before any contracting situation involving a potential statutory conflict.

9. GIFTS AND BENEFITS

The prohibition on accepting gifts that could influence or appear to influence official duties is established in Policy 200-2.01 § 4 (Gifts and Benefits). This policy supplements that prohibition with the following conflict of interest procedures:

- a. Disclosure of gifts received. Any person who receives a gift in connection with District business that has a value of \$25 or more shall disclose it to the District Chief (staff and volunteers) or the Secretary/Treasurer (Directors) within five (5) business days of receipt, regardless of whether the person considers it to create a conflict. The disclosure shall be logged and retained per Policy 200-2.11.
- b. Director obligations under the Colorado Government Ethics Act. Directors are subject to the gift restrictions and disclosure requirements of C.R.S. § 24-18-101 et seq. and the Independent Ethics Commission rules. Directors shall comply with those requirements independently of this policy, and shall consult District Counsel if uncertain about a gift's status under the Act.
- c. Refusal of improper gifts. Any person who receives an unsolicited gift that must be declined under Policy 200-2.01 shall return it promptly with a written explanation, or if return is impractical, shall donate it to a charitable organization and document the disposition. Notification to the District Chief or Board Chair is required.

10. POST-SERVICE OBLIGATIONS

Conflicts of interest do not automatically end when a person's service with the District concludes. Former Directors, employees, and volunteers retain the following obligations for a period of two (2) years following the end of their service:

- A former Director or employee shall not represent any private party before the District in connection with any specific matter in which the former Director or employee personally and substantially participated during their service.
- A former Director or employee shall not use or disclose confidential District information obtained during their service for personal gain or to benefit a third party, regardless of the passage of time. See also Policy 200-2.04 (Confidentiality and Non-Disclosure — DRAFT, pending Board adoption).
- These post-service obligations do not prohibit a former Director or employee from generally serving another government entity or from testifying before the Board as a member of the public on matters of general public concern.



11. COLORADO INDEPENDENT ETHICS COMMISSION

Directors and District employees are subject to the jurisdiction of the Colorado Independent Ethics Commission (IEC), established by Article XXIX of the Colorado Constitution and C.R.S. § 24-18-201 et seq. Any person may file a complaint with the IEC alleging a violation of the Colorado Government Ethics Act by a District Director or employee. The IEC has independent investigative and enforcement authority and its jurisdiction is not displaced by this policy or by any District-level proceeding. The Secretary/Treasurer shall provide Directors with current IEC contact information upon request.

12. ADMINISTRATION AND TRAINING

- a. **Secretary/Treasurer.** The Secretary/Treasurer is responsible for: distributing the annual disclosure form by December 15 of each year for the following year's deadline; receiving and logging completed forms; maintaining the disclosure log and all completed forms as official District records; notifying the Board Chair of non-submissions; and maintaining a current copy of this policy in the District's official records.
- b. **District Chief.** The District Chief is responsible for: ensuring all paid staff and volunteers receive and complete the annual disclosure form; reviewing disclosures from staff and volunteers and determining appropriate responses; documenting recusals for staff and volunteers; and incorporating COI training into the annual orientation and acknowledgment cycle.
- c. **Training.** All Directors, paid staff, and volunteers shall receive COI awareness training within thirty (30) days of joining the District and annually thereafter. COI training shall be integrated with the annual ethics training required by Policy 200-2.01 § 9. Training shall cover: what constitutes a conflict of interest; the disclosure obligation and timeline; the recusal procedure; and the consequences of non-disclosure.
- d. **Annual review.** This policy shall be reviewed in the Q1 annual review cycle per Policy 100-1.06. The Secretary/Treasurer shall confirm that the Colorado Government Ethics Act provisions referenced in §§ 8(d), 9(b), and 11 reflect current law before each review.

13. ENFORCEMENT AND CONSEQUENCES

- a. **Reporting violations.** Any person who suspects a violation of this policy shall report it to the District Chief (for staff and volunteer matters) or to the Board Chair (for Director matters or matters involving the District Chief). Reports may also be submitted through the anonymous complaint process in Policy 200-2.13. Retaliation against any person making a good-faith report is prohibited and is itself a policy violation.
- b. **Investigation.** Alleged violations shall be investigated per the procedures in Policy 200-2.13 (Citizen Complaint Procedure) for public complaints, and per the applicable personnel policy for internal matters. The investigator shall be a disinterested person — an independent investigator or District Counsel shall be retained where the alleged violation involves a Director or the District Chief.
- c. **Consequences.** Consequences for violations of this policy shall be proportionate to the severity of the violation and may include:
 - For paid staff and volunteers: counseling, written warning, suspension, or termination per Policy 300-3.13 (Progressive Discipline — pending);
 - For Directors: formal written censure by Board resolution at a duly noticed public meeting; mandatory additional ethics training; or referral to the Colorado Independent Ethics Commission;
 - For any person: referral to law enforcement or the Colorado State Attorney General if the violation involves criminal conduct under C.R.S. § 18-8-308 (abuse of public trust) or other applicable law;
 - For contractors: contract termination and disqualification from future District contracts.
- d. **Void contracts.** Any contract or procurement entered into in material violation of this policy or of C.R.S. § 24-18-109 may be declared void by the Board or by a court of competent jurisdiction. The Board shall consult District Counsel before taking action on a potentially void contract.



14. SEVERABILITY

If any provision of this policy is held invalid or unenforceable, the remaining provisions shall continue in full force and effect.

PASSAGE AND ADOPTION.

PASSED, APPROVED, AND ADOPTED by the Board of Directors of the Southern Park County Fire Protection District at a duly noticed public meeting, by the following vote:

Director	AYE	NAY	ABSTAIN
Sean English (Board Chair)	AYE		
Mike Brandt (Secretary/Treasurer)	AYE		
Mike Parrish	AYE		
Mike Smith	<input type="checkbox"/>		
Jennifer Taylor	AYE		

ATTESTATION.

IN WITNESS WHEREOF, the undersigned duly authorized officers hereby attest to the adoption of this policy.

Sean English

Board Chair — Board of Directors, SPCFPD

Date: May 12, 2026

Mike Brandt

Secretary/Treasurer — Board of Directors, SPCFPD

Date: May 12, 2026

Mike Parrish

Board Member — Board of Directors, SPCFPD

Date: May 12, 2026

Mike Smith

Board Member — Board of Directors, SPCFPD

Date: _____

Jennifer Taylor

Board Member — Board of Directors, SPCFPD

Date: May 12, 2026

CERTIFICATION.

I, Mike Brandt, Secretary/Treasurer of the Board of Directors of the Southern Park County Fire Protection District, Park County, Colorado, hereby certify that the foregoing is a true and correct copy of Policy 200-2.02 duly adopted by the Board of Directors at a duly noticed public meeting, at which a quorum was present and acting throughout.

Mike Brandt

Secretary/Treasurer — Southern Park County Fire Protection District

Date: May 6, 2026



APPENDIX A — ANNUAL CONFLICT OF INTEREST DISCLOSURE FORM

Policy 200-2.02 § 5 • Due: January 31 each year • Submit to: Secretary/Treasurer • This form is a public record.

ANNUAL CONFLICT OF INTEREST DISCLOSURE FORM

Southern Park County Fire Protection District • Policy 200-2.02, Appendix A

SUBMITTING MEMBER INFORMATION

Full Name: _____ **Date:** _____

Role / Position: _____ Director Paid Staff

Volunteer Contractor

Disclosure Period: Calendar year _____ Annual Amended mid-year Initial (new member)

INSTRUCTIONS

Identify all interests that could constitute a conflict of interest as defined in Policy 200-2.02 § 3. If no conflict exists, check "None" in each category. If uncertain whether a particular interest qualifies, disclose it — err on the side of disclosure. This form is a public record. Submit to the Secretary/Treasurer by January 31 of each year, or within 15 days of appointment or hire.

SECTION 1 — FINANCIAL INTERESTS

Do you, or does any member of your household, have a direct or indirect financial interest in any entity that has or is likely to have a contractual, regulatory, or financial relationship with the District?

None at this time. Yes — describe below:

SECTION 2 — OUTSIDE EMPLOYMENT OR BUSINESS INTERESTS

Do you hold any outside employment, consulting role, or business ownership that could conflict with your duties to the District or that involves an entity with a relationship to the District?

None at this time. Yes — describe below:

SECTION 3 — HOUSEHOLD OR FAMILY MEMBER INTERESTS

Does any member of your household or immediate family hold a position with, or have a significant financial interest in, an entity that has or is likely to have a relationship with the District (including employment, contracting, or regulatory matters)?

None at this time. Yes — describe below:

SECTION 4 — ORGANIZATIONAL OR ASSOCIATIONAL INTERESTS

Do you serve as an officer, board member, or key volunteer for any organization that has or is likely to have a financial, contractual, or regulatory relationship with the District?

None at this time. Yes — describe below:



SECTION 5 — OTHER POTENTIAL CONFLICTS

Are you aware of any other interest, relationship, or circumstance not covered above that could reasonably appear to influence your impartial judgment or decision-making in your role with the District?

None at this time. Yes — describe below:

CERTIFICATION

I certify that the information provided on this form is true and complete to the best of my knowledge. I understand that I have an ongoing obligation to update this disclosure whenever a new conflict of interest arises, and to promptly disclose any interest not previously identified before participating in any matter in which that interest is relevant. I acknowledge that I have read and understand Policy 200-2.02.

Signature: _____ **Date:** _____

FOR OFFICE USE ONLY

Received by: _____ **Date received:** _____

Log entry #: _____ **Action taken (if any):** _____

File completed form per Policy 100-1.05: YYYYMMDD_ADMIN_COI_Disclosure_[LastName]_[Role].pdf



Document Revision History

Document: 20260408_ADMIN_200-2.02_ConflictOfInterest_DRAFT-v0.4 Policy: 200-2.02 — CONFLICT OF INTEREST — ALL PERSONNEL

Table with 4 columns: Ver., Date, Author, Changes / Status. Rows include v0.1 through v1.0, detailing revisions such as 'Initial adoption', 'Corrected Policy 200-2.04 cross-reference label', and 'Formally adopted at regular board meeting'.

This policy shall be interpreted consistently with: BAM v0.8 (§§ 2.2, 2.2.1, 2.2.2, 2.2.3, 2.3.1); Policy 100-1.02 (Mission, Core Values & Ethics § 5.3); Policy 200-2.01 (Code of Ethics and Conduct § 6); Policy 200-2.03 (Dual-Role Policy — pending); Policy 200-2.13 (Citizen Complaint Procedure); Policy 300-3.13 (Progressive Discipline — pending); C.R.S. § 24-18-101 et seq. (Colorado Government Ethics Act); C.R.S. § 24-18-109 (Special district officers); C.R.S. § 24-18-201 et seq. (Independent Ethics Commission); C.R.S. § 32-1-902 (Special district board duties); Article XXIX, Colorado Constitution (Ethics in Government).

— END OF POLICY 200-2.02 —