



## Legislative Action Committee Delegate Conflict of Interest Policy

The Delegates of the Legislative Action Committee (LAC) owe a duty of loyalty to Community Associations Institute (CAI) which requires that in serving CAI they act, not in their personal interests or the interests of others, but rather solely in the interests of CAI. Delegates must have undivided allegiance to CAI's mission and public policies, and may not use their positions as Delegates, information they have about CAI, the LAC, or strategies related to their activities, in a manner that allows them to secure a pecuniary or any other benefit for themselves, their relatives, or other organizations they belong to or serve.

The conduct of personal business between the Delegate and CAI or the Delegate and the LAC is discouraged. Business transactions involving CAI or the LAC in which a Delegate has an interest shall not be prohibited, but shall be subject to close scrutiny by the Government and Public Affairs Department at CAI. Such proposed transactions shall be reviewed carefully by the Government and Public Affairs Department to determine that those transactions are in the best interests of CAI or the LAC. Any matter in which one has a personal interest is, de facto, a conflict of interest.

The issue is whether, despite the conflict, the transaction is commercially reasonable and in the best interests of CAI or the LAC. For the purposes of this policy, a Delegate has an interest in a proposed transaction if the Delegate has a financial interest in the transaction that is not shared by the membership at large or a substantial portion of the membership of CAI, or has a financial interest in any organization involved in the proposed transaction (except an interest as a shareholder in a publicly traded company) or holds a position as trustee, director, general manager, or principal officer in any such organization.

Prior to participating in any briefings, discussions, strategy sessions or lobbying activities that affect any programs or interests of other organizations to which Delegates are affiliated or which affect a Delegate personally, the Delegate must make full disclosure to the best of his or her knowledge of any interest inconsistent with this policy in a proposed issue, transaction, legislative or regulatory strategy, or policy position by submitting a written report to the Chair of the G&PA Committee, Chair of the Legislative Action Committee and the Vice President of G&PA for CAI.

A Delegate with a dual interest in a proposed issue, transaction, legislative or regulatory strategy, or policy position shall not vote on or participate in a discussion of the matter.

A Delegate shall not use inside information about CAI or the LAC for his/her personal benefit or for the benefit of any other organization, or use such inside information or his/her position as a Delegate to the detriment of CAI. Inside information is information obtained by a Delegate through the Delegate's position that has not become public information.

***Please return the completed form to the attention of the G&PA Department at [government@caionline.org](mailto:government@caionline.org) or you may also fax to 703.970.9558***

CAI | 6402 Arlington Boulevard, Suite 500 | Falls Church, VA 22042  
Toll Free: 888.224.4321 | [www. Caionline.org](http://www.Caionline.org)

Each Delegate has a duty to place the interests of CAI and adherence to CAI's public policies foremost in any dealings involving CAI and has a continuing responsibility to comply with the requirements of this Policy. On an annual basis, each Delegate is required to complete a Delegate Disclosure Statement.

**Adopted by the CAI Board of Trustees on August 4, 2003**

The Delegate Disclosure Statement is designed to help Delegates meet their continuing responsibility to disclose potential conflicts of interest.

Part A of this Delegate Disclosure Statement provides instructions that should be retained by each Delegate and used as necessary during his or her current term of service to report potential conflicts of interest as they may arise. In Part B, you should list all organizations, associations, or businesses in which you are involved that do business with or compete with Community Associations Institute (CAI) or a Legislative Action Committee of CAI. Part C is a year-end report in which you should describe any business transaction with CAI or a Legislative Action Committee of CAI during the past year in which you had an interest.

**Parts B and C of this form should be completed, signed, and returned as soon as possible to the attention of CAI, G&PA Department, 6402 Arlington Blvd., Suite 500, Falls Church, VA 22042. You may also fax your completed form to the attention of the G&PA Department at 703.970.9558.** *Your appointment as a LAC Delegate will not be final until your completed form has been returned to the G&PA Department and you have received a final letter of approval. Until you have received final approval, you may not participate in any meetings or functions of the Legislative Action Committee.*

**Part A. Instructions for Disclosure of Potential Conflicts of Interest  
(Retain for Future Use)**

If you have reason to believe that you may have any interest in a proposed issue, transaction, legislative or regulatory strategy, or public policy position that is inconsistent with the *Legislative Action Committee Delegate Conflict of Interest Policy*, you must prepare a brief letter to the Chair of the G&PA Committee, Chair of the Legislative Action Committee, and the Vice President of G&PA (hereinafter referred to as the "LAC Conflict Compliance Officers") describing your potential conflict of interest. Until you receive a response from the Vice President of G&PA you may not participate in any discussions relating to your potential conflict of interest.

A LAC Delegate is considered to have an "interest" in a transaction, issue, legislative or regulatory strategy, or public policy position if the delegate, or the business entity with which the delegate is associated, or any member of the delegate's family has a direct or indirect financial interest in or is a member of an association, organization, or business involved in or affected by the proposed transaction, issue, legislation or regulation; or holds a position as a trustee, director, general manager, principal officer, or is staff in any such association, organization, or business. A LAC delegate's "interest" will not be considered in conflict if the general membership of CAI or all members of the same membership category share the same interest.

The LAC Conflict Compliance Officers will review a delegate's letter describing a potential conflict of interest to ensure that the interests of CAI are not adversely affected or abrogated and may recommend measures to remedy actual conflicts. Until the Delegate receives a ruling from the LAC Conflict Compliance Officers, he or she is prohibited from discussing, voting on, or attempting to affect other LAC delegates on any subject that relates to the potential conflict of interest.

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**Part B. Organizations, Associations, or Businesses in Which You Have an Interest that are Doing Business with or Competing with Community Associations Institute**

In the space below, please list all organizations, associations, or businesses that conduct business with or compete in any way with Community Associations Institute or the Legislative Action Committee if: (1) you have a substantial financial interest, or (2) you are a member, trustee, director, general manager, principal officer, or employee.

Name of Organization, Association, or Business	Nature of Your Interest in the Organization, Association, or Business
_____	_____
_____	_____
_____	_____

**Part C. Transactions during the Past Fiscal Year.**

In the space below, please provide a description of any and all business transactions of the Legislative Action Committee during the past fiscal year in which (1) you have a substantial financial interest, or (2) that involve an organization, association, or business in which you have a substantial financial interest, or (3) that involved an organization, association, or business in which you hold a position as trustee, director, general manager, principal officer, or staff. Include a brief description of each transaction, and a description on your interest in the transaction. Enter "N/A" if you have no transactions to report.

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(Attach additional sheets if necessary.)

**I certify that the above information is correct to the best of my knowledge.**

**Name of LAC Delegate:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

*Please return the completed form to the attention of the G&PA Department at [government@caionline.org](mailto:government@caionline.org) or you may also fax to 703.970.9558*