



Housing Redevelopment Authority

Conflict of Interest Policy and Disclosure Form

Conflict of Interest Policy

I. Purpose

The purpose of this Conflict-of-Interest Policy is to protect the integrity of the decision-making processes of the Housing and Redevelopment Authority of Pine City, Minnesota (the "Authority" or "HRA") by establishing standards and procedures for identifying, disclosing, and addressing conflicts of interest. This policy is intended to ensure compliance with Minnesota Statutes, including but not limited to Minn. Stat. §§ 469.001–469.047, 471.87, and 471.88, and to promote transparency, accountability, and public trust.

II. Applicability

This policy applies to all members of the Authority, officers, commissioners, employees, committee members, consultants, and any other individuals acting on behalf of the Authority who have decision-making authority or influence over HRA actions.

III. Definition of Conflict of Interest

A conflict of interest exists when an individual's personal, financial, or business interests, or those of a family member or associated organization, could reasonably be perceived to:

- a. Influence or appear to influence the individual's judgment, actions, or decisions on behalf of the Authority; or
- b. Result in personal gain or benefit from an action, contract, transaction, or decision of the Authority.

Conflicts of interest may be actual, potential, or perceived.

IV. Examples of Conflicts of Interest

Conflicts of interest may include, but are not limited to:

- a. A direct or indirect financial interest in a contract, purchase, loan, development project, or other transaction involving the Authority;
- b. Ownership, employment, board membership, or significant involvement in an entity doing business with or seeking action from the Authority;
- c. Participation in decisions affecting property in which the individual or an immediate family member has a financial interest.

- d. Receipt of gifts, favors, services, or economic opportunities that could influence or appear to influence official actions.

V. Disclosure Requirements

1. Initial Disclosure:

Each covered individual shall complete a Conflict-of-Interest Disclosure Form upon appointment, election, or employment with the Authority.

2. Annual Disclosure:

Disclosure forms shall be updated annually.

3. Ongoing Disclosure:

Individuals must promptly disclose any new or changed conflicts of interest as they arise.

Disclosures shall be made in writing and submitted to the Executive Director or designee, and, where applicable, disclosed verbally at Authority meetings and recorded in the official minutes.

VI. Procedures When a Conflict Exists

When a conflict of interest is identified:

- a. The individual shall disclose the conflict prior to discussion or action on the matter.
- b. The individual shall abstain from participating in discussion, deliberation, or voting on the matter, unless otherwise permitted under applicable Minnesota law.
- c. The individual shall physically leave the meeting room during consideration of the matter when required or directed by the Chair or legal counsel.
- d. The remaining disinterested members of the Authority shall determine whether the conflict requires abstention, additional safeguards, or other action.

VII. Statutory Contracts and Exceptions

Nothing in this policy permits conduct prohibited by Minnesota law. Any contract or transaction involving a potential conflict must comply with Minn. Stat. §§ 471.87 and 471.88, including disclosure, public approval, and any required findings or limitations.

VIII. Gifts and Gratuities

Covered individuals shall not accept gifts, favors, or services that could reasonably be expected to influence the performance of official duties or violate Minnesota's ethical standards for public officials.

IX. Violations

Failure to disclose a conflict of interest or comply with this policy may result in corrective action, including censure, removal from office to the extent permitted by law, termination of employment or contract, and any other remedies available under Minnesota law.

X. Administration and Review

This policy shall be administered by the Authority and reviewed periodically to ensure consistency with applicable laws, bylaws, and best practices.

Conflict of Interest Disclosure Form

Instructions: Please complete this form fully and accurately. Disclose any actual, potential, or perceived conflicts of interest. Attach additional pages if necessary.

I. Identifying Information:

- Name: _____
- Position/Title: _____
- Date: _____

II. Financial and Business Interests:

Do you, or any immediate family member (spouse, domestic partner, parent, child, sibling), have any financial or business interest that could reasonably be perceived as a conflict of interest with the Authority?

- No
- Yes (If yes, please describe below)

Description of interest (entity, nature of interest, percentage ownership, role, etc.):

III. Property Interests

Do you or an immediate family member have any ownership or financial interest in property that may be affected by actions of the Authority?

- No
- Yes (If yes, please describe below)

IV. Other Relationships or Interests

Are there any other relationships, affiliations, or circumstances that could reasonably be perceived as a conflict of interest?

- No
- Yes (If yes, please describe below)

V. Certification

I certify that the information provided above is true, complete, and accurate to the best of my knowledge. I agree to comply with the Conflict of Interest Policy of the Housing and Redevelopment Authority of Pine City, Minnesota, and to promptly disclose any changes.

Signature: _____


Printed Name: _____

Date: _____

Adopted this 17 day of February, 2026 by the Housing and Redevelopment Authority of Pine City, Minnesota.



Chair

Attest: 

Secretary