



ETHICS COMMISSION AGENDA

**August 13, 2014
6:30 p.m.
Roseville City Hall
2660 Civic Center Drive**

- I. Call to Order
- II. Approve Minutes of May 14, 2014 Meeting
- III. Recap of Joint Meeting with City Council
- IV. 2015 Ethics Training
- V. Training for New Ethics Commissioners
- VI. On-going Training for Ethics Commissioners
- VII. Discuss Ethics Tip
- VIII. Other Business
- IX. Adjourn

City of Roseville
Ethics Commission Meeting Minutes
Wednesday, May 14, 2014

I. Call to Order

Chair Fjelstad called the meeting to order at 6:00 p.m.

Members Present:

Norine Quick-Lindberg, Nancy O'Brien, Matthew Becker, Margo Fjelstad, and Ben Lehman

Members Absent:

None.

Others Present:

Patrick Trudgeon, City Manager and Jim Erickson, City Attorney's Office

II. Oath of Office – Norine Quick-Lindberg

Chair Fjelstad administered Oath Office to newly appointed Ethics Commissioner Norine Quick-Lindberg and welcomed her to the Commission.

III. Approve Minutes of November 13, 2013

Lehman moved to approve the November 14, 2013 minutes, seconded by Becker.
Ayes All.

Commissioner O'Brien stated that the most recent minutes are not on the City website. City Manager Trudgeon indicated that staff will put up the missing minutes on the website and thanked Commissioner O'Brien for bringing the matter forward.

IV. Review of April 9 Ethics Training Event

City Manager Trudgeon provided a brief overview of the event and said it was well attended and the presentation was well received. City Attorney Mark Gaughan was the presenter and the focus was directly on the Roseville Ethics Code. City Attorney Gaughan led the discussion about the applicability of the Ethics Code by going through some scenarios.

Commissioners echoed the comments that it was well received, the length was perfect, and the topic very relevant. Discussion about next April's training will begin at the next Ethics Commission meeting in August.

Commissioner Lehman asked if there was a survey done for the people that participated in the Ethics Training. City Manager Trudgeon replied that there was not this time, but that it would be worthwhile to do after future Ethics Training.

V. Discuss Ethics Tip

Commissioner Lehman brought forward an Ethics Tip regarding the recent changes to the Ethics Code this past January.

Chair Fjelstad asked for volunteers to write the next Ethics tip. Commissioner O'Brien volunteered to write the tip for the next meeting with a focus around the meaning of ethics in several different contexts.

VI. Review Ethics Code

Chair Fjelstad recapped the joint meeting with the City Council in January and the discussion about open meeting laws and the lack of ability for the Ethics Commission to meet in a closed session. Another point of the discussion was to allow for the withdrawal of an ethics complaint by the complainant.

Based on that discussion, Chair Fjelstad introduced language drafted by herself and Commissioner Lehman regarding the withdrawal of an ethics complaint. City Manager Trudgeon indicated that language drafted by the City Attorney regarding withdrawal of an Ethics Complainant is also included in the packet.

City Attorney Erickson reviewed the language drafted by Mr. Gaughan.

The Commission discussed what language should be included in the Ethics Code and worked on tailoring the language to meet all of the suggestions.

After considerable discussion, Commissioner Lehman proposed the following language.

H. A complainant may withdraw a complaint in writing with the City Manager or City Attorney filed under this code at any time. Unless the City Council directs otherwise, City personnel need not take any further action in accordance with the Code after such withdrawal. Once acceptance by the City Council has been granted, the City Attorney or City Manager shall provide notice to the complainant, the subject of the complaint if appropriate, and the Ethics Commission that the withdrawal has been accepted.

Motion by Commissioner O'Brien moved approval of the language amending the Ethics Code to allow for the withdrawal of an ethics complaint as previously read by Commissioner Lehman. Seconded by Commissioner Becker.

Ayes All.

VII. Other Business

Commissioner Lehman asked if there were any outstanding financial disclosure reports. City Manager said he would double check and send a report out to the Ethics Commission members.

Commissioner Lehman asked if there were any ethics complaints filed with the City Manager or City Attorney. Staff reported that none were received.

Commissioner Quick-Lindberg asked some general questions about the application of the Ethics Code to the Ethics Commission and City Council. Staff and the Commission had discussion regarding how the code is applied to various groups.

VIII. Adjourn

Lehman moved to adjourn the meeting at 7:11 p.m. and Becker seconded.
Ayes All.

Respectfully submitted,

Patrick J. Trudgeon
City Manager



Memo

To: Ethics Commission
From: Patrick Trudgeon, City Manager
Date: August 6, 2014
Re: August 13, 2014 Ethics Commission Meeting

We have several topics to cover in the August Ethics Commission meeting. They include:

- **Recap of the Joint Meeting with the City Council on July 14.** Commissioners Lehman and O'Brien presented information about the proposed changes to the Ethics Code that the Ethics Commission previously recommended regarding withdrawal of an Ethics Commission. I have attached the minutes from the joint meeting for your information.
- **2015 Ethics Training.** The Ethics Commission should discuss the date, time, topic, and speaker for the 2015 training.
- **Training for New Ethics Commissioners/On-going Training for Ethics Commissioners.** Commissioner O'Brien has brought this topic for discussion amongst the Commission to see if there is interest in providing ethics education for new members as well as for on-going education on ethics for existing Commissioners. She has provided links to three online resources that are very helpful about government ethics. They are:

The Markkula Center for Applied Ethics at Santa Clara University. This link is to their "government ethics" page:

http://www.scu.edu/ethics/practicing/focusareas/government_ethics/

2. City Ethics, Inc has an excellent website with information about city government ethics programs. Here is a link to that site:

<http://www.cityethics.org/>

3. Robert Wechsler, Director of Research at City Ethics, Inc has published a free, online book on government ethics, available through the CityEthics.org website. Here is a link to that book:

<http://www.cityethics.org/ethics%20book>

Please take a moment to review the websites prior to the meeting. Also feel free to bring forward other resources on August 13.

- **Ethics Tip.** Commissioner O'Brien has written an ethics tip for the Commission to review about government ethics.

9. General Ordinances for Adoption

10. Presentations

a. Joint Meeting with Ethics Commission and Consideration of Proposed Changes by the Ethics Commission to the Roseville Ethics Code

Recognizing that only two members of the Ethics Commission were available to-night, City Manager Trudgeon noted that this was due to scheduling conflicts, and should not be taken as intent at offense by the City Council.

Ethics Commission members present were Vice Chair Ben Lehman and Commissioners Nancy O'Brien.

Vice Chair Lehman reviewed the recommendation of the Ethic Commission to the City Council for an amendment to the Roseville Ethics Code, as detailed in the RCA dated July 14, 2014; and followed several drafts to get to this final recommendation, subsequently approved by the City Attorney.

Councilmember Willmus spoke in support of the recommendation, and opined that, based on his viewing of the Commission meeting discussions, the final recommendation made sense given the context from which it originated, and provided a step in the right direction.

Commissioner O'Brien reviewed the origination of the problem with a complaint received and subsequently withdrawn in 2012, with no process in place for addressing withdrawal, while recognizing the need for the City Council to determine if it was appropriate to be withdrawn.

Councilmember McGehee questioned if there were provisions made if something was ongoing and while the complainant wanted to withdraw, there could be a process for the City Council to take action.

City Attorney Mark Gaughan responded that, based on his recollection of discussions, he had intentionally worded the amendment to address that option, with the City Council able to carry on a review of an allegation of their own volition as applicable and no matter if and when a complainant may withdraw their complaint.

Laliberte moved, McGehee seconded, adopted Resolution No. 11163 (Attachment B) entitled, "A Resolution Amending the Code of Ethics for Public Officials in the City of Roseville (Resolution No. 10905);" amending Section 5 of the Code regarding withdrawal of ethics complaints.

Mayor Roe offered a friendly amendment, accepted by the makers of the motion, amending language of the first sentence of Section 5, Item H as follows:

“A complainant may withdraw a complaint *[filed under this code at any time,]* in writing with the City Manager or City Attorney ~~*[filed under this code at any time]*~~. ...”

Roll Call

Ayes: McGehee; Willmus; Laliberte; Etten; Roe.

Nays: None.

Commissioner O’Brien reviewed the most recent Ethics training session, with the average thirty-five attendees, and presentation made by the City Attorney and much more educational in providing examples specific to the Roseville Code of Ethics, and much shorter in length this year which seemed to be appreciated by those attending. Commissioner O’Brien noted that the training had been varied over the years, and they would continue to try different approaches, and solicited City Council comments for those future training sessions.

Councilmember Etten opined that the changes made by the Commission in their training efforts were appreciated and he found to be positive overall. From the feedback he’d heard from those attending, Councilmember Etten stated that they appeared to appreciate the big picture given by previous outside speakers, but they also appreciated the specifics with the City of Roseville Code, finding them most important and what they needed to understand at a deeper level, suggesting the need to continue focusing on those items.

Councilmember Laliberte echoed those comments; noting that she had heard several years ago when there was an outside speaker doing the training that it was hard for attendees to tie back to the City’s Code of Ethics and the City’s expectations. At this most recent session, Councilmember Laliberte advised that she heard many comments that those attending had a much clearer understanding of their role in municipal government.

Vice Chair Lehman thanked City Attorney Gaughan for his presentation.

Councilmember Willmus expressed his appreciation of the many venues available for the training, whether live, on C-TV or via internet, and agreed that the training at the front end for new commissioners was most beneficial; and suggested continuing that process going forward as providing the most benefit, especially if they were strongly encouraged to attend the live event.

Mayor Roe concurred; and offered using him as an example by the Commission and City Attorney for future presentations as applicable. Mayor Roe expressed his appreciation to the Commission for their ongoing work, and for providing the annual training and exploring creative ways to bring ethics issues to the forefront.

**EXTRACT OF MINUTES OF MEETING OF THE
CITY COUNCIL OF THE CITY OF ROSEVILLE**

Pursuant to due call and notice thereof, a regular meeting of the City Council of the City of Roseville, County of Ramsey, Minnesota, was held on the 14th day of July 2014, at 6:00 p.m.

The following members were present: McGehee, Willmus, Laliberte, Etten, Roe

and the following members were absent: None.

Council Member Laliberte introduced the following resolution and moved its adoption:

**RESOLUTION NO. 11163
A RESOLUTION AMENDING THE CODE OF ETHICS FOR PUBLIC
OFFICIALS IN THE CITY OF ROSEVILLE
(RESOLUTION NO 10905)**

WHEREAS, it is the Council's desire to create and maintain ethical standards that guide Public Officials in the transaction of public business; and

WHEREAS, the Council has determined the most effective way to do so is to adopt and enforce a Code of Ethics that guides the conduct of Public Officials:

NOW THEREFORE BE IT RESOLVED, by the Roseville City Council, that the following Code of Ethics is hereby adopted:

**CODE OF ETHICS FOR PUBLIC OFFICIALS IN THE CITY OF
ROSEVILLE**

Purpose

Officials in the public service must maintain the highest possible standards of ethical conduct in their transactions of public business. Such standards must be clearly defined and known to the public as well as to the Public Officials. Violations of the ethical standards in this ordinance are punishable by the City Council and are not to be deemed criminal misdemeanors of any other type of crime except as those behaviors or activities may separately be determined to be criminal under state or federal law.

Section 1. Declaration of Policy

The proper operation of democratic government requires that Public Officials be independent, impartial and responsible to the people; that government decisions and policy be made in the proper channels of the government structure; that public office not be used for personal gain; and that the public have confidence in the integrity of its government.

In recognition of these goals, there is hereby established a Code of Ethics for all Public Officials of the City of Roseville. The purpose of this Code is to establish ethical standards of conduct for all such officials by setting forth those acts or actions that are incompatible with the best interests of the City, and by directing disclosure by such officials of private financial or other interests in matters affecting the City. The provisions and purpose of this Code and such rules and regulations as may be established are in the best interests of the City of Roseville.

Recognizing that education on ethics in government is the key to having good government, this code requires that annual training be held to discuss the meaning of this code with Public Officials, and in addition such training shall involve trained experts on government ethics. The City Manager shall be the coordinator for the annual training. The training will keep the subject of ethics in government fresh in everyone's mind.
(amended 5-23-2011)

To increase the awareness and understanding of the importance of ethical considerations and behavior among the public as well as government employees, communication of the role of the ethics commission and this Code must occur at least annually in local newspapers and the Roseville website as determined by the City Manager. Additionally, this Code of Ethics shall be reviewed annually to determine if modifications are appropriate.

Section 2. Definitions of Terms

Public Official

Any person that has been elected to office, appointed to a City board or commission, or hired by the City to serve as a department head or assistant department head.

Public Officials include the following:

- a. Members of the City Council and Mayor;
- b. The department head and assistant department head of each City department;

- c. Any person that has been appointed by the Roseville City Council. This would include City commission, board, and task force members; and
- d. The City Manager.

Anything of Value

Money, real or personal property, a permit or license, a favor, a service, forgiveness of a loan or promise of future employment. The term “Anything of Value” shall not be deemed to include:

- (1) Services to assist an official in the performance of official duties, including but not limited to providing advice, consultation, information, and communication in connection with legislation, and services to constituents;
- (2) Services of insignificant monetary value;
- (3) A plaque or similar memento recognizing individual services in a field of specialty or to a charitable cause;
- (4) A trinket or memento costing \$5 or less;
- (5) Informational material of unexceptional value;
- (6) Food or a beverage given at a reception, meal, or meeting away from the recipient’s place of work by an organization before whom the recipient appears to make a speech or answer questions as part of a program; or
- (7) A contribution as defined in Minn. Stat. § 211A.01, subd. 5.

Compensation

A payment of Anything of Value to an individual in return for that individual's services of any kind.

Association

A business entity of any kind, a labor union, a club or any other group of two or more persons other than the immediate family.

Immediate Family

A reporting individual, spouse, minor children, minor stepchildren or other person residing in the same household.

Gift

The payment or receipt of Anything of Value unless consideration of greater or equal value is provided in return.

City Manager

The person that heads up the administration of the operating government of Roseville.

Section 3. Ethical Considerations

Public Officials are to serve all persons fairly and equitably without regard to their personal or financial benefit. The credibility of Roseville government hinges on the proper discharge of duties in the public interest. Public Officials must assure that the independence of their judgment and actions, without any consideration for personal gain, is preserved.

Specific ethical violations are enumerated below for the guidance of Public Officials, but these do not necessarily encompass all the possible ethical considerations that might arise.

- A. Other Offices or Employment. An elected Public Official shall not hold another incompatible office, as that term has been interpreted from time to time by statute, the courts, and by the Attorney General. Employed Public Officials shall not hold such incompatible office nor shall they engage in any regular outside employment without notice to and approval by the City Council, in the case of the City Manager, and the City Manager in the case of other employed Public Officials.

Elected and appointed Public Officials shall not hold other office or employment which compromises the performance of their elected or appointed duties without disclosure of said office or employment and self disqualification from any particular action which might be compromised by such office or employment.

- B. Use of Confidential Information. No Public Official shall use information gained as a Public Official which is not generally made available to and/or is not known to the public, to directly or indirectly gain anything of value, or for the benefit of any other person or entity; nor shall any Public Official make such information available when it would be reasonably foreseeable that a person or entity would benefit from it.
- C. Solicitation of or Receipt of Anything of Value. A Public Official shall not solicit or receive anything of value from any person or association, directly or indirectly, in consideration of some action to be taken or not to be taken in the performance of the Public Official's duties.

- D. Holding Investments. No Public Official shall hold any investment which might compromise the performance of the Public Official's duties without disclosure of said investment and self disqualification from any particular action which might be compromised by such investment, except as permitted by statute, such as Minnesota Statute 471.88.
- E. Representation of Others. A Public Official shall not represent persons or associations in dealings with the City where the persons or associations have paid or promised to pay compensation to the Public Official.
- F. Financial Interest. Where a Public Official or a member of the Public Official's immediate family has a financial interest in any matter being considered by the Public Official, such interest, if known to the Public Official, shall be disclosed by the Public Official. If the Public Official has such a financial interest or if the minor child of a Public Official has such a financial interest, the Public Official shall be disqualified from further participation in the matter.
- G. City Property. No Public Official shall use City-owned property such as vehicles, equipment, or supplies for personal convenience or profit except when such property is available to the public generally, or where such property is provided by specific City policy in the conduct of official City business.
- H. Special consideration. No Public Official shall grant any special consideration, treatment, or advantage to any citizen beyond that which is available to every other citizen.
- I. Giving Anything of Value. No elected Public Official shall give anything of value to potential voters in return for their votes, promises, or financial considerations which would be prohibited by the State Minnesota Fair Campaign Practices statute.
- J. Public Funds, etc. No Public Official shall use public funds, personnel, facilities, or equipment for private gain or political campaign activities, except as may be authorized by law.
- K. Expenses. Public Officials shall provide complete documentation to support requests for expense reimbursement. Expense reimbursement shall be made in accordance with City policy.
- L. Donations. No Public Official shall take an official action which will benefit any person or entity because of a donation of Anything of Value to the City by such person or entity.

- M. Official Action. No Public Official shall take an official action or attempt to influence any process which will benefit any person or entity where such Public Official would not have otherwise have taken such action but for the Public Official's family relationship, friendship, or business relationship with such person or entity.
- N. Compliance with Laws. Public Officials shall comply with all local ordinances and State and Federal Statutes including, but not limited to, the Criminal Code, Fair Campaign Practices Act, and laws governing the functioning of municipalities, their elected and appointed officials, and employees.
- O. Cooperation with Ethics Committee Investigations. Public Officials shall cooperate with ethics investigations and shall respond in good faith to reasonable requests for information.
- P. Resolution of Ethics Complaints. The Ethics Commission, City Attorney, or City Manager, as the case may be, shall promptly attend to all ethics complaints in the manner provided in this Code. It is expected that most complaints will be investigated as necessary and presented to the City Council for consideration within 45 days of submission of the complaint.

Section 4. Special Considerations

Situations can arise where a member of a commission, a board, or the City Council abstains from voting because of a conflict of interest, but his or her abstention becomes a vote either for or against the matter because a majority are required to pass or reject that matter. This can happen where four-fifths vote is needed to pass an issue, or the vote has to be a clear majority and a split vote does not pass or reject.

When this happens, the City Attorney must be consulted and the final vote should carry a public notice explaining what took place, and how it was resolved.

Section 5. Handling Alleged Violations of Code of Ethics

- A. Complaints alleging ethical violations by Public Officials must be submitted in written form to the City Attorney. Complaints alleging ethical violations by City employee Public Officials shall be submitted in written form to the City Manager.
- B. The City Attorney shall investigate all ethics complaints pertaining to non-employee Public Officials unless the City Attorney has a conflict, in which case outside counsel will be assigned the complaint. The City Manager will investigate complaints pertaining to employee Public Officials.

- C. If the City Attorney or City Manager determines that the subject of the complaint may have committed a crime, the City Attorney and City Manager shall refer the matter to the appropriate criminal authority.
- D. If the criminal proceeding ends with a sentencing, said sentencing shall be considered to be the final disposition of the complaint.
- E. If there has been no violation of a criminal law, the City Attorney or City Manager, as the case may be, shall issue a report that documents the results of the City Attorney's or City Manager's investigation(s).
 - 1. The report shall be sent directly to the City Council if the complaint involves an Ethics Commission member. The Council shall have the authority to dismiss any Ethics Commission member found to have violated the Ethics Code.
 - 2. The report shall be sent to the Ethics Commission if the complaint involves other Public Officials. The Ethics Commission shall have the authority to convene and issue its own report and recommendation to the City Council. Thereafter, the City Council shall take action as the Council deems appropriate.
- F. The standard for decisions regarding allegations of ethical violations covered by Section 3 of this code shall be "clear and convincing evidence." The term "clear and convincing evidence" shall mean that burden of proof as defined by Minnesota State law.
- G. In processing complaints, the City Attorney, City Manager, Ethics Commission and City Council shall process and maintain data in a manner consistent with Minn. Stat. Ch. 13, the Minnesota Data Practices Act.
- H. **A complainant may withdraw a complaint, filed under this Code at any time, in writing with the City Manager or City Attorney. Unless the City Council directs otherwise, City personnel need not take any further action in accordance with the Code after such withdrawal. Once acceptance by the City Council has been granted, the City Attorney or City Manager shall provide notice to the complainant, the subject of the complaint if appropriate, and the Ethics Commission that the withdrawal has been accepted.**

Section 6. Disclosure of Financial Interests

Not later than ninety (90) days after the date of approval of this Code, each Public Official of the City shall file as a public record, in the office of the City Manager, a statement containing the following:

1. A list naming all business enterprises known by the Public Official to be licensed by or to be doing business with the City in which the Public Official or any member of the Public Official's immediate family is connected as an employee, officer, owner, investor, creditor of, director, trustee, partner, advisor, or consultant; and
2. A list of the Public Officials and members of the Public Officials' immediate family's interests in real property located in the City or which may be competing with the interests of the City located elsewhere, other than property occupied as a personal residence.

Each person who enters upon duty after the date of this code in an office or position as to which a statement is required by this Code shall file such a statement on forms to be provided by the City not less than thirty (30) days after the date of his/her entrance on duty.

Each person who made an initial filing shall file a new Statement by January 30 of each year thereafter giving the information called for above as of the time of the new statement. If a change in financial interest or property ownership occurs between filings, a new filing shall be made within thirty (30) days of the change.

The interest of any member of the immediate family shall be considered to be an interest of a person required to file a statement by or pursuant to this Code.

This Code shall not be construed to require the filing of any information relating to any person's connection with or interest in any professional society or any charitable, religious, social, fraternal, educational, recreational, public service, civil, or political organization, or any similar organization not conducted as a business enterprise and which is not engaged in the ownership or conduct of a business enterprise.

However, if any of such organizations seeking any action or benefit come before a Roseville commission or the Council, then membership in the organization shall be a potential conflict of interest and must be reported as such to the City Manager by the Public Official in an amended disclosure statement. The other stipulations of this Code then apply.

The City Manager shall inform each person who is required to file of the time and place for filing. The City Manager shall inform the Council whenever a person who is required to file a statement fails to do so.

The motion for the adoption of the foregoing resolution was duly seconded by Council Member McGehee and upon vote being taken thereon, the following voted in favor: McGehee, Willmus, Laliberte, Etten, Roe

and the following voted against: none.

WHEREUPON said resolution was declared duly passed and adopted.

STATE OF MINNESOTA)
) ss
COUNTY OF RAMSEY)

I, the undersigned, being the duly qualified City Manager of the City of Roseville, County of Ramsey, State of Minnesota, do hereby certify that I have carefully compared the attached and foregoing extract of minutes of a regular meeting of said City Council held on the 14^h day of July, with the original thereof on file in my office.

WITNESS MY HAND officially as such Manager this 14^h day of July, 2014.

Patrick Trudgeon, City Manager

State of Minnesota - County of Ramsey
Signed or Attested before me on this

_____ day of _____, 2014

by: Patrick Trudgeon

Notary Public

What Exactly is Government Ethics All About, Anyway?

When we hear the word “ethics” we usually think about following certain moral principles or “doing what is right.” We hear about ethics in medical care, our legal system, our financial system, and in regard to how organizations and companies operate. We certainly want our society in general and specifically our government to behave in an ethical manner, but what exactly does this mean when it comes to our local government? What is covered by “Government Ethics?”

Robert Wechsler in his book *Local Government Ethics Programs: A Resource for Ethics Commission Members, Ethics Reformers, Local Officials, Attorneys, Journalists and Students*¹ gives us the following information:

The purpose of local government ethics is not just concerned about “being or doing good” but gives guidance about acting responsibly and professionally as a government official or employee, and under certain circumstances, following specific rules and procedures.

The principal goal of a city ethics program is to further the public’s trust in those who govern their communities. The community and its citizens need to have trust that their government officials and employees will follow these specific guidelines and not misuse their office to benefit themselves or family members and friends. There must be trust that the good of the community is primary. Without this trust, people tend not to participate in their government, and not to accept its decision and work as fair and democratic.

Therefore, city governments, like Roseville, enact a Code of Ethics. Roseville’s Code of Ethics states, “Officials in the public service must maintain the highest possible standards of ethical conduct in their transactions of public business. Such standards must clearly be defined and known to the public as well as to the Public Officials.”

The City of Roseville’s Code of Ethics gives specific rules and guidance on such topics (among others) as:

- Conflicts of Interest
- Gifts and Bribes
- Favoritism and Nepotism
- Use of Public Funds
- Use of Confidential Information
- Disclosure of Financial Interests of Public Officials

City Officials are also cautioned to avoid even the *appearance* of ethical misconduct.

Please review the Roseville Code of Ethics for the specific rules and procedures that our public officials are held to. The City Attorney is available for consultation and advisory opinions on specific questions you may have about the Code.

¹Robert Wechsler’s book is found as a free online resource at the following website:
<http://www.cityethics.org/ethics%20book>