

September 24, 2025

Ledyard Town Council
741 Colonel Ledyard Hwy.
Ledyard, CT 06339

Councilors,

I write in opposition to the proposed "An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission" for the following reasons:

- 1) CT General Statutes 7-148(h). A municipality in Connecticut can cite this section to incorporate the state's ethical conduct rules into local investigations of misconduct by officials or employees.
- 2) The Town Charter, Chapter III, Section 9 grants this power to the Town Council to investigate, call witnesses, appear before the Town Council and testify. The electors of this town have vested this power with the Town Council, not another group.
- 3) Town of Ledyard Fraud Policy. Dated May 28, 2014 clearly outlines no less than eight (8) different actions that constitute fraud. It is noted the language also include the words "...but not limited to".
- 4) Town of Ledyard Employee Handbook. The handbook includes Nepotism (page 20), Conflict of Interest (page 20), Outside employment (page 21) and Vehicle Use Policy (appendix 8). Every Town employee received a copy of the handbook and are required to sign and accept the obligations contained in said handbook.
- 5) Though the draft ordinance, dated 6/11/25 *did* receive a legal review, the Council has not requested a legal review for the draft dated 9/7/2025. At the September 10, 2025 meeting, Councilor Buhle states "...the draft for tonight incorporates probably 80% of the Town Attorney's language." That statement would imply the newly revised ordinance would be approximately 20% shorter, however the proposed document is now 2+ pages longer than the 6/11/2025 draft. In an ordinance where substantial liability exposure to the Town may exist, I would certainly think a second legal review of the 9/7/25 draft should be mandatory.
- 6) There is no budget line for this new commission. The Town Attorney has suggested a minimum of \$20,000 annually for legal fees, with some towns spending as much as \$200,000. Keep in mind, if the aggrieved party does not agree with the outcome, the next stop for the town and the aggrieved party does not agree with the outcome, the next stop for the town and the aggrieved is Superior Court.

