



TOWN OF LEDYARD

Administration Committee

Meeting Minutes

741 Colonel Ledyard Highway
Ledyard, CT 06339
<http://www.ledyardct.org>

Chairman S. Naomi
Rodriguez

Regular Meeting

Wednesday, June 11, 2025

5:30 PM

Town Hall Annex- Hybrid Format

In -Person Location goes here

Join Zoom Meeting from your Computer, Smart Phone or Tablet:

<https://us06web.zoom.us/j/83175252192?pwd=EfyBoPvCYUbLQnAFKJ7qeQydRFhFYs.1>
Or by Audio Only: Telephone: +1 646 558 8656; Meeting ID: 831 7525 2192; Passcode: 601320

I CALL TO ORDER

the Meeting was called to order by Councilor Buhle at 5:30 p.m. at the Council Chambers Town Hall Annex Building.

Councilor Buhle welcomed all to the Hybrid Meeting. She stated for the Town Council Administration Committee and members of the Public who were participating via video conference that the remote meeting information was available on the Agenda that was posted on the Town's Website - Granicus-Legistar Meeting Portal.

II. ROLL CALL

Present: Kevin Dombrowski
Jessica Buhle
April Brunelle

In addition, the following were present:

S. Naomi Rodriguez Town Council Chairman
Christine Dia Human Resources Director
Deborah Edwards Resident
Roxanne Maher Administrative Assistant

III. RESIDENTS & PROPERTY OWNERS COMMENTS

None.

IV. PRESENTATIONS / INFORMATIONAL ITEMS

None.

V. APPROVAL OF MINUTES

Special Meeting Minutes of May 14, 2025

Moved by Councilor Dombrowski, seconded by Councilor Brunelle

VOTE: 3- 0 Approved and so declared

VI. OLD BUSINESS

1. Discussion and possible action to create an Ethics Commission for the Town of Ledyard.

Councilor Buhle stated at their May 14, 2025 meeting that she and Councilor Dombrowski conducted an extensive review of the proposed “*An Ordinance to Establishing a Code of Ethics and Ethics Commission*” and they each provided suggestions and edits to the document. She stated that both of their suggestions were included in the May 14, 2024 draft for review this evening. She noted that her recommendations were identified in *pink font*; and Councilor Dombrowski’s suggestions were identified in *bule font*.

The Administration reviewed the May 14, 2025 draft and discussed the importance for consistency in the langue and agreed to add the following text noted by the *green front in the June 11, 2025 draft below*.

Councilor Buhle’s proposed changes were noted in pink italic font
Councilor Dombrowski’s proposed changes were noted in bule italic font

DRAFT ~~09/09/2024~~ *6/11/2025 - Admin Cmt*

J.Buhle: 5/14/2026

K. Dombrowski 5/14/2025

Ordinance # _____

AN ORDINANCE ESTABLISHING A TOWN OF LEDYARD
CODE OF ETHICS AND ETHICS COMMISSION

Be it ordained by the Town Council of the **T**own of Ledyard

Section 1. Authority

In accordance with Chapter III, Section 8 of the Town Charter, there is hereby established a Town of Ledyard Code of Ethics and Ethics Commission.

Section 2. Declaration of Policy and Purpose

Public Office is a public trust. The trust of the public is essential for government to function effectively. The proper operation of the town government requires that public officers, *public* officials, and *public* employees be independent, impartial, and responsible to the people; that governmental decision and policies be made in the proper channels of governmental structure; that public office and employment not be used for personal gain; and that the public has confidence in the integrity of its government.

Therefore, herewith is an established Code of Ethics for all Town Officials, *Town* Officers, and *Town* Employees. The purpose of this code is to establish standards of ethical conduct for all such officials, officers and employees, and for those who serve or conduct business with the Town of Ledyard; to assist those parties under the jurisdiction of the Ethics Commission by establishing guidelines for their conduct in order to maintain a tradition of responsible and effective public service; and to establish rules of procedure to be followed by the Ethics Commission in receiving, adjudicating, and reporting on alleged violations of the Code of Ethics.

Section 3. Applicability

The Ethics Code shall apply to all Town Officials, *Town* Officers, and *Town* Employees, whether elected and/or appointed, paid or unpaid. The Ethics Code shall also apply to those conducting business with the Town of Ledyard.

Specific portions of this Ordinance shall not be applicable if they conflict in whole or in part with ~~any~~ *the Town Charter*, labor agreement, employment contract, or state statute.

Section 4. Definitions

As used in this document, the following words or phrases, unless a different meaning is required by the context or is specifically prescribed, shall have the meanings indicated:

1. *"Persons governed by this Code"* means ALL Town/*municipal* officials, *municipal* officers, and *municipal* employees, whether elected and/or appointed, paid or unpaid.
2. *"Business"* means any entity through which activity for profit or not for profit is conducted including, but not limited to a corporation, *limited liability corporation*, partnership, proprietorship, firm, enterprise, franchise, association, organization, or self-employed individual.
3. *"Complainant"* means any person who signed a complaint under penalties of false statement alleging a violation of this Code.
4. *"Confidential Information"* means information, whether transmitted orally or in writing,

which is obtained by reason of the public position of office held, that is not, at the time of transmission, a matter of public record or public knowledge.

5. “*Confidential Investigation*” means the examination, prior to the finding of probable cause, of both written and oral evidence, that is not to be disclosed to any third party by anyone connected with the investigation, except upon the written request of the respondent.
6. “*Financial Interest*” means pecuniary or material benefit accruing to a town official/employee, spouse or minor child of an officer, official or employee of the Town as a result of a contract, transaction, zoning decision or other matter which is, or may be, the subject of an official act or action by or with the Town of Ledyard except for such contracts of transactions which by their terms and by the substance of their provisions confer the opportunity and right to realize the accrual of similar benefits to all persons and/or property similarly situated.

“Financial Interest” shall be deemed to exist if any municipal/Town officer, member, employee, immediate family of a municipal officer, official or employee of the Town might, directly or indirectly, derive financial gain or suffer loss from any purchase, contract, transaction, zoning decision, or other matter involving any such Town office, board, commission, authority or committee and shall also be deemed to exist if a business or professional enterprise in which the municipal officer, employee, member or commission has any financial interest as owner, member, partner, officer, employee or stockholder or has any other form of participation which will be affected by the outcome of the matter under consideration.

1. “*Gift*” means anything of economic value in excess of ~~\$100.00~~ **\$25.00**, including but not limited to entertainment, food, beverage, travel, lodging, given or paid.

A gift does not include:

- a. A political contribution reported as required by law or a donation or payment as described in subdivision (9) or (11) of subsection (b) of 9-333b.
- b. Services provided by persons volunteering their time.
- c. A commercially reasonable loan made on terms not more favorable than loans made in the ordinary course of business.
- d. A gift received from a member of a person’s immediate family or fiancé.
- e. Goods or services which are provided to the municipality and facilitate government actions or functions.
- f. A certificate, plaque, or other ceremonial award.

- g. A rebate or discount on the price of anything of value made in the ordinary course of business, without regard to that person's status.
 - h. Printed or recorded information germane to government action or functions.
 - i. An honorary degree bestowed upon a public official or public employee by a public or private university.
 - j. A meal provided at an event or business meeting and/or the registration or entrance fee to attend such an event, in which the public official or public employee participates in his official capacity.
 - k. A meal provided in the home by a Ledyard resident.
 - l. Gift giving occasions recognized by the public, including, Christmas, Chanukah, birthdays, the birth or adoption of a child, weddings, First Communions, Confirmations, or Bar/Bat Mitzvahs, provided the total value of such gifts for each event shall not exceed ~~\$100.00~~ **\$25.00**.
2. *"Immediate family"* means spouse, child, parent, grandchild, brother, sister, grandparent, **niece, nephew**, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, and brother-in-law.
3. *"On The Record"* means in writing, signed and dated, or a directive to the secretary taking the minutes of a meeting to note in the minutes of the meeting a special disclosure or statement.
1. *"Personal Beneficial Interest"* means any interest, other than financial, which would affect the action of the official or employee, except if that interest is based solely on the responsibility of his/her town office or employment. Membership in or affiliation with a social, fraternal, charitable, service, educational, religious, governmental or similar non-profit organization is not deemed to automatically create a presumption of personal interest unless the official employee is also an employee of the organization.
2. *"Probable Cause"* is defined by determining whether the facts would warrant a reasonable person to believe that a Town official, officer, or employee violated this Code; the belief should be more than mere suspicions, but less than proof beyond a reasonable doubt.
3. *"Respondent"* means any person accused of violating this Code.
4. *"Town Official, Officer, or Employee"* means an individual whether elected or appointed, whether paid or unpaid, full or part time, including members of boards, commissions, and committees in the service of the Town of Ledyard.

Section 5. Conflict Of Interest

1. Persons governed by this Code shall not engage in or participate in any business or transaction, nor have an interest, direct or indirect, which is incompatible with the proper discharge of that person or persons' independent judgement or action in the performance of that person or persons' official duties.
2. Persons governed by this Code shall not be financially interested or have any personal beneficial interest, in any contract or purchase order for any supplies, materials, equipment or contractual services furnished to or used by the board, agency or commission of which that person or persons is or are an employee(s).

It is further provided, notwithstanding the above, that the Mayor of the Town of Ledyard, members of the Town Council of the Town of Ledyard, members of the Board of Education of the Town of Ledyard shall not be financially interested, or have any personal beneficial interest, either directly or indirectly, in any contract or purchase order for any supplies, materials, equipment, or contractual services furnished to or used by any board, agency, or commission of the Town of Ledyard.

- A. A Town official, officer, or employee shall refrain from voting upon or otherwise participating in any matter on behalf of the municipality if he/she, a member of his/her immediate family, or a business with which the person is associated has a financial or personal interest in the transaction or contract, including but not limited to the sale of real estate, material, supplies, or services to the municipality.

If such participation is within the scope of the municipal official's or municipal employee's official responsibility, he or she shall be required to provide written disclosure, that sets forth in detail the nature and extent of such interest, to the Town clerk.

Notwithstanding the prohibition in subsection ~~3(a)~~ 5(A) a Town official, officer, or employee may vote or otherwise participate in a matter if it involves a determination of general policy, and the interest is shared with a substantial segment of the population of the Town of Ledyard.

- B. Persons governed by this Code shall not accept or receive, directly or indirectly, from any person or business to which any contract or purchase order may be awarded by the Town of Ledyard or any of its boards, agencies, or commissions any money, rebate, or gifts, or any promise, obligation, or contract for future reward or compensation.

No Town officials or employees shall accept a gift or engage in private employment or render services when the gift, employment, or services are incompatible with the proper discharge of the official duties of the Town official or Town employee, or could tend to impair independence of judgement or action by the Town official or Town employee, in the performance of his or her official duties. If a prohibited gift

is offered to a Town official or a Town employee, he or she shall refuse it, return it, or pay the donor the market value of the gift.

- C. To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of this Code, a Town Official or Town employee, not otherwise restrained by the Code, shall exercise care when appearing before other Agencies and shall disclose whether he or she is appearing in his or her official capacity or as a private citizen.
- D. Persons governed by this Code who have a financial or personal interest in any transactions or contract with the Town, including but not limited to the sale of real estate, materials, supplies, or services to the Town, on which that person or persons may be called upon to act in that persons official capacity shall not vote or otherwise participate in the transaction on behalf of the Town. That person (or persons) shall declare on the record that person (or persons) has or have a conflict of interest.
- E. Persons governed by this Code shall not request or permit the use of Town owned vehicles, equipment, facilities, materials, or property for personal convenience or profit, except when such are available to the public generally, or provided a municipal policy for the use of such Town official/employee in the interest of the Town.
- F. No Town official or Town employee shall use his or her position or office and any confidential information acquired by a Town official or Town employee through his or her office or position to further such official's or employee's personal or financial interest, or interest of his or her spouse, child, child's spouse, parent, grandparent, brother or sister, *cousin, niece, nephew, father in-law; mother in-law; brother-in-law; sister-in-law* ; or a business with which the person is associated.

No Town official or Town employee may appoint or hire or participate in influencing the appointment or hiring of his or her spouse, child, child's spouse, parent, grandparent, brother or sister, *cousin, niece, nephew, father in-law; mother in-law; brother-in-law; sister-in-law*; or a business with which the person is associated for any type of employment with the Town, including by contract, unless the contract is competitively bid. No Town official or Town employee may directly supervise his or her family member or any business with which the person is associated. No Town official or Town employee may exercise authority or make recommendations with regard to personnel actions involving such family member or any business with which the person is associated.

- G. No Town official or Town employee, or a member of his or her immediate family, or a business with which the person is associated shall enter into a contract with the Town valued at five hundred (500) dollars or more, other than a contract of employment as a Town employee, or pursuant to a court appointment, unless the contract has been awarded through a process of public notice and competitive bidding.

- H. No persons in their capacities as Town official or Town employee shall represent anyone, other than the Town, concerning any matter before any board, commission, council, committee, or department of the Town. Nothing herein shall prohibit or restrict a Town official or Town employee from appearing before any board, commission, council, committee, or department of the Town on his or her own behalf, or on behalf of a member of his or her immediate family, or from being a party in any action, proceeding or litigation brought by or against such Town official or Town employee to which the Town is a party.
- I. No former Town official or Town employee member shall represent anyone for compensation before any Town board, commission, council, committee, or department in which he or she was formerly employed at any time within a period of **one (1) ~~three (3)~~** year after termination of his or her service with the Town.
- J. No former Town official or Town employee ~~member~~ shall represent anyone other than the Town concerning any particular matter in which he or she participated personally and substantially while in Town service.
- K. No former Town official or Town employee shall disclose or use confidential information acquired in the course of and by reason of his or her official duties, for financial gain for himself or herself or others.
- L. No former Town official or Town employee who participated substantially in the negotiation or award of a Town contract obliging the Town to pay an amount of twenty-five thousand (25,000) dollars or more, or who supervised the negotiation or award of such contract shall seek or accept employment with a party to the contract other than the Town for a period of **one (1) ~~three (3)~~ years** after his or her resignation from Town office or position if his or her resignation occurs less than one year after the contract is signed.
- M. Willful violation by any such officer or employee of the provisions of this Code shall be grounds **for** his/her removal in accordance with Chapter IX, Section 6 of the Town Charter. Violation of this section with the knowledge, express or implied, of any person
- N. Willful violation by any such officer or employee of the provisions of this Code shall be grounds **for** his/her removal in accordance with Chapter IX, Section 6 of the Town Charter. Violation of this section with the knowledge, express or implied, of any person or corporation participating in such contract, transaction, or decision shall render the same voidable by the Town Council, or by a court of competent jurisdiction.

Section 6. Disclosure of Interests Required

- A. Any officer, official or employee who has a private financial interest in any action,***

legislative or otherwise, by any Town agency and who is a member of, participates in discussion with or gives an official opinion to such Town agency shall disclose on the written records of such agency the true nature and extent of such interest. This section shall not apply to:

- 1. Contracts awarded to the lowest responsible bidder after public advertisement.*
- 2. Unpaid appointed officials during a declared state of emergency.*
- 3. Matters requiring disclosure to or approval by a court.*
- 4. The Town Attorney, Town Engineer or similar Official, who is participating in or offering an opinion on behalf of said agency, and whose financial interest is merely in being paid for such services.*

B. Every elected official, excluding Justices of the Peace shall, on or before January 1 each year, file with the Town Clerk, on a form to be prepared by the Town Attorney, a statement, under oath, containing the following information:

- 1. All real estate located within the Town of Ledyard owned by such elected official or held under a lease for a term exceeding five years, excluding, however, his or her principal residence. The foregoing shall also apply to real estate owned or leased, as aforesaid, by a corporation, trust or partnership in which any such elected official is the legal or equitable holder of at least 5% of the legal or equitable interests in said corporation, trust or partnership.*
- 1. The names of any firm, proprietorship, partnership, or corporation of which said elected official is an employee or in which such elected official holds at least a five-percent interest, and which firm, proprietorship, partnership, corporation, or limited liability corporation has sold or supplied goods or services in excess of \$10,000 per annum to the Town of Ledyard during the two years immediately preceding such official's election to office.*
- 3. Any income, fees, salary, or wages directly or indirectly received by such elected official from the Town of Ledyard or its political subdivisions during the two years immediately preceding such official's election to public office.*

Section 7. Establishment Of An Ethics Commission

1. Purpose

An Ethics Commission is hereby established to investigate specific charge(s) and complaints concerning allegations of violations of this Code under this ordinance as identified and assigned by the Town Council and/or the Mayor.

RESULT: CONTINUE

The Ethics Commission shall be comprised of five (5) regular members and two (2) alternates of whom shall be electors of the Town. ~~No member shall hold or campaign for any public office, hold office in any political party, serve as an officer of any other Town Committee, Commission, and Board, or be part of the immediate family of any Town official and Town employee.~~ Political minority rules shall apply for the membership of this commission.

The Regular Members shall include:

- *At least one member with Legal background (attorney, paralegal)*
- *At least one member with Financial background.*
- *Three Members from the Community-at-Large*

No more than two (2) Regular Members may be affiliated with any one political party. Both Alternate Members may not be affiliated with the same political party. At least one Regular Member and one Alternate Member shall be registered as an unaffiliated.

Minority Representation shall apply separately to each of the subsets: Regular Members and Alternate Members.

~~Members will serve without compensation except for authorized expenses in conjunction with their duties.~~

Members and alternate members must be residents of the Town of Ledyard. No member or alternate member shall:

- A. Be a public official or public employee of the municipality; or an official; or employee of a quasi-public agency of the municipality.*
- B. Have held any Town or State Office for a period of one-year ~~two years~~ prior to being appointed to the Commission.*
- C. Hold office in a political party or political committee.*
- D. Serve as a member of another agency*
- E. Hold or campaign to seek any Town Office.*
- F. Have been employed by the Town for a period of one-year ~~two years~~ prior to being appointed to the Commission.*
- G. Serve as an officer ~~member~~ of any other Town Committee, Commission, and-or Board, or be part of the immediate family of any Town*

official or Town employee.

H. Have any beneficial interest or financial interest in matters before the Town or the Board of Education.

I. Have been found in violation of any federal, state, municipal or professional code of ethics.

~~Members will serve without compensation except for authorized expenses in conjunction with their duties.~~

3. Terms of Appointment

Members shall be appointed by the Town Council for a term of three (3) years and shall commence to serve their terms immediately upon appointment and shall serve until their successor has qualified or are removed by the Town Council.

In making the original appointments under this ordinance, the Town Council shall designate two (2) regular members to serve for three (3) years, two (2) regular members to serve for two (2) years; one (1) regular member to serve for (1) year; one (1) alternate member to serve for three (3) years and one alternate member to serve for two (2) years. Thereafter, vacancies shall be filled for a three (3) year term.

Inaugural members shall be eligible to serve two (2) additional three (3) year term beyond his/her initial appointment.

Any vacancy on the Commission, other than by expiration of term, shall be filled for the unexpired portion of the term by the Town Council with priority given to maintain the structure above.

The Town Council may remove members for cause and fill the vacancy per Chapter III, Section 6 of the Town Charter.

Cause for removal shall include, but is not limited to, unexcused absence from three (3) consecutive meetings. It shall be the responsibility of the Chairman of the Commission to notify the Town council when a member has not properly performed his/her duties.

Within thirty (30) days of the appointment of this Commission, an Organization Meeting of said Commission shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary. Any vacancy in any such office shall be filled by from its regular membership.

4. Authority/Duties

The *Town of Ledyard Ethics Commission* shall be authorized to perform the following:

- Review assignments and determine whether or not the Ethics Commission would have jurisdiction, if the allegation(s) is true, and if it would be a violation of this

Code.

- Consult with the Town Attorney or an Attorney, and other professionals specially appointed by the Town Council to conduct its duties on assignments, *as authorized by the Town Council on a case-by case-basis.*
- Request the Attorney provide advisory opinions with regard to the requirements of this Code pertaining to the subject assignment. Advisory opinions rendered by the Town Attorney, until amended or revoked by the Ethics Commission, shall be binding and shall be deemed to be final decisions.
- Conduct hearings and issue subpoenas or subpoenas pursuant to Sections 7-148(c)(10)(B) of the Connecticut General Statutes.
- Compile and maintain a record with the Town Clerk of all reports, advisory opinions, statements, and memoranda filed by and with the Commission to facilitate public access to such reports and statements *unless doing so would violate the confidentiality provision of this Code or is otherwise prohibited by law.*
- Report to the Town Council when an investigation is complete, and a decision is rendered.
- Annually report to the Town Council on the status of investigations, *while maintaining confidentiality as applicable*; summarizing the activities of the commission.
- Agendas and Minutes of the Ethics Commission, *not including those protected by confidentiality*, are public information and will be made available to the public through the Town's meeting portal and the Town Clerk's Office in accordance with Sections 1-200, 1-225 of the Connecticut General Statutes. Executive session discussion will be confidential.

5. Procedures

a. Filing of Complaints

Complaints of violation of the code of Ethics related to unethical behavior concerning any *municipal* official, officer, or employee of the Town of Ledyard may be made by any person and shall be made in person on a form prescribed by the Commission and signed under penalty of false statement before the *Ledyard Town Clerk; or Assistant Town Clerk. one of the following*

- ~~1. A judge of a court of record~~
- ~~2. A clerk or a deputy clerk of a court having a seal;~~
- ~~3. A~~The Ledyard Town Clerk (Moved to above paragraph);
- ~~4. A public notary;~~

- ~~5. An attorney admitted to the bar of this state~~
~~6. A justice of the peace~~

No complaint may be made under the code unless it is filed with the Commission within ~~three (3)~~ *four (4)* years after the violation alleged in the complaint has been committed, *and within six (6) months of discovery*. If multiple violations are alleged, the *four (4)* ~~three (3)~~ year limitation shall be applied separately to each such alleged violation.

The Complaint shall include:

- Name of the person accused (respondent).
- Name of the person filing the complaint.
- The specific acts alleged to constitute the violation of Section 4 of this code, and when they occurred.
- Whether or not these allegations have been presented to other administrative or judicial authorities.

The Town Clerk within ten (10) business days shall provide proper notice to the Town Council and Mayor that an Ethics Complaint has been filed The Town Council or Mayor shall, within ten (10) business days of receiving complaint, forward the specific charge(s) and complaints concerning allegations of violations of this Code under this ordinance to the Ethics Commission under the heading of “Confidential Materials”; *pursuant to Section 1-82a of Connecticut General Statutes..*

In the application of this Code of Ethics, care will be given to distinguish between concerns of management of Town employees and violations of the public trust. The daily management of employee performance is the responsibility of the Mayor or School Superintendent in the case of the employees of Ledyard Public Schools. Personnel policies should be the first guide in those areas where applicable. Similarly, the routine activities of the Commission should be governed by its rules and regulations.

b. Evaluation and Acknowledgement

- i. Within thirty (30) business days of the receipt of the specific charge(s) and/or complaints, the Ethics Commission shall call an *executive meeting session* to evaluate if the filing is *not in violation* or is not in *the* proper form.
- ii. If the complaint is not in the proper form and/or the Ethics Commission determines that the allegations, even if true, would not constitute a violation of this Code then the Ethics Commission shall dismiss the complaint and duly notify the complainant in writing, with a copy to the Town Council, *and Mayor* of said fact and the reasons thereof; by registered or certified mail not later than ten (10) business days after said decision. Allegations applicable to other administrative, or judicial authority will be referred to the proper authority.

- iii. If the Ethics Commission determines that the complaint is in proper form and the allegations, if true would, constitute a violation of this Code then the Ethics Commission shall, not later than ten (10) business days after said determination, provide a copy of the complaint *provide a copy of the complaint to the Town Council, Mayor and* by registered or certified mail to all respondents against whom such complaint is filed, and shall provide notice of the receipt of such complaint to the complainant. The respondent(s) shall have ten (10) business days to submit any response to the Ethics Commission.
- i. If the Complaint is applicable to this Code, the Town Council shall request the Ethics Commission convene *an executive session-meeting* within fourteen (14) business days of the issuance of notification to the complainant.
- b. Investigation of Probable Cause-Confidential Investigation

All information supplied to or received from the Ethics Commission during their evaluation or investigation shall remain confidential, as specified by provisions of the Connecticut General Statutes, Section 1-82a, in relation to operations of a Commission of Ethics, unless the Commission makes a finding of probable cause for a hearing, or unless the respondent requests in writing that the entire record and any hearings be open to the public.

The Ethics Commission shall within thirty (30) business days from the receipt of the assignment evaluate the complaint to determine whether the person who is the subject of the complaint is under the jurisdiction of the Ethics Commission; whether the act(s) alleged in the complaint, if proven, would constitute a violation of the Code.

If the Ethics Commission accepts jurisdiction, it shall so advise both the complainant and respondent by certified mail and provide a copy of the complaint (and any other information submitted by the complainant) to the respondent ~~The Ethics Commission shall advise that complainant and the respondent~~ by certified mail that it will conduct a probable cause determination and invite the respondent to provide any information the respondent deems relevant to the Commission's determination of probable cause. Such information must be submitted to the Commission within twenty-one (21) business days of notification.

Within thirty (30) business days after the response period specified in the previous paragraph, the Ethics Commission shall meet *in an executive session* to determine if there is probable cause that a violation of the Code has occurred. In so doing, the Ethics Commission shall only consider the information submitted by the complainant and the respondent.

If the Ethics Commission does not find probable cause of a violation of the Code, it shall so notify in writing both the complainant and the respondent within five (5) business days of its findings and a summary of the reasons and the complaint, and the record of investigation shall remain confidential. Upon a finding of no probable

cause, the case file will be sealed and all matters pertaining thereto shall remain confidential.

The Highlighted Sentences are redundant- I think the two paragraphs can be combined into one paragraph as noted in red font below:

If the Ethics Commission determines, by *four (4)* ~~three (3)~~ affirmative votes that there is probable cause of a violation of the code, it shall so notify ~~both~~ the complainant, respondent; *Town Council and Mayor* in writing within five (5) business days of such determination.

If the Ethics Commission determines that probable cause of a violation of the Code has occurred, *the Town Council will authorize the Ethics Commission to perform an investigation.* An investigation shall be conducted within (90) business days of determining the complaint is in violation of this Code.

Substitute with the Paragraph below:

If the Ethics Commission determines, by four (4) affirmative votes that there is probable cause of a violation of the code, it shall notify the complainant, respondent; Town Council and Mayor in writing within five (5) business days of such determination. The Town Council will authorize the Ethics Commission to perform an investigation. An investigation shall be conducted within (90) business days of determining whether the complaint is in violation of this Code.

If the Ethics Commission determines, by three (3) affirmative votes that there is probable cause of a violation of the code, it shall so notify both the complainant and respondent in writing within five (5) business days of such determination.

~~Within thirty (30) business days of a finding of probable cause, the Ethics Commission shall schedule a hearing to determine if a violation of the Code has occurred if the allegations are true. The Ethics Commission shall notify both the complainant and the respondent of the date, time, and place of such hearing. Such notification shall be made in writing within five (5) business days of the scheduling of the hearing.~~

All notifications under this section shall be sent via certified mail, return receipt requested.

If the Ethics Commission determines that *probable cause of* a violation of the Code has occurred, an investigation shall be conducted within (90) business days of determining the complaint is in violation of this Code.

In the conduct of its investigation, the Ethics Commission shall have the power to hold hearings, administer oaths, examine witnesses, receive oral and documentary evidence, subpoena witnesses, and to require the production for examination by the Commission of any books and papers as permitted by law which are relevant in any manner under investigation or in question.

All parties and witnesses shall be duly sworn under oath prior to testifying before the Commission.

During the investigation, the complainant shall be allowed to present evidence, including documents and witnesses. The respondent(s) shall have the right to appear and be heard and offer any information which may tend to clear the respondent of probable cause to believe that the respondent has violated any provision of the Code of Ethics. The respondent shall be allowed to present evidence, including documents and witnesses. The respondent shall be allowed to examine and cross-examine witnesses presented and be allowed to offer before the Ethics Commission any evidence or witnesses on their behalf. ~~This investigation shall be confidential pursuant to Connecticut General Statutes, Section 1-82a.~~

i. No probable cause

~~If the Ethics Commission finds no probable cause it shall within five (5) business days advise the complainant and the respondent of its finding and a summary of the reasons therefore and the complaint and the record of investigation shall remain confidential.~~

ii. Probable cause

~~If the Ethics Commission finds probable cause by the concurring vote of three (3) out of five (5) voting members, it shall within five (5) business days of such determination notify both the complainant and the respondent in writing.~~

~~Within thirty (30) days of finding of probable cause, the Ethics Commission shall schedule a hearing to determine if a violation of the Code has occurred. The Ethics Commission shall notify both the complainant and the respondent of the date, time, and place of such hearing. Such notification shall be made in writing within five (5) business days of the scheduling of the hearing.~~

~~It shall also fix a date for a hearing on a complaint. It shall give notice of that date to the complainant and respondent. Such date shall be not less than thirty (30) business days following notice, nor more than ninety (90) business days after the finding of probable cause.~~

b. Hearings

The Ethics Commission shall conduct a hearing to determine if a violation of the code has occurred. *Confidentiality of complaints, evaluations of possible violations, and investigations shall be maintained pursuant Section 1-82a of the Connecticut General Statute. Unless a judge trial referee makes a finding of probable cause, a complaint alleging a violation of this part shall be confidential except upon the request of the respondent* ~~All hearings shall be opened to the public and recorded in a manner to be determined by the Ethics Commission.~~

Hearings shall not be subject to rules of court, except the rights:

- i. Of an accused to confront and cross-examine his/her accuser.
- ii. Of every witness or party to be represented by an attorney at law of his/her Choice.
- iii. Of every witness to decline to answer questions in accordance with the Fifth Amendment to the Constitution of the United States.

In all other respects, hearings shall be conducted by the Ethics Commission, with the advice and assistance of the Town Attorney acting through its Chairperson, in order to facilitate the prompt and fair disposition of the proceedings.

While conducting a hearing of an alleged violation of this Code, the Ethics Commission shall have the authority to administer oaths, examine witnesses, receive oral and documentary evidence.

The Ethics Commission shall have the authority to issue subpoenas or subpoenas duces tecum enforceable upon application to the Superior Court for the State of Connecticut, to compel attendance of persons at hearings and the production of books, documents, records, and papers, pursuant to Sections 7-148(c)(10)(B) of the Connecticut General Statutes, subject to the inherent power of the commission to decline or limit such request where it is merely duplicative or is unnecessarily burdensome or harassing and not likely to lead to evidence which will aid the Commission in its determination.

b. Finding/Sanctions

No finding of violation of this Code shall be made except upon ~~concurring~~ the vote of ~~five (5)~~ *four (4)* out of five (5) members of the Ethics Commission. The Chairperson shall render the finding of the Ethics Commission within thirty (30) business days after conclusion of the hearing. A copy of the finding shall be sent to the complainant, respondent, *Town Council, and Mayor.*

A copy of the finding shall be sent to the complainant, respondent, and the Town of Ledyard.

Upon finding of a violation of any provision of the Code, the Ethics Commission will refer the matter to the appropriate appointing or supervisory authority. The authority affected will report within thirty (30) business days to the Ethics Commission the action taken, if any. Violators of the Code of Ethics are subject to penalties that may consist, *but not limited to, any one or a combination of the following:* ~~of an order to cease and desist the violation, to pay a civil penalty of up to the maximum allowed per state law per violation, censure, reprimand, suspension without pay, termination of employment and/or removal from appointed office. Additionally, the commission~~

~~may refer violators to the proper authorities for further civil or criminal action. If the commission finds unethical conduct by a paid consultant or business performing work for the Town, it can disbar the consultant or business from doing business with the Town for up to 10 years.~~

- 1. Order to cease and desist the violation which must be enforced by a court of competent jurisdiction.*
- 2. Pay a civil penalty of up to the maximum allowed per state law per violation.*
- 3. Public admonition or reprimand.*
- 4. Censure.*
- 5. Suspension without pay.*
- 6. Demotion.*
- 7. Termination of employment and/or removal from appointed office.*
- 8. Restitution of any pecuniary benefits received because of the violation committed.*

The Town Council may prescribe penalties for violation of this Ordinance, as authorized in CGS 7-479, including the avoidance of any municipal purchase, contract, or ruling adopted in contravention thereof. In the case of an Ethics violation by a member of the Town Council, the Ethics Commission will prescribe the appropriate penalty(s) as permissible under the Law, and its decision will be binding upon said Town Council Member, after appeal.

Persons subject to this code found not to be in violation of this code will be reimbursed by the Town of Ledyard for their reasonable legal fees, except no legal fees shall be paid for any services rendered before a finding of probable cause.

b. Appeals

Any person aggrieved by any final decision of the Ethics Commission may appeal such decision in accordance with the provisions of Sections 4-175 or Section 4-183 of the Connecticut General Statutes. If successful, any and all reasonable legal fees will be paid by the Town of Ledyard.

b. Interpretation

The provisions of this ordinance shall be construed in a manner consistent with all applicable federal and state laws, and applicable to the provisions of the Charter of the Town of Ledyard. In the event a conflict exists between this ordinance and a federal or state law, or the Charter of the Town of Ledyard, the federal or state law, or the Charter shall control.

Section 8. Severability

If any part of this Code or Ordinance shall be held by a court of competent Jurisdiction to be invalid, such holding shall not be deemed to invalidate the remaining provisions hereof.

Adopted by the Ledyard Town Council on: _____

S. Naomi Rodriguez, Chairman

Approve/Disapprove on: _____

Fred B. Allyn, III, Mayor

Continued Discussion: Councilor Buhle stated that she appreciated all of their recommendations and suggestions noting that with tonight's work that she thought that they had a good draft. She asked Administrative Assistant Roxanne Maher to incorporate the additional changes they agreed to this evening into the proposed draft "*An Ordinance Establishing an Ethics Commission for the Town of Ledyard*".

The Administration Committee noted that they were satisfied with the additional revisions they incorporated this evening. They agreed that after Administrative Assistant Roxanne Maher updated the proposed Ordinance that Councilor Buhle would review the document to ensure all changes have been included. With Councilor Buhle's review and verification, she would ask Ms. Maher to forward the proposed "*An Ordinance Establishing an Ethics Commission for the Town of Ledyard*" as contained in the draft dated June 11, 2025 to the Town Attorney for their legal review and recommendations.

2. Discussion and possible action to draft a resolution establishing a Sustainable CT Ad-hoc Committee.

Councilor Buhle noted the Administration Committee has been discussing the draft "*Resolution Supporting the Town's Continued Participation in the Sustainable CT Municipal Certification Program And Establishing A Sustainable CT Ad Hoc Committee*" dated March

27, 2025. She stated in thinking about her conversation with Land Use Director/Town Planner Elizabeth Burdick about having the Committee be comprised of Town Employees that she had concerns about the town's limited staffing and not wanting to overload staff with additional work. Therefore, she suggested the Committee be comprised of the following:

- One member from the Planning & Zoning Commission or Inland Wetlands & Water Courses Commission
- One member from the Economic Development Commission or Conservation Commission

- One member from the Town Council Land Use Committee
- Two members from the Community-at-Large

Councilor Buhle went on to note as currently written in the March 27, 2025 draft the proposed Resolution already named the Director of Land Use & Planning as the Town's contact person for the Sustainable CT Municipal Certification process and authorizes him/her to complete Municipal Registration on behalf of the Town of Ledyard.

The Administration Committee discussed the *Sustainable CT Ad Hoc Committee's* Membership and agreed with Councilor Buhle's suggestions, as noted in the draft dated June 11, 2025 below, not to overburden staff and to ask members that were currently serving on other Town Committees/Commissions to volunteer to take on the Sustainable CT initiative.

MOTION to recommend the Town Council adopt the proposed "*Resolution Supporting the Town's Continued Participation in the Sustainable CT Municipal Certification Program And Establishing A Sustainable CT Ad Hoc Committee*" as contained in the draft dated June 11, 2025

~~DRAFT: 3/27/25~~

DRAFT: 6/11/2025

TOWN OF LEDYARD
RESOLUTION SUPPORTING THEIR CONTINUED PARTICIPATION
IN THE SUSTAINABLE CT MUNICIPAL CERTIFICATION PROGRAM
AND ESTABLISHING A SUSTAINABLE CT AD HOC COMMITTEE

WHEREAS, On March 11, 2020 the Ledyard Town Council adopted a "*Town of Ledyard Resolution Supporting the Participation in the Sustainable CT Municipal Certification Program*"; recognizing that Sustainable CT is a comprehensive, statewide, action-oriented voluntary certification program, built by and for municipalities, with the vision that: "*Sustainable CT communities strive to be thriving, resilient, collaborative, and forward-looking*".

WHEREAS, Sustainable CT is designed to boost local economies, help municipal operations become more efficient, reduce operating costs, and provide grants and additional support to municipalities.

WHEREAS, the Town of Ledyard continues to embrace an ongoing process of working toward greater sustainability, selecting which actions it chooses to pursue from the voluntary menu of actions provided by Sustainable CT; and WHEREAS; The Town of Ledyard has implemented a number of programs which included a streetlight assessment that resulted in the purchase of the streetlights from Eversource and converting them to Light-Emitting Diode (LED) light bulbs saving both energy and taxpayer dollars; constructed the Multi-Use Pathway from Ledyard High School to Ledyard Center to expand safe, connected, active transportation for pedestrians and bicyclists; extending the sewer line providing infrastructure for both affordable housing and business development; improvements to the Linda C. Davis Food Pantry providing an equitable community food action plan to ensure that all community members can access sustainable, nutritious food; improvements to the Town Green providing handicap access to one of the best Farmers' Markets in the State for

residents to purchase fresh produce from local farmers and featuring many community organizations providing information to residents regarding fuel assistance, mental health services, public safety services, and many other commodities and programs; regionalization of shared services with the Town of Preston by providing Emergency Dispatch Communication Services, Tax Assessor Services, Public Works Mechanic Services, and the shared purchase of a streetsweeper to maintain the required MS4 (Municipal Separate Storm Sewer System) Permit Certifications.

WHEREAS, the *Director of Land Use & Planning is authorized to serve as the Town of Ledyard's Sustainable CT contact person* for the Sustainable CT Municipal Certification process and authorizes him/her to complete Municipal Registration on behalf of the Town of Ledyard;

WHEREAS: it is recognized that the town is minimally staffed; and supplemental support is needed to continue efforts to reach the Sustainable CT Goals of the community.

NOW, THEREFORE, BE IT RESOLVED, that to focus attention and effort within the Town of Ledyard on matters of sustainability, and in order to promote local initiatives and actions toward Sustainable CT Municipal Certification, the Ledyard Town Council establishes a Ledyard Sustainable CT Ad Hoc Committee to be comprised of ~~seven~~ **five (5)** members appointed by the Ledyard Town Council.

Those members shall, as much as possible, be representative as follows:

- One member from the Planning & Zoning Commission or Inland Wetlands & Water Courses Commission
- One member from the Economic Development Commission or Conservation Commission
- ~~One member from the Parks, Recreation, & Senior Citizens Commission~~
- ~~One member from the Board of Education~~
- ~~One Member from a Community Organization (i.e. Rotary, Lions Club, etc.)~~
- One member from the Town Council Land Use Committee
- **Two** ~~One~~ member from the Community-at-Large

BE IT FURTHER RESOLVED, each member shall serve for a term of two (2) years. Members shall commence to serve their terms immediately upon appointment and shall serve until their successor has qualified or they have been reappointed or removed by the Town Council.

Any vacancies on said committee shall be filled by the appointment of the Ledyard Town Council, with priority given to maintaining as much as possible the structure above; and

Any member of the Committee who is absent from three (3) consecutive regular meetings and any intervening duly called special meetings shall be considered to have resigned from the Commission and the vacancy shall be filled as hereinbefore provided, except that the Commission may vote to waive the requirements of the section in each case where illness or other extenuating circumstances make it impossible for a member to meet

the attendance requirements of this action. It shall be the responsibility of the Chairman of the Committee to notify the Town Council when a member has not properly performed his/her duties.

BE IT FURTHER RESOLVED, that said Ledyard Sustainable CT Ad Hoc Committee is authorized to:

- (1). Work with the Land Use Director and the Mayor to engage staff; and or, contract with consultants, or a Sustainable CT Fellow through Southeastern Connecticut Council of Government (SCCOG) Program.
- (2). Review the Sustainable CT Tool Kit and Guidelines; and to oversee the preparation and submission of Application at the appropriate time.
- (3). Develop initiatives, goals, and recommendations to achieve Points required to complete the process to obtain the Sustainable CT Certification to include:
 - Building our community and our local economy;
 - Equitably promote the health and well-being of current and future residents;
 - Encourage and participate in regional collaboration and other forms of partnership.
 - Improve the services and quality of life for our residents, while focusing on sustainability, efficiencies, and reducing the impact of inflationary costs for residents.
- (4). Work with the Public Works Director on Food Waste Composting and other waste management initiatives.
- (5). Work with the Planning & Zoning Commission to ensure the Town's Plan of Conservation and Development supports the proposed Sustainable CT Initiatives.
- (6). Work with the Board of Education to ensure that Ledyard's educational facility needs are considered and met in developing a plan and implementing Sustainable CT initiatives.
- (7). Prepare and present to the Town Council for approval a Capital Improvement Plan to support and move the Sustainable CT Plan forward.
- (8) Identify funding sources, including grant funding, and other grassroots funding options such as *In Our Backyard* (IOB) Grants, to support the goals and initiatives; complying with the town's Grant Policy.
- (9) Work with the Finance Director on the application and administration of any grant funding received; and the preparation of bid specifications and advertisement for Requests for Proposals to facilitate approved Sustainable CT Initiatives, in accordance with Ordinance #200-001 "*Purchasing Ordinance for the Town of Ledyard*".

RESOLVED, that the first meeting of the Sustainability CT Ad Hoc Committee must be held within 90 days of passing this resolution and that the Sustainability Ad Hoc Committee shall meet as frequently as needed, but no less than quarterly; and shall select a Chairman, Recording Secretary, and Fiscal Officer from its body.

RESOLVED, that the Sustainability Ad Hoc Committee shall report annually to the Ledyard

Town Council on the progress of its activities toward the Sustainable CT Certification, with reports and presentations being publicly available.

NOW, THEREFORE, BE IT FURTHER RESOLVED, that the adoption of this Resolution reaffirms the Town of Ledyard's March 11, 2020 initial desire and commitment to continue their work in achieving the Sustainable Development CT Certification.

Adopted by the Ledyard Town Council on: _____

S. Naomi Rodriguez, Chairman

*

The above is a certified a true copy of a Resolution adopted by the Town of Ledyard at a meeting of its Town Council on _____, 2025 and which has not been rescinded or modified in any way whatsoever.

IN WITNESS WHEREOF: The undersigned has affixed his signature and corporate seal on this _____ day of _____ 2025.

Patricia A. Riley, Town Clerk

(SEAL)

*

Revision: "Town of Ledyard Resolution Supporting the Participation in the Sustainable CT Municipal Certification Program" Adopted: March 11, 2020

History:

Due to other competing demands on staff the Town of Ledyard was unable to continue their Application process to obtain the Sustainable CT Certifications. However, the Town has continued to take on and has completed a number of initiatives that have contributed to building its community and our local economy; to equitably promote the health and well-being of current and future residents; and has developed, fostered and participated in regional collaboration and other forms of partnership with other communities in the area.

The 2025 adoption of this Resolution reaffirms the Town of Ledyard's desire and interest to achieve the Sustainable CT Certification to continue to improve the services and quality of life for its residents, while focusing on sustainability, efficiencies, and reducing inflationary costs for its residents.

Moved by Councilor Buhle, seconded by Councilor Dombrowski

Discussion: (see above).

\VOTE: 3 - 0 Approved and so declared

RESULT: RECOMMENDED FOR APPROVAL

MOVER: Jessica Buhle

SECONDER: Kevin Dombrowski

AYE: 3 Dombrowski, Buhle and Brunelle

3. Any Old Business proper to come before the Committee.

VII. NEW BUSINESS

1. MOTION to reappoint Mr. Ethan Foltz (D) 894 Colonel Ledyard Highway, Ledyard, as a regular member of the Ledyard Farmers' Market Committee, for three (3) year term ending May 9, 2028.

Moved by Councilor Dombrowski, seconded by Councilor Brunelle

Discussion: The Administration Committee noted that all of the members of the Farmers Market Committee do an amazing job.

VOTE: 3 - 0 Approved and so declared

RESULT: RECOMMENDED FOR APPROVAL

MOVER: Kevin Dombrowski

SECONDER: April Brunelle

AYE: 3 Dombrowski, Buhle and Brunelle

2. MOTION to reappoint the following Members to the Parks, Recreation & Senior Citizens Commission for a three (3) year term ending June 28, 2028.

- Ms. Lauren Hawes, (U) 8 Wabler Way, Gales Ferry, as an Regular Member
- Ms. Paula Crocker (U) 1500 Route 12, Gales Ferry, as a Regular Member
- Ms. Stephanie Bacon (D) 6 Patricia Court, Gales Ferry, as an Alternate Member.

Moved by Councilor Brunelle, seconded by Councilor Dombrowski

Discussion: These members of the Parks, Recreation & Senior Citizens Commission are interested in continuing to serve on the Commission, and their reappointment has been endorsed by the Commission and their respective parties.

VOTE: 3 - 0 Approved and so declared

RESULT: RECOMMENDED FOR APPROVAL

MOVER: April Brunelle

SECONDER: Kevin Dombrowski

AYE: 3 Dombrowski, Buhle and Brunelle

3. MOTION to approve Mechanic II job description as presented in the draft dated May 16, 2024.

Moved by Councilor Dombrowski, seconded by Councilor Brunelle

Discussion: Human Resources Director Christine Dias explained that the Mechanic II was a new job description that was added to provide the shared services support to

Preston. She noted that the individual was hired under a draft job description.

VOTE: 3 - 0 Approved and so declared

RESULT: RECOMMENDED FOR APPROVAL

MOVER: Kevin Dombrowski

SECONDER: April Brunelle

AYE: 3 Dombrowski, Buhle and Brunelle

4. MOTION to approve proposed updates to Fiscal Assistant II Finance Department position as presented in the draft dated February 19, 2025.

Moved by Councilor Brunelle, seconded by Councilor Dombrowski

Discussion: Human Resources Director Christine Dias explained Fiscal Assistant II Finance and Human Resources job description has been updated to reflect the current duties of the position.

VOTE: 3 - 0 Approved and so declared

RESULT: RECOMMENDED FOR APPROVAL

MOVER: April Brunelle

SECONDER: Kevin Dombrowski

AYE: 3 Dombrowski, Buhle and Brunelle

5. MOTION to approve proposed updates to the Fiscal Assistant II Finance and Human Resources job description as presented in the draft dated November 15, 2023.

Moved by Councilor Dombrowski, seconded by Councilor Brunelle

Discussion: Human Resources Director Christine Dias explained Fiscal Assistant II Finance job description has been updated to reflect the current duties of the position.

VOTE: 3 - 0 Approved and so declared

RESULT: RECOMMENDED FOR APPROVAL

MOVER: Kevin Dombrowski

SECONDER: April Brunelle

AYE: 3 Dombrowski, Buhle and Brunelle

6. MOTION to approve proposed updates to the Assistant to the Tax Collector Job Description as presented in the draft dated May 2025.

Moved by Councilor Brunelle, seconded by Councilor Dombrowski

Discussion: Human Resources Director Christine Dias explained Tax Collector job description has been updated to reflect the current duties of the position.

VOTE: 3 - 0 Approved and so declared

RESULT: RECOMMENDED FOR APPROVAL

MOVER: April Brunelle

SECONDER: Kevin Dombrowski

AYE: 3 Dombrowski, Buhle and Brunelle

7. Any New Business proper to come before the Committee
 None.

IV **ADJOURNMENT**

Councilor Dombrowski moved the meeting be adjourned, seconded by Councilor Brunelle.

VOTE: 3 - 0 Approved and so declared, the meeting was adjourned at 6:01 p.m.

Respectfully submitted,
Jessica Buhle
Committee Chairman
Administration Committee

DISCLAIMER: Although we try to be timely and accurate these are not official records of the Town.