



Chairman Gary St. Vil

TOWN OF LEDYARD

CONNECTICUT
TOWN COUNCIL

MINUTES
PUBLIC HEARING
LEDYARD TOWN COUNCIL
COUNCIL CHAMBERS - ANNEX BUILDING
HYBRID FORMAT

PUBLIC HEARING MINUTES

5:30 PM; MARCH 25, 2026

- I. CALL TO ORDER – Chairman St. Vil called to order the Public Hearing at 5:32 p.m. regarding a proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission*”
- II. PLEDGE OF ALLEGIANCE
- III. PROCEDURE OF THE PUBLIC HEARING

Chairman St. Vil welcomed all to the Hybrid Meeting. He stated for the members of the Town Council and 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.

Chairman St. Vil provided an overview of the procedure of the Public Hearing, and he asked those attending remotely to put their name and address in the “Chat” and that they would be called upon during the Public Comment portion of tonight’s meeting.

- IV. CALL OF THE PUBLIC HEARING

The following call of the Public Hearing was read by Town Council Administrative Assistant Roxanne M. Maher:

LEGAL NOTICE TOWN OF LEDYARD

NOTICE OF PUBLIC HEARING

The Ledyard Town Council will conduct a Hybrid Format Public Hearing
(In-Person & Video Conference)
on Wednesday, March 25, 2026 at 5:30 p.m.
to receive comments/recommendations regarding a Proposed

“*An Ordinance Establishing a Town of Ledyard Code of Ethics
And Ethics Commission*”

Please join the Public Hearing in-person or remotely as follows:

In-person attendance will be at the
Council Chambers, Town Hall Annex Building
741 Colonel Ledyard Highway, Ledyard, Connecticut

Please join the video conference meeting from your computer, tablet, or smartphone at:
<https://ledyardct.zoom.us/j/89697254385?pwd=4jKmbFQVAFhV9FRgHZdggBanldNfX8.1>

or by audio only dial: +1 646 558 8656 Meeting ID: 896 9725 4385; Passcode: 084604

At this hearing interested persons may appear and be heard and written communications will be accepted at towncouncil@ledyardct.org.

Dated at Ledyard, Connecticut this 12th day of March, 2026

For the Ledyard Town Council
s/s Gary St. Vil, Chairman

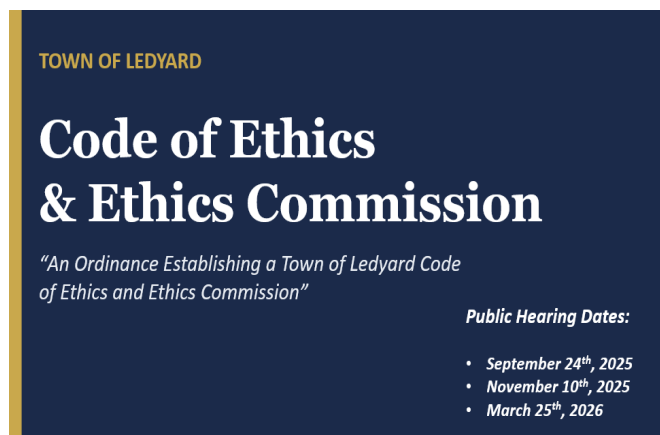
Please Publish on Monday, March 16, 2026

V. PRESENTATIONS

Chairman St Vil called upon Administration Committee Chairman Councilor Garcia-Irizarry to present the proposed Ethics Ordinance.

Councilor Garcia-Irizarry stated tonight was the third Public Hearing the Town Council has held regarding the proposed Ethics Ordinance; noting the following Public Hearing dates: September 24, 2025; November 10, 2026; and tonight March 25, 2026.

Councilor Garcia-Irizarry proceeded by reviewing the following PowerPoint Presentation detailing the process which included incorporating feedback from the public, town employees, and legal guidance from the Town Attorney:



DIFFERENCES BETWEEN DRAFTS FROM 10/29/2025 AND 03/11/2026

- The term "Board of Education" was inserted in several provisions to ensure language consistency.
- Some definitions were simplified (i.e. "consultant" definition was narrowed).
- The overall structure was streamlined, reducing the number of sections from 15 to 12 by merging certain sections.
- Input from both the public and Town employees was taken into account.
- The Communications section was eliminated.

Ordinance Sections

Section 1: Authority Granted by Chapter III of the Ledyard Town Charter	Section 6: Disclosure and Disqualification
Section 2: Declaration of Policy and Purpose Officials, employees, and consultants are expected to be: 1. Independent & Impartial 2. Act only through proper channels 3. Not use public office for beneficial or financial interest 4. Citizens deserve confidence in the integrity of their government.	Section 7: Required Filings for Certain Town & board of Education Officials
Section 3: Definitions	Section 8: Acknowledgement Forms
Section 4: Confidential Information & Withholding of Information	Section 9: Establishments & Qualifications of Ethics Commission
Section 5: Conflict of Interest Provisions & Other Prohibited Activities	Section 10: Powers and Duties of Ethics Commission
	Section 11: Ethics Commission Rules of Procedure
	Section 12: Severability

CONFLICT OF INTEREST

Sections 5 & 6 – Conflict of Interest, Prohibited Activities & Disclosure Requirements

PROHIBITED ACTIVITIES


- Participating in contracts or decisions where officials, employees, consultants, or their family members have a financial/beneficial interest
- Directly hiring or supervising a family member (except during temporary emergencies)
- Using Town vehicles, equipment, or property for personal profit
- Soliciting or accepting gifts from persons interested directly or indirectly in a business transaction or pending matter within the purview of the official, employee, or consultant.

DISCLOSURE REQUIREMENTS

- Must disclose any conflict of interest in contracts, transactions, or decisions within the official, employee, or consultant's purview
- Cannot represent private parties before agencies without first disclosing his or her interest
- May request an advisory opinion from the Ethics Commission if there's uncertainty as to whether the official, employee, or consultant has a conflict of interest, beneficial or financial interest that could disqualify him or her from participation in a matter.

ANNUAL DISCLOSURE FILINGS

Section 7 – Required Annual Filings for Mayor, Town Council & Board of Education

 **Due Date: January 1st each year — filed under oath with the Town Clerk**

- A Real Estate Holdings**
All Town of Ledyard real estate owned or leased (>5 yrs), excluding primary residence. Includes corporate, trust, or partners hip holdings where official holds 25% interest.
- B Business Interests & Employment**
Names of any firm, partnership, or corporation where official holds 25% interest or is employed and if applicable note if that entity has sold or supplied >\$10,000 in goods/services to the Town in the prior two years.
- C Income from the Town**
Any income, fees, salary, or wages received from the Town of Ledyard during the two years immediately preceding election to a office.

IMPLEMENTATION & TRAINING

Section 8 – Acknowledgement Forms

10 business days	Code incorporated into all new consultant contracts <i>Responsible: Town & BOE</i>
30 business days	Current consultants receive copy of Code of Ethics <i>Responsible: HR Directors</i>
60 business days	New employees given copy within 60 days of hire <i>Responsible: HR Directors</i>
120 business days	Current employees receive copy from effective date <i>Responsible: HR Directors</i>

ETHICS COMMISSION

Section 9 – Structure, Qualifications & Appointment

5 Regular Members	2 Alternate Members	3 Year Term	7 Council Votes Required
PARTY AFFILIATION RULES		DISQUALIFICATIONS	
<ul style="list-style-type: none"> No more than 2 regular members from any one party At least 1 regular member must be unaffiliated Alternate members cannot both be from the same party 		<ul style="list-style-type: none"> Currently employed by Town or BOE (or within 2 yrs) Holds or held elective Town office (within 2 yrs) Serves on another Town agency or political committee Found in violation of any code of ethics 	
<i>Members serve without compensation. Max 3 terms total.</i>			

SECTION 11: ETHICS COMMISSION RULES OF PROCEDURE

Section 11A – Advisory Opinions

WHO CAN REQUEST?	TIMELINE & PROCESS
<ul style="list-style-type: none"> Current, former, or prospective Town/BOE officials Current, former, or prospective employees Consultants engaged by the Town or BOE Officials asking about departments under their jurisdiction 	Day 1 Sealed form submitted to Town Clerk (www.Ledyardct.org)
	Day 5 Clerk notifies Commission Chair/Vice-Chair
	Next meeting Chair presents request (exec. session by default)
	90 business days Commission issues written advisory opinion
	+30 days Optional extension if needed

ETHICS COMMISSION RULES OF PROCEDURE

Section 11A – Advisory Opinions & Section 11B - Complaints

1	Filing of a complaint <ul style="list-style-type: none"> Shall be made on a form prescribed by the Ethics Commission and must be signed under penalty of false statement. Form shall be delivered to the Town Clerk in a sealed envelope who will date stamp the envelope and forward it to the Ethics Commission. Must file within 3 years of alleged violation
2	Probable Cause Determination <ul style="list-style-type: none"> Must be determined within 60 business days of receipt Requires 3 affirmative votes to proceed Complaint shall remain confidential unless probable cause is found
3	Public Hearing <ul style="list-style-type: none"> Respondent will have the right to be represented by legal counsel & present evidence and witnesses
4	Final Decision & Penalties <ul style="list-style-type: none"> Decisions by the Ethics Commission that a person is in violation of the Code of Ethics requires 4 concurring votes The commission must render its decision within 60 business days of the closing of the hearing. Penalties will be determined by a majority vote of the Town Council

PENALTIES FOR VIOLATIONS

Section 11B(v) – Range of Consequences for Ethics Violations

Cease & Desist Order to immediately stop the violating conduct	Civil Penalty Up to maximum amount permitted under State law	Censure Formal public reprimand of the official or employee	Suspension Suspension without pay for specified period
Demotion Reduction in rank or level of employment	Termination End of employment or contract with the Town/BOE	Restitution Repayment of any benefits gained from the violation	

QUESTIONS & COMMENTS



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

Be it ordained by the Town Council of the Town of Ledyard:

Section 1. Authority.

In accordance with Chapter III 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.

The trust of the public is essential for government to function effectively. The proper operation of the Town government requires that Town and Board of Education officials, employees and consultants 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 beneficial and/or financial interest; and that the public has confidence in the integrity of its government.

Section 3. Definitions

As used in this ordinance, the following words or phrases shall have the meanings indicated below:

“Agency” is any board, commission, authority or committee of the Town, including the Town Council and Board of Education.

“Beneficial interest” means any nonfinancial interest or special treatment that is not common to other citizens of the Town.

“Business day” means a day other than a Saturday, Sunday or other day in which the office of the Ledyard Town Clerk is closed to the public for business.

“Complainant” means a person who files a complaint under penalties of false statement against an official, employee or consultant containing an allegation of prohibited activities under the Code of Ethics.

“Confidential Information” means information acquired by a Town or Board of Education official, employee or consultant in the course of and by reason of performing an individual’s official duties and which is not a matter of public record or public knowledge.

“Consultant” means (i) an attorney hired by the Town or the Board of Education to provide legal services; (ii) any engineer, architect or construction manager hired by the Town or the Board of Education to provide professional services related to construction projects; or (iii) any professional who is hired by the Town to provide professional advice or services related to land use matters. In addition, the definition of what constitutes a consultant shall be limited to an officer or an employee of any Town or Board of Education contractor who has managerial or discretionary responsibilities with respect to a Town or Board of Education contract.

“Employee” is any person receiving a salary, wages or a stipend from the Town or Board of Education for services rendered, whether full-time or part-time.

“Family” means the spouse, domestic partner, fiancé, fiancée, parents, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, brother-in-law, grandparents, great-grandparents, children, stepchildren, foster children, siblings and their children, stepsiblings and their children, and foster siblings and their children, of an official, employee, or consultant, or his/her spouse or domestic partner.

“Financial Interest” means any interest that has a: (i) monetary value of one hundred dollars (\$100.00) or more or generates a financial gain or loss of one hundred dollars (\$100.00) or more in a calendar year; (ii) and is not common to the other citizens of the Town.

“Gift” is a gift of more than one hundred dollars (\$100.00) in value. A gift includes, but is not limited to, entertainment, food, beverage, travel and lodging to the extent that the gift value exceeds one hundred dollars (\$100.00) in any one (1) year from the same person.

Gifts do not include:

- a. A political contribution that is otherwise reported in accordance with the law.
- b. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.
- c. Certificates, plaques or other ceremonial awards costing less than fifty dollars (\$50.00).
- d. 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.
- e. Honorary degrees.
- f. Costs associated with attending a conference or business meeting and/or registration or entrance fee to attend such conference or business meeting in which the Town or Board of Education official or Town Board of Education employee participates in his/her official capacity.
- g. Any gift provided to a Town or Board of Education official or Town or Board of Education Employee or to a family member of a Town or Board of Education official or Town or Board of Education Employee for the celebration of a major life event provided any such gift provided to an individual does not exceed one thousand dollars (\$1,000.00) in value. A major life event shall include, but not be limited to, a ceremony commemorating an individual’s induction into religious adulthood such as a confirmation or bar mitzvah; a wedding; a funeral; the birth or adoption of a child; and retirement from public service or Town employment.

“Inquiry” means a complaint or allegation of a possible violation of the Code.

“Managerial or discretionary responsibilities with respect to a Town or Board of Education contract” means having direct, extensive, and substantive responsibilities with respect to the negotiation of the contract and not peripheral, clerical, or ministerial responsibilities.

“Official” is any person holding elective or appointive office in the government of the town and shall include, but not be limited to, the Town Council, Board of Education or any other agency as defined herein.

“Respondent” means a person who is the subject of a complaint.

Section 4. Confidential information and Withholding of Information.

Town and Board of Education officials, employees or consultants may not disclose or use any information or records that are not available to the public except in the performance of official duties or as required by law or court order. No Town or Board of Education official, employee or consultant may withhold information or make a dishonest or fraudulent statement with the intent to deceive or to misrepresent material facts in the performance of his or her official duties.

Section 5. Conflict of Interest Provisions and Other Prohibited Activities

- A. A Town or Board of Education official, employee or consultant has a conflict of interest when that individual engages in or participates in any contract, transaction, decision, employment or rendering of service in which the Town or Board of Education official, employee or consultant or any member of his family has a financial or beneficial interest. Notwithstanding anything contained in this ordinance to the contrary, a Town or Board of Education official, employee or consultant may enter into a contract with the Town or the Board of Education if the contract is (i) publicly quoted or bid; or (ii) the Town or Board of Education official, employee or consultant is not involved in the awarding of the contract. In addition, the provisions of this section shall not apply to any employment or consultant contracts in which a Town or Board of Education official, employee or consultant is hired by the Town or the Board of Education to perform necessary services, including, but not limited to recreational services.
- B. A financial interest or beneficial interest presents a conflict of interest that is incompatible with the proper discharge of official responsibilities in the public interest if the Town or Board of Education official or employee has reason to believe or expect that he/she or any member of his family will obtain, secure, or advance such interest by reason of his/her actions in performance or nonperformance of his/her official responsibilities.
- C. A Town or Board of Education official, employee or consultant does not have a financial interest or beneficial interest that is incompatible with the proper discharge of his/her official responsibilities in the public interest if the interest accrues to such individual or his/her family members as a member of a profession, occupation, or group to no greater extent that it accrues to any other member of the profession, occupation, or group with which he/she is affiliated as set forth in Section 7-148h(b) of the General Statutes.
- D. No Town or Board of Education official or employee may directly hire or supervise a member of his/her family except for temporary emergency situations, including, but not limited to, inclement weather and labor shortages.
- E. Town officials and employees shall not use Town owned or leased vehicles, equipment, facilities, materials or property for personal convenience or profit. This section does not apply to Town-owned vehicles issued to emergency responders who are authorized by the Mayor, Fire Chief or Police Chief to take their Town-owned vehicles home, or vehicles issued to employees who are permitted to bring their Town-owned vehicles homes as part of an employment agreement or contract.
- F. No Town or Board of Education official, employee or consultant shall solicit or accept any gift from any person or entity who or which is interested directly or indirectly in any business transaction or pending matter that is within the purview of such official, employee or consultant. No Town or Board of Education official, employee or consultant shall accept, or knowingly seek or cause to be given to any member of his/her family, any valuable favor, treatment, consideration, or advantage beyond that which is generally available to the citizens of the Town from any person who, to the knowledge of the official, employee or consultant, is interested directly or indirectly in any business transaction or pending matter that is within the responsibilities of the official, employee or consultant. For purposes of this section, a pending matter includes, but is not limited to, any application to any agency, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment or services.

Section 6. Disclosure and disqualification.

- A. Any Town or Board of Education official, employee or consultant who has a conflict of interest, financial interest, or beneficial interest, direct or indirect, in any contract, transaction or decision within the purview of his/her official responsibilities shall disclose that conflict of interest in accordance with the provisions of this ordinance. Such disclosure shall disqualify the official, employee or consultant from participation in the matter, transaction or decision.
- B. No Town or Board of Education official, employee or consultant shall appear on behalf of any private person or party before any agency in connection with any cause, proceeding, application or other matter in which he/she has financial interest or beneficial interest without first disclosing such interest to the agency, which shall record

such disclosure in the record of the agency's proceeding. This Code shall not prohibit any current or former Town or Board of Education official, employee or consultant from appearing before any agency on his/her own behalf.

- C. If there is an uncertainty whether a Town or Board of Education official, employee or consultant has a conflict of interest, financial interest, or beneficial interest that could disqualify that individual from participation in a matter, such individual may request an advisory opinion from the Ethics Commission pursuant to this ordinance.
- D. Nothing in the Code shall be interpreted to authorize conduct restricted or prohibited by any provision of the Connecticut General Statutes including, but not limited to, Sections 8-11, 821 and 22a-42(c) of the Connecticut General Statutes that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.

Section 7. Required Filings for Certain Town and Board of Education Officials.

The Mayor and the members of the Town Council and the Board of Education shall, on or before January 1st 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:

- A. All real estate located within the Town of Ledyard owned by such official or held under lease for a term exceeding five years, excluding, however, his/her principal residence. The foregoing shall also apply to real estate in the Town of Ledyard owned or leased, by a corporation, trust or partnership in which any such official is the legal or equitable holder of at least five (5) percent of the legal or equitable interest in said corporation, trust, or partnership.
- B. The names of any firm, proprietorship, partnership or corporation of which said official is an employee or in which such official holds at least a five (5) percent interest; and if applicable, whether such firm, proprietorship, partnership or corporation has sold or supplied goods or services in excess of ten thousand dollars (\$10,000.00) per annum to the Town of Ledyard during the two (2) years immediately preceding such official's election to office.
- C. Any income, fees, salary or wages, directly or indirectly, received by such official from the Town of Ledyard during the two (2) years immediate proceeding such official's election to public office.

Section 8. Acknowledgment forms

- A. The Town Clerk shall provide a copy of the Code of Ethics to every Town and Board of Education official. Every Town official, including members of the Board of Education, shall sign and file with the Town Clerk an acknowledgement form, prepared by the Town Attorney, indicating his/her awareness of the provisions of this Code. The Superintendent of Schools shall sign and file with the Board of Education Human Resources Director an acknowledgement form, prepared by the Town attorney, indicating his/her awareness of the provisions of this Code. The Human Resources Directors of both the Town and Board of Education, respectively, shall: (i) provide current Town and Board of Education employees a copy of the Code of Ethics within one-hundred-twenty (120) business days of its effective date; and (ii) provide a copy of the Code of Ethics to every Town and Board of Education employee within sixty (60) business days of employment. Copies of the Code of Ethics may be sent to officials and employees electronically.
- B. Within ten (10) business days of the effective date of this ordinance, the Code of Ethics shall be incorporated by reference into all prospective contracts entered into by the Town of Ledyard and the Board of Education with a consultant. The Human Resources Directors of both the Town and Board of Education, respectively, shall provide current Town and Board of Education consultants a copy of the Code of Ethics within thirty (30) business days of its effective date. Copies of the Code of Ethics may be sent to consultants electronically.

- C. The Mayor and Superintendent of Schools shall develop a protocol for periodic training of employees concerning the Code of Ethics. The Commission shall develop a protocol for periodic training of officials.
- D. The Town Council shall approve a procedure for monitoring compliance with this section and approve the training protocols specified in subsection (c).

Section 9. Establishment and Qualifications of Ethics Commission.

- A. Structure. The Ethics Commission shall be comprised of five (5) regular members and two (2) alternate members. All regular members and alternate members of the Ethics Commission shall be electors of the Town. No more than two (2) of the regular members may be affiliated with any one political party. At all times, at least one regular member shall be unaffiliated with any political party. Both alternate members may not be affiliated with the same political party.
- B. Member and alternate member qualifications. No regular member or alternate members shall:
 - i. be currently employed by the Town or Board of Education;
 - ii. have been employed by the Town or Board of Education for a period of two years prior to being appointed to the Ethics Commission;
 - iii. hold any elective Town office or have been elected to any elective Town office for a period of two years prior to being appointed to the Ethics Commission;
 - iv. be a current member of the Board of Education or have been elected to the Board of Education for a period of two years prior to being appointed to the Ethics Commission;
 - v. serve as a member of another Town agency; vi. hold office in a political party or political committee;
 - vi. have been found in violation of any state, local or professional code of ethics.

If a current member of the Ethics Commission files to run for any elective Town office or for the Board of Education, such member shall resign from the Ethics Commission within seven (7) days of said filing.

- C. Compensation. Members will not be compensated for their service on the Commission.
- D. Organizational Meeting. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chair, Vice-Chair and a Secretary.
- E. Method and Terms of appointment: The Town Council shall appoint the Ethics Commission members in the manner provided in the Town Charter. Members of the Ethics Commission shall be appointed by a minimum of (7) seven affirmative votes of the Town Council. Members shall be appointed for a term of three (3) years. If a member is appointed to fill an unexpired term, then that member's term ends at the same time as the term of the person being replaced. 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 (1) 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) years term beyond his/her initial appointment. No member may serve more than three (3) terms total.
- F. Removal. The Town Council may remove members for cause and fill the vacancy in accordance with the Town Charter. Cause for removal shall include, but is not limited to, an unexcused absence from three (3) consecutive meetings. It shall be the responsibility of the Chairman of the Ethics Commission to notify the Town Council when a member has not properly performed his/her duties.

Section 10. Powers and Duties of Ethics Commission.

- A. The Ethics Commission shall be authorized to consult with the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.
- B. The Ethics Commission may render advisory opinions to any Town or Board of Education official, employee or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provisions of this Code of Ethics or is otherwise prohibited by law.
- C. The Ethics Commission may examine complaints and to make a determination of probable cause pursuant to the procedures outlined herein. The Ethics Commission may hold hearings concerning alleged violations of the code, may administer oaths, and may compel attendance of witnesses by subpoena to the extent permitted by law.
- D. The Ethics Commission may review the Code of Ethics policies and procedures on an as needed basis and may make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures. The Ethics Commission may take action to increase public awareness of the Code of Ethics.

Section 11. Ethics Commission Rules of Procedure.

- A. Advisory opinions. Any current, former or prospective Town of Ledyard or Board of Education employee, official or consultant may request an advisory opinion from the Ethics Commission as to whether conduct by that person or entity would violate the Code of Ethics. Any current Town or Board of Education official also may request an advisory opinion concerning the activities of any department over which he/she has jurisdiction or agency on which he/she serves.

Individuals initiating a request for an advisory opinion must do so by completing a form available through the Ledyard Town Clerk's Office or through the Town's website www.ledyardct.org. The form must contain a statement setting forth the advice requested and the relevant facts known to the individual making the request so that the Ethics Commission can reasonably be expected to understand the nature of the request.

The individual making the request must sign and date the form. Requests must be addressed in a sealed envelope to the Ethics Commission, c/o The Ledyard Town Clerk, 741 Colonel Ledyard Highway, Ledyard, CT 06339-1511 who will date stamp the envelope and forward the sealed envelope promptly to the chair or vice-chair of the Ethics Commission. Within five (5) business days that said request is received by the Town Clerk, the Town Clerk or his/her representative shall notify the chair or vice-chair of the Ethics Commission, or both, of same. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions. The chair or vice-chair of the Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the request.

The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting at an executive session, except upon the request of the individual that is seeking the advisory opinion to present the request in open session.

Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) business days from the day it first considers the request. The Ethics Commission may extend the time for a decision for up to an additional thirty business (30) days. All advisory opinions must be in writing and communicated to the individual making the request.

The Ethics Commission may decline to render an advisory opinion if (1) the subject matter is not covered by the Code of Ethics, (2) the known facts are incomplete or incorrect, and the omission or misstatements are material to the advisory opinion

requested, or (3) other reasonable grounds exist for not taking action. If the Ethics Commission decides to so act, it shall state its reasons.

B. Complaints.

- i. Filing of a Complaint. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope who will date stamp the envelope and forward the sealed envelope promptly to the chair or vice-chair of the Ethics Commission. On the day the sealed envelope is received by the Town Clerk, the Town Clerk or his/her representative shall notify the chair or vice-chair of the Commission, or both, and the respondent within five (5) business days of receipt of the complaint. The chair or vice-chair of the Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the complaint. The Ethics Commission shall also notify the respondent that a complaint was received and that it will conduct a probable cause determination and invite the respondent to provide any information the respondent deems relevant to the Ethics Commission's determination of probable cause. No complaint may be made under the Code of Ethics unless it is filed with the Ethics Commission within three (3) years after the violation alleged in the complaint has been committed.

The Complaint shall include the: (i) the name of the person accused (respondent); (ii) name of the person filing the complaint; and (iii) the specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

- ii. Probable Cause Determination

Within sixty (60) business days of the receipt of a complaint by the Chair or Vice-Chair, the Ethics Commission shall review and determine whether there is probable cause that a violation of the Code of Ethics has occurred. A finding of probable cause means that based on a review of the available information, the Ethics Commission determines that reasonable grounds exist to believe that the respondent engaged in prohibited conduct by the Code of Ethics. If the Ethics Commission does not make a finding of probable cause, the complaint shall be dismissed, and a copy of its decision shall be mailed to both the complainant and the respondent. Unless the Ethics Commission makes a finding of probable cause, a complaint alleging a violation of this Code of Ethics shall be confidential except upon the request of the respondent.

If the Ethics Commission makes a finding of probable cause, which shall require three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation.

- iii. Hearings

If the Ethics Commission decides that probable cause of a violation of the Code of Ethics exists, it will conduct a public hearing to determine whether or not a violation occurred in accordance with Uniform Administrative Procedure Act ("UAPA") (See Chapter 54 of the Connecticut General Statutes). At the hearing, the respondent will have the right to be represented by legal counsel; to present evidence and witnesses and compel the attendance of witnesses; to produce books, documents, records and papers; to examine and cross-examine witnesses; and to inspect and copy relevant and material records, papers and documents. Hearings are not governed by the legal rules of evidence and any information relevant to the matter may be considered. The Ethics Commission will respect the rules of privilege recognized by the law. Not later than ten business (10) days before the start of the hearing, the Ethics Commission will provide the respondent with a list of its intended witnesses. The Ethics Commission will make a record of the proceedings.

- iv. Final Decisions

Decisions by the Ethics Commission that a person is in violation of the Code of Ethics must result from the concurring vote of four (4) of its members. The Ethics Commission must render its decision within sixty business (60) days of the closing of the hearing. Such finding and memorandum will be deemed to be the final decision of the Ethics

Commission for the purposes of the UAPA. The respondent may appeal to the superior court in accordance with the provisions of Section 4-183 of the Connecticut General Statutes. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, the Ledyard Town Council and the Board of Education (if applicable) with a copy of its findings and memorandum within ten (10) business days after its decision. It will also advise the respondent of his/her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

v. Penalties for Violations of the Code of Ethics

A violation of the Code of Ethics may lead to any one or a combination of the following penalties:

- a. order to cease and desist the violation;
- b. pay a civil penalty of up to the maximum amount permitted by State law;
- c. censure;
- d. suspension without pay;
- e. demotion;
- f. termination of employment or contract; and
- g. Restitution of any benefits received because of the violation committed.

Penalties will be determined by a majority vote of the Town Council within sixty (60) business days after receipt of the finding and memorandum of Ethics Commission. The remedies and procedures specified in any applicable statutory and Charter provisions, personnel rules, contract grievance rules, or other work rules, policies, and procedures, shall be followed in the enforcement of this section.

Section 12. Severability.

If any part of this Code of Ethics 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.

Signed/Certified on: _____
Gary St. Vil, Chairman

Approve/Disapprove on: _____
Fred B. Allyn, III, Mayor

Published on: _____
Patricia A. Riley, Town Clerk

Effective: _____

History: Based on the public’s interest to establish standards of ethical conduct for all town officials and town employees and for those who serve or conduct business with the Town of Ledyard. This Code of Ethics and Ethics Commission was developed to establish guidelines for the conduct of those in public service; and to establish a procedure to be followed by the Ethics Commission in receiving, adjudicating, and reporting on alleged violations of the Code of Ethics.

VI. PUBLIC COMMENT

Chairman St. Vil thanked Councilor Garcia-Irizarry for her presentation regarding the proposed Ethics Ordinance. He asked those wishing to comment to please state their name and address for the record and to keep their comments to 3-minutes or less. He noted for those attending on-line to please put their name and address in the *Chat* and they would be called on in the order they were signed up. He also asked that if residents have already submitted written comments to the Town Council, that they not read their written communication, as Town Council has already received their comments, to allow time for all those who would like to speak this evening. However, he stated that residents were welcome to provide other comments that have not already been submitted.

Mr. Jeff Eilenberger, 2 Village Drive, Ledyard, stated through September 24, 2025 \$4,000 was spent in legal fees to provide assistance in drafting the proposed Ethics Ordinance. He noted as of February 23, 2026 the total legal fees for the current fiscal year were \$5,874 to provide legal advice with regard to the draft Ordinance. He stated going forward there was not a budget to support the Ethics Commission.

Mr. Eilenberger requested clarification on the following:

- **Business Days** – Mr. Eilenberger questioned does this mean *Business Days* or *Calendar Days*?

Councilor Garcia-Irizarry responded to Mr. Eilenberger explaining for the draft the proposed Ethics Ordinance; that “*Business Days*” were the days that the Town Hall was open for business. She noted because the Town Hall was not open on Friday, that would not count as a *Business Day*; and that holidays were also not a *Business Day*.

- **Advisory Opinions** - Mr. Eilenberger stated *Advisory Opinions* were not enforceable and were the way of the past. He stated the Town of Waterford was getting rid of their *Advisory Opinions*.
- **Former Councilor Dombrowski** – Mr. Eilenberger questioned the reason Mr. Dombrowski was not mentioned during the Ethics Commission Ordinance presentation this evening, noting that Mr. Dombrowski was well versed in *process*.

Councilor Brunelle noted that she also participated in the discussions regarding the proposed Ethics Ordinance as a member of the Administration Committee; and that she was not mentioned in this evening’s presentation either.

Councilor Garcia-Irizarry stated she did not mention former Councilor Dombrowski because he was not here this evening; so he was not in her mind right now. She noted when Councilor Buhle was the Administration Committee Chairman that they had a workshop to discuss the proposed Ethics Ordinance. She stated that she agreed that former Councilor Dombrowski always stuck to the process; and she noted that tonight’s Public Hearing was part of the Process.

Mr. Eilenberger stated that former Councilor Dombrowski was the King of Process, and he commented as Freshman Councilors that they have shown that they did not know *processes*. Councilor Brunelle stated that she had a Quality Assurance Background, noting that she understands *process*.

Councilor Garcia-Irizarry stated she worked with the Town Attorney to review every Section of the proposed Ethics Ordinance that was presented in the March 11, 2026 draft this evening. She stated that she could not think of anyone better than the Town Attorney to have the insight needed to draft the proposed Ethics Ordinance.

Mr. Eilenberger noted the Ethics Complaint that was filed against some Board of Education Members in Waterford. He stated they thought they had enough evidence to indite the four Board of Education Members, but as it turned-out there was not enough to indite the four individuals. However, he stated those four Board of Education members would always be known for the Ethics Complaint that was filed against them because their names were in the newspaper. He stated once someone was “*Under Investigation*” that their future was over. He questioned whether anyone on the Town Council has talked to other town’s that have an Ethics Commission.

Mr. M. Dave Schroeder Jr., 290 Whalehead Road, Gales Ferry, stated that he was present this evening to speak in-favor of adopting the proposed Ethics Ordinance for Ledyard. He stated that he wanted to recognize and appreciate the effort that went into this draft by everyone involved; both from the Town Council and the Public. He stated that it was clear that a great deal of time, thought, and input shaped what they were looking at tonight.

Mr. Schroder went on to note at its core, the proposed Ethics Ordinance was about maintaining public trust in local government. He stated that ethics codes were not unusual, noting that they were a standard part of municipal governance. He stated having a clear, transparent process benefited not just residents, but also town officials, employees, and volunteers who were trying to serve in good faith. He stated that this draft was thorough; noting that it provided clear definitions, processes, and guidance that the town currently does not have in a structured way. He stated every aspect of this proposed Ordinance has been discussed in Committee, reviewed under public scrutiny, and shaped through public input; criticisms, suggestions, and compromises. He stated the proposed Ordinance was the product of that process; and it was ready; commenting that alone was a strong reason to adopt it.

Mr. Schroeder continued by stating at the same time it was important to recognize that a complex system like an the establishing of an Code of Ethics and Ethics Commission cannot be fully evaluated on paper. He noted some aspects; such as the formal procedures and the timeframes for advisory opinions, would only really be understood once the Ordinance was in use. He stated when he talked about Ethics Ordinances over the past few months, he has often mentioned the City of Norwich because they have had an Ethics Code for over 30-years; and they have revised it multiple times, noting they adopted an Ordinance, used it, learned from it, and improved it. He stated for that reason, he would encourage the Town Council to think of this as a strong beginning; and to adopt the Ordinance, put it into practice, see what worked well and what worked less well, and then revisit it after some agreed-upon period of time with real experience behind it. He stated if adjustments were needed, and he commented that there surely would be some, that they could make them.

Mr. Schroeder concluded his comments by stating that it was worth noting that without a clear Ethics Framework, that concerns do not disappear, stating that they tend to fester under the surface, whether as rumors or real concerns, and they slowly erode confidence in government. He stated by having a defined process; even one that evolves, that it was ultimately better for everyone and for the town. He stated overall, he urge the Town Council to move forward with the proposed Ethics Ordinance; adopt it, give it a chance to work, and do so with the understanding that it could and should be refined over time. He asked that the Town Council to please *Vote Yes*. Thank you.

Mr. Bradon Sabbage, 16 Nutmeg Drive, Gales Ferry, stated they have come a long way from the first draft of the proposed Ethics Ordinance. He stated that was presented this evening to support the March 11, 2026 draft. He stated with support from both sides of the aisle that the proposed Ordinance would pass, noting that this was an opportunity to unify. He stated that they had to make sure the proposed Ethics Ordinance would be used for its intended purpose; and that it does not become political; or that it would not be directed at a certain person because they do not agree with them. He stated that he has been traveling around their District, and he stated that there was so much division between the two political parties, commenting that he did not know how to unify that. He stated if they all had a cup of coffee together and had more conversations, that there may be places where they could unify. He stated he supported the proposed Ethics Ordinance; and he hoped that it would be used to get the bad actors out of the way; and not to attack the other political party.

Mr. Mike Cherry, 5 Whippoorwill Drive, Gales Ferry, stated that he supported the proposed Ethics Ordinance, as presented in the March 11, 2026 draft noting the amount of work that went into it. He stated although the proposed Ordinance was not perfect, that once they get it implemented that they would find things that they would like to change. Mr. Cherry proceeded to note the following editorials:

- Section 10. Powers and Duties of Ethics Commission
 - A. *The Ethics Commission shall be authorized to consult with the Town Attorney or another attorney hired by the Commission **if so authorized by the Town Council.** The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.*

Mr. Cherry suggested rather than put the authorization at the end of the paragraph they put it at the beginning as follows:

If so authorized by the Town Council, the Ethics Commission shall ~~be authorized to consult with the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council.~~ The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.

- Section 10. Powers and Duties of Ethics Commission

D. *The Ethics Commission may review the Code of Ethics policies and procedures on an as needed basis and may make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures. The Ethics Commission may take action to increase public awareness of the Code of Ethics.*

Mr. Cherry noted as he has stated at previous meetings that he did not see a “**Code of Ethics**”. He stated what he sees was “*Conflict of Interest*”. He stated as a volunteer member of some Town Commissions that it was important for him; and for other volunteers to know exactly what the rules were.

Councilor Garcia-Irizarry explained that she included language for a *Code of Ethics*; however, she stated the Town Attorney removed that language, because he stated the *Code of Ethics was the behaviors that were defined in the proposed Ethics Ordinance*. Mr. Cherry stated that he understood the Attorney’s guidance, however, he stated it was important to put a plaque on the wall stating this was “*Ledyard’s Code of Ethics*” as stated in their Ordinance. He stated that he would thank the Town Attorney for his guidance, and say that he respectfully disagreed with the Town Attorney; noting that he would provide a Code of Ethics. He stated although this was his opinion; that it does not make it right.

- Section 11. Ethics Commission Rules of Procedure; Paragraph B; subparagraph (i) “*Filing a Complaint*” states in part the following:

“..... ***On the day the sealed envelope is received by the Town Clerk, the Town Clerk or his/her representative shall notify the chair or vice-chair of the Commission, or both, and the respondent within five (5) business days of receipt of the complaint.....***”

Mr. Cherry questioned whether the Town Clerk had to notify the Chairman ***on the day the Complaint was received***” or whether it was “***within five (5) business days of receipt***”. He stated it was not clear and he suggested the sentence start with “***Within five business days***”.

- Section 11. Ethics Commission Rules of Procedure; Paragraph B; subparagraph (ii) “*Probable Cause Determination*” states in part the following:

“.....*the Ethics Commission determines that reasonable grounds exist to believe that the respondent engaged in prohibited conduct by the Code of Ethics.....*”

Mr. Cherry noted this language would be clearer if the order of the words ***prohibited conduct*** were switched as follows: “***conduct prohibited***”.

- Section 9. Establishment and Qualifications of Ethics Commission; Paragraph B. *Member and alternate member qualifications*; subparagraph (iii)

(iii) hold any elective Town office or have been elected to any elective Town office for a period of two years prior to being appointed to the Ethics Commission;

Mr. Cherry questioned whether this language was intended to preclude officers that were in a political party such as the Democratic Town Committee or the Republican Town Committee. He stated it was not clear if this language would eliminate those from serving on the Ethics Commission.

- Section 9. Establishment and Qualifications of Ethics Commission; Paragraph A.

(A) Structure. *The Ethics Commission shall be comprised of five (5) regular members and two (2) alternate members. All regular members and alternate members of the Ethics Commission shall be electors of the Town. **No more than two (2) of the regular members may be affiliated with any one political party.** At all times, at least one regular member shall be unaffiliated with any political party. Both alternate members may not be affiliated with the same political party.*

Mr. Cherry stated the town had more than two parties in town; and therefore, the way this paragraph was written that it worked.

Mr. Cherry concluded his comments by stating the Administration Committee did a wonderful job in drafting the proposed Ethics Ordinance; and that he would echo Mr. Schroeder's comments this evening, in that the Committee collected everyone's comments and have come out with a workable document. He continued by noting Mr. Eilenberger's comment regarding the \$5,000 - \$6,000 in legal fees to support drafting the proposed Ordinance. Mr. Cherry stated the first Complaint would blow through \$5,000 - \$6,000 in a heartbeat. He suggested the Town Council include a separate line in the Annual Budget so the legal fees spent to support Ethic Matters were transparent; and would not be lumped into another legal fee budget line, such as the Mayor's Legal Fees Budget. He stated by including a Ethics Legal Fees expenditure line with \$1.00 that they would have a budget line to transfer funds into should a Complaint be filed and funding for legal costs were required. He congratulated the Administration Committee for a good job.

Mr. Carlo Porazzi, 30 Chapman Lane, Gales Ferry, thanked everyone who put time into the proposed Ethics Ordinance stating that the Ethics Ordinance was needed. He stated that he did not think they were weaponizing the Department of Justice (DOJ) with the proposed Ordinance. He stated that they were not looking for bad actors, however, he stated that it was important to have guidelines. He stated he worked for a large company, and every year they had to review their Code of Conduct and sign off on it. He stated if their local government was run like it should be run, noting that everyone was not always going to agree, but that he would hope if there was a Complaint that it would not get past the first Ethics Step, which was the Review. He stated Complaints may not ever have to go as far as some people seemed to fear that they would go; and the Ethics Ordinance was not going to be used as a weapon. He thanked the Town Council for their work and he stated that he appreciated their time.

Mr. Brandon Graber, 42 Church Hill Road, Ledyard, stated that he was an Elected Official serving on the Board of Education and that he was looking for clarification regarding the following:

- *Section 7. "Required Filings for Certain Town and Board of Education Officials"*

Mr. Graber stated this Section required Elected Officials to file a *Statement of Income Form* by January 1st; and he asked the following questions:

- ✓ Mr. Graber questioned if he does not get elected in November, would that mean he would not have to file the *Statement of Income Form* divulging his income on January 1st?
- ✓ Mr. Graber questioned for those who were elected this past November 4, 2025; would they have to file *Statement of Income Form* for the past two years?
- ✓ Mr. Graber was a Poll Worker and received income from the town, would that income need to be included on his *Statement of Income Form*. Mr. Graber noted that his kids work at the Polls and his wife worked for the town. Would their earnings be considered indirect income to his family. Would he need to divulge all of his family's income from the town on his *Statement of Income Form*.
- ✓ Mr. Graber noted that he won a Parks & Recreation Raffle, and received a check that he donated the check back to Parks & Recreation. Would that Raffle Check be income that he would have to divulge on his *Statement of Income Form*?

- ✓ Mr. Graber questioned who had access to the *Statement of Income Forms*; and when they would have access to his *Statement of Income Form*? He stated the proposed Ordinance does not state that the Ethics Commission would review the *Statement of Income Forms*. The proposed Ordinance does not state at what point the *Statement of Income Form* would be subject to a Freedom of Information Act Request (FOIA); or whether it was FOIA-able.

- Section 9. Establishment and Qualifications of Ethics Commission; Paragraph B.
 - (i) *Member and alternate member qualifications:*

No regular member or alternate members shall: be currently employed by the Town or Board of Education;

- ✓ Mr. Graber questioned whether his spouse could be employed by the Board of Education or the Town?
- Section 11. *Ethics Commission Rules of Procedure*; Paragraph B; subparagraph (i) “*Filing a Complaint*”
- ✓ Mr. Graber questioned at what point does a Complaint become subject to a Freedom of Information Act Request (FOIA).

Councilor Garcia-Irizarry stated that a Complaint would become subject to a Freedom of Information Act Request (FOIA) if the Ethics Commission finds *probable cause*, explaining at that point the Complaint would become public. She stated if the Ethics Commission does not find *probable cause* everything would remain confidential.

- ✓ Mr. Graber noted Mr. Eilenberger’s comments regarding the Ethics Issue in Waterford, and he questioned what recourse an individual would have if the information were to get out to the public before the Ethics Commission finds *probable cause*?

Councilor Garcia-Irizarry noted that the proposed Ethics Ordinance included a Section regarding divulging information that the public does not have access to. She stated if someone divulged something that was confidential that it would be a violation.

Ms. Pam Ball, 674 Shewville Road, Ledyard, attending remotely via Zoom, Farmers Market Committee Chairman, noted as she has stated many times during this process that she was against having an Ethics Commission. She stated the Town Council has not made a case for why the town needed an Ethics Commission. She stated the major complaints have been the Cashman Project and construction of Apartments at the Sweet Hill Farm Property; and she noted an Ethics Commission was not going to stop those developments. She stated the Ethics Commission would not discover any fiscal issues within the town because they would not be carrying out audits. She proceeded to ask the following questions:

- ✓ What issues does the Town Council expect the Ethics Commission to address? Do they have any examples from other towns that have Ethics Commissions on what issues they have addressed?
- ✓ What are the bad actors they expect to find? Ms. Ball stated that the town deserved to know what they think they were going to find. She stated that it was ridiculous to think that members of the Ledyard Beautification Committee, the Library Commission; or the Ledyard Farmers Market Committee were going to gain financially by volunteering; or that they were going to be bribed to have an effect on Town Policies.
- Section 3. Definitions:
Ms. Ball stated “*Advisory Opinion*” and “*Complaint*” should be defined so the differences were clarified.

“***Beneficial interest***” means any nonfinancial interest or special treatment that is not common to other citizens of the Town.

Ms. Ball stated that this would basically allow anyone to complain about anything and about anyone on any agency. She questioned if someone did not like the way she does something at the Farmers Market they could file a Complaint to the Ethics Commission.

She questioned if someone went to a protest, could someone file a Complaint with the Ethics Commission; and would that be considered a legitimate complaint.

“Gifts” Ms. Ball stated the definition of *Gifts* should **exclude** “*family members*”.

“Officials” Ms. Ball stated the definition of *Officials* should **include** “*volunteers*”, because she thought that people were not aware of how many people volunteer to serve the town.

Ms. Ball questioned whether the proposed Ethics Ordinance meant that volunteer members who serve on the Ledyard Farmers Market Committee cannot be Vendors at the Market; and that Vendors could not participate on the Farmers Market Committee. She stated currently there were two volunteers serving on the Farmers Market Committee who were also Vendors at the Market; and she questioned whether this would be a *Conflict of Interest*; and whether they would have to choose between being a Vendor or volunteering their time to serve on the Farmers Market Committee. She stated the Farmers Market Committee Members paid the same fees as the other Vendors; they recuse themselves from the votes regarding the Vendor Fees. She stated if she had to choose between being the Farmers Market Manger and being a Vendor at the Market that she would step down from serving on the Farmers Market Committee. She noted the significant amount of time the volunteers dedicate to the town during the year and to put the Farmers Market on each week during the summer. She asked that the Town Council consider what it would mean if they were to lose one or two members of Farmers Market Committee.

Ms. Ball suggested they exclude the Volunteers who bring joy to the Town from the proposed Ethics Ordinance, because all volunteers do not have roles that were equal to employees. She stated the way she understands the proposed Ethics Ordinance that she thought it puts in peril the people who were volunteering to serve the town to be vendors at the Farmers Market. She concluded her comments by noting that she had some non-substantive editorials/formatting corrections that she would email to the Town Council.

Chairman St. Vil asked Councilor Garcia-Irizarry for those who want to adhere to the proposed Ethics Ordinance, whether there was a mechanism that would allow people to seek clarification regarding their interpretation of what the proposed Ordinance would mean for them.

Councilor Garcia-Irizarry stated for interpretation or clarification regarding the a behavior that they were doing; or not doing; or if something was a *conflict of interest* or if it would be a *violation of the code* they could request an Advisory Opinion as provided in Section 11. *Ethics Commission Rules of Procedure*; Paragraph A: “*Advisory Opinions*”. She noted as Mr. Eilenberger mentioned this evening, Advisory Opinions were not enforceable. She stated the person could take the advice ;or choose not to follow the advice. Ms. Ball stated that the Farmers Market Committee Members were not in a position to choose; or not choose to follow the Advice, noting that they really need to have an answer on the question as to whether Farmers Market Committee Members could be vendors at the Market. Councilor Garcia-Irizarry explained that it does not prohibit people from performing work for the town, noting that they had to follow the same process as everyone else, stating it was about not giving preferential treatment.

Chaiman St. Vil stated that Councilor Garcia-Irizarry was clarifying the intent to the Ordinance. He noted as a lot of their residents have said this evening, they may iterate in the future as they take on new learnings. He stated there may be some folks that have a specific interpretation and they were going to behave in a way that they feel was best for them and their lives and their contributions. He stated that he wanted to make sure there was a process in-place where folks had the opportunity to ask a question if they were unsure about something; and that Councilor Garcia-Irizarry answered his question by stating the proposed Ordinance provided the opportunity for the Ethics Commission to provide Advisory Opinions.

Chairman St. Vil continued by questioning when the proposed Ethics Ordinance would become effective once the Town Council approved it; in other words was there a certain period of time that the Ordinance would be in-place, but it would be dormant to allow folks a period of time to comply with the Ordinance. Administrative Assistant Roxanne Maher noted in accordance with Chapter III; Section 5 “*Public Hearing On, Publication Of, And Passage of Ordinances*”:

“.....after passage, the Ordinance shall be filed with the Town Clerk..... Within ten (10) days after final passage, a summary of the ordinance(s) shall bepublished on the Town Website. Every ordinance, unless it shall specify a later date, shall become effective on the twenty-first (21) day after such publication following its final passage.”

Ms. Ball stated the Farmers Market Committee Members were volunteers working at the Market. She stated anyone who was on the Farmers Market Committee and was a Vendor at the Market was selling their goods, explaining that they were not contractors and they were not working for the town. She stated the two Committee Members who were Vendors at the Market adhere to all the Market Guidelines, and they pay the same fees as the other vendors, etc. She stated the money the Vendors were making at the Market was for themselves; and she did not know whether this was conflict; and whether it was her responsibility to ask for an Advisory Opinion. She stated the Farmers Market was not like any other Town Committee, explaining that they do not have a town funded budget, noting that the Market generated its own income from the vendor fees to pay their operational expenses to hold the Market each week. She stated the volunteer members of the Farmers Market Committee donate thousands of hours every year to run the Market; and she did not want to go into the upcoming Farmers Market Season with any questions over their heads as to whether or not Committee Members could also be Vendors at the Market. She stated if she had to choose between volunteering to serve on the Committee or to be a Vendor at the Market, that she would choose to be a Vendor. She stated the Town had an amazing Farmers Market Committee and they have asked for help millions of times, but they do not get any response; and she noted that the town may want to think twice about jeopardizing that.

Chairman St. Vil stated that Ms. Ball had some questions that were unique to the Farmers Market Committee. Councilor Brunelle stated the Ethics Commission was being made for people who were being unethical and were doing shady things under the table. She stated if a Farmers Market Committee Member was running a Vendor Booth at the Market, that they were doing that openly, honestly, and they were following the same rules as all the other vendors, and that was not an unethical behavior. She stated that they were not hiding anything or breaking any rules, therefore, there was nothing unethical about what they were doing.

Chairman St. Vil stated that they all understand that the intent of the proposed Ethics Ordinance is not to target individuals, but to provide a fair and consistent framework. He stated they were not talking about malicious people that were trying to circumvent the system, noting that there were going to be honest people that want to comply with the proposed Ethics Ordinance that have unique situations like Ms. Ball, who were going to have questions as to whether the proposed Ordinance was applicable to them, noting that they were going to have billions of questions. Therefore, he stated he was questioning “*the process*” noting that once the proposed Ethics Ordinance was adopted that they would not have an Advisory Commission right-a-way. Therefore, he stated how members of the community could continue to serve the town in whatever capacity they were serving in; and get their questions resolved, while living under the Ethics Ordinance, stating this was a valid question that that may require additional review outside of tonight’s hearing.

Ms. Ball stated they had over 1,000 visitors to the Farmers Market each week that could file a Complaint for any reason based on the “Advisory” portion of the proposed Ethics Ordinance. Councilor Garcia-Irizarry stated all the Councilors and everyone involved with drafting the proposed Ethics Ordinance worked hard to define the behaviors that were *Ethical* and *Not Ethical*. She stated if someone complained for whatever reason, that if the person followed the same procedure that everyone else followed, then it would not be a problem. She stated the proposed Ethics Ordinance did not apply to the Vendors at

the Farmers Market. She stated the proposed Ethics Ordinance only applied to Town Officials, Town Employees, and Consultants, as defined in the proposed Ordinance. She stated as they worked through the process and as questions were raised such as whether the person who cut the grass at the Parks & Recreation Facilities and provided advice on fertilizing the grass would be a consultant that the definition for the *Consultant* was narrowed down.

Ms. Ball stated the Farmers Market Committee Members and the Vendors were not *Consultants*, and she was not concerned about the other Market Vendors, noting that her concern was regarding Farmers Market Committee Volunteers who also want to be Vendors at the Market. She stated with this proposed the proposed Ethics Ordinance that people in town were going to have questions as to whether or not there should be vendor market managers, or vendor committee members. She stated the proposal opened up a big can of worms for the Farmers Market Committee.

Chairman St. Vil suggested the Administration Committee answer questions based on how they interpreted the proposed Ethics Ordinance. He stated they could pressure test the proposed Ethics Ordinance using the specific questions that were asked by Board of Education Member Brandon Graber, and Farmers Market Committee Chairman Pam Ball, noting that they could put their questions in an email to the Administration Committee. He stated that the Administration Committee would not be able to answer everyone's questions because they would be inundated. However, he stated as authors of the proposed Ethics Ordinance the Administration Committee would gain some insight as to whether the people were applying interpretations that do not exist; or whether there were some potential grey areas in the proposed Ethics Ordinance. He asked whether the Administration Committee would be willing to do that. Councilor Garcia-Irizarry stated that she welcomed emails, questions, and comments, noting that the Administration Committee could include the emails on their Agendas to discuss during their meetings. She asked anyone who had questions that were not answered during tonight's Public Hearing to email her, noting that she was available to answer questions.

Mr. Mike Cherry, 5 Whippoorwill Drive, Gales Ferry, stated the proposed Ethics Ordinance ***does not say that the Town Council would validate Advisory Opinions; or actions on Complaints.*** He stated the Ethics Commission would come back to the Town Council with their answer. He noted Mr. Graber's comment regarding being paid as a Poll Worker, stating that the Poll Workers used to be paid with a 1099 Form, however; he stated this year they were paid with a W-2 Form, which made them a town employee. He stated they should pass the proposed Ethics Ordinance and allow the Ethics Commission to develop and publish their Policies and Procedures and let them do their job and take the actions. He stated none of the members of the Town Council could be on the Ethics Commission, therefore, he stated that they should not insert their opinions in-place of the Ethics Commission. He stated "*Are there going to be questions...Absolutely.....Are you going to have answers.... No*".

Ms. Angela Cassidy, 62 Hurlbutt Road, Gales Ferry, attending remotely via Zoom, stated Ledyard had a great Farmers Market and she thanked Ms. Ball for all of her work. She stated if she was not mistaken that she thought there was \$20,000 of taxpayer money associated with the Farmers Market. Administrative Assistant Roxanne Maher stated the Farmers Market Committee does not have a line in the Annual Budget that was funded by tax dollars. She explained, as Ms. Ball stated earlier this evening, the Farmers Market generated their own funds through the vendor fees that were used to pay to operate the Market. Ms. Ball stated the Farmers Market Committee operated the Market solely on vendor fees. She also noted that the Farmers Market Committee was also working to use the funding they generate from the vendor fees to make improvements to the Pavilion, noting that all of the money goes back into the Market to pay for the Operations, Children Activities, Entertainment, etc. Ms. Cassidy stated whether or not the Farmers Market was making money was a whole different thing. She stated what she was saying was that there was money exchanged, noting that they had income and expenses. Ms. Maher explained that the Farmers Market Committee and the Ledyard Beautification Committee do not have a line in the Annual Budget, noting that they rely solely on donations, vendor fees, and other funding sources; stating that they do not have town budgets that were funded by taxpayers dollars for either of those two

town committees. Ms. Cassidy stated that if there was money involved that there should be controls in the process. She stated this was not a *gotcha opportunity*, but that they should have a preventative tool in-place that was a plus for everybody, if they were using it correctly. She noted that she would hope that the Ethics Commission would be just as much as a preventive tool if it was anything else; and that they would not need to use it; and that it would save the town money on legal fees in the long run, versus having a bad actor leaving the town responsible. She thanked Councilor Garcia-Irizarry, Councilor Buhle, Councilor Brunelle, and Councilor Barnes for all their hard work and for coming together. She stated that she hoped they would put something through and get it moving and make some small necessary changes if possible along the way. She stated that she liked Mr. Cherry's suggestion to include a Code of Ethics; and that she also sent over a small change.

Ms. Ball addressed Ms. Cassidy's comments regarding the exchange of money and that there should be controls and processes in-place. Ms. Ball stated the Farmers Market does not have access to their money, explaining that the money the Farmers Market generated was turned over to the Town Treasurer who deposited the funds into a town account. She stated that the Farmers Market follows the town's procedures and processes relative to the use of Purchase Orders and the payment of invoices. She stated members of the Farmers Market Committee do not have access to the money. She stated it was a huge problem that people do not understand how the Farmers Market operated in their Town.

Ms. Lee Ann Berry, 78 Military Highway, Gales Ferry, attending remotely via Zoom, stated that she supported the proposed Ethics Ordinance. She thanked Town Council members for their time and effort and for the thoughtful work that has gone into the draft Ordinance. She stated it has been a long detailed process and that she appreciated the commitment shown to create something that would serve their community well. She stated that she also shared the comments that were provided by Mr. Schroeder this evening. She thanked the Town Council for giving the residents the opportunity to be part of this process.

Ms. Deborah Edwards, 30 Bluff Road West, Gales Ferry, attending remotely via Zoom, stated she has spoken in-favor of the proposed Ethics Ordinance at just about every meeting. She stated she wanted to go on record at tonight's Public Hearing that it was beyond time for the proposed Ethics Ordinance to be put in-place. She stated a lot of work has gone into it, noting that they now had a good product. She stated that she agreed with Mr. Schroeder that the Ethics Ordinance could be tweaked as they go along. She stated that she also agreed with Mr. Porazzi, in that, nobody was trying to weaponize the Department of Justice (DOJ). She congratulated everyone who put the in time and effort to get it done.

Councilor Garcia-Irizarry stated the proposed March 11, 2026 draft of the proposed Ethics Ordinance presented this evening was a result of all the feedback they received from the public and from their town employees. She stated that she started the draft Ordinance and that she wanted to thank Councilors Buhle, Brunelle, Dombrowski, and Barnes for their work and for staying with it throughout the process. She stated the proposed Ethics Ordinance was not the product of one person, noting that many of them put in a lot of time. She stated once the Ethics Commission was appointed that one of their jobs would be to answer questions. She stated that her hope was that they would never have to use the Ethics Ordinance, because there would be no complaints and no advisory opinions needed. However, she stated having a document to tell them what they could do and could not do was important because what they currently had was subjective. She stated by having the definitions and the Ethics Ordinance in-place that it would protect them, because it was not subjective. She thanked the public and the town employees who provided a lot of feedback. She stated Attorney Matt Ritter reviewed the proposed Ethics Ordinance to make sure it was enforceable. She stated if there was language that was not enforceable that Attorney Ritter removed the language. She stated until the town had an Ethics Commission appointed that she welcomed questions, noting that she would try to answer the questions to the best of her ability. However, she stated that her answers would only be her opinion to help clarify things, until they could ask the Ethics Commission, who would have the final say.

Chairman St. Vil thanked Councilor Garcia-Irizarry, the Administration Committee Members, both past and present, who worked on the proposed Ethics Ordinance; and the residents who provided comments this evening, and everyone who previously provided input throughout this process.

VII. ADJOURNMENT

Chairman St. Vil stated hearing no further public comment, that the Public Hearing was adjourned at 6:50 p.m.

Transcribed by Roxanne M. Maher
Administrative Assistant to the Town Council

I, Gary St. Vil, Chairman of the Ledyard Town Council,
hereby certify that the above and foregoing is a true and correct
copy of the minutes of the Public Hearing held on March 25, 2026

Attest: _____
Gary St. Vil, Chairman