



TOWN OF LEDYARD CONNECTICUT

741 Colonel Ledyard Highway
Ledyard, Connecticut 06339-1551
(860) 464-3203
council@ledyardct.org

Town Council ~ AGENDA ~

Chairman Gary St. Vil

Regular Meeting

Wednesday, February 25, 2026

7:00 PM

Town Hall Council Chambers

In-Person: Council Chambers Town Hall Annex

Remote: Information noted below:

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

<https://ledyardct.zoom.us/j/87251764456?pwd=R7ZagNwsW8KVm13GZJaNK5sJkM3wKv.1>

Audio Only: Telephone: +1 646 558 8656; Meeting ID: 872 5176 4456; Passcode: 253966

- I. CALL TO ORDER
- II. PLEDGE OF ALLEGIANCE
- III. ROLL CALL
- IV. PRESENTATIONS

****ADD ON****

Update on Flock Group DBA Flock Safety License Plate Readers.

Attachments: [Malcome-Buhle-St Vil-Chief Rich -Flock License Plate Readers-Email Thread-2026-02-17-22](#)

Board of Education Proposed Fiscal Year 2026/2027 Budget

Attachments: [BOE-TC Capital Plan Presentation2026-02-11](#)

- V. COMMENTS OF TOWN COUNCILORS
- VI. RESIDENT & PROPERTY OWNERS (COMMENTS LIMITED TO THREE (3) MINUTES)
- VII. COMMITTEE COMMISSION AND BOARD REPORTS
- VIII. REVIEW AND APPROVAL OF MINUTES
 - Public Hearing Minutes of February 11, 2026
 - Regular Meeting Minutes of February 11, 2026

Attachments: [PUB-HEAR -MIN-2026-02-11-ORD-AVALOINA TAX EXEMPT STATUS](#)
[TC-MIN-2026-02-11](#)

IX. COMMUNICATIONS

Communications List - February 25, 2026

Attachments: [C-LIST-2026-02-25](#)
[Boyle-Stand for Flag-Conduct town business-email-2026-02-13](#)
[Boyle-American with Disabilities Act- Town Council -Reading of Correspondence-email-2026-02-16](#)
[Boyle-Ethics Complaint Proceedings -Town Council Correspondence-Meetings-email-2026-02-16](#)
[DTC-APPOINT APPL-BOWEN-IWWC-2026-02-16](#)
[RTC Appoint Appl-Harty-Beautification Committee. 02-17-2026](#)
[RTC Appoint Appl-Winkelman Beautification Committee-02-17-2026](#)
[McKeon-Freedom of Information Act-Correspondence-email-2026-02-16](#)
[Hosey-Committee to Investigate Separating the Planning & Zoning Commission-email-2026-02-21](#)
[Malcome-Buhle-St Vil-Chief Rich -Flock License Plate Readers-Email Thread-2026-02-17-22](#)
[ACTION LTR-TC MTG-2026-02-11](#)
[ACTION LTR-TC -CLERK-MTG-2026-02-11-LANTERN HILL ROAD BRIDGE](#)
[APPOINT LTR-HARWOOD-SUSTAINABLE CT-2026-02-12](#)
[APPOINT LTR-WALSH-BEAUTIFICATION-CMT-2026-02-12](#)
[Request Names -Ad Hoc Committee-Process for Capital Building Projects-Memo-2026-02-11](#)
[Brunelle-Ryan-St Vi-Rules of Procedure-emailThread-2026-02-15-17](#)
[Budget Work Session Schedule-Department Heads-Memo-2026-02-24](#)
[FISCAL YEAR 2026-2027 BUDGET PROCESS](#)
[BUDGET-2026-03](#)
[BUDGET-2026-04](#)
[BUDGET-2026-05](#)
[BUDGET-2026-06](#)

X. REFERRALS

XI. COUNCIL SUB COMMITTEE, LIAISON REPORTS

1. Administration Committee Report Fiscal Year 2025/2026
2. Community Relations Committee for Diversity, Equity & Inclusion – Report- Fiscal Year 2025/2026
3. Finance Committee Report Fiscal Year 2025/2026

4. LUPPW Committee Report Fiscal Year 2025/2026

XII. REPORT OF THE MAYOR

Mayor Report Fiscal Year 2025/2025

XIII. OLD BUSINESS

XIV. NEW BUSINESS

Administration Committee

1. MOTION to set a Public Hearing (Hybrid Format - Video Conference and In-Person) Public Hearing date to be determined to be held in Council Chambers, Town Hall Annex, 741 Colonel Ledyard Highway, Ledyard, Connecticut, to receive comments and recommendations regarding a proposed "An Ordinance Establishing a Town of Ledyard Code Of Ethics".

Attachments: [Ledyard Ethics Ordinance \(FEB 2026 DRAFT\)-23452496-v3-CLEAN COPY](#)

[Change-Pro Redline - Ledyard Ethics Ordinance \(FEB 2026 DRAFT\)-23452496-v2 and Ledyard Ethics Ordinance \(FEB 2026 DRAFT\)-23452496-v3](#)

[PUB HEAR-LEGAL NOTICE-2025-11-10--ETHICS](#)

[ORDINANCE-DRAFT 2025-10-29](#)

[10-29 Clean Copy with Employee and Public Feedback-TRACK CHANGES](#)

[BUHLE EMAIL-2025-10-28-TRANSMITTING ADDITONAL CORRESPONDENCE-REDLINE](#)

[Secondary Attorney Revisions Clean Copy 10-28](#)

[Secondary Attorney Revisions Redline 10-28](#)

[Final Draft with Attorney Revisions - Clean Copy](#)

[Modified Draft with Attorney Revisions](#)

[Modified Draft with Attorney Revisions-with Attorney email-2025-10-27](#)

[BUHLE-ATTORNEY-PROPOSED ETHICS ORDINANCE-EMAIL COMMUNICATION-2025-10-27](#)

[Redline Glastonbury to Ledyard ordinance](#)

[Ethics Ordinance DRAFT-2025-10-27](#)

[Code of Ethics Searchable Version-GLASTONBURY](#)

Finance Committee

2. MOTION to adopt a proposed "An Ordinance of the Town Of Ledyard Authorizing Avalonia Land Conservancy, Inc., to Receive Property Tax Exempt Status As of the Date of Purchase of Real Property to be Preserved And Maintained As Open Space" as presented in the draft dated January 15, 2026.

Attachments: [ORDINANCE AVALONIA TAX ABATEMENT-DRAFT-2026-01-15](#)

[Avalonia Land Conservancy-Request Tax Abatement -154 Stodddards](#)

[Wharf Rd-CGS12-81dd-ltr-2026-01-12](#)

General Items

3. Discussion and possible action on the Town Council's "Goals Letter"

Attachments: [Letter to Residents-Town Council Goals-2026-02-021DRAFT-GARY](#)

XV. ADJOURNMENT

DISCLAIMER:

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

The Town Council's Official Agenda and final Minutes will be on file in the Town Clerk's Office.



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2902

Agenda Date: 3/4/2026

Agenda #:

FINANCIAL BUSINESS REQUEST (FBR)

Motion/Request:

Update on Flock Group DBA Flock Safety License Plate Readers.

Background:

Ledyard Police Depart and the Ledyard Emergency Communications Center are in the process of implementation of their Automated License Reader (APLR) project. Flock Group DBA Flock Safety is the sole provider of this service in our region and surrounding agencies including the Connecticut State Police, Groton Town, Groton City, Mashantucket, Norwich, and Stonington Police are all Flock Safety clients. To use the system most effectively for crime prevention and investigation, it is critical that we share and receive APLR data from our local and state law enforcement partners. The town's initial cost for this project is expected to be approximately \$12,000.

Department Comment/Recommendation:

This request was initiated by Chief Rich.

Finance Director Comment/Recommendation:

Given the sole source aspect, I support this request.

Mayor Comment/Recommendation:

(type text here)

Roxanne Maher

From: Gary St. Vil
Sent: Sunday, February 22, 2026 4:39 PM
To: Roxanne Maher
Cc: Town Council Group
Subject: Fw: Flock LPR Cameras – Follow-Up Informational Update (2/25)

Roxanne,

Please add Flock LPR camera update to the informational section of Wed's Town Council meeting.

Respectfully,

Gary A. St. Vil

Chairman, Ledyard Town Council
741 Colonel Ledyard Highway
Ledyard, CT 06339
(860) 980-0656 | gsvil@ledyardct.org
www.ledyardct.org

From: John Rich <chief.rich@ledyardct.org>
Sent: Saturday, February 21, 2026 11:14 PM
To: Gary St. Vil <GSVil@ledyardct.org>
Subject: Re: Flock LPR Cameras – Follow-Up Informational Update (2/25)

Gary,

I'll be happy to come in to share some information.

Chief

On Feb 21, 2026, at 3:40 PM, Gary St. Vil <GSVil@ledyardct.org> wrote:

Chief,

At our December meeting, the Town Council voted to approve the Flock LPR contract following your presentation. Since then, the Council has received resident inquiries regarding privacy safeguards, data retention, and certain contract provisions. Would your department be able to provide a brief follow-up informational update at our February 25 meeting?

It would be helpful if you could address:

- Data retention policies
- Data access controls and audit safeguards
- Information-sharing parameters
- Any public safety outcomes or early results to date
- Clarification on contract cancellation provisions

The intent would be informational only, ensuring residents have a clear understanding of the program's safeguards and operational benefits.

Please let me know if February 25 works for you.

Respectfully,

Gary A. St. Vil

Chairman, Ledyard Town Council
741 Colonel Ledyard Highway
Ledyard, CT 06339
(860) 980-0656 | gsvil@ledyardct.org
www.ledyardct.org

From: Gary St. Vil <GSvil@ledyardct.org>
Sent: Saturday, February 21, 2026 3:36 PM
To: Jason <jason.malcolm@protonmail.com>; Jessica Buhle <Jbuh@ledyardct.org>
Cc: Town Council Group <TownCouncil@ledyardct.org>
Subject: Flock LPR Cameras

Hi Jason,

Thank you for reaching out and for reviewing the contract materials.

As you know, the Town Council previously voted to approve the Flock contract following a presentation at our December meeting. That said, questions involving privacy, data management, and public safety technology deserve continued transparency and review. In light of your inquiry and others that have been raised, I will be requesting an informational update from the Police Department regarding:

- Data retention and access policies
- Oversight safeguards and audit controls
- Information-sharing parameters
- Any reported public safety benefits to date

Once that information is presented publicly, the Council and residents will have the opportunity to better understand the program and its safeguards. I appreciate your engagement on this issue.

Respectfully,

Gary A. St. Vil

Chairman, Ledyard Town Council
741 Colonel Ledyard Highway
Ledyard, CT 06339
(860) 980-0656 | gsvil@ledyardct.org
www.ledyardct.org

From: Jason <jason.malcolm@protonmail.com>
Sent: Friday, February 20, 2026 12:03 PM
To: Jessica Buhle <Jbuh@ledyardct.org>
Cc: Gary St. Vil <GSvil@ledyardct.org>
Subject: Re: Question regarding Flock cameras in town

Thank you Jessica; look forward to hearing more soon.

-Jason Malcolm

On Friday, February 20th, 2026 at 12:00 PM, Jessica Buhle <Jbuh@ledyardct.org> wrote:

Good morning Jason,

Thank you for reaching out! I have forwarded your email to Chairman St. Vil for potential discussion. He is copied on this reply as well.

Thank you for sharing your concerns and feedback.

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

On Feb 20, 2026, at 11:21 AM, Jason
<jason.malcolm@protonmail.com> wrote:

Jessica,

Good morning; you might remember me as Danielle's husband (Raven's Rise Sourdough and all). I'm reaching out because I recently put in a FOIA request to find out some more info about the 4 Flock LPR (License Plate Reader) cameras that are in Gales Ferry and Ledyard and got back the info just yesterday. This has been an increasingly covered topic, with towns across the country and CT canceling/revising/pausing contracts with Flock because of privacy and safety concerns presented by the cameras as well as how the company improperly handles the camera footage.

I was hoping this might be something the Town Council would consider raising as a topic, primarily a discussion around 1) the contract that the town has entered into with Flock for a 24-month

period, at \$12,000 a year and 2) the concerns I, and perhaps other residents, might have about these and a discussion about removing them from the town. It is my understanding based on the requisition/invoice I received via the FOIA request that they were just installed in November or so, and the town is now past a 60-day period of time when the contract might have been able to be cancelled easily with no financial penalty.

Hoping this is the right place to reach out; I figured since we had interacted prior and your name was familiar I would start with you in reaching out compared to another on the council I wasn't familiar with.

Thank you,

-Jason Malcolm

Disclaimer

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TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 26-0205

Agenda Date: 2/11/2026

Agenda #:

REPORT

Staff/Committee Report:

Board of Education Proposed Fiscal Year 2026/2027 Budget



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 26-0252

Agenda Date: 2/25/2026

Agenda #:

MINUTES

Minutes:

- Public Hearing Minutes of February 11, 2026
- Regular Meeting Minutes of February 11, 2026



Chairman Gary St. Vil

TOWN OF LEDYARD

CONNECTICUT
TOWN COUNCIL

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

DRAFT

PUBLIC HEARING MINUTES

6:30 PM; FEBRUARY 11, 2026

I. CALL TO ORDER – Chairman St. Vil called to order the Public Hearing at 6:32 p.m. regarding a proposed *“An Ordinance of the Town Of Ledyard Authorizing Avalonia Land Conservancy to Receive Property Tax Exempt Status As of the Date of Purchase of Real Property to be Preserved And Maintained As Open Space”*.

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, February 11, 2026 at 6:30 p.m.
to receive comments/recommendations regarding a Proposed

“An Ordinance of the Town Of Ledyard Authorizing Avalonia Land Conservancy to Receive Property Tax Exempt Status As of the Date of Purchase of Real Property to be Preserved And Maintained As Open Space”

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/89702365705?pwd=cq1KHPReQbb7JimFWs5kzAn9XmiEyn.1>

or by audio only dial: +1 646 558 8656 Meeting ID: 897 0236 5705; Passcode: 306017

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 29th day of January 2026.

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

Please Publish on Monday, February 2, 2026

V. PRESENTATIONS

Chairman St Vil called upon Councilor Garcia-Irizarry to present the proposed “*An Ordinance of the Town of Ledyard Authorizing Avalonia Land Conservancy to Receive Property Tax Exempt Status As of the Date of Purchase of Real Property to be Preserved And Maintained As Open Space*” as presented in the draft dated January 15, 2026.

Councilor Garcia-Irizarry explained that Avalonia Land Conservancy has acquired several properties in Ledyard that they were preserving in perpetuity as Conservation Open Space. She stated that pursuant to Connecticut General Statute §12-81b that lands owned by non-profit organization for conservation purposes can obtain a tax-exempt status by the Town adopting an Ordinance. She went on to explain in some cases at the time Avalonia Land Conservancy acquired certain parcels they were taxable properties. Therefore, she stated that this Ordinance would grant them the tax-exempt status from the date the parcel was acquired. She also noted that the Ordinance was not specific to any one Avalonia Land Conservancy parcel; explaining that the tax-exempt status would apply to all Avalonia Land Conservancy properties that were Conservation Open Space. She stated by leaving the Ordinance general that they would not have to update/amend the Ordinance each time they acquired a piece of property. She also noted that Avalonia Land Conservancy President Dennis Main was attending tonight’s Public Hearing remotely via Zoom and could answer questions.

Mayor Allyn, III stated that Avalonia Land Conservancy had substantial holdings in the Town of Ledyard, noting that they have been outstanding stewards of the Open Space Parcels the town has provided to their Organization; and of the parcels that they have also acquired on their own. He stated as a tax-exempt Organization that they had this tax-exempt right. He stated that he supported the proposed Ordinance as presented this evening.

Avalonia Land Conservancy President Dennis Main stated that the Organization has their Headquarters in Ledyard at 746 Colonel Ledyard Highway. He stated since 2004 the Town of Ledyard has transferred 22 parcels to Avalonia Land Conservancy. He thanked Mayor Allyn, the Administration, the Town Council and its Subcommittees for moving the proposed Ordinance forward. He stated as mentioned this evening Connecticut General Statute §12-81b has already established the tax-exemption for Avalonia Land Conservancy’s conservation properties. He stated the purpose of the proposed “*An Ordinance of the Town Of Ledyard Authorizing Avalonia Land Conservancy to Receive Property Tax Exempt Status As of the Date of Purchase of Real Property to be Preserved And Maintained As Open Space*” would be to eliminate the cumbersome process of abating the taxes from the closing date of the purchase to the next Grand List date. He stated there was a separate State Statute that addressed that process, noting that the proposed Ordinance would streamline that process.

DRAFT: 1/15/2026

Ordinance # _____

AN ORDINANCE
OF THE TOWN OF LEDYARD
AUTHORIZING AVALONIA LAND CONSERVANCY, INC
TO RECEIVE PROPERTY TAX EXEMPT STATUS AS
OF THE DATE OF PURCHASE OF REAL PROPERTY
TO BE PRESERVED AND MAINTAINED AS OPEN SPACE

Be it Ordained by the Town Council of the Town of Ledyard

Section 1 Statement of Purpose and Authority

The purpose of this Ordinance is to grant a property tax-exempt status to the Avalonia Land Conservancy Inc. located in the Town of Ledyard, a non-profit organization, pursuant to Connecticut General Statute §12-81b.

Section 2. Tax Exempt Status as of the Date of Acquisition.

The property tax exemption authorized by subsection (12) inclusive, of §12-81 of the Connecticut General Statutes shall be effective as of the date of the acquisition of the property acquired by Avalonia Land Conservancy, Inc. for the purpose to be preserved and maintained as open space for public passive recreation.

Section 3. Severability

If any provision of the is Ordinance shall be held invalid by a court having competent jurisdiction, such invalidity shall not affect any other provision of this Ordinance, that can be given effect without the invalid provisions, and for this purpose the provisions of this Ordinance are hereby declared to be severable.

Adopted by the Ledyard Town Council on: _____

Gary St. Vil , Chairman

Approved / Disapproved on: _____

Fred Allyn, III, Mayor

VI. PUBLIC COMMENT

Chairman St. Vil thanked Councilor Garica-Irizarry for her prestation regarding the proposed *“An Ordinance of the Town Of Ledyard Authorizing Avalonia Land Conservancy to Receive Property Tax Exempt Status As of the Date of Purchase of Real Property to be Preserved And Maintained As Open Space”*.

He stated that they would now open the floor for Residents comments; and he asked that residents state their r Name & Address for the record and to keep your comments to 3 minutes or less. For those attending on-line please put your name and address in the Chat and we will call on you. He also asked that residents have already submitted written comments to the Town Council, that they not read their written communication, as Town Council has already received your comments, to allow time for all those who would like to speak this evening. However, you are welcome to provide other comments that have not already been submitted.

Mr. Bill Banes, 1 Spruce Street, Ledyard, Town Councilor, noted former Town Councilor Kevin Dombrowski’s email dated February 9, 2026 in which he suggested the Avalonia Land Conservancy Properties be listed as part of the proposed Ordinance. Mr. Barnes questioned whether there was a difference between the properties that were given to Avalonia Land Conservancy and the properties they have purchased; and whether there was a distinction between the two processes; and whether they needed to specify them. Mayor Allyn, III stated he did not believe that they had to specify the properties. He went on to note the following example: Should Avalonia Land Conservancy purchase the building that houses their Headquarters and they leased out a portion of the building. He stated that Avalonia Land Conservancy would pay taxes on the portion of the building they were leasing out, noting that it would not fall under the exempt status; stating that it was just for Open Space Parcels.

VII. ADJOURNMENT

Chairman St. Vil stated the proposed *“An Ordinance of the Town Of Ledyard Authorizing Avalonia Land Conservancy to Receive Property Tax Exempt Status As of the Date of Purchase of Real Property to be Preserved And Maintained As Open Space”* would be included on the Town Council’s February 25, 2026 Agenda for action.

Chairman St. Vil stated hearing no further public comment, that the Public Hearing was adjourned at 6:41 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 February 11, 2026

Attest: _____
Gary St. Vil, Chairman



TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

Chairman Gary St. Vil

MINUTES
LEDYARD TOWN COUNCIL – REGULAR MEETING
WEDNESDAY, FEBRUARY 11, 2026; 7:00 PM
HYBRID FORMAT
VIDEO CONFERENCE VIA ZOOM

DRAFT

- I. CALL TO ORDER – Chairman St. Vil called the meeting to order at 7:00 p.m. at the Council Chambers, Town Hall Annex Building.

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.

- II. PLEDGE OF ALLEGIANCE

- III. ROLL CALL –

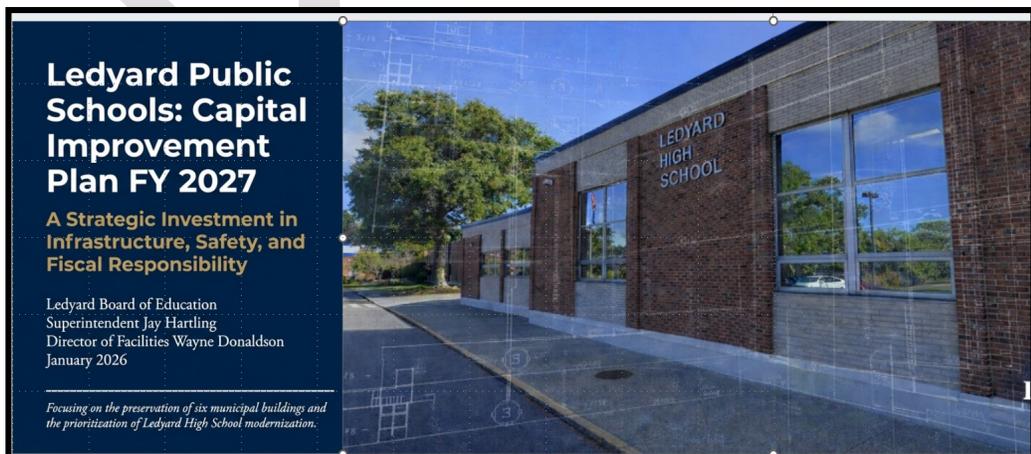
Attendee Name	Title	Status	Location
William Barnes	Town Councilor	Present	In-Person
April Brunelle	Town Councilor	Present	In-Person
Jessica Buhle	Town Councilor	Excused	
Carmen Garcia-Irizarry	Town Councilor	Present	In-Person
Ty (Earl) Lamb	Town Councilor	Present	In-Person
Adrienne Parad	Town Councilor	Present	In-Person
Tim Ryan	Town Councilor	Present	In-Person
James Thompson	Town Councilor	Present	In-Person
Gary St. Vil	Town Councilor	Present	In-Person

- IV. INFORMATIONAL ITEMS/PRESENTATIONS

Board of Education’s Fiscal Year 2026/2027 Capital Improvement Plan (CIP)

School Superintendent Jason Hartling thanked the Town Council for the opportunity to present the Board of Education’s proposed Fiscal Year 2026/2027 Capital Improvement Plan (CIP). He began by introducing Board of Education Director of Facilities Mr. Wayne Donaldson, who has been with them for about nine-years; and has been instrumental in putting their Capital Improvement Plan (CIP) together. He also noted that Board of Education Chairman Jennifer Reguin was attending tonight’s meeting remotely via Zoom. He stated the Capital Improvement Plan (CIP) has been a topic of discussion for quite a while and that he appreciated Chairman St. Vil and Chairman Reguin working together to set up tonight’s meeting so they could have this conversation directly.

Mr. Harting proceeded by reviewing a PowerPoint of the Board of Education’s proposed Fiscal Year 2026/2027 Capital Improvement Plan (CIP) as follows:



Why Facilities Matter

Schools are the town's largest long-term capital assets. Protecting them is a matter of safety, reliability, and law.



Statutory Obligation
Compliance with CGS § 10-220(a) mandates the Board of Education to provide "safe and properly-maintained" learning environments. This is a legal requirement, not a choice.



Operational Reliability
A breakdown in HVAC, plumbing, or power stops the school day. We focus on preventing catastrophic system failures that disrupt learning and force emergency closures.



Asset Preservation
Shifting from reactive emergency repairs (expensive) to proactive lifecycle management (predictable). This strategy extends the useful life of the Town's infrastructure.

Financial Stewardship & Funding Sources

Matching the right funding mechanism to the project scope.

Bondable Projects

Large-scale infrastructure (Boilers, Windows, Roofs). Eligible for State Reimbursement.

Capital Non-Recurring (CNR)

Medium-scale projects exceeding annual operating capacity (Gym upgrades, Vehicles).

Operating Budget

Routine maintenance preventing decay. HVAC service contracts (\$140k/yr), Curbing repairs (\$4k/yr).

Ag Science (ASTI) Fund

Restricted State funds for the Ag Science program. No impact to Town tax levy.

Current State of District Facilities

Condition assessment based on age of infrastructure and date of last major renovation.

- **Ledyard High School (LHS)**
Status: Critical. Built 1962/1966. Major mechanical systems (Boilers, Windows, Roof) are at end-of-life. 90% of current capital needs are concentrated here.
- **Gales Ferry / Juliet Long School**
Status: Aging. Built 2001 / 1961. Finishes reaching 26+ years. Specific system replacements needed (PA systems, Playground surfaces, Windows).
- **Ledyard Middle School / Gallup Hill School**
Status: Good. Renovated 2019. Limited capital needs; currently in maintenance mode.
- **Board of Education / District**
Status: Operational. Routine maintenance only.

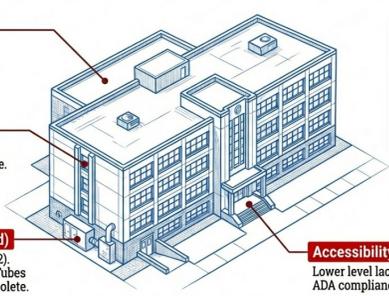
The Primary Challenge: Ledyard High School

Infrastructure from the 1960s is reaching total system failure.

Main Roof
Reaches end of life in 2032. Media Center roof currently leaking.

Original Windows
Inefficient single-pane. Drafty, difficult to operate. Prerequisite for HVAC upgrade.

Boilers (63 Years Old)
Original to building (1962). Metal pitting observed. Tubes failing. Service parts obsolete.



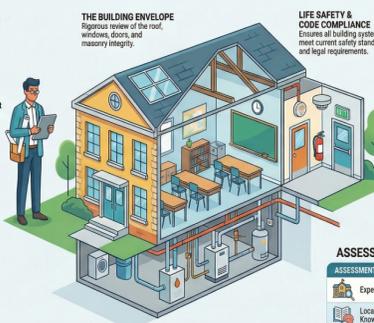
Accessibility
Lower level lacks elevator access. ADA compliance risk.

90% of major capital needs are concentrated at LHS due to infrastructure age and deferred modernization.

The Facilities Conditions Assessment (FCA): A Physical Exam for Our Schools

THE FOUNDATION OF THE FCA

- An Expert Observational Audit**
Licensed architects perform a non-invasive "peek" into the existing physical plant.
- Purely Physical Evaluation**
Focuses on identifying structural deficiencies rather than programmatic or educational layouts.
- Thermal Scanning for Efficiency**
Includes infrared scanning of the building envelope to detect air, heat, and cooling leakage.



THE BUILDING ENVELOPE
Rigorous review of the roof, windows, doors, and masonry integrity.

LIFE SAFETY & CODE COMPLIANCE
Ensures all building systems meet current safety standards and legal requirements.

OUTCOMES & PRIORITIZATION

- Severity-Based Ranking**
Deficiencies are prioritized based on the urgency of physical repair.
- Applied Cost Estimates**
Each identified issue is assigned a cost to provide a clear financial roadmap.

ASSESSMENT PHASE	PRIMARY FOCUS	EXPLAINED BY
Expert FCA	Physical Condition & Code	Professional Consultants
Local Knowledge	Educational Needs & Programs	District Administrators
Financial Plan	Cost Application & Scheduling	Town & Board of Education

The Road to Renewal: Ledyard Public Schools Facility Decision Process

Structured assessment framework to move from initial building observations to final infrastructure decisions, ensuring facility improvements align with physical plant requirements and modern educational standards.

Phase 1: Data Gathering & Needs Assessment

- Facility Conditions Assessment (FCA)**
A comprehensive, observation-based review of the building envelope, mechanical systems, and life safety codes.
- Enrollment & Space Projections**
Calculating 5-year high enrollment to determine the required space footage and state reimbursement eligibility.
- Educational Specifications (Ed Specs)**
Defining the specific classrooms and programs needed to meet modern learning standards regardless of construction type.

Phase 2: Evaluation & Final Decision

- Renovation Status Analysis**
A licensed architect evaluates existing systems (Fire, Risk, Restroom, or Build New).
- Comparing Solution Paths**
Weighing the FCA and Ed Specs against three options: Repair, Renovate, or Build New.

Option: Repair
Primary Trigger: Localized deterioration or aging finishes
Financial Impact: Targeted operating or non-recurring capital funds

Option: Renovate
Primary Trigger: Significant physical deficiencies/code needs
Financial Impact: Renovable project; requires state "Renovation Status"

Option: Build New
Primary Trigger: Low enrollment/space standard mismatch
Financial Impact: Renovable project; focus on right-sizing the facility

LMS Cafeteria Expansion



Expanding the Middle School cafeteria to accommodate entire grade levels and alleviate overcrowding.

Total Estimated Cost: \$600,000
Net Cost to Ledyard (Est.): \$227,160

JWL Window Replacement



Replacing aged windows at Juliet W. Long to meet energy standards and reduce heat loss.

Total Estimated Cost: \$1,200,000
Net Cost to Ledyard (Est.): \$454,320



JWL Parking Lot Repave
\$500,000 **\$500,000**
No Grant

FY2027 Critical Capital Priorities

Emergency Communication Overhaul
Critical PA system replacements at LHS (\$10k), JWL (\$6k), and GFS (\$6k) for emergency safety.

LHS Modernization Foundation
\$75,000 allocated for a comprehensive modernization study to plan the high school's future.

Classroom Renewal (\$140,000)
Continuing renovations at Juliet W. Long School to meet modern learning environment standards.

High-Priority Non-Recurring FY27 Requests

Replacement Maintenance Truck	\$80,000
GHS Turf Playground Installation	\$47,000
Ag-Science Restroom Upgrades	\$20,000

- High School Facilities Needs Assessment Study**

Superintendent Hartling stated at their February 10, 2026 meeting the Board of Education provided authorization for him to move forward with preparing and soliciting Request for Proposals (RFP) a Facilities Assessment Study for the High School (built 1963-1966); and authorized the use of \$75,000 from their Capital Funding to pay for the Facilities Assessment Study. He stated the Study would not be about programmatic spaces, explaining that it was about the physical plan of the High School as it exists today such as: Thermal Scanning for efficiency; Building Envelope; Roof, Windows, Masonry Integrity; Life Safety; Code Compliance, and Walls. He noted when the bathrooms were renovated they had to open the walls because the cast iron piping had rotted out, The Study would provide an idea regarding the prioritization, overall cost, and the extent of what they were looking at. They expect the Study to be completed around the June/July, 2026.

Mr. Hartling explained the Facilities Needs Assessment Study would help them determine the following:

- Price Tag and how that investment should move forward:
 - Repair
 - Renovate
 - Build New
- State Grant Reimbursement would require the following:
 - Enrollment Study
 - Ten-year look at enrollment projections
- State Grant Reimbursement could dictate a number of things such as:
 - Whether they would support repairs
 - Whether they would support Renovate-As-New
 - New Construction – Size
- Agricultural Science High School

Mr. Hartling explained because Ledyard was an Ag-Science School they may be eligible for additional State Grant Reimbursement, noting that instead of looking at 62% state grant reimbursement, they may be looking at 82% state grant reimbursement. However, he stated that more work was needed to investigate the options.

Councilor Lamb addressed the importance to have an overall Community Capital Improvement Plan that included a time phase, and he questioned whether the Board of Education has prioritized their needs. Mr. Hartling stated that the Board of Education has prioritized their Capital Needs. However, he stated the \$75,000 for the *Facilities Needs Assessment Study* would only address the High School. He stated the idea of a Community Capital Improvement Plan was something they could all talk about; however, he stated that it was out of his purview. He stated the *Facilities Needs Assessment Study* for the High School was their first step to plan any path forward. He stated that he did not want to use community resources to make significant spot repairs to only realize 5-6-years down the road that the short-term BanAides were not going to work for the long term.

Councilor Parad stated that she went through the process and saw the Renovate-As-New improvements to the Gallup Hill School and the Middle School. She stated that there seemed to be a miscalculation regarding the student enrollment numbers for the school facilities, noting the kids were packed in; and there was not enough room in the Middle School Cafeteria. She questioned how they would plan for an influx in the number of students that would be attending their schools. Mr. Hartling explained the Student Enrollment Study for the Gallup Hill School and Middle School was done as part of the Project(s) Referendum process; working through all of the stages, and had assumptions which he could not speak to because all that work was done before his arrival in Ledyard. He stated they did have a space challenge at the Middle School, noting that he thought that it was less dictated by the Enrollment Study; and more dictated by the decisions that were made relative to the State Grant Reimbursement Funding, explaining that the State would provide reimbursement funding on certain spaces; and not provide reimbursement funding on other spaces. He stated spaces that were not eligible for State Grant Reimbursement; or for a lesser amount of Grant Reimbursement, were sized down to keep the project within the approved Referendum amount. He stated because the Middle School Cafeteria was sized for about 152 kids, that they cannot fit one grade level in the Cafeteria, which meant that the Middle School was running 4-5 Lunch Waives to accommodate the school population, noting that it creates operational havoc. He stated the Middle School Auditorium was also sized down, noting that they cannot fit two-grades let alone the entire school; and that the Gymnasium was also sized down, explaining that those decisions were not dictated by the *Enrollment Study*, but rather by the hard choices the community had to make between reimbursable items; the approved referendum dollar amount of \$65,835,000 ; and cost of what the *Schools Consolidate - Renovate-As-New Project(s) (Middle School and Gallup Hil School)* came in at. He stated at the time he arrived in Ledyard, in 2016, they were getting ready to go out to Bid; and he explained because the budget was so tight they removed the Air Conditioning from the School(s) Projects, noting that the Bid Request included an “*Add Alternate with Air Conditioning*”.

School Superintendent Hartling went on to state for the High School that the Enrollment Study was going to be challenging because they have to take into account the 13 towns who feed into the Ledyard Agriculture Science Program. (Ag-Science). He stated every school in the State has seen a decline in Student Enrollment. He stated although they do not have a crystal ball, that he wanted to make sure that they had an open and transparent process as they work through all of the required steps, to allow them to make the best long-term and short-term challenge points, in making the best decision for their community.

Chairman St. Vil stated as stewards of the town resources that the most cost prohibited thing they could do was wait for something to break before they decided to fix it. He stated that he applauded the Board of Education and Superintendent Hartling's efforts to identify the critical path forward for the School District's Capital Expenditures. He stated that *High School Facilities Needs Assessment Study* appeared to be Step One in that critical path. Therefore, he questioned what the Town Council and/or the Mayor could do to support them in conducting the Needs Assessment; and when could they expect to hear more on the process. Mr. Hartling stated that his hope was to advertise the Request for Proposals for the *High School Needs Assessment Study* early, so they could potentially contract a Firm before the summer. He stated the work for the Town Council and Mayor would begin once they receive the *High School Facilities Needs Assessment Study*. He explained at that they would then need to have an open and honest dialogue about the path forward; what that would mean for the students, what that would mean to the community; and what that would mean to taxpayers in a broader sense. He stated that the Board of Education has had Capital Improvement Plan with Projects projected out for ten-years. However, he stated that the community has not had the resources to address many of the projects, and therefore, they continued to get kicked-down-the-road. He stated they were now at that critical place particularly with the High School.

School Superintendent Hartling continued to note the following two Bondable Projects in the Board of Education's Capital Improvement Plan:

- ***Middle School Cafeteria Expansion \$600,000 (Bondable Project)***

Mr. Harting stated he hoped that through State Legislative Action that Ledyard could receive State Grant Reimbursement for this project; which would leave an estimated projected town-share of \$227,160 for the taxpayers. He noted that State Grant Reimbursement was not a given, and that he has been working with State Senator Cathy Osten.

- ***Juliet W. Long School Window Replacement \$1,200,000 (Bondable Project)***

Mr. Harting stated he hoped that through State Legislative Action that Ledyard could receive State Grant Reimbursement for this project; which would leave an estimated projected town-share of \$454,320 for the taxpayers.

- ***Juliet W. Long School Pavement Projects – \$1,000,000 (Bondable Project)***

Mr. Hartling stated the estimated cost for the Juliet W. Long School Parking Lot Repavement was \$500,000 and estimated cost to pave other areas around the school was \$500,000. He stated that these pavement projects have been included in the Bondable Capital Projects and that ***State Grant Funding would not be available for these pavement projects.***

- ***Critical Capital Improvement Projects – Tax Levy***

- Safety & Security Plan
 - ✓ Public Address (PA) System Replacements - Systems were antiquated and parts to repair them were no longer available.
 - High School \$10,000
 - Juliet W. Long School \$6,000
 - Gales Ferry School \$6,000
- Juliet W. Long School Classrooms Infrastructure Renewal \$140,000
- Maintenance Truck Replacement - \$80,000

- Gallup Hill School Artificial Surface - \$47,000- Mr. Hartling stated the kids do not have enough space to play outdoors, noting the grassy area has become a dirt pit and after it rains it's a mud pit. He stated an artificial surface would enable the 600 students at the Gallup Hill School to have a place to play, even after it rains.
- High School Ag-Science Bathrooms \$20,000

Mr. Hartling concluded his presentation by stating the Board of Education's Capital Improvement Plan was a living document and changes from year to year, noting as an example things such as Gallup Hill School Playground Replacement was not on their radar two-years ago. He stated for the upcoming Fiscal Year 2026/2027 the Board of Education's Tax Levy Capital Projects were in the total amount of \$269,000. He provided each member of the Town Council with the Board of Education's Fiscal Year 2026/2027 Capital Needs Report noting that it was divided into the following four categories noting that it included a full description, ranking, funding source, evaluation; and projected escalation cost for each project as follows:

- Bondable – Escalation costs not built into the Bondable Projects
- Capital
- Operating
- Ag-Science

Councilor Ryan thanked Mr. Hartling for his presentation and the detailed Board of Education's Fiscal Year 2026/2027 Capital Needs Report. He noted in comparing some of the Bondable Projects to prior year cost projections that a number of them have significantly increased by tens of millions of dollars; such as the Roof Replacements, and the Heating Ventilation and Air Conditioning (HVAC) Systems, noting in last year's (fy 25/26) Capital Plan the High School Heating System Replacement was listed as \$5 million; and for the coming fiscal year (26/27) the same project was estimated to cost \$20 million. He asked Superintendent Hartling to explain why the numbers have increased so much since last year. Board of Education Director of Facilities Wayne Donaldson explained as they get closer to the year for those projects that he would contact architects and engineers to see if the cost estimates were still good or whether they needed to be updated due to inflationary costs; noting that he does not worry about projects that were slated for 2036, etc. Councilor Ryan stated that he appreciated the escalations which were about 3% per year. However, he stated that they needed to do a better job estimating costs, noting that they have discussed this issue with their Operating Budgets and that they also need to have a serious conversation about better estimating Capital Expenses for a Facilities Master Plan for future years; if they were going to take the High School Facilities Needs Assessment seriously, and they were going to bond the project that they needed to have better cost estimates, especially if the town was going to take on the interest costs that come with bonding (borrowing money) to facilitate the projects. Mr. Hartling stated that Councilor Ryan's comments supported the need to fund hiring professional engineers to prepare an assessment and cost estimates. He stated as the town has seen costs for fire apparatus escalate that the same type of cost escalations have occurred for things such as boilers. He stated that he would appreciate the Town Council's support and resources for the Board of Education to obtain professional cost estimates for the replacement of the High School Boiler.

Councilor Ryan addressed Mr. Hartling's comment regarding the replacement of the fire apparatus explaining that the difference between the Fire Departments and the Board of Education was that the Fire Departments fund their Capital Plan every year; and the Town Council supports that funding request. Therefore, he stated when the Fire Departments have large expenses they had a significant amount of funding available to support those capital costs. He stated the reason he brings up the Fire Departments, and the Police Department was because they were great examples for Long-Term Planning for Capital Expenses. He stated that he would go on the record this evening stating that when the Facilities Capital Plan comes out, that if it was a sound Plan that he would commit himself to finding a way for them to continuously fund budget lines to feed this Capital Account in a responsible way for the taxpayers and responsible for the schools; to start to build up a Capital Fund; so that they were not dealing with huge expenses that surprise them a year out.

Superintendent Hartling stated that the Town Council has been exceptional at making sure that \$300,000 in Capital Funding goes to fire apparatus each year, and they did the same thing with public works trucks, stating that it was smart to have those sinking funds. However, that level of funding resources has not been assigned to the Board of Education for a variety of reasons. He thought it would be great to establish that level of investment to permit the smoothing of capital expenses. However, he stated that they cannot allocate \$200,000 a year into a Capital Sinking Fund and expect to smooth a \$50 million hole for something such as replacing the boilers at the High School before the units were completely gone. Councilor Ryan stated that there had to be a way to blunt those costs. He went on to note that the Capital Projects using the Tax Levy did not seem to follow the same level of escalation as the

Bondable Projects did; stating that he wanted to make sure that they were dealing with accurate numbers.

Councilor Lamb addressed the importance to get serious with the development of a Strategic Capital Improvement Plan for both the School Facilities and the Town Facilities. He addressed the Board of Education's February 10, 2026 approval to use \$75,000 from their Capital Account to pay for the *High School Facilities Needs Assessment Study*. Therefore, he questioned the reason the Board of Education has included \$75,000 in their Fiscal Year 2026/2027 Capital Improvement Plan, and he asked whether they were looking for the Town Council to allocate \$75,000 to reimburse the Board's Capital Account. Superintendent Hartling stated the Board of Education made a decision to use their Capital Non-Recurring Funds to move the High School Facilities Needs Assessment Study forward. He stated the Board of Education has not discussed asking the Town Council to reimburse those funds, noting that they have asked for a number of capital items that needed to be addressed.

Councilor St. Vil thanked Superintendent Hartling for his time and for presenting the Board of Education's proposed Capital Improvement Plan for Fiscal Year 2026/2027. Mr. Hartling stated that he appreciated the conversation. He left the meeting at 7:40 p.m.

V. RESIDENTS AND PROPERTY OWNERS

Chairman St. Vil stated before they moved into *Residents and Property Owners Comments* that he wanted to acknowledge what has been happening over the past week. He stated many of them have read the Article, comments, and emails that followed. He stated that he has received messages from residents who were proud of members of this Town Council, and also received messages from residents who were frustrated or disappointed with members of this Town Council. He stated that both perspectives were real and both come from people who care deeply about Ledyard. He stated they were a community with different viewpoints, but what was important was how they handled those differences. He stated as Chairman that his role was not to take sides in political disagreements; and that his responsibility was to run meetings fairly, follow their Rules of Procedure, follow the Town Charter, and to make sure every resident is heard. He stated if residents support the actions of certain Town Councilors that they would be heard; and if residents disagreed strongly with the actions of certain Town Councilors that they would be heard. He stated equal voices matter in this Chamber; and that he would set the following expectations: This was a Public Meeting of a Local Governing Body, it was not a debate period; the Town Council would not engage back and forth during Public Comment; this was the Residents time to speak and the Town Council's time to listen. He also asked that everyone maintain decorum, noting that strong opinions were welcome, passion was understandable, however, he would not allow profanity in this Chamber, including reading profanity from Social Media posts, or other communications written outside of this room. He stated that he believed that they could express themselves clearly and firmly without crossing that line.

Chairman St. Vil continued by stating that he wanted to address an idea to remove Elected Officials which was raised in several emails. Chairman St. Vil stated under Ledyard's system of government the Town Council does not have the authority to remove a duly elected member because of their speech or their political expressions. Councilors were elected by the voters; and they remained accountable to those voters. He stated tonight that he would ask residents to speak honestly, and clearly, but remember the person they disagree with was still their neighbor.

Mr. Steve Munger, 12 Nutmeg Drive, Gales Ferry, noted as he says every time he addressed the Town Council, that he appreciated all of their efforts, noting that he was always polite to everyone; and he always thanked everybody. However, he stated that tonight he was only going to thank six members of the Town Council. He continued by addressing the following:

- Pledge of Allegiance – Mr. Munger noted the comments that members of the Town Council had the right not to stand for the *Pledge of Allegiance*, noting as town representatives that they did not have that right. He stated if they were residents sitting in the audience at a Town Council meeting that they had the right not to stand for the *Pledge of Allegiance*. He stated by not standing for the *Pledge of Allegiance* at an official meeting was a form of *protest*, explaining that they could not *protest* at an official meeting. He stated that if they allowed one person to protest at an official meeting then they would have to allow everyone to protest at an

official meeting. He stated hundreds of thousands of people have died since this country was founded defending the American Flag. He asked that members of the Town Council show respect to the military members and everyone that defend the American Flag. He stated that they should at least stand up, if they do not want to recite the *Pledge of Allegiance* that was on them. However he stated he was asking, as a resident, that they show some respect toward the American Flag and that they stop protesting during a Town Council official meeting.

- Social Media Post – Mr. Munger noted that he agreed that everyone had the Freedom of Speech to say what they want to say. However, he stated that there were consequences in what they say, noting that a formal apology should be made.

Mr. Munger concluded his comments by stated that both of these were serious issues; and he would like a response as to whether the protest at Town Council meeting was going to be allowed to continue.

Mr. Jeff Eillenberger, 2 Village Drive, Ledyard, submitted a written response regarding a Social Media post from Pastor Kyle Dykes of the Gallup Hill Baptist Church.

Ms. Karyn Collins, 37 Chriswood Trace, Ledyard, stated that she was a long time resident of Ledyard and that her family members were all Veterans. She stated that she was proud of every one of them. She stated that she was present this evening to comment on the following:

Pledge of Allegiance – Ms. Collins stated that Ledyard had roughly 6,500 active duty military members; 1,200 Veterans; and more than 12,000 military family members spread throughout New London County. This area’s military presence goes back to the American Revolutionary War, most notable the 1781 Battle of Groton Heights. This Town was named from Colonel William Ledyard who died defending Fort Griswold. Their School Mascot was the Colonels; service was in their DNA. She stated when members of the Town Council chose not to stand for the *Pledge of Allegiance* it does not come across as *thoughtful protest*; noting that it comes across as a *rejection of the people of who defend the freedoms they enjoy*. She stated standing for the American Flag was not about blind politics, it was about respect, unity, and honoring those who serve, and those who never came home. She noted that Councilor Brunelle and Councilor Thompson stated that they refused to stand for the *Pledge of Allegiance* in protest because of the Immigration Policy. She stated town hall meetings were not the place for symbolic virtue signaling. She stated they were not Federal Policy makers, noting that they were local representatives and their job was to serve all residents of Ledyard, not just the ones that agree with them. She stated when they stay seated during the *Pledge of Allegiance* they were not speaking for the town; they were speaking only for themselves. She asked that they act appropriately when representing the entire town.

- Social Media Post – Ms. Collins stated although Councilor Buhle did not sit for the *Pledge of Allegiance* that her recent Social Media Post caught the attention of the New London Day Newspaper and other media platforms. She stated that Councilor Buhle’s post was filled with profanity stating that she had no interest in speaking to or engaging with constituents or anyone who did not agree with her. She openly dismissed accountability and told residents who thought differently to essentially go away. Ms. Collins stated that this was not leadership, it was not service; it was not representation; and it was an embarrassing moment for Ledyard. She stated that leadership required maturity, emotional discipline, and the ability to listen, engage, and to serve across differences. For these reasons Ms. Collins stated that she was formally calling for the resignation of Councilor Jessica Buhle, because her actions demonstrated that she was unwilling to represent the entire town of Ledyard with the dignity, seriousness and the respect that this office required.

Ms. Collins concluded her comments by stating that they deserve leaders that stand for our American Flag, our history, our service members, and for all of Ledyard.

Mr. Drew Chappelle, 14 Sherwood Trace, Ledyard, stated that he appreciated the work, time, and efforts the members of the Town Council do for their town. He stated that he understands that they had a lot of military service members in their town and in their country; and that he appreciated them standing by the values that their country and what their *Pledge of Allegiance* was about. He stated when they see that twisted and changed into something that it was never

meant to be; and when members of the Town Council was called out in hatred because of their skin or their accent that it was hurtful. He stated that he loved this town, and he appreciated their leadership and passion; however, he stated he hated the divisiveness that he was seeing. Thank you.

Mr. Dave Collins, 37 Chriswood Trace, Ledyard, stated he served in the United States Navy for thirty-years and he chose to live Ledyard in 2000; when he could afford to buy a house, noting that he retired in 2013. He stated all of his children attended Ledyard schools and graduated from Ledyard High School. He stated that he only learned today that serving on the Town Council was a voluntary commitment and they were not paid Elected Officials. He noted that many of the members on the Town Council had careers outside of the work they do for the town; and he thanked them for their public service to the town. He stated Public Service means serving everyone they represent, noting that when he was in the military that meant serving the 360,000,000 people in the United States; and for the members of the Town Council that was everybody in Ledyard. He asked the Veterans in Chambers this evening to raise their hand, and he noted that the show of hands was a lot of people. He noted in public service that they have to put their personal opinions aside in order to serve those they worked for, which for the Town Council was the residents in Ledyard. He stated that he was a fervent advocate for both the First and Second Amendment; however, he stated when they serve on the Town Council that they represented their residents and not themselves. He stated although he did not know the words of the Oath of Office the Town Council takes that he could bet that it did not say they could choose when to serve, and when not to serve. He stated that he wished Councilor Buhle was present this evening, because he would have liked to impart some words of wisdom. He stated if Councilor Buhle thought her actions would not affect her husband's job, that it might, relative to security clearance, which was about trust worthiness and being able to rely on not only the Service Person, but the people that affect the Service Person.

Mr. Collins concluded his comments by stating the American Flag represented 360,000,000 people in the United States, noting the colors were important to him; and hopefully important to everybody here. He asked that they please honor the America Flag.

Ms. Wendy Hellenkenson, 14 – L-Lakeside Drive, Ledyard, noted her February 9, 2026 email to the Town Council. She stated that there was nothing that Councilor Brunelle or Councilor Thompson could have done that everyone in the room would have agreed with. She stated if they had worn pins, or if they had put magnets on their cars; that would have affirmed their right to protest, that there were some that would have disagreed with their protest. She stated that she did not think there was anything they could have done that people would not have complained about. She stated that she appreciated what they did, because this country was in a lot of trouble.

Mr. Jacob Hurt, 6 Nugget Hill Drive, Gales Ferry, stated that he was speaking for himself this evening; and that he wanted to address the following procedural items:

- Roberts Rules of Order relative to an elected official speaking in a personal capacity; and even during the public comment portion. Mr. Hurt stated that Mr. Chair talked about using the rules and that he thought that this one may be worthwhile.
- Elected Officials made a principled stance on something others did not agree with. Mr. Hurt stated that they recently witnessed a manufactured controversy over something that affected the entire community when some of their Elected Officials made a principled stance on something others did not agree with. He noted that he was referring, of course, to last year's Budget Vote (fy 25/26).
- Immigration and Customs Enforcement (ICE) – Mr. Hurt thanked the Councilors for calling attention to the recent issues and events of Immigration and Customs Enforcement, even if they did it in a way that others might not agree with. He stated that this was a town issue and he asked the Town Council use the Community Relations Committee for Diversity, Equity & Inclusion to help residents understand how their police and schools were dealing with that organization; what policies were in place, or what should be put in place; to make sure their police can continue to do their jobs with the trust and confidence they enjoy today; and that their educators and students have the safest educational environment they can. He stated if

the stories that broke today were true, noting that ICE was looking to build warehouses in this state and elsewhere, that this was probably something they should look into.

- Oath of Office – Mr. Hurt stated in the last couple weeks he has also seen and heard some things that made him need to address those who took an Oath to the Constitution; and who were either piling on this manufactured controversy, or failing to speak out in hopes it would benefit them somehow. He stated anyone who recently confused dissent with disloyalty should go home, and reread that Oath of Office; or read it if they had not read it before. He stated the Oath of Office was to the Constitution, the country whose course it directs, and the rights that are spelled out; including those in the Bill of Rights. He stated the Flag was nowhere in the Oath of Office, noting that the Flag was a symbol. He stated that people use the Flag everywhere, as a means of political expression, and that some candidates use stickers on their car and for their campaign paraphernalia. He turned to the audience and questioned how many of you walked by those today without getting triggered on your way to pick on a couple of peaceful protesters?

Members of the audience asked Mr. Hurt to address the Town Council. Mr. Munger and Mr. Sabbag said that Chairman St. Vil has control of the Council Chambers and they asked that the residents allow Chairman St. Vil to speak.

Chairman St. Vil called Order in the Council Chambers, and asked that they pause for a moment. He stated when others spoke this evening that he did not hear commentary from the audience.

Councilor Ryan stated that he agreed with Chairman St. Vil regarding decorum. He asked that decorum be represented by all speakers this evening, noting that he did not believe that decorum was represented with this speaker, and that perhaps some of the commentary has been incendiary; unlike some of the other comments that have been made. He stated that he would appreciate the speaker to perhaps tone back the incendiary nature of their comments, especially when it's turned towards the audience. Thank you.

Chairman St. Vil stated that he respected Councilor Ryan's opinion; and he respected the opinions of the audience. He stated at the onset of tonight's meeting he stated that every opinion, and every voice would be heard. He stated whether he thought the comments were incendiary, that it did not matter. He stated that there were people that serve, and there were people that fought, so that that person's voice could be heard, unfettered. He stated during his life that he has been treated unfairly; and that he would not do that to others. He stated whether he agreed; or he disagreed, that he learned throughout his life to hear him out; and to listen. That was what an orderly meeting was required to be by the Roberts Rules, and it was that simple. He stated if others cannot do that; there was a means of dealing with it, which he did not want to do. He stated that they could judge him and they could vote him out. However, he stated that he had to let everyone speak for their 3-4 minutes. He asked Mr. Hurt to please continue his comments.

Mr. Hurt stated his point was that the Flag was used in various ways, and that peaceful protest was something that anyone who served in any capacity and has taken any Oath; and fought to serve, and fought to protect. He stated as long as the rights they were protecting were being peacefully exercised by the people they protect, that they should be fine. He stated next time someone sees something they did not like that maybe they should mind their own business. He stated they should not grab a personal Facebook page post, spread it all over the place; and alert the media, and manufacture a self-serving tantrum. He stated just mind your business next time. Thank you.

Mr. Gary McKeon, 15 Elizabeth George Drive, Mashantucket, stated he was on travel, and therefore, he questioned what they were protesting. He stated it seemed like they always had something to protest, whether it was the Flag, or something else. He stated that his Father received the Purple Heart serving in North Korean War; and that he was a Law Enforcement Officer in Ledyard for 11-years. He questioned whether they were protesting the shooting of Rene Good in Minnesota, who was shot by the ICE Officer that she tried to run over, noting that he could assure them that if anyone of them were in that position they would have done

the same thing; or whether they were protesting the shooting of Alex Pretti who was involved in an ICE Protest and was carrying a weapon. He stated that ICE Officer's job was to remove Illegal Immigrates from this country; noting that they do not go after US Citizens. He stated people have to stop being victims, noting that nothing happens to you, it happens because of you. He stated that cops were not looking to stop people because of the color of their skin, etc., they were enforcing the law.

Mr. Brandon Sabbog, 16 Nutmeg Drive, Gales Ferry, thanked everyone for volunteering their time. He noted when he was in College that he was the Vice-President of the College Democrats and that he led a 2,000 person protest at the Boston Commons. He stated they all wore white, they laid down in the Boston Commons and called it a "*Die-in*" for the Genocide that was happening in Sudan, noting that they made the front page of the Boston Globe Newspaper. He stated that he loved the right to protest and that he supported the two Town Councilors in their desire to protest. However, he stated that he did not think the Town Council Meeting was the forum to do that. He stated when they take the Oath of Office that they represent everyone in their town. He stated although there may be 40%; 50%; or 60% of residents that may agree with what was being done in this Chamber; or with what they saw on-line that there was also people who do not agree. He stated that he was fine with pins or other passive protest items. He read the following fictitious story: "*When the bell rang at the Ledyard Middle School one morning the students rose for the Pledge of Allegiance, all except for one, Jake, a quiet eight grader who stayed in his seat. He wasn't trying to be disrespectful, he just didn't think it mattered. After class Mr. Daniels, a history teacher and retired Navy Officer, quietly walked over to Jake and sat down next to him. He did not yell, he did not scold, he simply asked Jake do you know why we stand? Jake shrugged, It was just something people do*" he said. Mr. Daniels nodded slowly, let me tell you something, he rolled up his sleeves and showed Jake faint scars from an explosion overseas. I've seen men who never made it home, men who gave up their future so that kids like you could grow-up in a country where you could choose to sit or stand. The Pledge was not about agreeing with politicians, it's not about who was in Office, like them or not, its about honoring the people who paid the price so that you could live for free. Jake looked down at his shoes, while Mr. Daniels continued, when you stand you recognize that Freedom is not Free, when you Stand you are showing Respect not to the Government but to the sacrifice to the idea that this Country even with all of its' flaws is worth Standing For. The next morning the bell rang; and Jake Stood, not because he was forced to' but because he finally understood what he was Standing for."

Mr. Sabbag noted the following numbers of Solders died in fighting in Wars during the last 100 years: World War II – 418,500; Korea War – 36,574; Vietnam War-58,220; Gulf War 294; Afghanistan War - 2,462; Iraq War 4,419. He concluded his comments by stating that they owe it to their Service Members who died; and to those who were still with them, to Stand for the *Pledge of Allegiance*. Thank you.

Mr. Whit Irwin, 2 Winfield Way, Ledyard, attending remotely via Zoom, stated on Monday, February 9, 2026 the Town of Ledyard, specifically Councilor Buhle, made the front page of *The Day Newspaper* and brought great discredit to the Town. He stated that Councilor Buhle's public pronouncement, her "*F.....ICE*" pronouncement, was nothing short of a childish tantrum. He stated had Councilor Buhle been a private individual this would have been a gross misrepresentation of the Federal Government and another cry of the leftist operation. However, he stated that Councilor Buhle was an Elected Representative of Ledyard; and as such, Councilor Buhle should know that her words reflect on the Town of Ledyard and its constituents. Yes, she represented all of them, and in this case poorly. He stated her pathetic outrage was combative and showed that she cannot and will not effectively listen to concerns of some significant segment of the people of the town that she represents. This was particularly unconscionable for the an elected Town Councilor. He stated while ordinarily private speech was protected from criminal prosecution under the First Amendment, with the most notable exception being "*Shouting Fire in a Crowded Movie Theater*" it does not mean that all expression was held in violent repercussions. Mr. Irwin stated that he echoed the call for Councilor Buhle's resignation for unfitness to serve; and he requested the Town Council take action to distance themselves as a body, from her belligerence. Councilor Buhle's comments regarding ICE seemed to be such an allegiance that it appeared that she had a genuine conflict of interest in her representation of the townspeople of Ledyard; and as such she should be investigated under Chapter IX; Section 6 of the Town Charter. He stated it was his opinion that she was unfit to serve and that she should resign in lieu of that resignation, the Town Council should take steps to censure her. Thank you for your attention.

Mrs. Karen Parkinson, 55 Rose Hill Road, Ledyard, stated that she stood for the *Pledge of Allegiance* this evening in respect for her deceased husband who spent 12-years under water serving in the US Navy, and away from his family; along with all the other Service Members who have served their country in the military forces. She stated for those who really do not understand what they were saying, that she would deeply appreciate that they change their view. She stated that she was begging them to stand for the *Pledge of Allegiance*, and to protest differently.

Mrs. Parkinson continued by stating that she was newly elected as the Historic District Commission's Chairman. She stated that she was also President of the Tri-Town Trail Association; and she was a retired Social Worker, who had a Code of Ethics that followed them their entire life, even after they have retired. She stated that she grew up on a Pig Farm in Iowa; and as a kid she slopped pigs and chased rats. She stated as an adult that part of her was still a kid, so *she could still butcher a chicken; and she could still seek out rats*, noting that was intended as a metaphor.

Mrs. Parkinson stated the reason she was present this evening was to address New Business Item # 5 regarding the Preservation of the Spicer Homestead Ruins. She stated it was a "*Homestead*" not a "*House*"; explaining that a *Homestead* was the house, the out buildings and the land, noting that it was not only the house; and that there has been some disagreement about that. She stated Dr. Ammie M. Chittim; who was a Registered Professional Archaeologist (RPA) and the Historic District Commission's Director of Archaeological Research and Preservation; submitted a letter dated January 5, 2026, which was included in tonight's Agenda Packet. She stated Dr. Chittim's letter talked about the reasons 4.4-acres should be preserved as the Spicer Homestead Ruins. Mrs. Parkinson noted the following preserved properties: Nathan Lester House, its museum and surrounding out buildings and land was 134-acres; and the Up-Down Sawmill was 11.6-acres. She stated the Historic District Commission was looking to preserve 4.4-acres for the Spicer Homestead Ruins, noting that there was some mysterious reference to an acre or 0.73-acres but that has never appeared on any Agenda item. She stated that she has been working to preserve the Spicer Homestead Ruins for six-years, and it has been on the Land Use/Planning/Public Works Committee Agenda for thirty-months, noting that she has been attending meetings for a long time to get the area preserved. She stated she spent two-days reviewing Minutes, trying to find a reference of the 1-acre or 0.73-acres, stating that it did not exist, except in the most recent January 5, 2026 Land Use/Planning/Public Works Minutes in which Councilor Buhle mentioned the 0.73-acres and the Town Planner mentioned 1-acre. She stated the Historic District Commission was looking to preserve 4.4-acres for the Spicer Homestead Ruins. She stated the Historic District Commission worked under Ordinance #300-019 "*An Ordinance Establishing Historic District Boundaries And Establishing A Historic District Commission for the Town of Ledyard*"; which was established in accordance with Connecticut General Statutes. She stated that the Historic District Commission gets its authority from State Statutes; and was comprised of five regular members and three alternate members, noting that the Commission was not political and was bipartisan. She asked that the Motion on tonight's Agenda be revised to the Motion that was acted on by the Land Use/Planning/Public Works Committee at their January 5, 2026 meeting and forwarded to the Town Council, stating that it was different wording. She stated per State Statute that Step 1 was for the Legislative Body, not the property owner, to appoint a Historic Property Study Committee; noting that they were asking that Historic District Commission be appointed as the Study Committee. She stated all the other things that have been added into New Business Item #5 was defined under the State Statute. She stated the A2 Survey was not required until the end of the process, which was when they would revise Ordinance #300-019 to include the Spicer Homestead Ruins; and that was when they would need the A2 Survey to file in the town's land records.

Chairman St. Vil thanked Mrs. Parkinson for her comments, and he asked her to remain at tonight's meeting, noting that the Town Council would be discussing New Business Item #5 later in the Agenda.

VI. COMMITTEE COMMISSION AND BOARD REPORTS – None.

VII. COMMENTS OF TOWN COUNCILORS

Councilor Barnes thanked all those who attended tonight's meeting both in-person and on-line; and he thanked all the residents who spoke this evening. He stated that he and Chairman St. Vil do not always agree on everything, however, he stated that they do both agree that everyone had a voice. He stated there was a lot of discussion this evening; and that he wanted to share the following points:

- Pledge of Allegiance – Councilor Barnes stated that he personally would appreciate if all Town Council Members would stand for the *Pledge of Allegiance*. He stated that he agreed and understands that the things they were seeing in their country were very uncomfortable; and concerning. He stated *Liberty and Justice for All* meant a lot to him; and it did not mean that they were there. He stated as a Nation they have never been there; but that was what they were striving to achieve.
- Councilor Buhle's Social Media Post – Councilor Barnes stated because Councilor Buhle was not present this evening, that he was not going to go into detail; and he would like to give Councilor Buhle an opportunity to respond. However, he stated her comments were an embarrassment. He stated her comments may not have been intended for public discourse, but they became public discourse and were in a tone and language that was not appropriate for the community.
- Good Thing – Bad Thing- Councilor Barnes stated during dinnertime his wife instituted something to engage their children in conversation that they called Good-Thing-Bad Thing. He stated that he mentioned two Bad-Things this evening; and therefore, he wanted to share the following Good-Thing this evening. He thanked their Public Works Department for their hard work in keeping their roads clear and safe during the snowstorms this winter. He stated that he hoped the weather was in their favor going forward and that the Public Works Crew could get some rest. He asked Mayor Allyn, III to express their deepest gratitude to the Public Works Department.

Councilor Brunelle thanked everyone for coming to tonight's meeting whether they liked her or not. She addressed those who were offended, angry, or ruffled by her choice to sit during the Town Council's *Pledge of Allegiance*, and that she wanted to note the following:

- First Amendment Protection – Councilor Brunelle stated that the Supreme Court confirmed that individuals could not be compelled to stand or salute the flag. Choosing not to stand was a form of symbolic speech, that was protected by the First Amendment. It was not illegal, it was not against the law to sit during the National Anthem, and it was not punishable by law. It was a valid expression of the freedoms the flag itself represents.

Councilor Brunelle stated that she was an Elected Official; does not get paid to do this; and that she volunteered to be elected; and was elected. She stated to believe that all of them to sit up here and should be puppets and mindless drones was ridiculous. She stated that she had integrity, which was defined as: Quality of being honest, and having strong moral principles, moral uprightness. She stated that Moral Uprightness was defined as: Having the quality of possessing strong ethical principles, integrity, and consistent honest behavior; it represents a firm commitment to doing what was right; acting with virtue, accountability, and fairness regardless of consequences, or convenience. She stated that she knew that people would be mad, angry, rood, and even hostile to her for sitting during the *Pledge of Allegiance*. She stated that she knew that it would make her life complicated and hurt her emotionally and be inconvenient, but she did it anyway, because she had integrity. She stated that she did not sit during the *Pledge of Allegiance* to grandstand, or for favorable attention, noting that she knew that unfavorable attention would be aimed at her; as shown here tonight. She stated that she did not sit during the *Pledge of Allegiance* for media attention, noting that *The New London Day Newspaper* reached out to her, noting that she had no intention for that. She stated as someone with integrity, that she would not say something to say something. She stated that she would not say *Liberty and Justice for All*; because she knew that was not true right now in this country; noting that she wanted it to be true, but it was not.

Councilor Brunelle continued by stating that Immigration Control Enforcement Officers (ICE) were breaking and treading over their Constitutional Rights. Their sitting President speaks of violence against those who disagree with him over policy, he was interwind in a massive pedophile debacle; posted highly racial facebook post about a former President and he refused to apologize for it. She stated that people will say that they were respectful of the flag and they were respectful the President, even if they do not like him. However, she stated that they

do not stand up and talk bad when the current sitting President was disrespecting a former President; and being racist.

Councilor Buhle went on to note that she has read letters and heard comments crying out against one of her colleague's facebook posts that had some profanity; and she questioned where those residents outrage was for the President's facebook post; and for his betrayal of President Barack Obama and his wife. She stated that she could see all of them, for who they were by their actions, noting that she could see if they had integrity or not. She stated for the call for her to focus on their town, that what was happening in our nation was important to their town and to every individual in it. She stated to ignore it would serve no one. She stated integrity would not let her ignore it. She stated as she has said at previous meetings that she did not know what to do about the policies at the top, but being silent was not an option.

Councilor Thompson stated that he appreciated all of the residents who were present and spoke this evening; and he appreciated all those who have spoken at other public forums and who have written a letter. He stated a part of him appreciated the outrage, but that he believed the outrage was misdirected. He stated he sat during the *Pledge of Allegiance* in-part to protest Immigration Control Enforcement Officers (ICE). He noted that he disagreed with Mr. McKeon's comments that the ICE Officers were cops. Councilor Thompson stated that the cops he knew were well trained, had discipline, and self-control; noting that ICE Officers have not demonstrated any of those qualities. He stated when he sits during the *Pledge of Allegiance* it was because he was disappointed. He asked that residents not allow what was happening in their country right now to become *normal*, and that they do not become *desensitized* to what was going on, because what was going on in their country was abnormal, it was ugly, and it was wrong. He stated he compiled a list of the things that ICE has done over the last few months and that he had to stop because it was a bit too much. He stated Rene Good and Alex Pretti were executed, a seven year old child was taken 1,200 miles away from her mother to a detention camp in Texas; noting legal or illegal this was wrong. He stated the American Flag stands for a lot of things to a lot of people, it was subjective. He thanked everyone in this room; and their family members who have served their country; noting that his Farther was a Naval Aviator during the Vietnam War and was a Prisoner of War (POW); both of this Grandfathers fought in World War II; one flew B-17 flying fortress and stay for the Berlin Airlift, and his other Grandfather had half his face caved-in by a Howitzer Recoil; his Step-Father was Special Forces and a POW, noting that someone does not walk away from that experience normal. He stated that he could trace his family's military tradition back to the Revolutionary War, noting that everybody he has talked to say they served to protect their rights; then they have also fought to protect his right, and Councilor Brunelle's right to sit down during the *Pledge of Allegiance*. He stated that he sits down during the *Pledge of Allegiance* with no disrespect in his heart to anyone who has served this country. He stated as he has said at prior meetings: "*You can love something and still be disappointed in it*". He stated the reason he was sitting down during the *Pledge of Allegiance* was because right now what was happening in his country disappointed him. He stated this was not the country he grew up in; and that this was not normal, and he begged them again not to become desensitized to this. He stated people who were present this evening and stood up, and said something; or even those who did not say something, the fact was that they were thinking awful things about them and about what they were doing.

A resident shouted that they could know what people were thinking in their thoughts, stating he was not a mind reader. He asked if there was a three minute rule for the Councilor to speak. Chairman St. Vil asked resident to leave the meeting. He asked Councilor Thompson to continue.

Councilor Thompson continued by stating regardless of what residents thought of him, that he appreciated the fact that they were here, because that meant that the conversation has already begun. Thank you.

Councilor Ryan stated that he appreciated everyone who attended tonight's meeting and the comments from both sides of the aisle. He stated as Local Elected Officials that they represented all of their residents, and therefore, he needed to hear all perspectives and that he needed to respect all perspectives; noting that he takes that into account with every decision he makes on the Town Council.

Councilor Ryan continued addressing the following:

- Winter Operations – Councilor Ryan stated that he echoed Councilor Barnes’ comments regarding the Public Works Department during the snowstorms; noting that he appreciated the work they do.
- Pledge of Allegiance – Councilor Ryan stated that he has always stood for the *Pledge of Allegiance* not because he does not know what it means, not because it was compulsory, noting that he had military service in his family. He stated that he respects what the American Flag stands for them, and the sacrifice they made for him to be where he was now, in arguably a privileged position, representing all of you. He stated one of the things he loved about living in Ledyard, specifically Gales Ferry, was that every morning at 8:00 a.m. he hears Reville, noting that he loves that. He stated through his employer he had the opportunity to work at the New London-Groton Sub Base and at 8:00 a.m. everybody froze, stopped, and paid their respect. He stated no matter where they stood, where they were, what their beliefs were, it was a single unifying symbol. He stated to him that was powerful; and it was something that endures Presidencies, it endures Congressional Seats, it endures time. He stated this year was their Country’s 205th Anniversary and that Flag in various iterations, as their country expanded, has stood for one thing and one thing only which was “*We are the United States of America*”. He stated that he would continue to stand for the *Pledge of Allegiance*; when he was outside he would stop at 8:00 a.m. and face the Flag on his property to pay his respects.
- Social Media Post – Councilor Ryan stated because Councilor Buhle was not present this evening he would not direct any specific comments toward her. However, he noted that he would state how he conducted his own behavior. He stated this was his third term serving on the Town Council; and that he conducted himself with the expectation that he represents the community of Ledyard at all times; at work, at home, on-line, regardless of whether you think it or not, the internet lives forever, it was not private space, it was a public service, end of story. He stated as Local Elected Officials that members of the Town Council represented all of their residents locally, at all times. He stated agnostic of his beliefs; agnostic of any one single perspective that exists. He stated for those who have followed him that his votes on the Town Council have not been party line, they have been rationale; and they were decisions that he thought were the best for the majority of the citizens they represent as Local Elected Officials. He stated that he would continue to do that, because that was what they were elected to do. He stated that they were not elected to provide their own perspectives of what was going on at the Federal Level; noting that they were not going to change that here on the Town Council. However, he stated what they could change was the quality of life for their residents locally, and that was how he would focus his energy.

Councilor Garcia-Irizarry stated at every Town Council meeting they stand up for the *Pledge of Allegiance*. She stated for many, when they say those words, they really mean what they were saying. She stated they were *Pledging Allegiance* to their country because they trust in their country there is and would always be *Liberty and Justice for All*; but as Councilor Barnes said, in history there were very few instances in which everyone has enjoyed *Liberty and Justice for All*. She noted up until the 1960 there was Segregation in which many of them grew up watching the Civil Rights Movement unfold. She stated their Government was who they entrusted with the duty to guarantee *Liberty and Justice for All*. However, she stated when their Government was not holding up their side of the bargaining than those words lose their meaning and purpose because the country from the *Pledge of Allegiance* does not exist in that specific moment in time. She stated the reason she stands for the *Pledge of Allegiance* was because she was holding on to the hope that those words would come true. She stated there was a five-year old in Minnesota who probably recited the *Pledge of Allegiance* every single day in school; and for what, for the country that he *Pledged Allegiance* to; to use him as bait and to treat him as if he was nothing. He stated that she supported her fellow Councilors for exercising their First Amendment Rights and for standing up; or in this case for sitting down; for what was right and for bringing up an issue that was happening in Minneapolis today, but tomorrow could happen here in Ledyard. She stated that she supported the rights of all of Ledyard’s residents, and while she may not agree with some of them, that she does appreciate every comment and email they have received. She stated that she understands that some feel that this act of protest devalues the sacrifices of their Troops and Veterans. She stated that she knows how passionate people can get about this noting that her Grandfather was a Veteran, her Uncle sacrificed his life in the Vietnam War noting that he was one of the 58,220 soldiers that died. She stated that her Uncle sacrificed his life to uphold the rights that

ideally we should all enjoy. She stated the interesting thing was that although her Uncle sacrificed his life for his country that because he lived in Puerto Rico he never had representation in Congress. She explained that because Puerto Rico a U.S. Territory, Puerto Rico does not have voting representation in Congress, meaning its residents cannot vote for voting members of the House of Representatives; Senators or the President. However, she stated Puerto Rico citizens enlist and fight for this country. She stated that they were fighting with the hope that someday they would be treated the same as the people who live in the mainland were treated. She stated their sacrifice and the sacrifice of many needed to mean something. She stated that she knows that they all disagree about some things; however, she stated that they should respect everyone's rights to exercise their Rights. She stated that she respected everyone, and appreciated every single person that stands up, and that she appreciated what Councilor Brunelle and Councilor Thompson were doing, whether she agreed with them or not; that she appreciated that they could exercise their Rights.

Councilor Garcia-Irizary continued by noting that she agreed with Councilor Barnes' and Councilor Ryan's comments regarding the Public Works Department, noting that they have not seen a winter like this one in a decade. She stated in reading the newspaper that many towns were in the same situation as Ledyard, noting that the salt supplier did not expect this type of winter, and that some towns were using sand on their roads. She asked that they all help the town by not shoveling their snow into the roads; and that they try to keep the snow on their own property.

Councilor Lamb thanked everyone for attending tonight's meeting. He noted the number of hands that were raised when asked if there were any military service members in the audience this evening. He stated that he was a 19 Delta Scout serving in the Army in the 24th Infantry Division. He stated as Councilor Thompson mentioned many of them have family members who served in the military, noting that he was a fourth generation stating that Timothy Lamb served in the 1754 Conflict with the French. He stated he loved Councilor Ryan's comment regarding being able to hear the Reville.

Councilor Lamb continued by addressing the false narrative that was heard during the November 4, 2025 General Election that the town was run into the ground; and they had problems with the schools, and the atmosphere that the town was terrible. He stated that Ledyard was a great town, and it was not run into the ground. He noted ever since the original Villages (Gales Ferry Village, Lambtown Village, Ledyard Center and the Rogerene section) came together that Ledyard has been a great town. He continued by commenting on the following:

- What makes Ledyard a great Town- Councilor Lamb stated the community and the volunteers who serve on all of the Town's committees/commission/boards make Ledyard a great town. He noted volunteers like Historic District Commission Members Doug Kelley and Karen Parkinson do a great job for the town.
- Staff and town workers – Councilor Lamb stated that Ledyard's Staff and Town Workers do a great job. He stated all of his interactions with them have been great.
- Board of Education & Ledyard School District – Councilor Lamb stated the Teachers, Staff, Paraprofessionals, the Substitutes were all great. He stated that this Board of Education was a great model. He noted that Board of Education Chairman Jennifer Reguin did a great job in putting the right people in the different leadership positions, not based on political party. He stated that was the type of model the Town Council should be considering.
- Fire Departments and Police Department – Councilor Lamb stated that he would not support anyone suggesting that they defund the Police Department. He stated he ran into a member of the Police Department who said that they felt bad that the Town Council did not support them. He stated that this cannot continue.
- Mayor Allyn, III – Councilor Lamb stated that Mayor Allyn, III has been serving the Town for about 12 years. He stated Mayor Allyn's guidance, working with the residents and supporting this town has been outstanding. He stated the community should celebrate their leaders like Mayor Allyn and School Superintendent Hartling.

- Town Council – Councilor Lamb stated the Town Council should shape-up and start supporting their Volunteers, Town Staff and everyone he mentioned this evening.
- Ledyard Fair Initiative – Councilor Lamb stated in early March there would be a Kick-Off Meeting to look at establishing a 501(c) non-profit status and bylaws, noting that this would be a non-partisan effort and an opportunity for everyone to come together. He stated that his intention was to be a facilitator, noting that eventually they would have a Ledyard Fair Board.
- Illegal Immigrant – Councilor Lamb stated he married an Illegal Immigrant. He stated that he used that term because that was what his wife said she was. He stated his wife went through the process to become a US Citizen, noting that the process took about 15-years. He stated that he was going to suggest they use the Community Relations Committee for Diversity, Equity & Inclusion to get some insight into their immigrant community. However, he stated that he was now saying that they should privately. He stated anyone on this Town Council who would like to learn more about the concerns of the immigrant community that he could help them connect with people to have these types of conversations. He stated that if they wanted to volunteer that he could hook them up. He stated the type of work Councilor Thompson does as the kind of stuff they could do for those who were interested.

Councilor Lamb stated that he thought they could do better and that he hoped they do; and that he could do better; and he hoped that he do.

Councilor Parad commented on the following:

- Measles and Mumps Cases were on the rise – Councilor Parad stated that Measles/Mumps/Rubella (MMR) was a combination vaccine. She stated if they skipped the MMR Vaccine that more illness would come about. She stated that the United States might be loosing their Status of *Disease Free* soon.
- Cajun Cook-Off - Sunday, February 15, 2026 – Councilor Parad stated the Ledyard Education Advancement Foundation (LEAF) would be hosting their 2nd Annual Cajun Cook-Off on Sunday, February 15, 2026 to coincide with Mardi Gras. The Event would take place from 3–5 p.m. at the Gales Ferry Fire Company. Contestants could sign up on line. She stated that they had a good amount of entries, but it would be great if more cooks and bakers wanted to enter. She state the High School Wood Shop students made some amazing plaques for the winners; and the Elementary School students made all of the decorations. She stated this was a good opportunity to bring everyone together to do something fun for their community and support Ledyard Schools.
- Councilor Buhle’s Statement – Councilor Parad stated that she was given a statement from Councilor Buhle to read this evening, noting that she just received it and has not read it until just now:

“2/11/2026

I’d like to apologize for missing this meeting. I am out of state on a vacation I planned in early January.

There has been a lot of controversy in differences of opinions in the last few weeks. In late January, I posted a Facebook post to my personal Facebook page. This post was not intended to be posted to the public, though, as a millennial, I know that everything on the internet is eventually public.

I am being strongly criticized for my use of vibrant and passionate adult language. Those who know me personally as a friend know that I use whatever words I’d like when I’m among friends, and conduct myself differently in a professional environment. Those words were not intended to be addressed to the public as a councilor comment, and the statement of “don’t speak to me again” was to imply that I cannot consider you a friend if you support the actions of the federal administration that are eroding constitutional rights.

In the aftermath of the public posting of my personal post, I received dozens of supportive private messages, and an outpouring of supportive comments saying that I was expressing their unheard rage. While many in our community are policing my language, others are passionately supportive of the genuine and empathetic anger I have.

While acting as a town councilor for the public, I have always conducted myself in a professional and far less profane matter. My actions and intentions as a councilor have always been to continue working for a vibrant, safe, and inclusive community.

The paradox of tolerance states: if a society extends its tolerance to those who are intolerant, the tolerant society will be destroyed. To create an inclusive environment in our town for all of our neighbors — immigrants, Americans, and otherwise — it is important that we continue to stand up against those who cheer for their demise.

To those who say that federal issues are not town issues, I encourage you to question how many of your friends are immigrants. How many of your friends and neighbors are people of color, full blooded Americans who are being targeted for the color of their skin? Privilege is saying it's not a problem because it isn't happening to you personally, and if you are still feeling that federal problems are not in our purview, I encourage you to talk further with neighbors of different viewpoints and recognize that these are local issues, even if they are beyond our jurisdiction.

Thank you to all those who have supported me and know that I will continue to support what makes our community and town beautiful.”

Chairman St. Vil stated that tonight has been interesting and definitely the hardest job that he has not been paid for. He stated that he has access to a panic button and at one point tonight he thought that he may have had to use it. However, he stated during that moment that Mr. Munger and Mr. Sabbag spoke-up and said let's give things a minute. He stated had they not spoke-up; that he thought this Chambers may have spiraled, and that the Group may have taken over, and he may have had to hit the panic button. However, he stated the temperature was lowered; and that he genuinely appreciated what they did in that moment. He stated the reason he was sharing this was because there were people who do not have a voice; and were relying on those who do, to speak up for them. He stated when they see someone speak up or protest, that they were Mr. Munger and Mr. Sabbag this evening, noting that they were advocating for people other do not listen too because there were not a member of their community.

VIII. REVIEW AND APPROVAL OF PRIOR MEETING MINUTES

MOTION to approve the Town Council Minutes of January 28, 2026:

Moved by Councilor Ryan, seconded by Councilor Garcia-Irizarry

VOTE: 8 – 0 Approved and so declared

IX. COMMUNICATIONS

Chairman St. Vil noted that a Communications List has been provided on the meeting portal for tonight's meeting, and he noted there were referrals were listed.

Councilor Ryan noted that the Town Council received communications that were not included on tonight's Communications List; such as Pastor Dyke's letter, noting that he wanted to make sure those communications were in the record. Chairman St. Vil explained the *Twenty-eight Town Council's Rules of Procedure* that were adopted at their December 1, 2025 Organizational Meeting included the following:

“Communications published with the Agenda shall consist of written correspondence formally submitted to the Town Council for the record.

The following will not be published with the Agenda, but will remain public records:

- a. *Communications that contain confidential personnel or protected information;*
- b. *Social media posts, screenshots, or online commentary;*
- c. *Communications containing profanity, threats, or defamatory statements;*
- d. *Communications unrelated to items within the Town Council’s legal jurisdiction.”*

Chairman St. Vil went on to note that they had Freedom of Information Act Training (FOIA) last night, and he explained all the communications they received were in the record, and that if someone were to ask for those communications that they would be available. He stated based on the *Rules of Procedure* that he did not include the communications regarding the social media post.

X. COUNCIL SUB COMMITTEE, LIAISON REPORTS

Administration Committee

Councilor Garcia-Irizarry stated the Administration Committee met earlier this evening noting they discussed the following: (1) Proposed “*Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” was forwarded to the Town Council to set a Public Hearing date; (2) Res#001-2023/Feb 22 “*Resolution Establishing Administrator Department Head Benefits*”; (3) Discussed Establishing an Ad Hoc Committee to Evaluate the Planning & Zoning Commission to determine if the two Commissions should be separate.

Community Relations Committee for Diversity Equity & Inclusion

Councilor Brunelle stated the Committee would be meeting on February 18, 2026.

Chairman St. Vil noted that the Community Relations Committee for Diversity, Equity & Inclusion would be hosting the 2026 Black History Month Contest. He stated that they were once again partnering with Ledyard Public Schools to offer a voluntary contest; noting for Elementary School the students had the opportunity to make Posters, and the Middle School and High School students could write Essays to reflect on the significance of Black History Month. He stated there were monetary prizes for the winners, noting that Contest information was available at each of the schools and was also posted on the Town’s Website.

Finance Committee

Councilor Garcia-Irizarry noted on February 4, 2026 the Finance Committee had the following two meetings: (1) Regular Meeting at which Auditors Clifton/Larson/Allen presented the Fiscal Year ending June 30, 2025 Annual Audit, noting that it was a good Report. She also noted that the Finance Committee had one item on tonight’s Agenda that they would discuss later this evening; and (2) Joint Meeting with the Board of Education’s Finance Committee at which they discussed a lot of items regarding the schools and the upcoming preparation for the Fiscal Year 2026/2027 Budget.

Land Use/Planning/Public Works Committee

Councilor Thompson stated the LUPPW Committee met on February 2, 2026 noting that the meeting was well attended by residents. He noted the LUPPW Committee primarily discussed the Spicer Homestead Ruins. He stated it was a lively discussion, noting that Councilor Lamb made an impassioned plea.

Liaison Reports

Board of Education

Councilor Barnes reported on the following: (1) Fiscal Year 2026/2027 Budget- At their February 10, 2026 meeting the Board of Education approved the Proposed Fiscal Year 2026/2027 Budget recommendation in the amount of \$41,932,335; (2) Signage at a Sledding Area at the Middle School – Councilor Barnes stated at the Town Council’s January 28, 2026 meeting he was asked to follow-up with the Board of Education regarding this suggestion. He stated the Board of Education’s purview was that the property was managed by the Parks & Recreation. He stated the Board of Education was not opposed to the signage; and they were not endorsing the signage. He stated the Board of Education referred it back to the Town for the decision as to whether signage would be appropriate or not.

Councilor Lamb commented on the Board of Education's interpretation of the new State Statute regarding their Capital Non-Recurring Account. He stated that the Board of Education has created a sub-account under the new account.

Ledyard Center Fire Department

Councilor Barnes stated the Fire Department addressed the following: (1) Fiscal Year 2026/2027 Budget included minor increases in the following accounts: (a) Incentive for Volunteers responding to fire emergencies; and (b) Fleet Maintenance Account; (2) Joint Radio Policy – Councilor Barnes stated the Ledyard Center Fire Department and the Gales Ferry Fire Department were collaborating to establish a Joint Radio Policy.

Ledyard Farmers Market Committee

Councilor Brunelle stated the Farmers Market Committee met on February 4, 2026 and discussed the following: (1) Purchase a laptop, printer, and a laminator; (2) Weekly Market Themes for the 2026 Season; (3) Increasing the number of Vendors at the Market; and (4) Fees may increase for the Food Vendors, but not the Regular Vendors to cover expenses.

Ledyard Beautification Committee

Councilor Brunelle stated the Beautification Committee met on February 3, 2026; however, she was unable to attend due to a schedule conflict. However, she stated that she would review the Committee's minutes and report back.

Inland Wetland and Water Courses Commission

Councilor Thompson stated the IWWC met on February 3, 2026 and discussed a property on Christy Hill.

Councilor Ryan stated that he did not have a Liaison Report; however, he stated that he wanted to go back to the Town Council's Communications List and he questioned whether Chairman St. Vil could point to the section in the *Twenty-eight Town Council's Rules of Procedure* he cited earlier this evening.

Chairman St. Vil suggested they take a 10-minute recess to look up the *Twenty-eight Town Council's Rules of Procedure*.

Entered into Recess at 9:16 p.m.

Came out of Recess 9:25 p.m.

Chairman St. Vil called the meeting back to order at 9:25 p.m.

Councilor Ryan apologized for wasting everyone's time, noting that he was not aware of the new Town Council Rules of Procedure, noting that he should have done his due diligence.

(Liaison Reports Continued)

Permanent Municipal Building Committee

Councilor Garcia-Irizarry the PMBC had to cancel their February 9, 2026 because they did not have a quorum.

Parks, Recreation & Senior Citizens Commission

Councilor Garcia-Irizarry stated because of the schedule conflict she was not able to attend the Parks, Recreation & Senior Citizens Commission February 10, 2026 meeting. She stated that she would review the Commission's minutes and report back at the next Town Council meeting.

Ledyard Historic District Commission

Councilor Lamb stated the Historic District Commission's January 28, 2026 was cancelled due to the snow storm. However, he stated the Commission attended the Land Use/Planning/Public Works Committee's January 5, 2026 and February 2, 2026 meetings. He stated at the February 2, 2026 meeting there were about 30 residents in attendance along with members from the State Historic Preservation.

Councilor Lamb stated during the LUPPW Committee's February 2, 2026 meeting that Councilor Thompson, as the Subcommittee Chairman conducted himself well. He stated that he took and executed a commitment. He stated the residents appreciated that Councilor Thompson was willing to listen to them and move things forwards.

Councilor Lamb went on to note that the Historic District Commission met on February 9, 2026 and held their Annual Meeting and addressed the following: (1) Election of Officers noting the following: Chairman – Karen Parkinson; Vice-Chairman- Doug Kelley; Clerk – Kelly Lamb, noting that they were all present this evening. He congratulated the Officers, and thanked them for their service and work that they do; stating that they appreciated them volunteering; and (2) Reviewed their Rules of Procedure.

Agricultural Commission

Councilor Lamb noted the Agricultural Commission met on January 20, 2026, and he noted their next Regular Meeting was scheduled for February 17, 2026. He stated the Agricultural Commission and the Conservation Commission were already working on the Plan of Conservation & Development (POCD) which was not due for another three-years. He noted the Agriculture Commission's next Quarterly Joint Land Use Meeting was scheduled for April 21, 2026. He suggested Chairman St. Vil or another Town Councilor attend the Quarterly Meeting to see that operation and what was going on there.

Conservation Commission

Councilor Lamb stated the Conservation Commission met on February 10, 2026 and were working on the following: (1) Pollinator Gardens and Water Gardens on one of Groton Open Space Association's (GOSA) property. He stated that they were working to have small gardens along the trails with signs where people could have lunch, noting it was a great way to connect their community.

Councilor Lamb stated although he was not assigned that he also attended the following Meetings: Board of Education Facilities Committee; Finance Committee; Public Work Shop; Social Services Board; America 250 Planning Committee Meeting was cancelled; Permanent Municipal Building Committee (PMBC) did not have quorum, which was part of the end-to-end process of delaying things. He stated if Town Councilors cannot make their Liaison Assignment Meetings to let him know; because he would show up. He stated that the members serving on their Volunteer Committees appreciate having a member of the Town Council attend their meetings. He stated there was a list of Committees that he does not hear Councilors Report on; noting those Committee also deserve to have a Report.

Library Commission

Councilor Parad stated she could not attend the Library Commission's February 9, 2026 meeting because she had a pre-existing Ledyard Education Advancement Foundation (LEAF) meeting that was scheduled at the beginning of the school year. She stated had she know that she would have tapped Councilor Lamb to fill her place on Monday. She reported that the Library Commission does have a 2026 Pi Day sale coming up on Saturday March 26, 2026 at which they would be selling desert pies.

Councilor Parad went on to note that Ledyard Education Advancement Foundation (LEAF) would also be doing a Pi Day at all of the Pizza Restaurants in town.

XI. MAYOR'S REPORT

Mayor Allyn reported on the following: (1) Snow Storm – Mayor Allyn stated they had another long duration snow storm this past weekend, noting that the Public Works Crew was in for 16-hours to handle the 6.5 inches of snow. He noted the Department was down two-drivers and he addressed the very cold temperatures explaining that the salt does not work at temperatures below 20-degrees. He stated they had a hiring request out since October, and that they now have a replacement who has their CDL License, and would be starting in two-weeks; (2) America 250 Planning Committee Meeting – Mayor Allyn stated the February 10, 2026 meeting was cancelled because he had a meeting with the Roofing Contractor who did the work at the Gales Ferry School and the Board of Education Central Office. He stated also at the meeting with the Contractor was the Architect and the Owners Representative to try to come to some resolution. He stated they did arrive at a level of resolution for the Board of Education Central Office; however, he stated the elephant in the room was Photovoltaic (PV)

Roofing System that has never been installed on the Gales Ferry School. He stated the Gales Ferry School Roofing Project was supposed to be done and delivered at the end of August, 2024. He stated there would be more to come on this legal matter; (3) Freedom of Information Act (FOIA) Training – Mayor Allyn stated he attended the February 10, 2026 Training with State FOIA Director of Education and Communication Russell Blair, noting that the session was outstanding. He noted they held two sessions one at 3:30 p.m. and one at 6:00 p.m. and that Mr. Blair provided a tremendous amount of information for everyone; (4) February 10, 2026 Freezing Rain and Sleet created hazardous conditions – Mayor Allyn stated half the Public Works Crew was called-in and worked over night to salt the roads. He stated that they were running low on their salt supply and that all the towns and the state were also running low. He stated Ledyard had submitted a Salt Order for 300-tons; however, he expressed concern that the State was trying to abscond with their entire salt load. He stated this was unconscionable because Ledyard has had their Salt Order in, as has many other towns, for weeks on end. He stated if the State takes the whole Salt Order that Ledyard would have a problem, because they only had enough salt for two plowable or icy events; (5) Mayor’s Executive Assistant Replacement Interviews – Mayor Allyn stated he has hired Jessica Michard, noting that she would start on February 23, 2026. He stated that he looked forward to Ms. Michard joining the town; (6) Federal Environmental Protection Agency (EPA) Lead Water Service Line Inspections – Mayor Allyn stated today they met with Groton Utilities about the Federal EPA Lead Water Service Line Inspections. He stated that they were 99.5% sure that Ledyard had no Lead Water Service Lines, because their water system was new, unlike surrounding towns like Norwich, New London and Groton. But nonetheless the Federal EPA was requiring them to dig at the street and to also go into the house to inspect where the waterline connects into the meter. He stated they were looking at \$750,000 to dig all the test holes to show that there were no lead water lines. He stated they were working with a Contractor and that Groton Utilities was helping to assist with a solution with the Contractor; (7) Fiscal Year 2026/2027 Budget – Mayor Allyn stated they were fully into budget season, noting that the Board of Education’s proposed Budget was due to his Office on Monday, February 23, 2026 in accordance with the Town Charter. He stated that he would deliver a proposed Fiscal Year 2026/2027 to the Town Council on Monday, March 2, 2026; (8) Ordinance #300-029 “*An Ordinance Regarding Control of Alcoholic Beverages At Town of Ledyard Facilities*” – Mayor Allyn stated that he would be assisting the Farmers Market Committee to amend Ordinance #300-029. He stated the Farmers Market has been very successful at the Lower Town Green. However, he stated there is a Policy that prohibits glass containers, noting that the Farmers Market has a Salsa Vendor, Pasta Sauce Vendor, they have jellies, jams wines and ciders which were packaged in glass containers. He stated as the Ordinance was currently written all of these products could not be at the Farmers Market. He stated that Farmers Market Committee Chairman Pam Ball was working on some language to amend the Ordinance. He stated that he would be looking for the Town Council’s assistance to get the Ordinance Amendment to the finish line, noting that it was a huge and successful Market, noting that the town was proud of their Farmers Market and did not want to see it diminished; (9) Town Attorney Budget – Mayor Allyn stated he would be coming to the Finance Committee next month to obtain authorization to overspend the Attorney/Legal Fee budget line. He stated with the billing through October 31, 2025 that \$7,109 was spent on the proposed Ethics Ordinance Reviews. He stated this budget line had a \$473 balance with about 67% of the fiscal year unbilled. He stated he had \$20,000 in his budget for Legal Fees and as he has said that they need to be mindful in how they spend their legal dollars. He stated that they needed to exercise caution. He stated they have been through three iterations of the proposed Ethics Ordinance, noting that the most recent draft dated February 9, 2026 was the best one he has seen yet. He stated that they also had some lead hazards at the Nathan Lester House that they had to address, which was part of that billing cycle. He stated that sometimes they have unusual issues that they did not know were coming. He stated that they needed to budget accordingly; or split the Town Attorney/Legal Fees budget line; or the Town could have a Town Attorney budget line, (10) Social Media Post – Mayor Allyn stated the Ledyard Police Department also saw Ms. Buhle’s social media post. He stated that the Police would be submitting a formal request that they do not want either Councilor Buhle or Councilor Brunelle to be involved with the negotiations of the contract; or involved in the vote on the contract. He stated that their view was that these two Councilors were biased toward federal law enforcement officials; and it could be a bias toward local law enforcement. He asked that they understand what their words mean and it’s impacts. He stated the Town Council was here to do the business of the Town of Ledyard; and he asked that they focus on the Town of Ledyard. He stated if they aspired to the State or Federal Offices that was fantastic; however, he stated that they needed to focus on their town.

Questions to the Mayor:

Councilor Ryan questioned whether the town had been invoiced for the 300 tons of salt and if so; how the State could take the delivery of the Salt. Mayor Allyn stated that the town had a Purchase Order in for 300 tons of Salt, noting because they were in the system, the State was aware of their Salt Order.

Councilor Ryan addressed the Town Attorney/Legal Fees budget line, and he asked whether it was possible for the Town Attorney to identify the purpose and the person engaging for each of the charges. Mayor Allyn stated that Shipman and Goodwin Invoices were itemized. He noted at one point 4 or 5 different Town Councilors all reached out to the Town Attorney regarding the same subject; noting that the Town Attorney was duplicating his efforts times five. Councilor Ryan suggested Chairman St. Vil streamline how the Town Council engages the Town Attorney so that they had a little more control in how the funds were being used. Mayor Allyn stated their Discounted Municipal Rate for Ledyard was \$295.00 per hour.

Councilor Ryan thanked Mayor Allyn for sharing the feedback from the Ledyard Police Department; noting that they all need to take that into account.

Chairman St. Vil stated the Town Council's point of contact for the contract negotiations was set prior to this, stating that it would be inappropriate for him to share who that was, noting that it was not going to change. He stated that he would like to see the Police Department's opinion in writing. He stated once they received that the Town Council would respond.

Chairman St. Vil stated at the Town Council's January 28, 2026 meeting they had a heated discussion regarding a request to overspend an account. He stated that Councilor Lamb questioned the process to overspend a budget line. Councilor Lamb stated his experience in serving on the Board of Education was that when a request was submitted to overspend an account that in the same motion they identified the source of funding to balance that over expenditure; and he questioned whether the Town followed that same process. Mayor Allyn stated that the Town typically does follow the process Councilor Lamb noted. He went on to explain in the case of something such as the Winter Operations that because it was a moving target, that it was difficult to project what that amount was going to be. However, he stated when they do authorize to overspend the Winter Operations Budget that they may get lucky, and they may see Spring; and money would not be moved.

Chairman St. Vil stated when the Town Council acted on the request to overspend the Winter Operations Budget that Councilor Buhle took the action to provide regular updates on where the Winter Operations Budget stood. He asked Councilor Barnes whether he was satisfied with Councilor Buhle's action and the Mayor's explanation of how the request to overspend accounts was typically handled.

Councilor Barnes stated at the January 28, 2026 Town Council meeting that his concern was that the request to overspend the Winter Operations budget came without a limit. He stated when they set the Winter Operations budget that they had a number in mind; and therefore, when they submit a request to overspend an account that it should include an "up-to amount". He stated because they were not prepared with a number in-mind at that meeting; Finance Committee Chairman Councilor Buhle agreed to provide updates regarding the Winter Operations budget expenditures. He stated that he was comfortable with the approach, noting that whenever they can that an overspending request should come with an increase to a certain amount. He stated when they cannot provide an amount that it was the obligation of the Finance Committee to ensure that they were monitoring what that increase was. He stated that he was satisfied with the explanation regarding the town's process to overspend a budget line.

Councilor Ryan stated during his first year on the Town Council that he had the same comments that Councilor Barnes was making this evening; and that he made at the Town Council's January 28, 2026 meeting. However, he stated that his concerns were regarding authorization to overspend the Town Attorney Fees; noting that he questioned the reason they could not budget what they thought they were going to need. He stated as explained to him at that time he fully understood in the case of the Town Attorney Fees it was more of a strategic move. He stated as everyone knows that liked having finite numbers to work with; but in the

case of the Attorney Fees they did not want to tip their hand on how much they were willing to spend, otherwise they might be taken advantage of.

Councilor Garcia-Irizarry questioned if the town ran out of salt for the roads whether they could use sand. Mayor Allyn stated that they could use sand, however, he stated it was quite messy and it would require more wear and tear on the new street sweeper; and it was a hazard for bicyclists, motorcycles, etc. He also explained that sand was not nearly as effective as the treated salt, and the state does not like them to use sand because of the MS4 Drainage Requirements. He stated when the sand gets washed into the catch basins the town would then have to clean the catch basins out and that the State then considers the sand hazardous waste. He stated as an alternative to treated salt they would use the rock salt; which was available. He stated their preference was the treated salt because it interfaces with the cold surface and the snow and ice much better than the rock salt.

Councilor Garcia-Irizarry addressed the hiring of an employee in the middle of the budget year relative to salary, noting in reviewing the Resolution - Res#001-2023/Feb 22 "Resolution Establishing Administrator Department Head Benefits" this subject was brought up. Mayor Allyn explained when a position was advertised, whether it was a union position or non-union position, that it was posted with Salary Range; so the Applicants were responding to a job posting within a salary range. He stated when a candidate was selected the town offered a salary within the range based on education, degree level, certifications, experience, etc. He stated the candidate may accept or they may counter. Councilor Garcia-Irizarry stated when the Budget has been established whether a candidate could be hired at a higher salary than the amount in the budget. Mayor Allyn stated that the salary offered could be up-to the amount at the top of the range.

Councilor Garcia-Irizarry noted the February 10, 2026 Freedom of Information Act Training, stating that she liked the FOIA pocket guide that summarized the most important points of laws that Mr. Blair handed out.

Councilor Garcia-Irizarry addressed the Attorney/Legal Fees, and she stated that she and Attorney Matt Ritter spoke for one-hour regarding the proposed Ethics Ordinance. She stated they reviewed the entire Ordinance and that she hoped they would not have to talk to Attorney Ritter again on this topic.

XII. OLD BUSINESS – None.

XIII. NEW BUSINESS

Administration Committee

1. MOTION to appoint Ms. Yvonne Walsh (U) 38 Fairway Drive, Ledyard, to the Ledyard Beautification Committee to complete a three (3) year term ending October 26, 2026 filling a vacancy left by Ms. Bingham.

Moved by Councilor Garcia-Irizarry, seconded by Councilor Brunelle

Discussion: Councilor Garcia-Irizarry stated the Administration Committee had the opportunity to talk with Ms. Walsh during their January 28, 2026 meeting, noting that Ms. Walsh attended the meeting remotely via Zoom. She stated that Ms. Walsh was excited about joining the Beautification Committee.

VOTE: 8 – 0 Approved and so declared

RESULT:	APPROVED 8 – 0
MOVER:	Carmen Garcia-Irizarry, Town Councilor.
SECONDER:	April Brunelle, Town Councilor
AYES:	Barnes, Brunelle, Garcia-Irizarry, Lamb, Parad, Ryan, St. Vil, Thompson
EXCUSED:	Buhle

2. MOTION to appoint Mr. James Harwood (D) 10 Eska Drive, Ledyard to the Sustainable CT Ad Hoc Committee to complete a two (2) year term ending December 15, 2027.

Moved by Councilor Garcia-Irizarry, seconded by Councilor Brunelle

Discussion: Councilor Garcia-Irizarry stated that Mr. Harwood was a member of the Conservation Commission and he was passionate about the environment. She stated he would be a good addition to the Sustainable CT Ad Hoc Committee.

Councilor Barnes stated as the Town Council Liaison to the Conservation Commission that he had the opportunity to work with Mr. Harwood. He noted that Mr. Harwood was a tremendous asset to the town. He stated that he enthusiastically supported Mr. Harwood's appointment to the Sustainable CT Ad Hoc Committee.

VOTE: 8 – 0 Approved and so declared

RESULT:	APPROVED 8 – 0
MOVER:	Carmen Garcia-Irizarry, Town Councilor.
SECONDER:	April Brunelle, Town Councilor
AYES:	Barnes, Brunelle, Garcia-Irizarry, Lamb, Parad, Ryan, St. Vil, Thompson
EXCUSED:	Buhle

3. MOTION to adopt a proposed “*Resolution Establishing an Ad Hoc Committee to Develop Process for Capital Improvement Building Projects*” as presented in the draft dated December 10, 2025.

DRAFT: 12/10/2025

Res: 002-2026/Feb 11

RESOLUTION
ESTABLISHING AN AD HOC COMMITTEE
TO DEVELOP A
PROCESS FOR CAPITAL IMPROVEMENT BUILDING PROJECTS
FOR THE TOWN OF LEDYARD

WHEREAS: the Ledyard Town Council recognizes the Permanent Municipal Building Committee's efforts to execute and supervise the design, construction, renovation, demolition and removal of Town and Board of Education assigned buildings that fall within the approved budget, as well as any significant installation, renovation or upgrade of service equipment and major systems as assigned by the Town Council.

WHEREAS: The Permanent Municipal Building Committee and the Board of Education have requested the Town Council establish an Ad Hoc Committee comprised of key stakeholders that play a role in the building project process.

NOW, THEREFORE, BE IT RESOLVED, that there is hereby established an *Ad Hoc Committee to Develop A Process For Capital Improvement Building Projects for the Town of Ledyard* to be composed of seven (7) members appointed by the Ledyard Town Council.

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

- One member from the Permanent Municipal Building Committee
- One member from the Board of Education
- Board of Education Director of Facilities
- Public Works Director/Town Engineer
- Finance Director
- One member from the Community-at-Large with Construction Management Experience
- One member from the Town Council

The Committee shall hold its Organizational Meeting no later than 30 days after its appointment and shall elect a Chairman, and Recording Secretary.

The Committee Members shall serve for a six (6) month term. 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.

BE IT FURTHER RESOLVED, that said Ad Hoc Committee shall:

1. Review the process for Town and School Building Projects.

2. Review Building Blocks and workflow for Building Projects.
3. Review Building Projects - Municipal Check List -1990.
4. Review Ordinance #100-015(rev1) “*An Ordinance Establishing a Permanent Municipal Building Committee for the Town of Ledyard*”
5. Evaluate the effectiveness of the Permanent Municipal Building Committee and options for the Town and Board of Education to better facilitate Capital Improvement Building Projects.

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

Develop an end-to- end Process and Timeline/Schedule for assigned Municipal and Board of Education Capital Improvement Projects to include but not be limited to the following:

For example:

- a. Preliminary Design and Cost Estimates for Project.
- b. Present Project to Town Council and request seed money for the town to hire Architects/Engineering Design Professionals.
- c. Prepare, Advertise, Evaluate, and Recommend Selection for Requests for Qualification/ Requests for Proposals (Architects/Engineering Design, Owners Representative, Construction Components, etc. to facilitate the project).
- d. Present proposed Project with cost estimates to the Town Council to request funding to support the Project (i.e. Bond/Borrowing Documentation and/or Grant Funding).
 - If Bond/Borrowing is required work with Finance Department to provide information needed for Bond Council to prepare Bond Authorization documents.
 - Work with Town Council and Departments to present the Project at a Special Town Meeting in preparation for Referendum, in accordance with Town Charter, Chapter VII: Section 9.
- e. Identify other funding sources such as Grant Funding.
 - Work with Town and/or Board of Education and Professional Consultants to complete required Applications and Forms and to submit Grant Applications according to Grant Schedules.
- f. With the approval of funding proceed to execute and supervise the design, construction, renovation, demolition and removal of Town and Board of Education buildings that fall within the approved budget, as well as any significant installation, renovation or upgrade of service equipment and major systems to include the following:
 - Work with Owners Representative, to provide oversight of construction and schedules to ensure work is progressing at a at school facilities was not being done while students were in the buildings.
 - Work with contractors and staff to review and approve payment of invoices in a timely manner.
 - Formally close out project with a letter to the Town Council and other stakeholders.
 - Provide a final report to the Town Council.
- g. Develop a process for Problem Resolution for issues that arise during the construction such as non-performance, improper installation/work, and to address warranty items.

BE IT FURTHER RESOLVED, that said Ad Hoc Committee shall provide a report of their recommendations to the Town Council upon completion of their assignment, no later than six months from its Organizational Meeting.

Adopted by the Ledyard Town Council on: _____

Gary St. Vil, Chairman

Moved by Councilor Garcia-Irizarry, seconded by Councilor Lamb
 Discussion: Councilor Garcia-Irizarry stated the purpose of creating his “*Ad Hoc Committee to Develop A Process For Capital Improvement Building Projects for the Town of Ledyard*” was to look at the entire process for a building project. She noted as an example the School Project noting that would look at what when right and what went wrong; and why the project was delayed; which cost the town more money. She stated this Ad Hoc Committee would create a step by step process that would save the town money.

Councilor Lamb stated one of the reasons he ran to serve on the Board of Education was because of all the issues regarding the school facilities; and because of the delays that increased the costs of the building projects. He noted that both former Board of Education Chaiman Anthony Favry and Permanent Municipal Building Committee Chairman Joe Gush submitted letters supporting the establishment of this Ad Hoc Committee to develop an end-to-end process because they believed there was ways to improve the process. He noted School Superintendent Jason Hartling’s presentation earlier this evening regarding the large Board of Education Capital Improvement Projects that were coming up. Therefore, he stated that it behooved the town to look at the whole process in how they identify projects all the way through the execution of projects, and the close out of contracts. He stated that this Committee would provide a recommendation.

VOTE: 8 – 0 Approved and so declared

RESULT:	APPROVED 8 – 0
MOVER:	Carmen Garcia-Irizarry, Town Councilor.
SECONDER:	Ty Lamb, Town Councilor
AYES:	Barnes, Brunelle, Garcia-Irizarry, Lamb, Parad, Ryan, St. Vil, Thompson
EXCUSED:	Buhle

Finance Committee

- MOTION to approve a Connecticut DOT Local Bridge Program Grant Application for replacement of Lantern Hill Road Bridge No. 137001 for 50% of eligible costs, the total of which is presently estimated to be nearly \$2.8 million;

In addition, approve a proposed “*Resolution Local Bridge Program State Project No. 9071-9001 Bridge Number: 137001 Lantern Hill Road Over Whitford Brook In The Town Of Ledyard*” authorizing the Mayor to submit the Grant Application, as presented in the draft dated January 28, 2026.

DRAFT: 1/28/2026

RESOLUTION
 LOCAL BRIDGE PROGRAM
 STATE PROJECT NO. 9071-9001
 BRIDGE NUMBER: 137001
 LANTERN HILL ROAD OVER WHITFORD BROOK
 IN THE TOWN OF LEDYARD

BE IT RESOLVED, that Fred Allyn, III, Mayor of the of the Town of Ledyard, is authorized to sign the **LOCAL BRIDGE PROGRAM SUPPLEMENTAL APPLICATION** and any associated agreements between the State of Connecticut and the Town of Ledyard for the Lantern Hill Road Bridge over Whitford Brook; Bridge No. 137001.

Adopted by the Ledyard Town Council on: _____

 Gary St. Vil, Chairman
 Ledyard Town Council

I, Patricia A. Riley, Town Clerk of the Town of Ledyard, a municipality organized and existing under the laws of the State of Connecticut, hereby certify that the above is a true copy of the resolution adopted by the Ledyard Town Council of said municipality at its Regular Meeting held on February 11, 2026

I DO FURTHER CERTIFY that the above resolution has in no way been altered, amended or revoked, and is in full force and effect.

AND I DO FURTHER CERTIFY that Mayor Frederic B. Allyn, III is the Mayor of the Town of Ledyard, and has been since May 1, 2017.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the Town of Ledyard this _____ day of _____, 2026

(Seal)

Patricia A. Riley, Town Clerk

Town of Ledyard

Moved by Councilor Ryan, seconded by Councilor Garcia-Irizarry

Discussion: Councilor Ryan stated the planning for the replacement of Lantern Hill Road Bridge over Whitford Brook has been in-process for several years. He stated a \$3 million Special Grant was previously obtained for infrastructure needs for the Whitford Brook watershed. He stated this Local Bridge Program Grant would pay for the balance (or 50%) of the cost for the replacement of the Lantern Hill Road Bridge, noting that no local funding would be required for this project, and therefore, it would be no cost to the taxpayers, which was great.

Mayor Allyn, III stated that Public Works/Town Engineer Steve Maslain became aware that Ledyard could apply to the State Local Bridge Program, however, they could not use local funding to get the 50% Grant Funding for the replacement of Lantern Hill Road Bridge over Whitford Brook. He stated because the Town was not using local funding they qualified for the State Local Bridge Program. He stated that this would allow the town to save some of the Grant Funding the Town received, compliments of Senator Cathy Osten, which was great, because they also had a second bridge on Lantern Hill Road that needed work.

VOTE:

8 – 0 Approved and so declared

RESULT:	APPROVED 8 – 0
MOVER:	Tim Ryan, Town Councilor.
SECONDER:	Carmen Garcia-Irizarry, Town Councilor
AYES:	Barnes, Brunelle, Garcia-Irizarry, Lamb, Parad, Ryan, St. Vil, Thompson
EXCUSED:	Buhle

Land Use/Planning/Public Works Committee

- MOTION for the Town Council to hereby appoint the Ledyard Historic District Commission to serve as the Historic Properties Study Committee for the Spicer Homestead ruins pursuant to CGS §7-147q. The study shall be limited to the parcel defined in the Town-commissioned survey dated January 14, 2025, unless otherwise authorized by the Town Council. This appointment is for study and recommendation purposes only, and does not constitute approval of any designation or ordinance.

Moved by Councilor Thompson, seconded by Councilor Barnes

Discussion: Chairman St. Vil stated as they heard earlier this evening this effort to obtain a Historic Designation of the Spicer Homestead Ruins has been going on for quite some time. He stated during his first term on the Town Council he walked the area with Mrs. Parkinson, noting that it was relevant to the history of Ledyard, and he thought it was a worthwhile effort

to preserve it . He stated the State has a process by which a Historic Property within the Town could be designated as such and there was a potential to eventually petition the State or Federal Government for additional funding. He stated during the time he served as the Land Use/Planning/Public Works Committee Chairman that they laid out a Plan to seek a Historic Designation which included compiling the study work that had already been done into a document, conduct an A2 Survey, proceed to submit the data to the State and/or Federal Government to begin the Official Process to designate the site as being of historical significance. He noted that work took a long time, and during that time Mayor Allyn, III provided some American Rescue Plan Act (ARPA) Funding to pay for the A2 Survey; which he had this evening, noting that the A2 Survey Map outlined the footprint of the Spicer Homestead Ruins, which was more or less 0.7- acres. He stated that it was valid for the Town Council to consider this Motion this evening; explaining that initially they did not think a Motion such as the one presented this evening was required because the Town has a Historic District Commission. However, he stated the Commission was for a “District” and Connecticut General Statute 7-147q was for a property. He stated that his understanding was wrong and that the Historic District Commission was right; and therefore, he stated they should Designate the Historic District Commission to Study the Spicer Homestead Property. He stated once appointed, the implications were that the Study Committee could go directly to the State and make recommendation on what the Spicer Homestead Ruins should look like. He stated that they should leverage the work and the A2 Survey that has already been done, because the Study Committee would not have to spend additional funds to conduct another A2 Survey, He stated during the course of their work if the Study Committee finds that the boundary should be expanded that they would come back to the Town Council to request an expanded boundary. He stated either way, the Clark Farm Property would remain town-owned property; and had potential value for use in the future. He stated that he was an advocate to preserve historic pieces of property and that he was also an advocate to follow the process; and using the data as previously laid out.

Mayor Allyn, III stated in looking at their American Rescue Plan Act (ARPA) Funding Accounting that on August 27, 2025 an entry was added to allocate \$2,500 to conduct the Spicer Homestead Ruins A2 Survey, noting that the previous Town Council authorized 1-acre. He stated when the A2 Survey was conducted the Surveyor used some boundary walls and the survey came out to 0.73-acres; which they accepted. He suggested that they start working with what they have and if they find there was something more there, that the Study Committee could come back to the Town Council to seek additional areas to be preserved.

Councilor Lamb noted the First Step was for the Legislative Body to say that the Historic District Commission was the Study Committee for the Spicer Homestead Ruins. He stated during the Historic District Commission and Land Use/Planning/Public Works Committee discussions the Historic District Commission agreed to make a Process Map to provide updates as they completed the information. He went on to state that the process also required review by Planning & Zoning Commission; and when they get to the end of the process that there was a Step in which the Owners, who were the taxpayers, could say “Yes – or - No” or modify the Plan. He stated the A2 Survey was not needed until they get to the end of the Process.

Councilor Lamb stated they should let the Study Committee do their work, and provide their recommendation. He noted the Spicer Rock was five-feet from the A2 Survey 0.73-acres boundary line, noting that the Spicer Rock was important to the site. He stated that he could guarantee that they would be able to get outside money, from donations, etc. to pay for another A2 Survey; which would not need to be done until the end of the process

Councilor Lamb proposed the following amendment:

MOTION to amend the Motion to strike the following language:

The study shall be limited to the parcel defined in the Town-commissioned survey dated January 14, 2025, unless otherwise authorized by the Town Council. This appointment is for study and recommendation purposes only, and does not constitute approval of any designation or ordinance.

Moved by Councilor Lamb, seconded by Councilor Barnes

Discussion: Councilor Ryan requested clarification on what the 4.4-acres was based on. Councilor Lamb stated the 4.4-acres was just a number the Historic District Commission and the petitioners of this Motion threw out there. He stated CGS §7-147q lays out the steps for the process to seek and obtain a Historic Designation, noting that the A2 Survey was not needed until they get to the last step. He stated they should let the Study Committee do their work and adjudicate what the area should be. He stated that he had Mr. Stefon Danczuk and Ms. Stacy Vairo from the Preserve Connecticut attend the Land Use/Planning/Public Works Committee's February 2, 2026 meeting, noting that they said if they appointed a Study Committee that they had no commitment or liabilities because they had to go through the Process, which required the proposal to go through the Zoning Commission and the Owner. He stated that there was no down side to appointing the Study Committee.

Chairman St. Vil stated the risk was that once they designate a Study Committee they were off on their own; and could proceed with a Study that the Town Council was not aligned with. He stated in accordance with CGS §7-147q the Study Committee could go directly to the State Historic Office with their Report/Study and say that they thought there was 50-acres within the Clark Farm that was part of the Spicer Homestead Ruins. He stated that they would still need to come back to the Town Council to approve the 50-acres; however, he stated that Town Council would then need to determine the area for the Spicer Homestead Ruins to preserve, noting that the Town Council may say it was not 50- acres, it was 20; 30; or 40-acres,etc. He stated as Mrs. Parkinson has stated, the work has been done to determine the historical significance of the Spicer Homestead Ruins site.

Chairman St. Vil went on to state that he walked the property with Mrs. Parkinson, noting that he saw a footprint of a building; and therefore, the 0.7-acres made logical sense. He stated the town has paid for the A2 Survey, the Town Planner and the Mayor were aligned with the A2 Survey. He stated nothing precluded the Study Committee from coming back to ask that the boundary be changed.

Councilor Lamb stated CGS §7-147q laid out the Steps noting that the Study Committee would have to go to Zoning that the Owner had to submit their request to the State.

Councilor Garcia-Irizarry questioned whether the Historic District Commission met with Surveyors Dietter & Gardner to talk about the A2 Survey. Councilor Lamb stated at the time he was the Historic District Commission Chairman; however, he was unavailable, and that former Town Council Chairman Rodriguez and Mayor Allyn, III gave the direction for the A2 Survey. He stated it was a minor cost to change the A2 Survey from 0.73-acres to 4.4-acres. He stated the Historic District Commission did not provide direction to the Surveyor for the A2 Survey.

Historic District Commission Chairman Karen Parkinson stated that she personally carried the 4.4-acre map down to Mr. Gardner before he went out to the site to conduct the A2 Survey for the Spicer Homestead Ruins. She noted that Administrative Assistant sent Mr. Gardner an email on December 5, 2024; which included several attachments, noting that one of the attachments was the 4.4-acre map. She stated that all of these attachments were included in Legislative File #23-2143 which has been on the Land Use/Planning/Public Works Committee's Agenda for thirty meetings. Therefore, she questioned how the Town Council could approve the \$2,500 ARPA Funding for the A2 Survey when there was an attachment of a map that was 4.4-acres.

Councilor Brunelle questioned if they voted on the Main Motion, as presented this evening, the Study Committee could come back to the Town Council and ask for the more space. Chairman St. Vil stated that they could.

Councilor Ryan stated in reading CGS §7-147q that Chairman St. Vil was correct in that the Study Committee would submit a copy of their Report and Recommendations to the State; a Public Hearing would then held on the Report and Study; after the Public Hearing, as Councilor Lamb stated; the Owners of the Property, which in this case was the Town, could reject the findings of the Report, by the majority vote of the body. He stated the CGS §7-147q was a little convoluted because it assumed that the owners were private owners. Therefore, he stated the Petition would be submitted to the Legislative Body, which was themselves. He stated by the majority vote of the Town Council they could reject the findings of the Report.

Chairman St. Vil stated the risk they were taking was the size of the area to be designated as a Historical Site; the cost to do rework, the Town would assume some level of liability with a scope that exceeds an already documented and agreed upon boundary, as stated on the A2 Survey Map. He stated he just received a copy of the A2 Survey, noting that there were notes on the A2 Survey acknowledging that Mr. Lamb, in his capacity as the Historic District Commission Chairman, received a copy of the A2 Survey. He stated during this process he begged Mrs. Parkinson to meet with the Mayor with Town Planner Ms. Burdick to come up with a resolution. He stated that he had extreme concerns regarding the boundary, noting that this could have been rectified a long time ago, noting that the A2 Survey was done a year ago (January 14, 2025). He stated all concerned parties have known about the A2 Survey for a year; yet nobody has talked to each other; and now the Historic District Commission is asking to go directly to the State with a Package that they were saying has a boundary of 4.4-acres. Chairman St. Vil questioned the reason they were saying the boundary was 4.4-acres on a site that had potential use for this town for alternative uses in the future, noting that the 4.4-acres could impede those potential uses in the future. He questioned why they would want to assume that risk.

Councilor Lamb stated because someone jumped the gun in conducting the A2 Survey that it had no relevance, because the A2 Survey was supposed to be the last Step in the Process. He stated if the 4.4-acre area was designated as a Historical Site that the Town owned the property; and they could take back the Administrative Control.

Councilor Barnes stated having walked the grounds of the Spicer Homestead Ruins that the area that was less than 1-acre does not take into effect many aspects of the Homestead Ruins. He stated that it was his belief that the map that Mrs. Parkinson has shared, was a more accurate reflection of the area. He stated that it also included the Spicer Rock, and it wrapped around the edge of the existing Tri-Town Trail, noting that all this would be to the west of the Clark Farm Property. He stated because the A2 Survey was done using the ARPA Funding that it may have moved along more quickly because of the time constraint for the use of the ARPA Funding. He stated that he was advocating that the 4.4-acres become the basis for tonight's Motion.

Chairman St. Vil stated that he was advocating that they work with Town Departments to definitize the boundary of a potential Historic District ahead of committing town resources and volunteers time, and efforts that potentially may have to be undone in the future. He noted the time that their Director of Land Use Elizabeth Burdick has spent attending Land Use/Planning/Public Works Committee Meetings, time she has spent writing emails, printing history, etc.

Chairman St. Vil called for a Vote on the Amendment as follows:

- ❖ MOTION to amend the Motion to strike the following language:

The study shall be limited to the parcel defined in the Town-commissioned survey dated January 14, 2025, unless otherwise authorized by the Town Council. This appointment is for study and recommendation purposes only, and does not constitute approval of any designation or ordinance.

Moved by Councilor Lamb, seconded by Councilor Barnes

VOTE: 3 – 3 - 2 Motion Failed (Brunelle, St. Vil, Thompson not in favor) (Garcia-Irizarry, Parad abstained)

RESULT:	AMENDMENT FAILED 3-3-2
MOVER:	Ty Lamb, Town Councilor.
SECONDER:	Bill Barnes, Town Councilor
AYES:	Barnes, Lamb, Ryan
NYES:	Brunelle, St. Vil, Thompson
ABSTAINED:	Garcia-Irizarry, Parad
EXCUSED:	Buhle

Chairman St. Vil called for additional discussion on the Main Motion
Hearing none. Chairman St. Vil called for a Vote on the Main Motion as follows:

MOTION for the Town Council to hereby appoint the Ledyard Historic District Commission to serve as the Historic Properties Study Committee for the Spicer Homestead ruins pursuant to CGS §7-147q. The study shall be limited to the parcel defined in the Town-commissioned survey dated January 14, 2025, unless otherwise authorized by the Town Council. This appointment is for study and recommendation purposes only, and does not constitute approval of any designation or ordinance.

VOTE: 6 – 1- 1 Approved and so declared (Ryan not in favor) (Garcia-Irizarry abstained)

RESULT:	APPROVED 8 – 0
MOVER:	James Thompson, Town Councilor.
SECONDER:	Bill Barnes, Town Councilor
AYES:	Barnes, Brunelle, Lamb, Parad, St. Vil, Thompson
NYE:	Ryan,
ABSTAIN:	Garcia-Irizarry,
EXCUSED:	Buhle

XV. ADJOURNMENT

Councilor Garcia-Irizarry moved to adjourn, seconded by Councilor Barnes
VOTE: 8 - 0 Approved and so declared. The meeting adjourned at 10: 40 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 Regular Town Council
Meeting held on February 11, 2026.

Gary St. Vil Chairman



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 26-0253

Agenda Date: 2/25/2026

Agenda #:

AGENDA ITEM
CORRESPONDENCE

Subject:

Communications List - February 25, 2026

Correspondence List:

(type text here)

COMMUNICATIONS LISTING FOR FEBRUARY 25, 2026

INCOMING CORRESPONDENCE

1. Mr. Boyle email dated 2/13/2026 re: Stand for Pledge Allegiance
2. Mr. Boyle – Chairman St. Vil email thread dated 2/14-17/2026 re: Correspondence List on Town Council Agenda – American Disabilities Act (ADA)
3. Mr. Boyle email dated 2/14/2026 re: Ethics Complaint – Town Council Rules of Procedure
4. DTC Appoint Appl dated 2/16/2026 re: Bowen - Inland Wetland & Water Courses Commission
5. RTC Appoint Appl dated 2/16/2026 re: Harty – Beautification Committee
6. RTC Appoint Appl dated 2/16/2026 re: Winkelman – Beautification Committee
7. Mr. McKeon email dated 2/16/2026 re: FOIA Request – Correspondence re: Social Media
8. Mr. Hosey email dated 2/21/2026 re: Separate Planning & Zoning Commission
9. Mr. Malcom-Buhle-St. Vil-Police Chief email thread 2/17 – 21/2026 re: Flock License Plate Readers

OUT GOING CORRESPONDENCE

1. Admin Asst ltr to Mayor dated 2/12/2026 re: Action ltr. Town Council Regular Meeting of February 11, 2026
2. Admin Asst ltr to Town Clerk dated 2/12/2026 re: Action ltr. Town Council Approved Grant Resolution – Lantern Hill Road Bridge over Whitfield Brook
3. LTC ltr to Walsh dated 2/12/2026 re: Appointment to Beautification Cmt
4. LTC ltr to Harwood dated 2/12/2026 re: Appointment to Sustainable CT Ad Hoc Cmt
5. LTC Memo to Mayor, Board of Education, Permanent Municipal Building Cmt, DTC, RTC dated 2/12/2026 r: Request Nominations for Ad Hoc Cmt to Review Process for Capital Improvement Projects
6. Brunelle-Ryan-Chairman St. Vil email thread dated 2/17 – 22/2026: Town Council Rules of Procedures
7. Finance Cmt Memo to Mayor, Superintendent & Department Heads dated 2/24/2026 re: Fiscal Year 2026/2027 Budget Work Sessions & Schedule

NOTICE OF AGENDAS

1. Agricultural Commission Agenda 1/20/2026
2. Retirement Board Agenda 1/20/2026
3. Parks, Recreation & Senior Citizens Agenda 1/15/2026
4. Parks, Recreation & Senior Citizens Agenda 1/20/2026 - Cancelled
5. Historic District Commission Agenda 1/26/2026
6. Library Commission Agenda 1/12/2026
7. Water Pollution Control Authority Agenda 1/27/2026
8. Finance Cmt Agenda 1/21/2026
9. Community Relations Cmt for DEI Organizational Agenda 1/21/2026 - Cancelled
10. Community Relations Cmt for DEI Sp. Agenda 1/29/2026
11. Administration Committee Sp. Agenda 1/28/2026
12. Town Council Agenda 1/28/2026

MINUTES

13. Agricultural Commission Agenda 1/20/2026
14. Retirement Board Agenda 1/20/2026
15. Parks, Recreation & Senior Citizens Agenda 1/15/2026
16. Parks, Recreation & Senior Citizens Agenda 1/20/2026 - Cancelled

17. Historic District Commission Agenda 1/26/2026
18. Library Commission Agenda 1/12/2026
19. Water Pollution Control Authority Agenda 1/27/2026
20. Finance Cmt Agenda 1/21/2026
21. Community Relations Cmt for DEI Organizational Agenda 1/21/2026 - Cancelled
22. Community Relations Cmt for DEI Sp. Agenda 1/29/2026
23. Administration Committee Sp. Agenda 1/28/2026
24. Town Council Agenda 1/28/2026

MISCELLANEOUS

REFERRALS

Administration Committee

1. DTC Appoint Appl dated 2/16/2026 re: Bowen - Inland Wetland & Water Courses Commission
2. RTC Appoint Appl dated 2/16/2026 re: Harty – Beautification Committee
3. RTC Appoint Appl dated 2/16/2026 re: Winkelman – Beautification Committee
4. Mr. Hosey email dated 2/21/2026 re: Separate Planning & Zoning Commission

Roxanne Maher

From: john boyle <jboyle201@gmail.com>
Sent: Friday, February 13, 2026 1:51 AM
To: Roxanne Maher
Subject: Request the following to be read into the record.

First and foremost,

I would like to you all for choosing to serve the public on the town council. No matter what your affiliation, this is still the best country on planet earth. Many have given their lives to support and defend the Constitution against all enemies, foreign and domestic.

That said , I understand that we have some on the council , that are simply unable to rise for the pledge of allegiance. Be it laziness , or indifference, it is a cry for attention. Being that they are so impacted , I believe they are unable to carry out their duties of their office. I am asking them to resign so we can focus on town business.

The rest of the board doesn't deserve the disrespect, and neither does the town . Instead of pouting , contact Joe Courtney and tell him what you think should change with the US Code of regulations. Congress passes laws, immigration enforces them .

Somehow you forgot you work for us , not the other way around. Thank you for your time.

Respectfully

John Boyle

Sent from my iPhone

Roxanne Maher

From: Roxanne Maher
Sent: Sunday, February 15, 2026 3:04 PM
To: Town Council Group
Subject: FW: ADA requirements

From: john boyle <jboyle201@gmail.com>
Sent: Saturday, February 14, 2026 9:45 PM
To: Roxanne Maher <council@ledyardct.org>
Subject: ADA requirements

I request that the following be read into to the record at your next scheduled meeting.

“To ensure ADA compliance during town meetings, specifically regarding audio, the reading of letters into the record, and overall accessibility, public entities must adhere to Title II requirements, which often involve conforming to Web Content Accessibility Guidelines (WCAG) 2.1 Level”

In other words, that stunt you pulled at your last meeting to bury the letters , is unacceptable. My proposed solution is that you cease and desist your newly adopted policies. You will then go back and read ALL submitted letters into the record under old business.

Consider this a professional courtesy before I file with the ADA. Understand that some of you do not deserve the respect I am showing you .

Our meetings deserve to be open, and transparent. You don't have to agree with anyone's position . It doesn't matter .

I look forward to seeing you all very soon .

Respectfully,
John Boyle

Sent from my iPhone

Roxanne Maher

From: Roxanne Maher
Sent: Sunday, February 15, 2026 3:04 PM
To: Town Council Group
Subject: FW: Ethics Commission

-----Original Message-----

From: john boyle <jboyle201@gmail.com>
Sent: Sunday, February 15, 2026 8:20 AM
To: Roxanne Maher <council@ledyardct.org>
Subject: Ethics Commission

I am writing to file a complaint with the towns ethics commission to be investigated.

Specifically members of the Town Council recently passed new policies regarding what letters will be read into the record . This occurred on 2/11/26 . This policy discriminates against those with disabilities in participating in the meeting- (I.e. the blind , who need audio to hear subject matter being discussed to participate).

Additionally this policy has the effect of silencing voices of the public to shield the council members themselves from certain commentary. This is essentially using their position as an elected official to violate the citizens 1st amendment rights , and flies in the face of honest and open government.

Being that it was the Town Council that implemented these policies , I would expect all of those affected by this complaint - to recuse themselves from the process.

I request that an independent committee be appointed for the purpose of fact finding, and report on those results.

I look forward to working with the ethics commission to bring about a positive change and a full disclosure of what transpired .

Respectfully
John Boyle
Sent from my iPhone

Application Form

Profile

Sarah _____ J _____ Bowen _____
 First Name Middle Initial Last Name

sjoy710@gmail.com _____
 Email Address

80 Avery Hill Rd _____ Suite or Apt _____
 Home Address

Ledyard _____ CT _____ 06339 _____
 City State Postal Code

Mobile: (860) 581-3333 _____
 Primary Phone Alternate Phone

Which Boards would you like to apply for?

Inland Wetland And Water Courses Commission: Submitted

Education & Experiences

Please tell us about yourself and why you want to serve.

Why are you interested in serving on a board or commission?

Town boards and commissions are vital to every community, and it is important to me as a resident of the town to ensure our community has the support it needs to flourish.

Community Involvement

Having only recently moved to Ledyard, I have only had a chance to volunteer once to assist with an event for the local animal control, but I am looking for more opportunities to be involved.

Educational Background

I received my B.A. in American Studies from the University of Connecticut but primarily attended the Avery Point campus in Groton. I received my M.A. in History and Archaeology from the University of Rhode Island in 2020. My education has allowed me a unique perspective on American history, politics, and human behavior that I feel can be applied in a variety of ways on a town committee.

The Society for American Archaeology _____ Education and Outreach Manager _____
 Employer Job Title

Bowen Resume.docx _____
 Upload a Resume

Party Affiliation**Party Affiliation ***

Democrat

Disclaimer & FOIA Information

Your attendance and active participation is important for the Committee to conduct its business. Any member of a Committee/Commission/Board who is absent from three (3) consecutive regular meetings and any intervening duly called special meetings shall be considered to have resigned from the Committee and the vacancy shall be filled, except that the Committee may vote to waive attendance requirements in each case where illness or other extenuating circumstances make it impossible for a member to meet the attendance requirements. It shall be the responsibility of the Chairman of the Committee to notify the Town Council or Mayor's office when a member has not properly performed his/her duties.

Please Agree with the Following Statement

If selected as a board member, I understand that information on this application is subject to the Freedom of Information Act (FOIA) and may be disclosed to anyone requesting this information.

I Agree

Signature (type full name below)

Sarah Joy Bowen

This application is approved by the Ledyard DTC Nominating Committee

Craig Breveran

Craig M. Breverman 02/06/2026

Roxanne Maher

From: Craig Breverman <cbreverman@gmail.com>
Sent: Monday, February 16, 2026 11:50 AM
To: Roxanne Maher
Subject: Re: FW: Appointment Applications - Bowen - DTC Recommendation
Attachments: APPOINT APPL-BOWEN-IWWC-2026-02-04.pdf

Thanks for the update,

Sarah's application is approved and attached.

Look forward to talking with you soon!

Craig

On Mon, Feb 16, 2026 at 11:15 AM Roxanne Maher <council@ledyardct.org> wrote:

Good Moring Craig:

There is just this Application from Sarah Bowen, who is interested in serving on the
Inland Wetland& Water Courses.

With regard to the Ad Hoc Building Process Committee they are only looking for one
Person from the Community-at-Large, the other Committee Members will be provided by
Their respected Groups.

Enjoy the Sunshine.

Roxanne

Application Form

Profile

Julie _____ S _____ Harty _____
 First Name Middle Initial Last Name

hartyjulie@yahoo.com _____
 Email Address

26 coachman pike _____ Suite or Apt _____
 Home Address

Ledyard _____ CT _____ 06339 _____
 City State Postal Code

Home: (413) 204-8538 _____
 Primary Phone Alternate Phone

Which Boards would you like to apply for?

Ledyard Beautification Committee: Submitted

Education & Experiences

Please tell us about yourself and why you want to serve.

Why are you interested in serving on a board or commission?

I enjoy gardening. Nice to be party of community.

Community Involvement

Educational Background

Mohegan _____ Onboarding administrator _____
 Employer Job Title

Upload a Resume _____

Party Affiliation

Party Affiliation *

Republican

Disclaimer & FOIA Information

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Please Agree with the Following Statement

If selected as a board member, I understand that information on this application is subject to the Freedom of Information Act (FOIA) and may be disclosed to anyone requesting this information.

I Agree

Signature (type full name below)

Julie Harty

Committee Comments: Yes, the RTC and it's Nominating Committee for RTC endorse Julie Harty for appointment to the Ledyard Beautification Committee.

Respectfully,

Joe Gush
Nominating Chairman

Application Form**Profile**

Marielle

First Name

Winkelman

Last Name

Middle
Initial

mariellewinkelman@icloud.com

Email Address

11 linden lane

Home Address

Suite or Apt

Ledyard

City

CT

State

06339

Postal Code

Mobile: 8605145308

Primary Phone

Home: 8605145308

Alternate Phone

Which Boards would you like to apply for?

Ledyard Beautification Committee: Submitted

Education & Experiences

Please tell us about yourself and why you want to serve.

Why are you interested in serving on a board or commission?

I am a ledyard resident and would like to be part of something meaningful to help our town.

Community Involvement

I am part of the Norwich Chamber volunteer committee where I serve multiple times a year to help them with the manufacturing and healthcare expos. I also work for a local community bank and volunteer at local events and non-profits throughout the year.

Educational Background

BS in Business Admin/Finance

Chelsea Groton Bank

Employer

Regional Sales and Service
Manager

Job Title

Upload a Resume

Party Affiliation

Party Affiliation *

Republican

Disclaimer & FOIA Information

Your attendance and active participation is important for the Committee to conduct its business. Any member of a Committee/Commission/Board who is absent from three (3) consecutive regular meetings and any intervening duly called special meetings shall be considered to have resigned from the Committee and the vacancy shall be filled, except that the Committee may vote to waive attendance requirements in each case where illness or other extenuating circumstances make it impossible for a member to meet the attendance requirements. It shall be the responsibility of the Chairman of the Committee to notify the Town Council or Mayor's office when a member has not properly performed his/her duties.

Please Agree with the Following Statement

If selected as a board member, I understand that information on this application is subject to the Freedom of Information Act (FOIA) and may be disclosed to anyone requesting this information.

I Agree

Signature (type full name below)

Marielle Winkelman

Committee Comments: Yes, the RTC and it's Nominating Committee for RTC endorse Marielle Winkelman for re-appointment to the Ledyard Beautification Committee.

Respectfully,

Joe Gush
Nominating Chairman

Roxanne Maher

From: Patricia A. Riley
Sent: Tuesday, February 17, 2026 10:31 AM
To: Roxanne Maher; Fred Allyn, III
Subject: FOIA Request - McKeon
Attachments: 20260217102649217.pdf

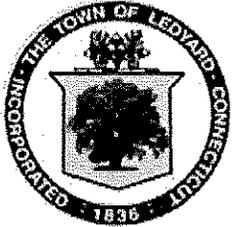
Good morning,

Please see the attached official received in for record FOIA request.

Thank you,

Patty

Patricia A. Riley, MCTC, CMC



Town Clerk, Town of Ledyard
Freedom of Information Officer
741 Colonel Ledyard Hwy.
Ledyard, CT 06339
(860) 464-3229
town.clerk@ledyardct.org

NOTICE* Effective June 11, 2018
Town Hall hours are 7:30AM-4:45PM Mon-Thurs
CLOSED FRIDAYS

Patricia A. Riley

From: Roxanne Maher
Sent: Tuesday, February 17, 2026 7:38 AM
To: Patricia A. Riley
Cc: Roxanne Maher
Subject: FW: Letters to Council- FOI Request

From: Roxanne Maher <council@ledyardct.org>
Sent: Monday, February 16, 2026 7:21 AM
To: Town Council Group <TownCouncil@ledyardct.org>
Subject: FW: Letters to Council

From: Gary McKeon <gary@joshuasworldwide.com>
Sent: Monday, February 16, 2026 6:47 AM
To: Roxanne Maher <council@ledyardct.org>
Cc: Ty Lamb <tylamb5350@outlook.com>
Subject: Letters to Council

Good morning Leadership

As per the statement from the last council meeting 2/11/26

I am requesting all correspondence, letter and all other communication which the council received in regards to all social media, Facebook, Twitter, X, Snapchat or any other forms of social media over the last 60 days.

Thank you

[Calendar](#) | [Linked In](#) | [Website](#)



Gary R. McKeon
Chief Executive Officer

 860.464.0336 ext. 106
 gary@joshuasworldwide.com
 joshuasworldwide.com



PROUD TO CELEBRATE 30 YEARS OF BUSINESS!

RECEIVED FOR RECORD
2026 FEB 17 AM 10:12
Patricia A. Riley
LEDYARD TOWN COUNCIL

Roxanne Maher

From: George Hosey <ghosey924@gmail.com>
Sent: Saturday, February 21, 2026 2:14 PM
To: Town Council Group
Subject: Planning and Zoning

Hello all,

Reading the recent TC meeting minutes, I noted an item to create an ad hoc committee to consider separating the Planning & Zoning Committee into two separate entities.

I have to wonder WHY? What is the impetus for such a change?

Perhaps I'm just old, but seems to me that it wasn't that many years ago that Planning and Zoning WERE separate committees, and the town chose to combine them? So...was the town wrong to combine them? Have the circumstances that led to the combination of Planning and Zoning several years ago changed dramatically?

On the surface, it sounds like we're walking in circles.

Thank you

GH

Roxanne Maher

From: Gary St. Vil
Sent: Sunday, February 22, 2026 4:39 PM
To: Roxanne Maher
Cc: Town Council Group
Subject: Fw: Flock LPR Cameras – Follow-Up Informational Update (2/25)

Roxanne,

Please add Flock LPR camera update to the informational section of Wed's Town Council meeting.

Respectfully,

Gary A. St. Vil

Chairman, Ledyard Town Council
741 Colonel Ledyard Highway
Ledyard, CT 06339
(860) 980-0656 | gsvil@ledyardct.org
www.ledyardct.org

From: John Rich <chief.rich@ledyardct.org>
Sent: Saturday, February 21, 2026 11:14 PM
To: Gary St. Vil <GSVil@ledyardct.org>
Subject: Re: Flock LPR Cameras – Follow-Up Informational Update (2/25)

Gary,

I'll be happy to come in to share some information.

Chief

On Feb 21, 2026, at 3:40 PM, Gary St. Vil <GSVil@ledyardct.org> wrote:

Chief,

At our December meeting, the Town Council voted to approve the Flock LPR contract following your presentation. Since then, the Council has received resident inquiries regarding privacy safeguards, data retention, and certain contract provisions. Would your department be able to provide a brief follow-up informational update at our February 25 meeting?

It would be helpful if you could address:

- Data retention policies
- Data access controls and audit safeguards
- Information-sharing parameters
- Any public safety outcomes or early results to date
- Clarification on contract cancellation provisions

The intent would be informational only, ensuring residents have a clear understanding of the program's safeguards and operational benefits.

Please let me know if February 25 works for you.

Respectfully,

Gary A. St. Vil

Chairman, Ledyard Town Council
741 Colonel Ledyard Highway
Ledyard, CT 06339
(860) 980-0656 | gsvil@ledyardct.org
www.ledyardct.org

From: Gary St. Vil <GSvil@ledyardct.org>
Sent: Saturday, February 21, 2026 3:36 PM
To: Jason <jason.malcolm@protonmail.com>; Jessica Buhle <Jbuh@ledyardct.org>
Cc: Town Council Group <TownCouncil@ledyardct.org>
Subject: Flock LPR Cameras

Hi Jason,

Thank you for reaching out and for reviewing the contract materials.

As you know, the Town Council previously voted to approve the Flock contract following a presentation at our December meeting. That said, questions involving privacy, data management, and public safety technology deserve continued transparency and review. In light of your inquiry and others that have been raised, I will be requesting an informational update from the Police Department regarding:

- Data retention and access policies
- Oversight safeguards and audit controls
- Information-sharing parameters
- Any reported public safety benefits to date

Once that information is presented publicly, the Council and residents will have the opportunity to better understand the program and its safeguards. I appreciate your engagement on this issue.

Respectfully,

Gary A. St. Vil

Chairman, Ledyard Town Council
741 Colonel Ledyard Highway
Ledyard, CT 06339
(860) 980-0656 | gsvil@ledyardct.org
www.ledyardct.org

From: Jason <jason.malcolm@protonmail.com>
Sent: Friday, February 20, 2026 12:03 PM
To: Jessica Buhle <Jbuh@ledyardct.org>
Cc: Gary St. Vil <GSvil@ledyardct.org>
Subject: Re: Question regarding Flock cameras in town

Thank you Jessica; look forward to hearing more soon.

-Jason Malcolm

On Friday, February 20th, 2026 at 12:00 PM, Jessica Buhle <Jbuh@ledyardct.org> wrote:

Good morning Jason,

Thank you for reaching out! I have forwarded your email to Chairman St. Vil for potential discussion. He is copied on this reply as well.

Thank you for sharing your concerns and feedback.

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

On Feb 20, 2026, at 11:21 AM, Jason
<jason.malcolm@protonmail.com> wrote:

Jessica,

Good morning; you might remember me as Danielle's husband (Raven's Rise Sourdough and all). I'm reaching out because I recently put in a FOIA request to find out some more info about the 4 Flock LPR (License Plate Reader) cameras that are in Gales Ferry and Ledyard and got back the info just yesterday. This has been an increasingly covered topic, with towns across the country and CT canceling/revising/pausing contracts with Flock because of privacy and safety concerns presented by the cameras as well as how the company improperly handles the camera footage.

I was hoping this might be something the Town Council would consider raising as a topic, primarily a discussion around 1) the contract that the town has entered into with Flock for a 24-month

period, at \$12,000 a year and 2) the concerns I, and perhaps other residents, might have about these and a discussion about removing them from the town. It is my understanding based on the requisition/invoice I received via the FOIA request that they were just installed in November or so, and the town is now past a 60-day period of time when the contract might have been able to be cancelled easily with no financial penalty.

Hoping this is the right place to reach out; I figured since we had interacted prior and your name was familiar I would start with you in reaching out compared to another on the council I wasn't familiar with.

Thank you,

-Jason Malcolm

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Chairman Gary St. Vil

TOWN OF LEDYARD CONNECTICUT TOWN COUNCIL

741 Colonel Ledyard Highway
Ledyard, CT 06339-1551
(860) 464-3203
council@ledyardct.org

February 12, 2026

Mayor Fred Allyn, III
Town of Ledyard
741 Colonel Ledyard Highway
Ledyard, Connecticut 06339

Dear Mayor Allyn:

At its Regular Meeting held on February 11, 2026 the Town Council took the following actions:

- Appointed Ms. Yvonne Walsh (U) 38 Fairway Drive, Ledyard, to the Ledyard Beautification Committee to complete a three (3) year term ending October 26, 2026 filling a vacancy left by Ms. Bingham.
- Appointed Mr. James Harwood (D) 10 Eska Drive, Ledyard to the Sustainable CT Ad Hoc Committee to complete a two (2) year term ending December 15, 2027.
- Adopted a proposed “*Resolution Establishing an Ad Hoc Committee to Develop Process for Capital Improvement Building Projects*” as presented in the draft dated December 10, 2025.
- Approved a Connecticut DOT Local Bridge Program Grant Application for replacement of Lantern Hill Road Bridge No. 137001 for 50% of eligible costs, the total of which is presently estimated to be nearly \$2.8 million;

In addition, approved a proposed “*Resolution Local Bridge Program State Project No. 9071-9001 Bridge Number: 137001 Lantern Hill Road Over Whitford Brook In The Town Of Ledyard*” authorizing the Mayor to submit the Grant Application, as presented in the draft dated January 28, 2026.

- Appointed the Ledyard Historic District Commission to serve as the Historic Properties Study Committee for the Spicer Homestead ruins pursuant to CGS §7-147q. The study shall be limited to the parcel defined in the Town-commissioned survey dated January 14, 2025, unless otherwise authorized by the Town Council. This appointment is for study and recommendation purposes only, and does not constitute approval of any designation or ordinance.

Please feel free to contact Chairman St. Vil should you have any questions regarding this meeting.

Respectfully submitted,



Roxanne M. Maher
Administrative Assistant
to the Ledyard Town Council

cc: Director of Finance-
Treasurer
Historic District Commission
Public Works Director/Town Engineer



Chairman Gary St. Vil

TOWN OF LEDYARD CONNECTICUT TOWN COUNCIL

741 Colonel Ledyard Highway
Ledyard, CT 06339-1551
(860) 464-3203
council@ledyardct.org

February 12, 2026

Mrs. Patricia A. Riley
Town Clerk
Town of Ledyard
741 Colonel Ledyard Highway
Ledyard, Connecticut 06339

Dear Mrs. Riley:

At its Regular Meeting held on February 11, 2026; at which a quorum was present throughout, the Town Council unanimously approved the following:

- Connecticut DOT Local Bridge Program Grant Application for replacement of Lantern Hill Road Bridge No. 137001 for 50% of eligible costs, the total of which is presently estimated to be nearly \$2.8 million;

In addition, approved a proposed "*Resolution Local Bridge Program State Project No. 9071-9001 Bridge Number: 137001 Lantern Hill Road Over Whitford Brook In The Town Of Ledyard*" authorizing the Mayor to submit the Grant Application, as presented in the draft dated January 28, 2026.

Please feel free to contact Chairman St. Vil should you have any questions regarding this meeting.

Respectfully submitted,

Roxanne M. Maher
Administrative Assistant



Chairman Gary St. Vil

TOWN OF LEDYARD

CONNECTICUT

TOWN COUNCIL

741 Colonel Ledyard Highway
Ledyard, CT 06339
(860) 464-3203
towncouncil@ledyardct.org

February 12, 2026

Mr. James Harwood
10 Eska Drive
Ledyard, Connecticut 06339

Dear Mr. Harwood:

CONGRATULATIONS! The Town Council, at its meeting on February 11, 2026 appointed you as a Community-at-Large member of the Sustainalbe CT Ad HocCommittee, to complete a two (2) year term ending December 15, 2027.

The Town's Meeting Portal (Granicus-Legistar) will aid you in preparation for the Sustainalbe CT Ad HocCommittee meetings by providing materials and supporting documentation, and other reference information. This technology has enabled the town to streamline processes and implement paperless meetings. Each month you will be electronically notified of the Sustainalbe CT Ad HocCommittee scheduled meeting. You can access this information by visiting the Town of Ledyard Website at: <https://www.ledyardct.org/> clicking on the "Agendas & Minutes" tab.

It is customary and traditional to be sworn-in by the Town Clerk prior to assuming your duties. Please bring a copy of this letter with you and try to have this accomplished as soon as possible.

Town Hall business hours are Monday through Thursday, 7:30 a.m. to 4:45 p.m.

Thank you for your willingness to continue to serve the Town of Ledyard.

Sincerely,

Gary St. Vil
Chairman

cc: Town Clerk
Sustainalbe CT Ad HocCommittee



TOWN OF LEDYARD

CONNECTICUT

TOWN COUNCIL

Chairman Gary St. Vil

741 Colonel Ledyard Highway
Ledyard, CT 06339
(860) 464-3203
towncouncil@ledyardct.org

February 12, 2026

Ms. Yvonne Walsh
38 Fairway Drive
Ledyard, Connecticut 06339

Dear Ms. Walsh:

CONGRATULATIONS! The Town Council, at its meeting on February 11 2026 appointed you as a member of the Ledyard Beautification Committee, to complete a three (3) year term ending October 26, 2026 filling a vacancy left by Ms. Bingham.

The Town's Meeting Portal (Granicus-Legistar) will aid you in preparation for the Ledyard Beautification Committee meetings by providing materials and supporting documentation, and other reference information. This technology has enabled the town to streamline processes and implement paperless meetings. Each month you will be electronically notified of the Ledyard Beautification Committee scheduled meeting. You can access this information by visiting the Town of Ledyard Website at: <https://www.ledyardct.org/> clicking on the "Agendas & Minutes" tab.

It is customary and traditional to be sworn-in by the Town Clerk prior to assuming your duties. Please bring a copy of this letter with you and try to have this accomplished as soon as possible.

Town Hall business hours are Monday through Thursday, 7:30 a.m. to 4:45 p.m.

Thank you for your willingness to continue to serve the Town of Ledyard.

Sincerely,

Gary St. Vil
Chairman

cc: Town Clerk
Ledyard Beautification Committee



Chairman Gary St. Vil

TOWN OF LEDYARD

CONNECTICUT

TOWN COUNCIL

741 Colonel Ledyard Highway
Ledyard, Connecticut 06339-1551
(860) 464-3203
FAX (860) 464-1485
council@ledyardct.org

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MEMORANDUM

TO: Board of Education
Superintendent Jason Hartling
Mayor Fred Allyn, III
Permanent Municipal Building Committee
Democratic Town Committee
Republican Town Committee

FROM: Chairman Gary St. Vil

DATE: February 12, 2026

RE: Request Nominations
Ad Hoc Committee to Develop a Process for Capital Improvement Building Projects

The Town Council adopted the attached "*Resolution Establishing an Ad Hoc Committee to Develop a Process for Capital Improvement Building Projects*" at their February 11, 2026 meeting. This is a short-term six-month assignment and calls for seven members comprised of our knowledgeable and experienced staff, committee members, as well as one member from the community with Construction Management Experience as follows:

- One member from the Permanent Municipal Building Committee
- One member from the Board of Education
- Board of Education Director of Facilities
- Public Works Director/Town Engineer
- Finance Director
- One member from the Town Council
- One member from the Community-at-Large with Construction Management Experience

The Town Council would like to appoint members to the "*Ad Hoc Committee to Develop a Process for Capital Improvement Building Projects*" as soon as possible; and respectfully requests that you submit names of the individuals to effectively staff this important Committee; as well as a member from the community who is interested in participating in this initiative.

Your attention to this request and your cooperation is appreciated. Should you have any questions, please feel free to contact the Town Council Office at e-mail council@ledyardct.org.

Thank you.

cc: Finance Director;
Public Works Director

Attachment

Ad Hoc Committee to Develop a Process for Capital Improvement Building Projects

GS/rm

Roxanne Maher

From: Gary St. Vil
Sent: Tuesday, February 17, 2026 10:12 AM
To: Town Council Group
Subject: Rule 10 Clarification and Disposition

Council,

I have reviewed the concerns raised regarding Rule 10 of our Rules of Procedure and the publication of communications with the agenda.

Rule 10 governs what is included with the posted meeting agenda. It provides that certain categories of communications — including social media posts and communications containing profanity — are not to be published with the agenda, but remain public records.

The rule addresses agenda publication. It does not prohibit access to public records, nor does it restrict a councilor from referencing or sharing materials that are public records outside of the formal agenda packet.

Under the Connecticut Freedom of Information Act, communications received and retained in the conduct of public business are public records unless specifically exempted by statute. The communications at issue fall within that definition and are not exempt.

Based on my review of our Rules of Procedure, the Town Charter, and applicable state law, I do not find that Rule 10 was violated.

Our current Rules of Procedure do not establish a disciplinary or code-of-conduct mechanism applicable in this situation, and I do not find a basis for any formal inquiry.

Accordingly, I consider this matter closed.

To avoid any inadvertent quorum discussion by email, please reserve any further discussion of this topic for a public meeting.

Respectfully,

Gary A. St. Vil

Chairman, Ledyard Town Council
741 Colonel Ledyard Highway
Ledyard, CT 06339
(860) 980-0656 | gsvil@ledyardct.org
www.ledyardct.org

From: Timothy Ryan <tryan@ledyardct.org>
Sent: Monday, February 16, 2026 11:13 PM
To: April Brunelle <ABru@ledyardct.org>

Cc: Town Council Group <TownCouncil@ledyardct.org>

Subject: Re: Code of Conduct Violation

Council;

Although Councilor Brunelle is entitled to her opinion, that does not make it fact. To that end, I will address the following actual facts:

The “rules of procedure” are instituted to govern how business is conducted at council meetings. As far as I can tell, none of those rules were violated during the regular meeting.

Specifically, contrary to what Councilor Brunelle alleges, the rule about what will not be published with the Agenda, but remain public record, was not violated as the criteria laid out in section 10 for what should not be published with the agenda was indeed followed. Please advise if I am in err.

In accordance with current the rules of procedure, the communications she cites are indeed part of the public record and members of the public are legally guaranteed access to such communications.

In summary, Councilor Brunelle’s accusation is without merit.

I am, however, deeply concerned with Councilor Brunelle’s perceived disposition and personal motivation regarding this matter, as it seems she is grasping at straws to try and prevent public record information from being accessible to the public. This, by definition, goes against the very principle of open and transparent government that we are to uphold, and being accountable to the public as elected officials.

Additionally, her statement that I am “not working with council but against it” seems to insinuate that I should ‘toe the line’, regardless of whether that action is disenfranchising residents; I will take this opportunity to remind all councilors that we work for the constituents who elected us, not for anyone else. As such, I personally will always put the best interests of our residents first. I can only hope that is a shared sentiment amongst all elected officials.

To that end, I would ask that the Council Chair look into these actions undertaken by Councilor Brunelle; which, at the very least, undermine the trust of the electorate in this town council.

Lastly, and it is with great irony that I state this, pursuant to the current rules of procedure, Councilor Brunelle’s below formally submitted communication to council (and my response) can not be published with the next council agenda, as it would *actually* be a violation since the subject they are referencing is a social media post.

That said, if the Council is willing to entertain a modification to the rules at the next meeting to revert back to having **all** communications being included in the agenda, I think it would absolutely be in the best interests of the town’s residents. I will note that Section 2 of the Town Charter does not explicitly prohibit an amendment or modification to the resolution which adopted the rules of procedure.

V/R;
Timothy Ryan

On Feb 15, 2026, at 3:01 PM, April Brunelle <ABru@ledyardct.org> wrote:

Dear Councilors and Chair,

It is with great disappointment I write to you all on a matter that concerns one of our Councilors breaking established Council procedures which is a breach of code of conduct.

During our Council Meeting on December 1st, the Council established that:

Communications published with the Agenda shall consist of written correspondence formally submitted to the Town Council for the record. The following will not be published with the Agenda, but will remain public records:

- a. Communications that contain confidential personnel or protected information;
- b. Social media posts, screenshots, or online commentary;
- c. Communications containing profanity, threats, or defamatory statements; d. Communications unrelated to items within the Town Council's legal jurisdiction.

With that being the case, during our last meeting Councilor Ryan brought up the fact that some Correspondences were not included in the Agenda, to which he was informed of the above procedure. Regardless if he agreed with it or not, he understood that was the procedure. Yet, he then after the meeting boldly post publicly those communications that were not included in the agenda.

We are all for transparency, that is not the issue here. The issue is that there was a procedure in place and he knowingly broke it. If one has an issue with a procedure there are proper ways to go about addressing them.

When a Councilor breaks a procedure, the consequences in general range up to legal and political sanctions, depending on the severity and frequency of the infractions.

Procedures are designed to ensure lawful, orderly and fair decision making. Violating them typically triggers a code of conduct investigation.

If a policy forbids publishing social media content, but is done so later, it can be viewed as an arbitrary or capricious action. Particularly if it targets specific individuals or topics.

Not only that, but actions like this can lead to litigation against the town. You can indeed sue someone for taking a private Facebook post and making it public, particularly if it invades the persons privacy, causes damage to their reputation or constitutes harassment. Possible legal claims include invasion of privacy, defamation, or copyright infringements in some cases, depending on what the post shared.

In summary, Councilor Ryan knowingly broke a policy in place and thus I would suspect a code of conduct investigation should be triggered as is customary in such circumstances. His actions show he is not working with the Council but against it.

Sincerely,

Councilor April Brunelle



Chairman Gary St. Vil

TOWN OF LEDYARD CONNECTICUT TOWN COUNCIL

741 Colonel Ledyard Highway
Ledyard, CT 06339
(860) 464-3023
council@ledyardct.org

MEMORANDUM

DATE: February 24, 2026

<p>TO: All Town Councilors Mayor Fred Allyn, III Board of Education Administrator of Emergency Services Finance Director Finance Department (Tax Assessor/Collector) Administrator of Human Resources Animal Control Officer Economic Development Emergency Dispatch Center Emergency Management Fire Marshall Gales Ferr Fire Department Historic District Commission</p>	<p>Historic District Commission Land Use Departments (Building-Planning & Zoning/Inland Wetlands) Ledyard Fire Department Library Director MIS Director Parks, Recreation & Senior Citizens Director Police Chief – Department Public Works Director – Department Registrar of Voters Social Services Coordinator School Nurses Town Clerk Water Pollution Control Authority</p>
--	--

Q

FROM: Jessica Buhle, Finance Committee Chairman

Re: **Final Budget Work Session Schedule for Fiscal Year 2026/2027**

Attached please find the final budget work session schedule for the Fiscal Year 2026/2027 Budget. As we have done in past years, the Finance Committee will hold work sessions during regular business hours. Budget work session time slots have been allocated appropriately to each department.

The Budget Work Sessions will be held in a hybrid format for Department Heads attending in-person in the Council Chambers, while providing an access for other members of their departments and the public to attend remotely by video conference using the Zoom platform.

The Finance Committee does not intend to break between each work session. Therefore, once a department work session has completed, we will immediately move to review the next department’s budget as sequentially listed on the tentative schedule. Please try to arrive 15 minutes prior to your scheduled time.

As the Finance Committee works to make proposed budget adjustments you are encouraged to contact the Town Council Office at (860) 464-3203 to schedule a follow-up session with the Finance Committee if you strongly disagree with their proposed adjustments that affect your department’s budget.

Thank you for your cooperation.

**BUDGET PREPARATION
SUGGESTED SCHEDULE/GUIDE
AND
ANNUAL TOWN BUDGET PROCESS
(Suggested Schedule Guide)**

(Please Note Some Dates are Subject to Change)

Key:

Purple: Suggested Date - Not Dictated by Town Charter;

Green/Blue: Dictated by Town Charter.

Reference: Town Charter Chapter VII - Pages (s) 28 – 31

October/November (Election Year-Dec) Town Council prepares and submits letter of Directive for Fiscal Year Budget to Mayor and Board of Education.

(This Date is NOT dictated by Charter)

December – Town Council approves Town Council Department budget to submit to Mayor's Office.

(This Date is NOT dictated by Charter)

Per Town Charter

(1/20/2026)

3rd Monday in January All Departments submit preliminary budget to Mayor's Office (Monday 1/19/2026 is Martin Luther King Day Holiday).

Per Town Charter

(2/23/2026)

4th Monday in February the Board of Education shall file budget estimates to Mayor's Office.

Per Town Charter

(3/2/2026)

1st Monday in March the Mayor submits budget to Town Council and files with Town Clerk's Office.

March

Finance Committee conducts Departmental Budget Work Sessions. Departments review and submits budget materials to Town Council.

(4/8/2026)

Town Council finalizes budget to Present to a Public Hearing.

(This Date is NOT dictated by Charter)

(4/15/2026)

Town Council files proposed budget with Town Clerk's Office for Public Hearing.

(This Date is NOT dictated by Charter)

Per Town Charter On or Before Last Monday in April

(4/20/2026)

On OR Before the last Monday in April the Town Council conducts one or more Public Hearings on the proposed budget at the Council Chambers. (School Vacation 4/13/2026 - 4/17/2026)

4/22/2026

Town Council Votes to Finalize Budget
(This Date is NOT dictated by Charter)

Per Town Charter

(5/4/2026)

1st Monday of May the Town Council files proposed budget with Town Clerk's Office for Annual Town Meeting

Per Town Charter

(5/18/2026)

3rd Monday in May Annual Town Meeting on the proposed budget to adjourn to a vote on the voting machine the following day (Tuesday).

Per Town Charter

(Tuesday 5/19/2026)

Vote on Budget on voting machine

Per Town Charter

Should the Referendum does not approve the budget; the budget will be referred back to the Council, the Town Council should reconsider the budget and present it for a second vote on the voting machines three weeks following the previous referendum.

In the event the second referendum does not approve a budget, the Town Council shall adopt a final budget by the fourth Monday in June. Should both the referenda and the Town Council fail to adopt a final budget by the fourth Monday in June, the budget that was presented at the second referendum shall be deemed to have been adopted.

Per Town Charter

6/22/2026

On or before the **Fourth Monday in June**, the Town Council shall fix the tax rate in mils.

** The budget must be presented as a Resolution

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
<i>March 2026</i>						
1	2 MAYOR'S BUDGET DUE LUPPW 6:00 CC	3	4 FINANCE 5:00 CC	5 BUDGET WORK SESSIONS 2:00 MAYOR 2:30 FINANCE 2:45 HUMAN RESOURCES 3:00 LAND USE 3:00 EDC 3:00 BUILDING 3:00 PLANNING//ZONING 3:00 IWWC 3:30 PUBLIC WORKS 3:45 CIP 4:00 BUDGET WORK	6	7
8	9 BUDGET WORK SESSIONS 2:00 FIRE MARSHALL 2:00 EMERG MGT 2:00 ADMIN OF EMERG SERV 2:15 GFFD 2:15 LCFD 2:30 ACO 2:30 DISPATCH 2:30 POLICE 3:00 WPCA 3:45 CIP 4:00 BUDGET WORK	10	11 ADMIN 5:30 CC TOWN COUNCIL 7:00 CC	12 BUDGET WORK SESSIONS 2:00 TOWN CLERK 2:10 REGISTRARS 2:20 HISTORIC 2:30 PARKS-REC- SENIORS 2:45 SOCIAL SERV 3:00 LIBRARY 3:15 SCHOOL NURSES 3:30 MIS DEPARTMENT 3:45 CIP 4:00 BUDGET WORK	13	14
15	16	17	18 FINANCE 5:00 CC (if Ready - Recommend FY 26/27 Budget to Town Council) COMM REL 6:30 CC	19	20	21
22	23	24	25 TOWN COUNCIL 7:00 CC APPROVE BUDGET FOR PUBLIC HEARING (if ready)	26	27	28
29	30	31				

Sunday	Monday	Sunday	Wednesday	Thursday	Friday	Saturday
<h1>April 2026</h1>						
			<p>1</p> <p>FINANCE 5:00 CC</p> <p>(Recommend FY 26/27 Budget to Town Council)</p>	2	3	4
5	<p>6</p> <p>LUPPW 6:00 CC</p>	7	<p>8</p> <p>ADMIN 5:30 CC TOWN COUNCIL 7:00 CC</p> <p>APPROVE BUDGET FOR PUBLIC HEARING</p>	9	10	11
12	13	14	<p>15</p> <p>FINANCE 5:00 CC COMM REL 6:30 CC</p>	16	17	18
	SCHOOL VACATION	SCHOOL VACATION	SCHOOL VACATION	SCHOOL VACATION	SCHOOL VACATION	
19	<p>20</p> <p>PUBLIC HEARING Fiscal Year 2026/2027 Budget</p>	21	<p>22</p> <p>TOWN COUNCIL 7:00 CC (Finalize Budget for Annual Town Meeting)</p>	23	24	25
26	27	28	29	30		

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
<i>May 2025</i>						
					1	2
3	4 TOWN COUNCIL FILES FY 26/27 BUDGET WITH TOWN CLERK LUPPW 6:00 CC	5	6 FINANCE 5:00 CC	7	8	9
10	11	12	13 ADMIN 5:30 CC TOWN COUNCIL 7:00 CC	14	15	16
17	18 ANNUAL TOWN MTG FY 26/27 BUDGET 7:00 COUNCIL CHAMBERS	19 TOWN-WIDE REFERENDUM FY26/27 BUDGET ON VOTING MACHINES	20 FINANCE 5:00 CC <i>(Review If Budget Fails)</i> COMM REL 6:30 CC	21	22	23
24	25 MEMORIAL DAY	26	27 TOWN COUNCIL 7:00 CC <i>(If Budget Fails—Review for 2nd Referendum)</i>	28	29	30
31						

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
<i>June 2026</i>						
	1 LUPPW 6:00 CC	2	3 FINANCE 5:00 CC	4	5	6
7	8	9 SECOND TOWN-WIDE REFERENDUM ON MACHINES (If Required)	10 ADMIN 5:30 CC TOWN COUNCIL 7:00 CC SET MILL RATE (On or Before the 4th Monday in June)	11	12	13
14	15	16	17 FINANCE 5:00 CC COMM REL 6:30 CC	18	19	20
21	22	23	24 TOWN COUNCIL 7:00 CC	25	26	27
28	29	30				



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2156

Agenda Date: 2/25/2026

Agenda #: 1.

REPORT

Staff/Committee Report: Administration Committee Reports Fiscal Year 2025/2026

Administration Committee Report Fiscal Year 2025/2026



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2157

Agenda Date: 2/25/2026

Agenda #: 2.

REPORT

Staff/Committee Report: Community Relations -DEI Reports Fiscal Year 2025/2026

Community Relations Committee for Diversity, Equity & Inclusion - Report- Fiscal Year 2025/2026



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2159

Agenda Date: 2/25/2026

Agenda #: 3.

REPORT

Staff/Committee Report: Finance Committee Reports Fiscal Year 2025/2026

Finance Committee Report Fiscal Year 2025/2026



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2160

Agenda Date: 2/25/2026

Agenda #: 4.

REPORT

Staff/Committee Report: LUPPW Committee Reports Fiscal Year 2025/2026
LUPPW Committee Report Fiscal Year 2025/2026



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2161

Agenda Date: 2/25/2026

Agenda #:

REPORT

Staff/Committee Report: Mayor Reports Fiscal Year 2025/2026
Mayor Report Fiscal Year 2025/2025



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2449

Agenda Date: 2/25/2026

Agenda #: 1.

POLICY-PROCEDURE

Motion/Request:

MOTION to set a Public Hearing (Hybrid Format - Video Conference and In-Person) Public Hearing **date to be determined** to be held in Council Chambers, Town Hall Annex, 741 Colonel Ledyard Highway, Ledyard, Connecticut, to receive comments and recommendations regarding a *proposed "An Ordinance Establishing a Town of Ledyard Code Of Ethics"* .

Background:

This will be the third Public Hearing regarding the "*An Ordinance Establishing a Town of Ledyard Code Of Ethics*"

Public Hearing Dates:

- September 24, 2025
- November 12, 2025

In accordance with the Town Charter; Section 5

Section 5. Public Hearing On, Publication Of, And Passage Of Ordinances

Unless otherwise required by State statutes, at least one public hearing, notice of which shall be given at least five (5) days in advance by publication on the Town Website and by posting a notice in a public place, shall be held by the Town Council before any ordinance shall be passed.

Department Comment/Recommendation:

(type text here)

Mayor Comment/Recommendation:

(type text here)

Body:

(type text here)

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:

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- 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, 8-21 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 shall sign and file with the Town Human Resources Director an acknowledgement form, prepared by the Town Attorney, indicating his/her awareness of the provisions of this Code. Every Board of Education official, including the Superintendent, 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;
- vii. 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.

Adopted by the Ledyard Town Council on: _____

Gary St. Vil, Chairman

Approve/Disapprove on: _____

Fred B. Allyn , III, Mayor

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knowledge.

“Consultant” means ~~any independent contractor or professional person or firm that receives compensation from the Town or Board of Education for the purpose of providing professional, scientific, technical, or other specialized opinion, and is in a position to influence any decision of an agency, official or employee.~~ (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.

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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. ~~Sections 5a., 5b. and 5c. shall not apply to any work performed by a~~ Notwithstanding anything contained in this ordinance to the contrary, a Town or Board of Education official, employee or consultant pursuant to 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 ~~or consultant~~ 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 ~~Town~~ 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 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.~~
- f. ~~g.~~ 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. ~~To avoid an actual or perceived conflict, Town officials are strongly discouraged from appearing before the agency on which they are a member or officer, absent extenuating circumstances, unless he/she has received a prior favorable advisory opinion by the Ethics Commission.~~

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, 8-21 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:

~~1.~~ 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.

~~2.~~ 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 ~~which if applicable, whether such~~ firm, proprietorship, partnership, ~~corporation or limited liability~~ 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.

~~3.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.a.~~ The Town Clerk shall provide a copy of the Code of Ethics to every Town and Board of Education official ~~and employee within sixty (60) days of date that he/she begins his/her duties.~~ Every Town official ~~and employee~~ shall sign and file with the Town ~~Clerk~~ Human Resources Director an acknowledgement form, prepared by the Town Attorney, indicating his/her awareness of the provisions of this Code. ~~Current Town officials and employees shall acknowledge~~ Every Board of Education official, including the Superintendent, 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.~~ The 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. ~~Each consultant shall sign and file with the Town Clerk an acknowledgment form, prepared by the Town Attorney, indicating his or her awareness of the provisions of this Code prior to being retained by the Town.~~ The Human Resources Directors of both the Town and Board of Education ~~or other agency.~~ Current, respectively, shall provide current Town and Board of Education consultants ~~shall acknowledge a copy of the Code of Ethics within one-hundred-twenty~~ thirty (120/30) business days of its effective date. Copies of the Code of Ethics may be sent to consultants electronically.

~~e.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.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;
- vii. 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 ~~(6)~~ 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. **On the day** [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 ~~and,~~ 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.

Adopted by the Ledyard Town Council on: _____

Gary St. Vil, Chairman

Approve/Disapprove on: _____

Fred B. Allyn , III, Mayor

Summary report:	
Litera Compare for Word 11.10.1.2 Document comparison done on 2/9/2026 5:50:18 PM	
Style name: Default Style	
Intelligent Table Comparison: Active	
Original DMS: iw://cloudimanager.com/SG/23452496/2	
Modified DMS: iw://cloudimanager.com/SG/23452496/3	
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Delete	46
Move From	0
Move To	0
Table Insert	0
Table Delete	0
Table moves to	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	133

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 officials, Town employees, and Town 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.

The purpose of the Town of Ledyard Code of Ethics is to:

- Identify standards of ethical conduct to guide all Town officials, including members of the Board of Education, and all Town and Board of Education officers, employees, and consultants as they conduct their public responsibilities.
- Clarify the role of the Ethics Commission.
- Outline a process that allows Town officials, including members of the Board of Education, and all Town and Board of Education employees, and consultants to seek guidance and advice about ethical issues connected with their public responsibilities, and
- Establish a process that enables citizens to report, and the Ethics Commission to investigate and respond to possible violation of the Code.

Section 3. Definitions

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

1. “Agency” is any board, commission, authority, or committee of the Town, including the Town Council and Board of Education.
2. “Beneficial interest” means any nonfinancial interest or special treatment that is not common to other citizens of the Town.
3. “Business associate” means a person joined together with another person through employment or to achieve a common financial and/or business-related objective.
4. “Business day” means a day other than a Saturday, Sunday, or other day on which the office of the Ledyard Town Clerk is closed to the public for business.
5. “Campaigning” – to be defined by attorney
6. “Complainant” means a person or persons who files a complaint under penalties of false statement against an official, employee, or consultant containing allegation of prohibited activities under the Code of Ethics.
7. “Confidential Information” means information acquired by a Town 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.
8. “Consultant” means any independent contractor or professional person or firm that is by virtue of an award of a public bid or contract engaged by and receives compensation from the Town or Board of Education for the purpose of providing professional, scientific, technical, or other specialized opinion, and is in a position to influence any decision of an agency, official, or employee.
9. “Employee” is any person receiving a salary, wages, or stipend from the Town or Board of Education for services rendered, whether full-time or part-time.
10. “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, lineal descendants, stepchildren, foster children, siblings, stepsiblings, foster siblings; lineal descendants of siblings, stepsiblings, and foster siblings of an official, employee, or consultant, or his/her spouse or domestic partner.
11. “Financial Interest” means any interest that:
 - a. has a 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;
 - b. is not common to the other citizens of the Town. An individual’s financial interests shall include the financial interests of all members of his/her family but shall not include any duly authorized compensation from the town.
12. “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, as well as loans that are not commercially reasonable. A gift may also include donations

to a third party on behalf of an official, employee, or consultant for which she/he receives some favor, advantage, or consideration.

Gifts do not include:

1. A political contribution that is otherwise reported in accordance with the law.
 2. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.
 3. Any gift regardless of value received from: (i) any family member who resides in the same household as the recipient of the gift, or (ii) another family member unless the other family member who makes the gift is interested, directly or indirectly, in a business transaction or pending matter that is within the purview or responsibilities of (a) the recipient of the gift, or (b) another family member residing in the same household as the recipient of the gift.
 4. Certificates, plaques, or other ceremonial awards costing less than fifty dollars (\$50.00).
 5. 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.
 6. Honorary degrees.
 7. 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 official or Town employee participates in his/her official capacity.
 8. Any gift provided to a Town Official or Town Employee or to a family member of a Town Official or Town 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.
13. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.
14. *"Official"* is any person holding elective or appointive office in the government of the town and shall include, but not limited to, the Town Council, Board of Education, Town commissions and committees, or any other agency.
15. *"Respondent"* means a person who is the subject of a complaint.

Section 4. Confidential information

Town 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.

Section 5. Conflict of Interest Provisions

- a. A Town 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 where the Town official, employee, or consultant has a financial or beneficial interest. *Notwithstanding anything contained in this ordinance to the contract, a Town official, employee, or consultant may enter into a contract with the Town if the contract is (i) publicly quoted or bid; or (ii) the Town 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 contracts in which a Town official, employee, or consultant is hired by the Town or the Board of Education to perform necessary 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 official, employee, or consultant has reason to believe or expect that he/she or any member of his family or business associate 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 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, his/her family members or business associate(s) 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 G.S. 7-148h(b).
- d. ~~No Town Official or employee may directly hire a member of his/her family.~~ *Town employee supervision of a member of his/her family may occur in temporary emergency situations, including but not limited to winter storms, tropical storms, and labor shortages.*
- e. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials, or property for personal convenience or profit. Personal convenience or profit refer to those matters that are not related to the individual's official duties. *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 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 6. Consultants

- a. The Code of Ethics shall be incorporated by reference into all contracts entered into by the Town of Ledyard and the Board of Education with a consultant.
- b. Persons or firms who are engaged by and receive compensation from other governmental entities, such as the state or federal government, and who are in a position to influence any decision of an agency, official, or employee shall be guided by the Code.

Section 7. Gifts and favors

- a. No Town official, employee, or consultant, or any business associate, or member of his/her family nor any agency, employee organization, or group of employees shall solicit or accept any gift, whether in the form of a service, a loan at a less than a commercially available rate, a material thing, or a promise, 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, consultant, agency, employee organization, or group of employees. No Town 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 an agency, commission, committee, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment, or services.
- b. This section shall not apply to any political contribution that is reported as required by law.

Section 8. Equal treatment

Without proper authorization, no Town official, employee, or consultant shall accept, seek, grant, or cause to be granted any special consideration, treatment, or advantage to such individual, or his/her family by virtues of his/her position or business association.

Section 9. Disclosure and disqualification

- a. Any Town 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 section 9(b) through 9(e). Such disclosure shall disqualify the official, employee, or consultant from participation in the matter, transaction, or decision.
- b. No Town 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.
- c. All Town Councilors, Board of Education members, and the Mayor 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:
 1. All real estate located within the Town of Ledyard owned by such elected 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, as aforesaid, by a corporation, trust or partnership in which any such elected 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.

2. 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 (5) percent interest, and which firm, proprietorship, partnership, corporation, or limited liability 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.
 3. 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.
- d. If there is an uncertainty whether a Town 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 shall disclose such possible conflict of interest to the following:
1. For a Town official who is a member of an elective or appointive board, commission, committee, or authority - to the particular chair of the commission or committee of which such official is a member.
 2. For Town employees and officials appointed by the appropriate authorities – the Mayor or Town Council.
 3. For Board of Education employees - to the superintendent of schools
 4. The Town department directors - to [the Mayor](#) or the Town Council.
 5. The superintendent of schools - to the Board of Education.
 6. For a consultant - to the agent executing the contract on behalf of the Town or Board of Education.
- e. The appropriate authority to which the disclosure is made shall make an appropriate record of such disclosure and shall recommend to the Town official, employee, or consultant making the report to seek an advisory opinion from the Ethics Commission regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.
- f. Any such questions concerning a possible conflict of interest may be referred to the Ethics Commission pursuant to Section 13 for an advisory opinion.

Section 10. Incompatible activities

- a. This Code shall not prohibit any current or former Town official, employee, or consultant from appearing before any agency on his/her own behalf. To avoid an actual or perceived conflict, Town officials are strongly discouraged from appearing before the agency on which they are a member or officer, absent extenuating circumstances, unless he/she has received a prior favorable advisory opinion by the Ethics Commission pursuant to Section 14(b) prior to appearing.
- b. 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, G.S. 8-11, 8-21, and 22a-42(c) that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.

- c. To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of the Code, a Town official shall exercise care when appearing before other agencies and shall disclose whether he/she is appearing in his/her official capacity or as a private citizen.

Section 11. Penalty for violation

A failure to comply with the Code shall be considered grounds for censure, reprimand, suspension, demotion, removal, or dismissal of Town officials, employees, and consultants as applicable. The remedies and procedures specified in 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. Acknowledgment form

- a. The Town Clerk shall provide a copy of the Code of Ethics to every Town official and employee within sixty (60) days of date that he/she begins his/her duties. Every Town official and employee shall sign and file with the Town Clerk an acknowledgment form indicating his/her awareness of the provisions of this Code. Current Town officials and employees shall acknowledge the Code of Ethics within one-hundred-twenty (120) days of its effective date.
- b. Each consultant shall sign and file with the Town Clerk an acknowledgment form indicating his or her awareness of the provisions of this Code on or before being retained by the Town, Board of Education, or other agency. Current consultants shall acknowledge the Code of Ethics within one-hundred-twenty (120) days of its effective date.
- 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 13. Ethics Commission

- a. Structure
 - 1. The Ethics Commission shall be comprised of five (5) regular members and two (2) alternate members. All members of the Ethics Commission shall be electors of the Town
 - 2. 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.
 - 3. Members will not be compensated for their service on the Commission.
 - 4. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary

- b. Member and alternate member qualifications
 - a. Members and alternate members must be residents of the Town of Ledyard.
 - b. No member or alternate member shall:
 - a. Be employed by the Town;
 - b. Have been employed by the Town for a period of two years prior to being appointed to the Ethics Commission.
 - c. Hold or seek any Town office.
 - d. *Have campaigned for any other person seeking a town office.*
 - e. Have held any Town office for a period of two years prior to being appointed to the Ethics Commission.
 - f. Serve as a member of another Town agency.
 - g. Hold office in a political party or political committee.
 - h. Have been found in violation of state, local, or professional code of ethics.
- c. Method 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 (6) affirmative votes of the Town Council.
- d. Terms of appointment
 - 1. Members will be appointed for three (3) year terms.
 - 2. 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.
 - 3. 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.
 - 4. 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.*
 - 5. 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.
- e. Powers and duties
 - 1. The Ethics Commission shall be authorized to consult the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council.
 - 2. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.
 - 3. The Ethics Commission has the power to render advisory opinions to any Town official, employee, or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. Individuals seeking an advisory opinion should follow the procedures outlined in Section 14 of the Code.

4. The Ethics Commission has the power to examine complaints and to make a determination of probable cause, pursuant to the procedures outlined in Section 14.
5. The Ethics Commission has the power to 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.
6. The Ethics Commission has the power to review the Code of Ethics policies and procedures on an as-needed basis and will make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures.
7. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provision of this Code of Ethics or is otherwise prohibited by law.
8. The Ethics Commission will protect the personal privacy rights of any individual who is the subject of an inquiry or complaint, except as necessary to investigate and make determinations of probable cause. If there is a finding of no probable cause, the existence of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.
9. The Ethics Commission may take action to increase public awareness of the Code of Ethics.

Section 14. Ethics Commission rules of procedure

- (a) These procedures shall be used by the Ethics Commission established in Section 14 hereof, and are designed to guide public officials, officers, employees, consultants, and citizens of the process to be followed if they seek advice or question the conduct of those in or affiliated with town government. Subsection (b), advisory opinions, describes a process for Town officers, officials, employees, or consultants, and other parties doing business with the Town who are seeking advice about their own conduct or the conduct of a Town office or function. Subsection (c), complaints, describes a formal, public procedure for filing complaints. Subsection (d), other communications; miscellaneous, describes the process to be followed by anyone wishing to bring something to the attention of the Ethics Commission, without requesting an advisory opinion or filing a complaint.

(b) Advisory opinions

1. Any current, former, or prospective Town of Ledyard 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 official also may request an advisory opinion concerning the activities of any department over which he/she has jurisdiction or board or commission on which he/she serves.
2. 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 ~~it~~ the form.

3. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day 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.
4. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions.
5. Proceedings
 - i. The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting under executive session, except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics, called by the Ethics Commission chair or vice-chair.
 - ii. The Ethics Commission will meet in to review the request. At that time, it may decide to (1) Seek additional information, (2) Create a subcommittee of at least two (2) commission members to make a recommendation for consideration by the full Ethics Commission, (3) Hold an informal hearing to receive comments from the individual who request the advisory opinion and/or from the public, (4) Investigate the relevant facts and issues in order to render the advisory opinion.
6. Decisions
 - i. Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present.
 - ii. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) 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 (30) days.
 - iii. All advisory opinions must be in writing and communicated to the individual making the request.
 - iv. 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.
7. Confidentiality
 - i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.
 - ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

c. Complaints

1. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day said request 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) days of receipt of the complaint. The Ethics Commission shall also notify the respondent 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:

- Name of the person accused (respondent).
- Name of the person filing the complaint.
- The specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

1. Evaluation and Acknowledgment

- a. Within sixty (60) business days of the receipt of a complaint, 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.
- b. 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 process.

2. Hearings

- i. 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

attendance of witnesses and the production of books, documents, records, and papers, and to examine and cross-examine witnesses and inspect and copy relevant and material records, papers and documents not in such person's possession. 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 (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.

3. Final Decisions

- ii. 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.
- iii. The Ethics Commission must render its decision within sixty (60) days of the closing of the hearing.
- iv. 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.
- v. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) 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.
- vi. Penalties for Violations of the Code of Ethics
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
 - g. Termination of employment
 - h. 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) days after receipt of the finding and memorandum of Ethics Commission.

d. Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of the Ethics Commission, c/o the Ledyard Town Clerk, 741 Colonel Ledyard Highway, Ledyard, CT 06339-1511 who will date stamp, but not open, the envelope and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said

communication 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 chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. 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.

Adopted by the Ledyard Town Council on: _____

Signed/Certified on: _____

Gary St. Vil, Chairman

Approve/Disapprove on: _____

Fred B. Allyn , III, Mayor

Roxanne Maher

From: Jessica Buhle
Sent: Tuesday, October 28, 2025 10:35 AM
To: Roxanne Maher
Subject: Fwd: Redline version of the draft and two notes.
Attachments: Secondary Attorney Revisions Clean Copy 10-28.docx; Secondary Attorney Revisions Redline 10-28.docx

Good morning Roxanne,

Please attach this additional correspondence between Attorney Ritter and I.

I am also attaching a secondary redline draft showing these recommended changes, and a new attorney revised clean copy of the draft to attach as well.

Thank you.

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

Begin forwarded message:

From: "Ritter, Matthew D." <MRitter@goodwin.com>
Subject: **Re: Redline version of the draft and two notes.**
Date: October 28, 2025 at 8:59:39 AM EDT
To: Jessica Buhle <Jbuh@ledyardct.org>

Thanks. -Matt

Sent from my iPhone

On Oct 28, 2025, at 8:31 AM, Jessica Buhle <Jbuh@ledyardct.org> wrote:

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Thank you. I will incorporate those changes and send you a clean copy after the meeting as requested.

-Jessica

Sent from my iPhone

On Oct 28, 2025, at 8:29 AM, Ritter, Matthew D. <MRitter@goodwin.com> wrote:

Hood morning Jessica – some small comments below. I have no additional comments at this time. However, after the meeting tomorrow please send me a clean version just so I can proofread it one more time for typos, section ordering, etc. Thanks. -Matt

1. Gift definition. I think it should be something like this:

“*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) calendar year from the same person, as well as loans that are not commercially reasonable.”

Under this language, you could take someone out to dinner for \$99.99 once a calendar year. Does that make sense?

2. Add the word two times to Section 9(d). 6:

1. For a consultant - to **the** agent
executing **the** contract on behalf of the Town or
Board of Education.

3. Section 10 – maybe re-title it since the employment language has been deleted?

4. Section 12 – not a legal issue...just concerned about the Town Clerk’s ability to get all these forms signed in 60 days especially since it includes teachers, etc. And if the ordinance is adopted in November, there are a lot of holidays/vacation days in the subsequent 60 days.

Maybe use 120 days? I would just make sure the Town Clerk can handle this in whatever time period is given.

Thanks, Matt

[<image001.png>](#)

Matthew D. Ritter
Shipman & Goodwin LLP
Partner
One Constitution Plaza
Hartford, CT 06103-1919

Tel: (860) 251-5092
Fax: (860) 251-5212
MRitter@goodwin.com
www.shipmangoodwin.com

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From: Jessica Buhle <Jbuh@ledyardct.org>
Sent: Monday, October 27, 2025 7:30 PM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Re: Redline version of the draft and two notes.

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Good evening,

I am attaching a final redline draft incorporating your changes. I have made the changes from the clean draft I sent you.

Green items are the changes you've recommended adding or defended modifying; redlines are items we've deleted.

With these changes adopted, do you feel this ordinance is effective to protect the Town of Ledyard and can be defended if the need arose?

Thank you again for your assistance and prompt replies (but if you happen to read this this evening, please don't reply until tomorrow and enjoy your evening).

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

On Oct 27, 2025, at 6:29 PM, Ritter, Matthew D.
<MRitter@goodwin.com> wrote:

Hi Jessica – thanks for the redline. Very helpful. Comments/suggested edits below:

1. Definition of “Gift” - I think you accidentally deleted the phrase “and one hundred dollars (\$100.00) total in any one (1) year from the same person.”

2. You include the “Town Attorney” in the definition of “Official.” However, the Town Attorney is already included in the definition of consultant.

If you include Town Attorney in the definition of “Official” you will have to clarify some provisions in which the term “Official” is used. See Section 9.d., Section 12.a. and #8 of “Gifts do not include”, for example. There may be some more as well.

3. Conflicts of Interest – I fully appreciate that this language below in subsection (a) comes directly from the Glastonbury code. I will only point out that this is a subjective standard. I just note that it will be easier for the Ethics Commission to make rulings if there are objective criteria (i.e. the gift rule or financial interest rule). However, this is a policy decision for the Town Council/Mayor to determine.

“that is incompatible with the proper discharge of that individual’s official responsibilities in the public interest or would tend to impair his/her independent judgment or action in the performance of official responsibilities.”

-I think it is fine to leave in subsection (d) even though it is already in the employee handbook.

-I would delete (f) because it appears earlier in the ordinance (or vise versa...delete the earlier section).

4. Section 9(c) – I assume section 1. applies only to property in Ledyard? I would clarify that for the corporation, trust, partnerships, etc.

Section(c) 3. – delete the term “political subdivision.” Or let me know what you are trying

to capture here? This was in my prior comments as well.

Section 9(d) – I know this comes from Glastonbury but what does it mean for a Town official to report to a “particular agency?” I would recommend that these officials report to the Town Council Chair and/or Mayor maybe? Or maybe the chair of that board or commission?

For Town employees, it is hard without a Town Manager. However, the term “appropriate authorities” may not be clear enough. Again, maybe it is the Mayor and/or Town Council Chair? Or the full Town Council like with department heads?

-It may also be easier to just require anyone who is uncertain to ask for an advisory opinion? Maybe eliminate the middle step? The involvement of other individuals raises questions about FOIA, confidentiality, etc.

5. Section 10 – is almost identical to the conflicts of interest section I highlighted above. If the Town Council keeps the provision, I would just use it once in the ordinance.

-10. b. I understand subsection (c) because it relates to a matter a consultant/employee may have been involved with in their role as a consultant (and they may be privy to certain confidential information, etc). However, it does not work as well for subsection (b). What is meant by “affiliated” for a consultant? For example, if the P&Z Commission hires a consultant for advice in 2025, can that consultant advise a different applicant in 2026 if it is a completely different property and an unrelated matter?

“No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency with which he/she previously was employed or affiliated for a period of one (1) year after the termination of his/her public service or employment; provided,

however, that such an individual may be permitted to make such an appearance upon receipt of a favorable prior advisory opinion by the Ethics Commission pursuant to Section 13 following its review of the individual's written application and relevant facts.”

-As noted before, I understand that Glastonbury has these revolving door provisions but I do not know if they will pass legal muster for certain consultants, unionized employees, etc. We can certainly research this issue further if requested.

-10. f. – I know this is in Glastonbury, but I still think it is a typo. I would recommend deleting this language in yellow. This was also in my earlier comments.

To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of the Code, a Town official, **not otherwise restrained by the Code**, shall exercise care when appearing before other agencies and shall disclose whether he/she is appearing in his/her official capacity or as a private citizen.

6. Section 12. How are you going to handle existing employees/consultants as opposed to new hires/contracts? Are you going to require them to all sign the form or just new employees? The language may have to be amended to reflect this policy decision.

7. There are no legal issues with adding the training requirements.

<image001.png>

Matthew D. Ritter
Shipman & Goodwin LLP
Partner
One Constitution Plaza
Hartford, CT 06103-1919

Tel: (860) 251-5092
Fax: (860) 251-5212
MRitter@goodwin.com
www.shipmangoodwin.com

Disclaimer: Privileged and confidential. If received in error, please notify me by e-mail and delete the message.

From: Jessica Buhle <Jbuh@ledyardct.org>
Sent: Monday, October 27, 2025 4:09 PM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Redline version of the draft and two notes.

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Good afternoon,

I have attached the redline draft of the ordinance proposed comparing to the Glastonbury code of ethics. There are also notes in the document as well regarding some of the changes if they are visible. If they are not visible, please let me know and I can send those separately.

Before a final draft is adopted, I have two changes I would like to make to it that didn't get changed before I sent it to you.

First, I would like to change the requirements for finding probable cause to 3 votes instead of 4 while retaining 4 for a final decision.

Second, I would like to re-add section c and d from Section 2-68 about maintaining training for town employees and officials. The language as written in the Glastonbury code is sufficient removing the reference to their charter and naming the Mayor instead of the Town Manager.

Lastly, if you think the language specific to inquiries and complaints directly from the Glastonbury code is better overall, we can move forward with that language instead of the previously proposed language. All of the hearing and procedural language in the draft sent to you is directly from the previous draft.

Thank you for all the feedback and assistance
you have provided to support effective
legislation for Ledyard

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

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are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

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<image001.png>

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 officials, Town employees, and Town 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.

The purpose of the Town of Ledyard Code of Ethics is to:

- Identify standards of ethical conduct to guide all Town officials, including members of the Board of Education, and all Town and Board of Education officers, employees, and consultants as they conduct their public responsibilities.
- Clarify the role of the Ethics Commission.
- Outline a process that allows Town officials, including members of the Board of Education, and all Town and Board of Education employees, and consultants to seek guidance and advice about ethical issues connected with their public responsibilities, and
- Establish a process that enables citizens to report, and the Ethics Commission to investigate and respond to possible violation of the Code.

Section 3. Definitions

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

1. “*Agency*” is any board, commission, authority, or committee of the Town, including the Town Council and Board of Education.
2. “*Beneficial interest*” means any nonfinancial interest or special treatment that is not common to other citizens of the Town.

3. “*Business associate*” means a person joined together with another person through employment or to achieve a common financial and/or business-related objective.
4. “*Business day*” means a day other than a Saturday, Sunday, or other day on which the office of the Ledyard Town Clerk is closed to the public for business.
5. “*Complainant*” means a person or person who files a complaint under penalties of false statement against an official, employee, or consultant containing allegation of prohibited activities under the Code of Ethics.
6. “*Confidential Information*” means information acquired by a Town 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.
7. “*Consultant*” means any independent contractor or professional person or firm that is by virtue of an award of a public bid or contract engaged by and receives compensation from the Town or Board of Education for the purpose of providing professional, scientific, technical, or other specialized opinion, and is in a position to influence any decision of an agency, official, or employee.
8. “*Employee*” is any person receiving a salary, wages, or stipend from the Town or Board of Education for services rendered, whether full-time or part-time.
9. “*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, lineal descendants, stepchildren, foster children, siblings, stepsiblings, foster siblings; lineal descendants of siblings, stepsiblings, and foster siblings of an official, employee, or consultant, or his/her spouse or domestic partner.
10. “*Financial Interest*” means any interest that:
 - a. has a 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;
 - b. is not common to the other citizens of the Town. An individual’s financial interests shall include the financial interests of all members of his/her family but shall not include any duly authorized compensation from the town.
11. “*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, as well as loans that are not commercially reasonable. A gift may also include donations to a third party on behalf of an official, employee, or consultant for which she/he receives some favor, advantage, or consideration.

Gifts do not include:

1. A political contribution that is otherwise reported in accordance with the law.
2. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.
3. Any gift regardless of value received from: (i) any family member who resides in the same household as the recipient of the gift, or (ii) another family member unless the other family member who makes the gift is interested, directly or indirectly, in a business transaction or pending matter that is within the purview or responsibilities of (a) the recipient of the gift, or (b) another family member residing in the same household as the recipient of the gift.
4. Certificates, plaques, or other ceremonial awards costing less than fifty dollars (\$50.00).
5. 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.
6. Honorary degrees.
7. 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 official or Town employee participates in his/her official capacity.
8. Any gift provided to a Town Official or Town Employee or to a family member of a Town Official or Town 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.

12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

13. *"Official"* is any person holding elective or appointive office in the government of the town and shall include, but not limited to, the Town Council, Board of Education, Town commissions and committees, or any other agency.

14. *"Respondent"* means a person who is the subject of a complaint.

Section 4. Confidential information

Town 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.

Section 5. Conflict of Interest Provisions

- a. A Town 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 where the Town official, employee, or consultant has a financial or beneficial interest.
- 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 official, employee, or consultant has reason to believe or expect that he/she or any member of his family or business associate 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 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, his/her family members or business associate(s) 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 G.S. 7-148h(b).
- d. No Town official or employee may directly hire or supervise a member of his/her family.
- e. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials, or property for personal convenience or profit. Personal convenience or profit refer to those matters that are not related to the individual's official duties.
- f. No Town 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 6. Consultants

- a. The Code of Ethics shall be incorporated by reference into all contracts entered into by the Town of Ledyard and the Board of Education with a consultant.
- b. Persons or firms who are engaged by and receive compensation from other governmental entities, such as the state or federal government, and who are in a position to influence any decision of an agency, official, or employee shall be guided by the Code.

Section 7. Gifts and favors

- a. No Town official, employee, or consultant, or any business associate, or member of his/her family nor any agency, employee organization, or group of employees shall solicit or accept any gift, whether in the form of a service, a loan at a less than a commercially available rate, a material thing, or a promise, 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, consultant, agency, employee organization, or group of employees. No Town 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 an agency, commission, committee, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment, or services.
- b. This section shall not apply to any political contribution that is reported as required by law.

Section 8. Equal treatment

Without proper authorization, no Town official, employee, or consultant shall accept, seek, grant, or cause to be granted any special consideration, treatment, or advantage to such individual, or his/her family by virtue of his/her position or business association.

Section 9. Disclosure and disqualification

- a. Any Town 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 section 9(b) through 9(e). Such disclosure shall disqualify the official, employee, or consultant from participation in the matter, transaction, or decision.
- b. No Town 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.
- c. All Town Councilors, Board of Education members, and the Mayor 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:
 1. All real estate located within the Town of Ledyard owned by such elected 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, as aforesaid, by a corporation, trust or partnership in which any such elected 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.
 2. 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 (5) percent interest, and which firm, proprietorship, partnership, corporation, or limited liability 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.
 3. 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.
- d. If there is an uncertainty whether a Town 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 shall disclose such possible conflict of interest to the following:
 1. For a Town official who is a member of an elective or appointive board, commission, committee, or authority - to the particular chair of the commission or committee of which such official is a member.
 2. For Town employees and officials appointed by the appropriate authorities - the Mayor or Town Council.
 3. For Board of Education employees - to the superintendent of schools

4. The Town department directors - to the Town Council.
 5. The superintendent of schools - to the Board of Education.
 6. For a consultant - to the agent executing the contract on behalf of the Town or Board of Education.
- e. The appropriate authority to which the disclosure is made shall make an appropriate record of such disclosure and shall recommend to the Town official, employee, or consultant making the report to seek an advisory opinion from the Ethics Commission regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.
 - f. Any such questions concerning a possible conflict of interest may be referred to the Ethics Commission pursuant to Section 13 for an advisory opinion.

Section 10. Incompatible activities

- a. This Code shall not prohibit any current or former Town official, employee, or consultant from appearing before any agency on his/her own behalf. To avoid an actual or perceived conflict, Town officials are strongly discouraged from appearing before the agency on which they are a member or officer, absent extenuating circumstances, unless he/she has received a prior favorable advisory opinion by the Ethics Commission pursuant to Section 14(b) prior to appearing.
- b. 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, G.S. 8-11, 8-21, and 22a-42(c) that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.
- c. To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of the Code, a Town official shall exercise care when appearing before other agencies and shall disclose whether he/she is appearing in his/her official capacity or as a private citizen.

Section 11. Penalty for violation

A failure to comply with the Code shall be considered grounds for censure, reprimand, suspension, demotion, removal, or dismissal of Town officials, employees, and consultants as applicable. The remedies and procedures specified in 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. Acknowledgment form

- a. The Town Clerk shall provide a copy of the Code of Ethics to every Town official and employee within sixty (60) days of date that he/she begins his/her duties. Every Town official and employee shall sign and file with the Town Clerk an acknowledgment form indicating his/her awareness of the provisions of this Code. Current Town officials and employees shall acknowledge the Code of Ethics within one-hundred-twenty (120) days of its effective date.
- b. Each consultant shall sign and file with the Town Clerk an acknowledgment form indicating his or her awareness of the provisions of this Code on or before being retained

by the Town, Board of Education, or other agency. Current consultants shall acknowledge the Code of Ethics within one-hundred-twenty (120) days of its effective date.

- 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 13. Ethics Commission

a. Structure

- 1. The Ethics Commission shall be comprised of five (5) regular members and two (2) alternate members. All members of the Ethics Commission shall be electors of the Town.
- 2. 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.
- 3. Members will not be compensated for their service on the Commission.
- 4. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary

b. Member and alternate member qualifications

- a. Members and alternate members must be residents of the Town of Ledyard.
- b. No member or alternate member shall:
 - a. Be employed by the Town;
 - b. Have been employed by the Town for a period of two years prior to being appointed to the Ethics Commission.
 - c. Hold or seek any Town office.
 - d. Have held any Town office for a period of two years prior to being appointed to the Ethics Commission.
 - e. Serve as a member of another Town agency.
 - f. Hold office in a political party or political committee.
 - g. Have been found in violation of state, local, or professional code of ethics.
- c. Method 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 (6) affirmative votes of the Town Council.
- d. Terms of appointment
 - 1. Members will be appointed for three (3) year terms.

2. 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.
3. 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.
4. Inaugural members shall be eligible to serve two (2) additional three (3) years term beyond his/her initial appointment.
5. 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.

e. Powers and duties

1. The Ethics Commission shall be authorized to consult the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council.
2. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.
3. The Ethics Commission has the power to render advisory opinions to any Town official, employee, or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. Individuals seeking an advisory opinion should follow the procedures outlined in Section 14 of the Code.
4. The Ethics Commission has the power to examine complaints and to make a determination of probable cause, pursuant to the procedures outlined in Section 14
5. The Ethics Commission has the power to 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.
6. The Ethics Commission has the power to review the Code of Ethics policies and procedures on an as-needed basis and will make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures.
7. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provision of this Code of Ethics or is otherwise prohibited by law.
8. The Ethics Commission will protect the personal privacy rights of any individual who is the subject of an inquiry or complaint, except as necessary to investigate and make determinations of probable cause. If there is a finding of no probable cause, the existence of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.
9. The Ethics Commission may take action to increase public awareness of the Code of Ethics.

Section 14. Ethics Commission rules of procedure

(a) These procedures shall be used by the Ethics Commission established in Section 14 hereof, and are designed to guide public officials, officers, employees, consultants, and citizens of the process to be followed if they seek advice or question the conduct of those in or affiliated with town government. Subsection (b), advisory opinions, describes a process for Town officers, officials, employees, or consultants, and other parties doing business with the Town who are seeking advice about their own conduct or the conduct of a Town office or function. Subsection (c), complaints, describes a formal, public procedure for filing complaints. Subsection (d), other communications; miscellaneous, describes the process to be followed by anyone wishing to bring something to the attention of the Ethics Commission, without requesting an advisory opinion or filing a complaint.

(b) Advisory opinions

1. Any current, former, or prospective Town of Ledyard 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 official also may request an advisory opinion concerning the activities of any department over which he/she has jurisdiction or board or commission on which he/she serves.

2. 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 it.

3. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day 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.

4. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions.

5. Proceedings

- i. The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting under executive session, except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics, called by the Ethics Commission chair or vice-chair.
- ii. The Ethics Commission will meet in to review the request. At that time, it may decide to (1) Seek additional information, (2) Create a subcommittee of at least two (2) commission members to make a recommendation for consideration by the full Ethics Commission, (3) Hold an informal hearing to receive comments from

the individual who request the advisory opinion and/or from the public, (4) Investigate the relevant facts and issues in order to render the advisory opinion.

6. Decisions

- i. Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present.
- ii. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) 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 (30) days.
- i. All advisory opinions must be in writing and communicated to the individual making the request.
- ii. 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.

7. Confidentiality

- i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.
- ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

c. Complaints

1. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day said request 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) days of receipt of the complaint. The Ethics Commission shall also notify the respondent 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:

- Name of the person accused (respondent).
- Name of the person filing the complaint.

- The specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

2.Evaluation and Acknowledgment

- i. Within sixty (60) business days of the receipt of a complaint, 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.
- ii. 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 process.

3.Hearings

- i. 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 attendance of witnesses and the production of books, documents, records, and papers, and to examine and cross-examine witnesses and inspect and copy relevant and material records, papers and documents not in such person’s possession. 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 (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.

4.Final Decisions

- i. 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.
- ii. The Ethics Commission must render its decision within sixty (60) days of the closing of the hearing.

- iii. 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.
- iv. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) 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. A violation of the Code of Ethics may lead to any one or a combination of the following penalties:
 - b. Order to cease and desist the violation
 - c. Pay a civil penalty of up to the maximum amount permitted by State law.
 - d. Censure
 - e. Suspension without pay
 - f. Demotion
 - g. Termination of employment
 - h. Restitution of any benefits received because of the violation committed.

d. Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of the Ethics Commission, c/o the Ledyard Town Clerk, 741 Colonel Ledyard Highway, Ledyard, CT 06339-1511 who will date stamp, but not open, the envelope and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said communication 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 chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. 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.

Adopted by the Ledyard Town Council on: _____

Gary St. Vil, Chairman

Approve/Disapprove on: _____

Fred B. Allyn , III, Mayor

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 officials, Town employees, and Town 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.

The purpose of the Town of Ledyard Code of Ethics is to:

- Identify standards of ethical conduct to guide all Town officials, including members of the Board of Education, and all Town and Board of Education officers, employees, and consultants as they conduct their public responsibilities.
- Clarify the role of the Ethics Commission.
- Outline a process that allows Town officials, including members of the Board of Education, and all Town and Board of Education employees, and consultants to seek guidance and advice about ethical issues connected with their public responsibilities, and
- Establish a process that enables citizens to report, and the Ethics Commission to investigate and respond to possible violation of the Code.

Section 3. Definitions

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

1. “*Agency*” is any board, commission, authority, or committee of the Town, including the Town Council and Board of Education.
2. “*Beneficial interest*” means any nonfinancial interest or special treatment that is not common to other citizens of the Town.

3. *“Business associate”* means a person joined together with another person through employment or to achieve a common financial and/or business-related objective.
4. *“Business day”* means a day other than a Saturday, Sunday, or other day on which the office of the Ledyard Town Clerk is closed to the public for business.
5. *“Complainant”* means a person or person who files a complaint under penalties of false statement against an official, employee, or consultant containing allegation of prohibited activities under the Code of Ethics.
6. *“Confidential Information”* means information acquired by a Town 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.
7. *“Consultant”* means any independent contractor or professional person or firm that is by virtue of an award of a public bid or contract engaged by and receives compensation from the Town or Board of Education for the purpose of providing professional, scientific, technical, or other specialized opinion, and is in a position to influence any decision of an agency, official, or employee.
8. *“Employee”* is any person receiving a salary, wages, or stipend from the Town or Board of Education for services rendered, whether full-time or part-time.
9. *“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, lineal descendants, stepchildren, foster children, siblings, stepsiblings, foster siblings; lineal descendants of siblings, stepsiblings, and foster siblings of an official, employee, or consultant, or his/her spouse or domestic partner.
10. *“Financial Interest”* means any interest that:
 - a. has a 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;
 - b. is not common to the other citizens of the Town. An individual’s financial interests shall include the financial interests of all members of his/her family but shall not include any duly authorized compensation from the town.
11. *“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) ~~for any one (1) occasion, and one hundred dollars (\$100.00) total~~ in any one (1) year from the same person, as well as loans that are not commercially reasonable. A gift may also include donations to a third party on behalf of an official, employee, or consultant for which she/he receives some favor, advantage, or consideration.

Gifts do not include:

1. A political contribution that is otherwise reported in accordance with the law.
2. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.
3. Any gift regardless of value received from: (i) any family member who resides in the same household as the recipient of the gift, or (ii) another family member unless the other family member who makes the gift is interested, directly or indirectly, in a business transaction or pending matter that is within the purview or responsibilities of (a) the recipient of the gift, or (b) another family member residing in the same household as the recipient of the gift.
4. Certificates, plaques, or other ceremonial awards costing less than fifty dollars (\$50.00).
5. 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.
6. Honorary degrees.
7. 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 official or Town employee participates in his/her official capacity.
8. Any gift provided to a Town Official or Town Employee or to a family member of a Town Official or Town 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.

12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

13. *"Official"* is any person holding elective or appointive office in the government of the town and shall include, but not limited to, the Town Council, Board of Education, Town commissions and committees, or any other agency.

14. *"Respondent"* means a person who is the subject of a complaint.

Section 4. Confidential information

Town 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.

Section 5. Conflict of Interest Provisions

- a. A Town 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 where the Town official, employee, or consultant has a financial or beneficial interest.
- 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 official, employee, or consultant has reason to believe or expect that he/she or any member of his family or business associate 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 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, his/her family members or business associate(s) 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 G.S. 7-148h(b).
- d. No Town official or employee may directly hire or supervise a member of his/her family.
- e. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials, or property for personal convenience or profit. Personal convenience or profit refer to those matters that are not related to the individual's official duties.
- f. No Town 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 6. Consultants

- a. The Code of Ethics shall be incorporated by reference into all contracts entered into by the Town of Ledyard and the Board of Education with a consultant.
- b. Persons or firms who are engaged by and receive compensation from other governmental entities, such as the state or federal government, and who are in a position to influence any decision of an agency, official, or employee shall be guided by the Code.

Section 7. Gifts and favors

- a. No Town official, employee, or consultant, or any business associate, or member of his/her family nor any agency, employee organization, or group of employees shall solicit or accept any gift, whether in the form of a service, a loan at a less than a commercially available rate, a material thing, or a promise, 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, consultant, agency, employee organization, or group of employees. No Town 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 an agency, commission, committee, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment, or services.
- b. This section shall not apply to any political contribution that is reported as required by law.

Section 8. Equal treatment

Without proper authorization, no Town official, employee, or consultant shall accept, seek, grant, or cause to be granted any special consideration, treatment, or advantage to such individual, or his/her family by virtue of his/her position or business association.

Section 9. Disclosure and disqualification

- a. Any Town 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 section 9(b) through 9(e). Such disclosure shall disqualify the official, employee, or consultant from participation in the matter, transaction, or decision.
- b. No Town 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.
- c. All Town Councilors, Board of Education members, and the Mayor 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:
 1. All real estate located within the Town of Ledyard owned by such elected 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, as aforesaid, by a corporation, trust or partnership in which any such elected 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.
 2. 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 (5) percent interest, and which firm, proprietorship, partnership, corporation, or limited liability 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.
 3. 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.
- d. If there is an uncertainty whether a Town 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 shall disclose such possible conflict of interest to the following:
 1. For a Town official who is a member of an elective or appointive board, commission, committee, or authority - to the particular chair of the commission or committee of which such official is a member.
 2. For Town employees and officials appointed by the appropriate authorities - the Mayor or Town Council.
 3. For Board of Education employees - to the superintendent of schools

4. The Town department directors - to the Town Council.
 5. The superintendent of schools - to the Board of Education.
 6. For a consultant - to the agent executing ~~the~~ contract on behalf of the Town or Board of Education.
- e. The appropriate authority to which the disclosure is made shall make an appropriate record of such disclosure and shall recommend to the Town official, employee, or consultant making the report to seek an advisory opinion from the Ethics Commission regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.
 - f. Any such questions concerning a possible conflict of interest may be referred to the Ethics Commission pursuant to Section 13 for an advisory opinion.

Section 10. Incompatible ~~employment and~~ activities

- a. This Code shall not prohibit any current or former Town official, employee, or consultant from appearing before any agency on his/her own behalf. To avoid an actual or perceived conflict, Town officials are strongly discouraged from appearing before the agency on which they are a member or officer, absent extenuating circumstances, unless he/she has received a prior favorable advisory opinion by the Ethics Commission pursuant to Section 14(b) prior to appearing.
- b. 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, G.S. 8-11, 8-21, and 22a-42(c) that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.
- c. To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of the Code, a Town official shall exercise care when appearing before other agencies and shall disclose whether he/she is appearing in his/her official capacity or as a private citizen.

Section 11. Penalty for violation

A failure to comply with the Code shall be considered grounds for censure, reprimand, suspension, demotion, removal, or dismissal of Town officials, employees, and consultants as applicable. The remedies and procedures specified in 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. Acknowledgment form

- a. The Town Clerk shall provide a copy of the Code of Ethics to every Town official and employee within sixty (60) days of date that he/she begins his/her duties. Every Town official and employee shall sign and file with the Town Clerk an acknowledgment form indicating his/her awareness of the provisions of this Code. Current Town officials and employees shall acknowledge the Code of Ethics within ~~sixty (60)~~ ~~one-hundred-twenty (120)~~ days of its effective date.
- b. Each consultant shall sign and file with the Town Clerk an acknowledgment form indicating his or her awareness of the provisions of this Code on or before being retained

by the Town, Board of Education, or other agency. Current consultants shall acknowledge the Code of Ethics within ~~sixty (60)~~ **one-hundred-twenty (120)** days of its effective date.

- 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 13. Ethics Commission

a. Structure

1. The Ethics Commission shall be comprised of five (5) regular members and two (2) alternate members. All members of the Ethics Commission shall be electors of the Town.
2. 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.
3. Members will not be compensated for their service on the Commission.
4. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary

b. Member and alternate member qualifications

- a. Members and alternate members must be residents of the Town of Ledyard.
- b. No member or alternate member shall:
 - a. Be employed by the Town;
 - b. Have been employed by the Town for a period of two years prior to being appointed to the Ethics Commission.
 - c. Hold or seek any Town office.
 - d. Have held any Town office for a period of two years prior to being appointed to the Ethics Commission.
 - e. Serve as a member of another Town agency.
 - f. Hold office in a political party or political committee.
 - g. Have been found in violation of state, local, or professional code of ethics.
- c. Method 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 (6) affirmative votes of the Town Council.
- d. Terms of appointment
 1. Members will be appointed for three (3) year terms.

2. 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.
3. 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.
4. Inaugural members shall be eligible to serve two (2) additional three (3) years term beyond his/her initial appointment.
5. 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.

e. Powers and duties

1. The Ethics Commission shall be authorized to consult the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council.
2. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.
3. The Ethics Commission has the power to render advisory opinions to any Town official, employee, or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. Individuals seeking an advisory opinion should follow the procedures outlined in Section 14 of the Code.
4. The Ethics Commission has the power to examine complaints and to make a determination of probable cause, pursuant to the procedures outlined in Section 14
5. The Ethics Commission has the power to 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.
6. The Ethics Commission has the power to review the Code of Ethics policies and procedures on an as-needed basis and will make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures.
7. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provision of this Code of Ethics or is otherwise prohibited by law.
8. The Ethics Commission will protect the personal privacy rights of any individual who is the subject of an inquiry or complaint, except as necessary to investigate and make determinations of probable cause. If there is a finding of no probable cause, the existence of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.
9. The Ethics Commission may take action to increase public awareness of the Code of Ethics.

Section 14. Ethics Commission rules of procedure

(a) These procedures shall be used by the Ethics Commission established in Section 14 hereof, and are designed to guide public officials, officers, employees, consultants, and citizens of the process to be followed if they seek advice or question the conduct of those in or affiliated with town government. Subsection (b), advisory opinions, describes a process for Town officers, officials, employees, or consultants, and other parties doing business with the Town who are seeking advice about their own conduct or the conduct of a Town office or function. Subsection (c), complaints, describes a formal, public procedure for filing complaints. Subsection (d), other communications; miscellaneous, describes the process to be followed by anyone wishing to bring something to the attention of the Ethics Commission, without requesting an advisory opinion or filing a complaint.

(b) Advisory opinions

1. Any current, former, or prospective Town of Ledyard 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 official also may request an advisory opinion concerning the activities of any department over which he/she has jurisdiction or board or commission on which he/she serves.

2. 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 it.

3. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day 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.

4. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions.

5. Proceedings

- i. The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting under executive session, except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics, called by the Ethics Commission chair or vice-chair.
- ii. The Ethics Commission will meet in to review the request. At that time, it may decide to (1) Seek additional information, (2) Create a subcommittee of at least two (2) commission members to make a recommendation for consideration by the full Ethics Commission, (3) Hold an informal hearing to receive comments from

the individual who request the advisory opinion and/or from the public, (4) Investigate the relevant facts and issues in order to render the advisory opinion.

6. Decisions

- i. Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present.
- ii. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) 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 (30) days.
- i. All advisory opinions must be in writing and communicated to the individual making the request.
- ii. 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.

7. Confidentiality

- i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.
- ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

c. Complaints

1. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day said request 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) days of receipt of the complaint. The Ethics Commission shall also notify the respondent 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:

- Name of the person accused (respondent).
- Name of the person filing the complaint.

- The specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

2.Evaluation and Acknowledgment

- i. Within sixty (60) business days of the receipt of a complaint, 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.
- ii. 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 process.

3.Hearings

- i. 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 attendance of witnesses and the production of books, documents, records, and papers, and to examine and cross-examine witnesses and inspect and copy relevant and material records, papers and documents not in such person’s possession. 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 (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.

4.Final Decisions

- i. 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.
- ii. The Ethics Commission must render its decision within sixty (60) days of the closing of the hearing.

- iii. 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.
- iv. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) 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. A violation of the Code of Ethics may lead to any one or a combination of the following penalties:
 - b. Order to cease and desist the violation
 - c. Pay a civil penalty of up to the maximum amount permitted by State law.
 - d. Censure
 - e. Suspension without pay
 - f. Demotion
 - g. Termination of employment
 - h. Restitution of any benefits received because of the violation committed.

d. Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of the Ethics Commission, c/o the Ledyard Town Clerk, 741 Colonel Ledyard Highway, Ledyard, CT 06339-1511 who will date stamp, but not open, the envelope and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said communication 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 chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. 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.

Adopted by the Ledyard Town Council on: _____

Gary St. Vil, Chairman

Approve/Disapprove on: _____

Fred B. Allyn , III, Mayor

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 officials, Town employees, and Town 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.

The purpose of the Town of Ledyard Code of Ethics is to:

- Identify standards of ethical conduct to guide all Town officials, including members of the Board of Education, and all Town and Board of Education officers, employees, and consultants as they conduct their public responsibilities.
- Clarify the role of the Ethics Commission.
- Outline a process that allows Town officials, including members of the Board of Education, and all Town and Board of Education employees, and consultants to seek guidance and advice about ethical issues connected with their public responsibilities, and
- Establish a process that enables citizens to report, and the Ethics Commission to investigate and respond to possible violation of the Code.

Section 3. Definitions

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

1. “*Agency*” is any board, commission, authority, or committee of the Town, including the Town Council and Board of Education.
2. “*Beneficial interest*” means any nonfinancial interest or special treatment that is not common to other citizens of the Town.

3. “*Business associate*” means a person joined together with another person through employment or to achieve a common financial and/or business-related objective.
4. “*Business day*” means a day other than a Saturday, Sunday, or other day on which the office of the Ledyard Town Clerk is closed to the public for business.
5. “*Complainant*” means a person or person who files a complaint under penalties of false statement against an official, employee, or consultant containing allegation of prohibited activities under the Code of Ethics.
6. “*Confidential Information*” means information acquired by a Town 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.
7. “*Consultant*” means any independent contractor or professional person or firm that is by virtue of an award of a public bid or contract engaged by and receives compensation from the Town or Board of Education for the purpose of providing professional, scientific, technical, or other specialized opinion, and is in a position to influence any decision of an agency, official, or employee.
8. “*Employee*” is any person receiving a salary, wages, or stipend from the Town or Board of Education for services rendered, whether full-time or part-time.
9. “*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, lineal descendants, stepchildren, foster children, siblings, stepsiblings, foster siblings; lineal descendants of siblings, stepsiblings, and foster siblings of an official, employee, or consultant, or his/her spouse or domestic partner.
10. “*Financial Interest*” means any interest that:
 - a. has a 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;
 - b. is not common to the other citizens of the Town. An individual’s financial interests shall include the financial interests of all members of his/her family but shall not include any duly authorized compensation from the town.
11. “*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) for any one (1) occasion, and one hundred dollars (\$100.00) total in any one (1) year from the same person, as well as loans that are not commercially reasonable. A gift may also include donations to a third party on behalf of an official, employee, or consultant for which she/he receives some favor, advantage, or consideration.

Gifts do not include:

1. A political contribution that is otherwise reported in accordance with the law.
2. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.
3. Any gift regardless of value received from: (i) any family member who resides in the same household as the recipient of the gift, or (ii) another family member unless the other family member who makes the gift is interested, directly or indirectly, in a business transaction or pending matter that is within the purview or responsibilities of (a) the recipient of the gift, or (b) another family member residing in the same household as the recipient of the gift.
4. Certificates, plaques, or other ceremonial awards costing less than fifty dollars (\$50.00).
5. 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.
6. Honorary degrees.
7. 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 official or Town employee participates in his/her official capacity.
8. Any gift provided to a Town Official or Town Employee or to a family member of a Town Official or Town 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.

12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

13. *"Official"* is any person holding elective or appointive office in the government of the town and shall include, but not limited to, the Town Council, Board of Education, Town commissions and committees, or any other agency.

14. *"Respondent"* means a person who is the subject of a complaint.

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Town 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.

Section 5. Conflict of Interest Provisions

- a. A Town 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 where the Town official, employee, or consultant has a financial or beneficial interest.
- 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 official, employee, or consultant has reason to believe or expect that he/she or any member of his family or business associate 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 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, his/her family members or business associate(s) 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 G.S. 7-148h(b).
- d. No Town official or employee may directly hire or supervise a member of his/her family.
- e. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials, or property for personal convenience or profit. Personal convenience or profit refer to those matters that are not related to the individual's official duties.
- f. No Town 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 6. Consultants

- a. The Code of Ethics shall be incorporated by reference into all contracts entered into by the Town of Ledyard and the Board of Education with a consultant.
- b. Persons or firms who are engaged by and receive compensation from other governmental entities, such as the state or federal government, and who are in a position to influence any decision of an agency, official, or employee shall be guided by the Code.

Section 7. Gifts and favors

- a. No Town official, employee, or consultant, or any business associate, or member of his/her family nor any agency, employee organization, or group of employees shall solicit or accept any gift, whether in the form of a service, a loan at a less than a commercially available rate, a material thing, or a promise, 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, consultant, agency, employee organization, or group of employees. No Town 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 an agency, commission, committee, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment, or services.
- b. This section shall not apply to any political contribution that is reported as required by law.

Section 8. Equal treatment

Without proper authorization, no Town official, employee, or consultant shall accept, seek, grant, or cause to be granted any special consideration, treatment, or advantage to such individual, or his/her family by virtue of his/her position or business association.

Section 9. Disclosure and disqualification

- a. Any Town 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 section 9(b) through 9(e). Such disclosure shall disqualify the official, employee, or consultant from participation in the matter, transaction, or decision.
- b. No Town 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.
- c. All Town Councilors, Board of Education members, and the Mayor 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:
 1. All real estate located within the Town of Ledyard owned by such elected 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, as aforesaid, by a corporation, trust or partnership in which any such elected 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.
 2. 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 (5) percent interest, and which firm, proprietorship, partnership, corporation, or limited liability 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.
 3. 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.
- d. If there is an uncertainty whether a Town 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 shall disclose such possible conflict of interest to the following:
 1. For a Town official who is a member of an elective or appointive board, commission, committee, or authority - to the particular chair of the commission or committee of which such official is a member.
 2. For Town employees and officials appointed by the appropriate authorities - the Mayor or Town Council.
 3. For Board of Education employees - to the superintendent of schools

4. The Town department directors - to the Town Council.
 5. The superintendent of schools - to the Board of Education.
 6. For a consultant - to the agent executing contract on behalf of the Town or Board of Education.
- e. The appropriate authority to which the disclosure is made shall make an appropriate record of such disclosure and shall recommend to the Town official, employee, or consultant making the report to seek an advisory opinion from the Ethics Commission regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.
 - f. Any such questions concerning a possible conflict of interest may be referred to the Ethics Commission pursuant to Section 13 for an advisory opinion.

Section 10. Incompatible employment and activities

- a. This Code shall not prohibit any current or former Town official, employee, or consultant from appearing before any agency on his/her own behalf. To avoid an actual or perceived conflict, Town officials are strongly discouraged from appearing before the agency on which they are a member or officer, absent extenuating circumstances, unless he/she has received a prior favorable advisory opinion by the Ethics Commission pursuant to Section 14(b) prior to appearing.
- b. 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, G.S. 8-11, 8-21, and 22a-42(c) that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.
- c. To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of the Code, a Town official shall exercise care when appearing before other agencies and shall disclose whether he/she is appearing in his/her official capacity or as a private citizen.

Section 11. Penalty for violation

A failure to comply with the Code shall be considered grounds for censure, reprimand, suspension, demotion, removal, or dismissal of Town officials, employees, and consultants as applicable. The remedies and procedures specified in 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. Acknowledgment form

- a. The Town Clerk shall provide a copy of the Code of Ethics to every Town official and employee within sixty (60) days of date that he/she begins his/her duties. Every Town official and employee shall sign and file with the Town Clerk an acknowledgment form indicating his/her awareness of the provisions of this Code. Current Town officials and employees shall acknowledge the Code of Ethics within sixty (60) days of its effective date.
- b. Each consultant shall sign and file with the Town Clerk an acknowledgment form indicating his or her awareness of the provisions of this Code on or before being retained

by the Town, Board of Education, or other agency. Current consultants shall acknowledge the Code of Ethics within sixty (60) days of its effective date.

- 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 13. Ethics Commission

a. Structure

1. The Ethics Commission shall be comprised of five (5) regular members and two (2) alternate members. All members of the Ethics Commission shall be electors of the Town.
2. 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.
3. Members will not be compensated for their service on the Commission.
4. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary

b. Member and alternate member qualifications

- a. Members and alternate members must be residents of the Town of Ledyard.
- b. No member or alternate member shall:
 - a. Be employed by the Town;
 - b. Have been employed by the Town for a period of two years prior to being appointed to the Ethics Commission.
 - c. Hold or seek any Town office.
 - d. Have held any Town office for a period of two years prior to being appointed to the Ethics Commission.
 - e. Serve as a member of another Town agency.
 - f. Hold office in a political party or political committee.
 - g. Have been found in violation of state, local, or professional code of ethics.
- c. Method 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 (6) affirmative votes of the Town Council.
- d. Terms of appointment
 1. Members will be appointed for three (3) year terms.

2. 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.
3. 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.
4. Inaugural members shall be eligible to serve two (2) additional three (3) years term beyond his/her initial appointment.
5. 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.

e. Powers and duties

1. The Ethics Commission shall be authorized to consult the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council.
2. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.
3. The Ethics Commission has the power to render advisory opinions to any Town official, employee, or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. Individuals seeking an advisory opinion should follow the procedures outlined in Section 14 of the Code.
4. The Ethics Commission has the power to examine complaints and to make a determination of probable cause, pursuant to the procedures outlined in Section 14
5. The Ethics Commission has the power to 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.
6. The Ethics Commission has the power to review the Code of Ethics policies and procedures on an as-needed basis and will make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures.
7. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provision of this Code of Ethics or is otherwise prohibited by law.
8. The Ethics Commission will protect the personal privacy rights of any individual who is the subject of an inquiry or complaint, except as necessary to investigate and make determinations of probable cause. If there is a finding of no probable cause, the existence of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.
9. The Ethics Commission may take action to increase public awareness of the Code of Ethics.

Section 14. Ethics Commission rules of procedure

(a) These procedures shall be used by the Ethics Commission established in Section 14 hereof, and are designed to guide public officials, officers, employees, consultants, and citizens of the process to be followed if they seek advice or question the conduct of those in or affiliated with town government. Subsection (b), advisory opinions, describes a process for Town officers, officials, employees, or consultants, and other parties doing business with the Town who are seeking advice about their own conduct or the conduct of a Town office or function. Subsection (c), complaints, describes a formal, public procedure for filing complaints. Subsection (d), other communications; miscellaneous, describes the process to be followed by anyone wishing to bring something to the attention of the Ethics Commission, without requesting an advisory opinion or filing a complaint.

(b) Advisory opinions

1. Any current, former, or prospective Town of Ledyard 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 official also may request an advisory opinion concerning the activities of any department over which he/she has jurisdiction or board or commission on which he/she serves.

2. 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 it.

3. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day 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.

4. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions.

5. Proceedings

- i. The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting under executive session, except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics, called by the Ethics Commission chair or vice-chair.
- ii. The Ethics Commission will meet in to review the request. At that time, it may decide to (1) Seek additional information, (2) Create a subcommittee of at least two (2) commission members to make a recommendation for consideration by the full Ethics Commission, (3) Hold an informal hearing to receive comments from

the individual who request the advisory opinion and/or from the public, (4) Investigate the relevant facts and issues in order to render the advisory opinion.

6. Decisions

- i. Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present.
- ii. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) 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 (30) days.
- i. All advisory opinions must be in writing and communicated to the individual making the request.
- ii. 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.

7. Confidentiality

- i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.
- ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

c. Complaints

1. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day said request 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) days of receipt of the complaint. The Ethics Commission shall also notify the respondent 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:

- Name of the person accused (respondent).
- Name of the person filing the complaint.

- The specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

2.Evaluation and Acknowledgment

- i. Within sixty (60) business days of the receipt of a complaint, 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.
- ii. 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 process.

3.Hearings

- i. 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 attendance of witnesses and the production of books, documents, records, and papers, and to examine and cross-examine witnesses and inspect and copy relevant and material records, papers and documents not in such person’s possession. 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 (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.

4.Final Decisions

- i. 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.
- ii. The Ethics Commission must render its decision within sixty (60) days of the closing of the hearing.

- iii. 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.
- iv. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) 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. A violation of the Code of Ethics may lead to any one or a combination of the following penalties:
 - b. Order to cease and desist the violation
 - c. Pay a civil penalty of up to the maximum amount permitted by State law.
 - d. Censure
 - e. Suspension without pay
 - f. Demotion
 - g. Termination of employment
 - h. Restitution of any benefits received because of the violation committed.
- d. Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of the Ethics Commission, c/o the Ledyard Town Clerk, 741 Colonel Ledyard Highway, Ledyard, CT 06339-1511 who will date stamp, but not open, the envelope and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said communication 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 chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. 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.

Adopted by the Ledyard Town Council on: _____

Gary St. Vil, Chairman

Approve/Disapprove on: _____

Fred B. Allyn , III, Mayor

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 officials, Town employees, and Town 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.

The purpose of the Town of Ledyard Code of Ethics is to:

- Identify standards of ethical conduct to guide all Town officials, including members of the Board of Education, and all Town and Board of Education officers, employees, and consultants as they conduct their public responsibilities.
- Clarify the role of the Ethics Commission.
- Outline a process that allows Town officials, including members of the Board of Education, and all Town and Board of Education employees, and consultants to seek guidance and advice about ethical issues connected with their public responsibilities, and
- Establish a process that enables citizens to report, and the Ethics Commission to investigate and respond to possible violation of the Code.

Section 3. Definitions

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

1. “*Agency*” is any board, commission, authority, or committee of the Town, including the Town Council and Board of Education.
2. “*Beneficial interest*” means any nonfinancial interest or special treatment that is not common to other citizens of the Town.

3. “*Business associate*” means a person joined together with another person through employment or to achieve a common financial and/or business-related objective.
4. “*Business day*” means a day other than a Saturday, Sunday, or other day on which the office of the Ledyard Town Clerk is closed to the public for business.
5. “*Complainant*” means a person or person who files a complaint under penalties of false statement against an official, employee, or consultant containing allegation of prohibited activities under the Code of Ethics.
6. “*Confidential Information*” means information acquired by a Town 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.
7. “*Consultant*” means any independent contractor or professional person or firm that is by virtue of an award of a public bid or contract engaged by and receives compensation from the Town or Board of Education for the purpose of providing professional, scientific, technical, or other specialized opinion, and is in a position to influence any decision of an agency, official, or employee.
8. “*Employee*” is any person receiving a salary, wages, or stipend from the Town or Board of Education for services rendered, whether full-time or part-time.
9. “*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, lineal descendants, stepchildren, foster children, siblings, stepsiblings, foster siblings; lineal descendants of siblings, stepsiblings, and foster siblings of an official, employee, or consultant, or his/her spouse or domestic partner.
10. “*Financial Interest*” means any interest that:
 - a. has a 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;
 - b. is not common to the other citizens of the Town. An individual’s financial interests shall include the financial interests of all members of his/her family but shall not include any duly authorized compensation from the town.
11. “*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) for any one (1) occasion, and **one hundred dollars (\$100.00) total** in any one (1) year from the same person, as well as loans that are not commercially reasonable. A gift may also include donations to a third party on behalf of an official, employee, or consultant for which she/he receives some favor, advantage, or consideration.

Gifts do not include:

1. A political contribution that is otherwise reported in accordance with the law.
2. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.
3. Any gift regardless of value received from: (i) any family member who resides in the same household as the recipient of the gift, or (ii) another family member unless the other family member who makes the gift is interested, directly or indirectly, in a business transaction or pending matter that is within the purview or responsibilities of (a) the recipient of the gift, or (b) another family member residing in the same household as the recipient of the gift.
4. Certificates, plaques, or other ceremonial awards costing less than fifty dollars (\$50.00).
5. 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.
6. Honorary degrees.
7. 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 official or Town employee participates in his/her official capacity.
8. Any gift provided to a Town Official or Town Employee or to a family member of a Town Official or Town 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.

12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

13. *"Official"* is any person holding elective or appointive office in the government of the town and shall include, but not limited to, the Town Council, Board of Education, Town commissions and committees, ~~Town attorney~~, or any other agency.

14. *"Respondent"* means a person who is the subject of a complaint.

Section 4. Confidential information

Town 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.

Section 5. Conflict of Interest Provisions

- a. A Town 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 ~~that is incompatible with the proper discharge of that individual's official responsibilities in the public interest or would tend to impair his/her independent judgment or action in the performance of official responsibilities where~~ the Town official, employee, or consultant has a financial or beneficial interest.

- 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 official, employee, or consultant has reason to believe or expect that he/she or any member of his family or business associate 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 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, his/her family members or business associate(s) 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 G.S. 7-148h(b).
- d. No Town official or employee may directly hire or supervise a member of his/her family.
- e. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials, or property for personal convenience or profit. Personal convenience or profit refer to those matters that are not related to the individual's official duties.
- ~~f. No Town official, employee, or consultant may use his/her public office or position or disclose or use confidential information, in order to obtain a financial or beneficial interest for herself, himself, or for his/her family, or for any business associate.~~
- g. No Town 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 6. Consultants

- a. The Code of Ethics shall be incorporated by reference into all contracts entered into by the Town of Ledyard and the Board of Education with a consultant.
- b. Persons or firms who are engaged by and receive compensation from other governmental entities, such as the state or federal government, and who are in a position to influence any decision of an agency, official, or employee shall be guided by the Code.

Section 7. Gifts and favors

- a. No Town official, employee, or consultant, or any business associate, or member of his/her family nor any agency, employee organization, or group of employees shall solicit or accept any gift, whether in the form of a service, a loan at a less than a commercially available rate, a material thing, or a promise, 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, consultant, agency, employee organization, or group of employees. No Town 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 an agency, commission, committee, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment, or services.

- b. This section shall not apply to any political contribution that is reported as required by law.

Section 8. Equal treatment

Without proper authorization, no Town official, employee, or consultant shall accept, seek, grant, or cause to be granted any special consideration, treatment, or advantage to such individual, or his/her family by virtues of his/her position or business association.

Section 9. Disclosure and disqualification

- a. Any Town 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 section 9(b) through 9(e). Such disclosure shall disqualify the official, employee, or consultant from participation in the matter, transaction, or decision.
- b. No Town 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.
- c. All Town Councilors, Board of Education members, and the Mayor 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:
 1. All real estate located within the Town of Ledyard owned by such elected 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, as aforesaid, by a corporation, trust or partnership in which any such elected 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.
 2. 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 (5) percent interest, and which firm, proprietorship, partnership, corporation, or limited liability 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.
 3. Any income, fees, salary, or wages directly or indirectly, received by such official from the Town of Ledyard ~~or its political subdivisions~~ during the two (2) years immediate proceeding such official's election to public office.
- d. If there is an uncertainty whether a Town 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 shall disclose such possible conflict of interest to the following:

1. For a Town official who is a member of an elective or appointive board, commission, committee, or authority - to the particular ~~agency~~ chair of the commission or committee of which such official is a member.
 2. For Town employees and officials appointed by the appropriate authorities – the Mayor or Town Council.
 3. For Board of Education employees - to the superintendent of schools
 4. The Town department directors - to the Town Council.
 5. The superintendent of schools - to the Board of Education.
 6. For a consultant - to the agent executing contract on behalf of the Town or Board of Education.
- e. The appropriate authority to which the disclosure is made shall make an appropriate record of such disclosure and shall recommend to the Town official, employee, or consultant making the report ~~whether such official, employee, or consultant should abstain from participating in the transaction or decision to which the possible conflict of interest relates and whatever other appropriate action should be taken~~ to seek an advisory opinion from the Ethics Commission regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.
- f. Any such questions concerning a possible conflict of interest may be referred to the Ethics Commission pursuant to Section 13 for an advisory opinion.

Section 10. Incompatible employment and activities

- ~~a. No Town official or employee shall engage in or accept private employment or render services when the employment or services: (1) are incompatible with the proper discharge of the official duties of the official or employee; or (2) would tend to impair independence of judgment, or action by the official or employee in the performance of that individual's official duty. No consultant shall engage in employment or render services for interest other than the Town when such employment or services: (1) are incompatible with the proper discharge of his or her consulting duties on behalf of the town; or (2) would tend to impair the independence of the consultant's judgment or action on the matter for which the consultant has been engaged by the Town.~~
- ~~b. No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency with which he/she previously was employed or affiliated for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable prior advisory opinion by the Ethics Commission pursuant to Section 13 following its review of the individual's written application and relevant facts.~~
- ~~c. No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency in regard to a matter in which that individual previously participated in the course of his/her official responsibilities for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable advisory opinion by the Ethics Commission pursuant to Section 13.~~
- a. Subsection (a), (b), and (c) of This section code shall not prohibit any current or former Town official, employee, or consultant from appearing before any agency on his/her own behalf. To avoid an actual or perceived conflict, Town officials are strongly discouraged

from appearing before the agency on which they are a member or officer, absent extenuating circumstances, unless he/she has received a prior favorable advisory opinion by the Ethics Commission pursuant to Section 14(b) prior to appearing.

- b. 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, G.S. 8-11, 8-21, and 22a-42(c) that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.
- c. To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of the Code, a Town official, ~~not otherwise restrained by the Code~~, shall exercise care when appearing before other agencies and shall disclose whether he/she is appearing in his/her official capacity or as a private citizen.

Section 11. Penalty for violation

A failure to comply with the Code shall be considered grounds for censure, reprimand, suspension, demotion, removal, or dismissal of Town officials, employees, and consultants as applicable. The remedies and procedures specified in 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. Acknowledgment form

- a. The Town Clerk shall provide a copy of the Code of Ethics to every Town official and employee within sixty (60) days of date that he/she begins his/her duties. Every Town official and employee shall sign and file with the Town Clerk an acknowledgment form indicating his/her awareness of the provisions of this Code. **Current Town officials and employees shall acknowledge the Code of Ethics within sixty (60) days of its effective date.**
- b. Each consultant shall sign and file with the Town Clerk an acknowledgment form indicating his or her awareness of the provisions of this Code on or before being retained by the Town, Board of Education, or other agency. **Current consultants shall acknowledge the Code of Ethics within sixty (60) days of its effective date.**
- 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 13. Ethics Commission

a. Structure

1. The Ethics Commission shall be comprised of five (5) regular members and two (2) alternate members. All members of the Ethics Commission shall be electors of the Town.

2. 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.
 3. Members will not be compensated for their service on the Commission.
 4. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary
- b. Member and alternate member qualifications
- a. Members and alternate members must be residents of the Town of Ledyard.
 - b. No member or alternate member shall:
 - a. Be employed by the Town;
 - b. Have been employed by the Town for a period of two years prior to being appointed to the Ethics Commission.
 - c. Hold or seek any Town office.
 - d. Have held any Town office for a period of two years prior to being appointed to the Ethics Commission.
 - e. Serve as a member of another Town agency.
 - f. Hold office in a political party or political committee.
 - g. Have been found in violation of state, local, or professional code of ethics.
 - c. Method 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 (6) affirmative votes of the Town Council.
 - d. Terms of appointment
 1. Members will be appointed for three (3) year terms.
 2. 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.
 3. 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.
 4. Inaugural members shall be eligible to serve two (2) additional three (3) years term beyond his/her initial appointment.
 5. 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.

e. Powers and duties

1. The Ethics Commission shall be authorized to consult the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council.
2. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.
3. The Ethics Commission has the power to render advisory opinions to any Town official, employee, or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. Individuals seeking an advisory opinion should follow the procedures outlined in Section 14 of the Code.
4. The Ethics Commission has the power to examine complaints and to make a determination of probable cause, pursuant to the procedures outlined in Section 14
5. The Ethics Commission has the power to 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.
6. The Ethics Commission has the power to review the Code of Ethics policies and procedures on an as-needed basis and will make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures.
7. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provision of this Code of Ethics or is otherwise prohibited by law.
8. The Ethics Commission will protect the personal privacy rights of any individual who is the subject of an inquiry or complaint, except as necessary to investigate and make determinations of probable cause. If there is a finding of no probable cause, the existence of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.
9. The Ethics Commission may take action to increase public awareness of the Code of Ethics.

Section 14. Ethics Commission rules of procedure

(a) These procedures shall be used by the Ethics Commission established in Section 14 hereof, and are designed to guide public officials, officers, employees, consultants, and citizens of the process to be followed if they seek advice or question the conduct of those in or affiliated with town government. Subsection (b), advisory opinions, describes a process for Town officers, officials, employees, or consultants, and other parties doing business with the Town who are seeking advice about their own conduct or the conduct of a Town office or function. Subsection (c), complaints, describes a formal, public procedure for filing complaints. Subsection (d), other communications; miscellaneous, describes the process to be followed by anyone wishing to bring something to the attention of the Ethics Commission, without requesting an advisory opinion or filing a complaint.

(b) Advisory opinions

1. Any current, former, or prospective Town of Ledyard 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 official also may

request an advisory opinion concerning the activities of any department over which he/she has jurisdiction or board or commission on which he/she serves.

2. 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 it.

3. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day 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.

4. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions.

5. Proceedings

- i. The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting under executive session, except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics, called by the Ethics Commission chair or vice-chair.
- ii. The Ethics Commission will meet in to review the request. At that time, it may decide to (1) Seek additional information, (2) Create a subcommittee of at least two (2) commission members to make a recommendation for consideration by the full Ethics Commission, (3) Hold an informal hearing to receive comments from the individual who request the advisory opinion and/or from the public, (4) Investigate the relevant facts and issues in order to render the advisory opinion.

6. Decisions

- i. Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present.
- ii. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) 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 (30) days.
 - i. All advisory opinions must be in writing and communicated to the individual making the request.
 - ii. 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.

7. Confidentiality

- i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.
- ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

c. Complaints

1. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day said request 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) days of receipt of the complaint. The Ethics Commission shall also notify the respondent 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:

- Name of the person accused (respondent).
- Name of the person filing the complaint.
- The specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

2. Evaluation and Acknowledgment

- i. Within sixty (60) business days of the receipt of a complaint, 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.

- ii. If the Ethics Commission makes a finding of probable cause, which shall require ~~four (4)~~ **three (3)** affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation process.

3. Hearings

- i. 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 attendance of witnesses and the production of books, documents, records, and papers, and to examine and cross-examine witnesses and inspect and copy relevant and material records, papers and documents not in such person’s possession. 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 (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.

4. Final Decisions

- i. 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.
- ii. The Ethics Commission must render its decision within sixty (60) days of the closing of the hearing.
- iii. 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.
- iv. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) 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. A violation of the Code of Ethics may lead to any one or a combination of the following penalties:

- b. Order to cease and desist the violation
 - c. Pay a civil penalty of up to the maximum amount permitted by State law.
 - d. Censure
 - e. Suspension without pay
 - f. Demotion
 - g. Termination of employment
 - h. Restitution of any benefits received because of the violation committed.
- d. Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of the Ethics Commission, c/o the Ledyard Town Clerk, 741 Colonel Ledyard Highway, Ledyard, CT 06339-1511 who will date stamp, but not open, the envelop and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said communication 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 chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. 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.

Adopted by the Ledyard Town Council on: _____

Gary St. Vil, Chairman

Approve/Disapprove on: _____

Fred B. Allyn , III, Mayor

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 officials, Town employees, and Town 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.

The purpose of the Town of Ledyard Code of Ethics is to:

- Identify standards of ethical conduct to guide all Town officials, including members of the Board of Education, and all Town and Board of Education officers, employees, and consultants as they conduct their public responsibilities.
- Clarify the role of the Ethics Commission.
- Outline a process that allows Town officials, including members of the Board of Education, and all Town and Board of Education employees, and consultants to seek guidance and advice about ethical issues connected with their public responsibilities, and
- Establish a process that enables citizens to report, and the Ethics Commission to investigate and respond to possible violation of the Code.

Section 3. Definitions

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

1. “*Agency*” is any board, commission, authority, or committee of the Town, including the Town Council and Board of Education.
2. “*Beneficial interest*” means any nonfinancial interest or special treatment that is not common to other citizens of the Town.

3. “*Business associate*” means a person joined together with another person through employment or to achieve a common financial and/or business-related objective.
4. “*Business day*” means a day other than a Saturday, Sunday, or other day on which the office of the Ledyard Town Clerk is closed to the public for business.
5. “*Complainant*” means a person or person who files a complaint under penalties of false statement against an official, employee, or consultant containing allegation of prohibited activities under the Code of Ethics.
6. “*Confidential Information*” means information acquired by a Town 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.
7. “*Consultant*” means any independent contractor or professional person or firm that is by virtue of an award of a public bid or contract engaged by and receives compensation from the Town or Board of Education for the purpose of providing professional, scientific, technical, or other specialized opinion, and is in a position to influence any decision of an agency, official, or employee.
8. “*Employee*” is any person receiving a salary, wages, or stipend from the Town or Board of Education for services rendered, whether full-time or part-time.
9. “*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, lineal descendants, stepchildren, foster children, siblings, stepsiblings, foster siblings; lineal descendants of siblings, stepsiblings, and foster siblings of an official, employee, or consultant, or his/her spouse or domestic partner.
10. “*Financial Interest*” means any interest that:
 - a. has a 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;
 - b. is not common to the other citizens of the Town. An individual’s financial interests shall include the financial interests of all members of his/her family but shall not include any duly authorized compensation from the town.
11. “*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) for any one (1) occasion, and **one hundred dollars (\$100.00) total** in any one (1) year from the same person, as well as loans that are not commercially reasonable. A gift may also include donations to a third party on behalf of an official, employee, or consultant for which she/he receives some favor, advantage, or consideration.

Gifts do not include:

1. A political contribution that is otherwise reported in accordance with the law.
2. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.
3. Any gift regardless of value received from: (i) any family member who resides in the same household as the recipient of the gift, or (ii) another family member unless the other family member who makes the gift is interested, directly or indirectly, in a business transaction or pending matter that is within the purview or responsibilities of (a) the recipient of the gift, or (b) another family member residing in the same household as the recipient of the gift.
4. Certificates, plaques, or other ceremonial awards costing less than fifty dollars (\$50.00).
5. 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.
6. Honorary degrees.
7. 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 official or Town employee participates in his/her official capacity.
8. Any gift provided to a Town Official or Town Employee or to a family member of a Town Official or Town 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.

12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

13. *"Official"* is any person holding elective or appointive office in the government of the town and shall include, but not limited to, the Town Council, Board of Education, Town commissions and committees, ~~Town attorney~~, or any other agency.

14. *"Respondent"* means a person who is the subject of a complaint.

Section 4. Confidential information

Town 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.

Section 5. Conflict of Interest Provisions

- a. A Town 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 ~~that is incompatible with the proper discharge of that individual's official responsibilities in the public interest or would tend to impair his/her independent judgment or action in the performance of official responsibilities where~~ the Town official, employee, or consultant has a financial or beneficial interest.

- 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 official, employee, or consultant has reason to believe or expect that he/she or any member of his family or business associate 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 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, his/her family members or business associate(s) 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 G.S. 7-148h(b).
- d. No Town official or employee may directly hire or supervise a member of his/her family.
- e. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials, or property for personal convenience or profit. Personal convenience or profit refer to those matters that are not related to the individual's official duties.
- ~~f. No Town official, employee, or consultant may use his/her public office or position or disclose or use confidential information, in order to obtain a financial or beneficial interest for herself, himself, or for his/her family, or for any business associate.~~
- g. No Town 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 6. Consultants

- a. The Code of Ethics shall be incorporated by reference into all contracts entered into by the Town of Ledyard and the Board of Education with a consultant.
- b. Persons or firms who are engaged by and receive compensation from other governmental entities, such as the state or federal government, and who are in a position to influence any decision of an agency, official, or employee shall be guided by the Code.

Section 7. Gifts and favors

- a. No Town official, employee, or consultant, or any business associate, or member of his/her family nor any agency, employee organization, or group of employees shall solicit or accept any gift, whether in the form of a service, a loan at a less than a commercially available rate, a material thing, or a promise, 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, consultant, agency, employee organization, or group of employees. No Town 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 an agency, commission, committee, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment, or services.

- b. This section shall not apply to any political contribution that is reported as required by law.

Section 8. Equal treatment

Without proper authorization, no Town official, employee, or consultant shall accept, seek, grant, or cause to be granted any special consideration, treatment, or advantage to such individual, or his/her family by virtues of his/her position or business association.

Section 9. Disclosure and disqualification

- a. Any Town 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 section 9(b) through 9(e). Such disclosure shall disqualify the official, employee, or consultant from participation in the matter, transaction, or decision.
- b. No Town 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.
- c. All Town Councilors, Board of Education members, and the Mayor 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:
 1. All real estate located within the Town of Ledyard owned by such elected 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, as aforesaid, by a corporation, trust or partnership in which any such elected 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.
 2. 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 (5) percent interest, and which firm, proprietorship, partnership, corporation, or limited liability 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.
 3. Any income, fees, salary, or wages directly or indirectly, received by such official from the Town of Ledyard ~~or its political subdivisions~~ during the two (2) years immediate proceeding such official's election to public office.
- d. If there is an uncertainty whether a Town 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 shall disclose such possible conflict of interest to the following:

1. For a Town official who is a member of an elective or appointive board, commission, committee, or authority - to the particular ~~agency~~ chair of the ~~commission or committee~~ of which such official is a member.
 2. For Town employees and officials appointed by the appropriate authorities – the Mayor or Town Council.
 3. For Board of Education employees - to the superintendent of schools
 4. The Town department directors - to the Town Council.
 5. The superintendent of schools - to the Board of Education.
 6. For a consultant - to the agent executing contract on behalf of the Town or Board of Education.
- e. The appropriate authority to which the disclosure is made shall make an appropriate record of such disclosure and shall recommend to the Town official, employee, or consultant making the report ~~whether such official, employee, or consultant should abstain from participating in the transaction or decision to which the possible conflict of interest relates and whatever other appropriate action should be taken~~ to seek an advisory opinion from the Ethics Commission regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.
- f. Any such questions concerning a possible conflict of interest may be referred to the Ethics Commission pursuant to Section 13 for an advisory opinion.

Section 10. Incompatible employment and activities

- ~~a. No Town official or employee shall engage in or accept private employment or render services when the employment or services: (1) are incompatible with the proper discharge of the official duties of the official or employee; or (2) would tend to impair independence of judgment, or action by the official or employee in the performance of that individual's official duty. No consultant shall engage in employment or render services for interest other than the Town when such employment or services: (1) are incompatible with the proper discharge of his or her consulting duties on behalf of the town; or (2) would tend to impair the independence of the consultant's judgment or action on the matter for which the consultant has been engaged by the Town.~~
- ~~b. No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency with which he/she previously was employed or affiliated for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable prior advisory opinion by the Ethics Commission pursuant to Section 13 following its review of the individual's written application and relevant facts.~~
- ~~c. No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency in regard to a matter in which that individual previously participated in the course of his/her official responsibilities for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable advisory opinion by the Ethics Commission pursuant to Section 13.~~
- a. Subsection (a), (b), and (c) of This section code shall not prohibit any current or former Town official, employee, or consultant from appearing before any agency on his/her own behalf. To avoid an actual or perceived conflict, Town officials are strongly discouraged

from appearing before the agency on which they are a member or officer, absent extenuating circumstances, unless he/she has received a prior favorable advisory opinion by the Ethics Commission pursuant to Section 14(b) prior to appearing.

- b. 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, G.S. 8-11, 8-21, and 22a-42(c) that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.
- c. To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of the Code, a Town official, ~~not otherwise restrained by the Code,~~ shall exercise care when appearing before other agencies and shall disclose whether he/she is appearing in his/her official capacity or as a private citizen.

Section 11. Penalty for violation

A failure to comply with the Code shall be considered grounds for censure, reprimand, suspension, demotion, removal, or dismissal of Town officials, employees, and consultants as applicable. The remedies and procedures specified in 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. Acknowledgment form

- a. The Town Clerk shall provide a copy of the Code of Ethics to every Town official and employee within sixty (60) days of date that he/she begins his/her duties. Every Town official and employee shall sign and file with the Town Clerk an acknowledgment form indicating his/her awareness of the provisions of this Code. **Current Town officials and employees shall acknowledge the Code of Ethics within sixty (60) days of its effective date.**
- b. Each consultant shall sign and file with the Town Clerk an acknowledgment form indicating his or her awareness of the provisions of this Code on or before being retained by the Town, Board of Education, or other agency. **Current consultants shall acknowledge the Code of Ethics within sixty (60) days of its effective date.**
- 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 13. Ethics Commission

a. Structure

1. The Ethics Commission shall be comprised of five (5) regular members and two (2) alternate members. All members of the Ethics Commission shall be electors of the Town.

2. 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.
 3. Members will not be compensated for their service on the Commission.
 4. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary
- b. Member and alternate member qualifications
- a. Members and alternate members must be residents of the Town of Ledyard.
 - b. No member or alternate member shall:
 - a. Be employed by the Town;
 - b. Have been employed by the Town for a period of two years prior to being appointed to the Ethics Commission.
 - c. Hold or seek any Town office.
 - d. Have held any Town office for a period of two years prior to being appointed to the Ethics Commission.
 - e. Serve as a member of another Town agency.
 - f. Hold office in a political party or political committee.
 - g. Have been found in violation of state, local, or professional code of ethics.
 - c. Method 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 (6) affirmative votes of the Town Council.
 - d. Terms of appointment
 1. Members will be appointed for three (3) year terms.
 2. 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.
 3. 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.
 4. Inaugural members shall be eligible to serve two (2) additional three (3) years term beyond his/her initial appointment.
 5. 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.

e. Powers and duties

1. The Ethics Commission shall be authorized to consult the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council.
2. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.
3. The Ethics Commission has the power to render advisory opinions to any Town official, employee, or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. Individuals seeking an advisory opinion should follow the procedures outlined in Section 14 of the Code.
4. The Ethics Commission has the power to examine complaints and to make a determination of probable cause, pursuant to the procedures outlined in Section 14
5. The Ethics Commission has the power to 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.
6. The Ethics Commission has the power to review the Code of Ethics policies and procedures on an as-needed basis and will make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures.
7. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provision of this Code of Ethics or is otherwise prohibited by law.
8. The Ethics Commission will protect the personal privacy rights of any individual who is the subject of an inquiry or complaint, except as necessary to investigate and make determinations of probable cause. If there is a finding of no probable cause, the existence of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.
9. The Ethics Commission may take action to increase public awareness of the Code of Ethics.

Section 14. Ethics Commission rules of procedure

(a) These procedures shall be used by the Ethics Commission established in Section 14 hereof, and are designed to guide public officials, officers, employees, consultants, and citizens of the process to be followed if they seek advice or question the conduct of those in or affiliated with town government. Subsection (b), advisory opinions, describes a process for Town officers, officials, employees, or consultants, and other parties doing business with the Town who are seeking advice about their own conduct or the conduct of a Town office or function. Subsection (c), complaints, describes a formal, public procedure for filing complaints. Subsection (d), other communications; miscellaneous, describes the process to be followed by anyone wishing to bring something to the attention of the Ethics Commission, without requesting an advisory opinion or filing a complaint.

(b) Advisory opinions

1. Any current, former, or prospective Town of Ledyard 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 official also may

request an advisory opinion concerning the activities of any department over which he/she has jurisdiction or board or commission on which he/she serves.

2. 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 it.

3. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day 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.

4. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions.

5. Proceedings

- i. The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting under executive session, except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics, called by the Ethics Commission chair or vice-chair.
- ii. The Ethics Commission will meet in to review the request. At that time, it may decide to (1) Seek additional information, (2) Create a subcommittee of at least two (2) commission members to make a recommendation for consideration by the full Ethics Commission, (3) Hold an informal hearing to receive comments from the individual who request the advisory opinion and/or from the public, (4) Investigate the relevant facts and issues in order to render the advisory opinion.

6. Decisions

- i. Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present.
- ii. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) 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 (30) days.
 - i. All advisory opinions must be in writing and communicated to the individual making the request.
 - ii. 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.

7. Confidentiality

- i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.
- ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

c. Complaints

1. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day said request 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) days of receipt of the complaint. The Ethics Commission shall also notify the respondent 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:

- Name of the person accused (respondent).
- Name of the person filing the complaint.
- The specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

2. Evaluation and Acknowledgment

- i. Within sixty (60) business days of the receipt of a complaint, 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.

- ii. If the Ethics Commission makes a finding of probable cause, which shall require ~~four (4)~~ ~~three (3)~~ affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation process.

3. Hearings

- i. 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 attendance of witnesses and the production of books, documents, records, and papers, and to examine and cross-examine witnesses and inspect and copy relevant and material records, papers and documents not in such person’s possession. 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 (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.

4. Final Decisions

- i. 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.
- ii. The Ethics Commission must render its decision within sixty (60) days of the closing of the hearing.
- iii. 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.
- iv. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) 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. A violation of the Code of Ethics may lead to any one or a combination of the following penalties:

- b. Order to cease and desist the violation
 - c. Pay a civil penalty of up to the maximum amount permitted by State law.
 - d. Censure
 - e. Suspension without pay
 - f. Demotion
 - g. Termination of employment
 - h. Restitution of any benefits received because of the violation committed.
- d. Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of the Ethics Commission, c/o the Ledyard Town Clerk, 741 Colonel Ledyard Highway, Ledyard, CT 06339-1511 who will date stamp, but not open, the envelop and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said communication 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 chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. 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.

Adopted by the Ledyard Town Council on: _____

 Gary St. Vil, Chairman

Approve/Disapprove on: _____

 Fred B. Allyn , III, Mayor

Roxanne Maher

From: Jessica Buhle
Sent: Monday, October 27, 2025 7:41 PM
To: Roxanne Maher
Subject: Forward of communication with Matt Ritter
Attachments: Modified Draft with Attorney Revisions.docx

Begin forwarded message:

From: Jessica Buhle <jessicab@ledyardct.org>
Subject: Re: Redline version of the draft and two notes.
Date: October 27, 2025 at 7:29:29 PM EDT
To: "Ritter, Matthew D." <MRitter@goodwin.com>

Good evening,

I am attaching a final redline draft incorporating your changes. I have made the changes from the clean draft I sent you.

Green items are the changes you've recommended adding or defended modifying; redlines are items we've deleted.

With these changes adopted, do you feel this ordinance is effective to protect the Town of Ledyard and can be defended if the need arose?

Thank you again for your assistance and prompt replies (but if you happen to read this this evening, please don't reply until tomorrow and enjoy your evening).

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

On Oct 27, 2025, at 6:29 PM, Ritter, Matthew D. <MRitter@goodwin.com> wrote:

Hi Jessica – thanks for the redline. Very helpful. Comments/suggested edits below:

1. Definition of "Gift" - I think you accidentally deleted the phrase "and one hundred dollars (\$100.00) total in any one (1) year from the same person."

2. You include the “Town Attorney” in the definition of “Official.” However, the Town Attorney is already included in the definition of consultant.

If you include Town Attorney in the definition of “Official” you will have to clarify some provisions in which the term “Official” is used. See Section 9.d., Section 12.a. and #8 of “Gifts do not include”, for example. There may be some more as well.

3. Conflicts of Interest – I fully appreciate that this language below in subsection (a) comes directly from the Glastonbury code. I will only point out that this is a subjective standard. I just note that it will be easier for the Ethics Commission to make rulings if there are objective criteria (i.e. the gift rule or financial interest rule). However, this is a policy decision for the Town Council/Mayor to determine.

“that is incompatible with the proper discharge of that individual’s official responsibilities in the public interest or would tend to impair his/her independent judgment or action in the performance of official responsibilities.”

-I think it is fine to leave in subsection (d) even though it is already in the employee handbook.

-I would delete (f) because it appears earlier in the ordinance (or vice versa...delete the earlier section).

4. Section 9(c) – I assume section 1. applies only to property in Ledyard? I would clarify that for the corporation, trust, partnerships, etc.

Section(c) 3. – delete the term “political subdivision.” Or let me know what you are trying to capture here? This was in my prior comments as well.

Section 9(d) – I know this comes from Glastonbury but what does it mean for a Town official to report to a “particular agency?” I would recommend that these officials report to the Town Council Chair and/or Mayor maybe? Or maybe the chair of that board or commission?

For Town employees, it is hard without a Town Manager. However, the term “appropriate authorities” may not be clear enough. Again, maybe it is the Mayor and/or Town Council Chair? Or the full Town Council like with department heads?

-It may also be easier to just require anyone who is uncertain to ask for an advisory opinion? Maybe eliminate the middle step? The involvement of other individuals raises questions about FOIA, confidentiality, etc.

5. Section 10 – is almost identical to the conflicts of interest section I highlighted above. If the Town Council keeps the provision, I would just use it once in the ordinance.

-10. b. I understand subsection (c) because it relates to a matter a consultant/employee may have been involved with in their role as a consultant (and they may be privy to certain confidential information, etc). However, it does not work as well for subsection (b). What is meant by “affiliated” for a consultant? For example, if the P&Z Commission hires a consultant for advice in 2025, can that consultant advise a different applicant in 2026 if it is a completely different property and an unrelated matter?

“No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency with which he/she previously was employed or affiliated for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable prior advisory opinion by the Ethics Commission pursuant to Section 13 following its review of the individual’s written application and relevant facts.”

-As noted before, I understand that Glastonbury has these revolving door provisions but I do not know if they will pass legal muster for certain consultants, unionized employees, etc. We can certainly research this issue further if requested.

-10. f. – I know this is in Glastonbury, but I still think it is a typo. I would recommend deleting this language in yellow. This was also in my earlier comments.

To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of the Code, a Town official, not otherwise restrained by the Code, shall exercise care when appearing before other agencies and shall disclose whether he/she is appearing in his/her official capacity or as a private citizen.

6. Section 12. How are you going to handle existing employees/consultants as opposed to new hires/contracts? Are you going to require them to all sign the form or just new employees? The language may have to be amended to reflect this policy decision.

7. There are no legal issues with adding the training requirements.

<image001.png>

Matthew D. Ritter
Shipman & Goodwin LLP
Partner
One Constitution Plaza
Hartford, CT 06103-1919

Tel: (860) 251-5092
Fax: (860) 251-5212
MRitter@goodwin.com
www.shipmangoodwin.com

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Disclaimer: Privileged and confidential. If received in error, please notify me by e-mail and delete the message.

From: Jessica Buhle <Jbuh@ledyardct.org>
Sent: Monday, October 27, 2025 4:09 PM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Redline version of the draft and two notes.

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Good afternoon,

I have attached the redline draft of the ordinance proposed comparing to the Glastonbury code of ethics. There are also notes in the document as well regarding some of the changes if they are visible. If they are not visible, please let me know and I can send those separately.

Before a final draft is adopted, I have two changes I would like to make to it that didn't get changed before I sent it to you.

First, I would like to change the requirements for finding probable cause to 3 votes instead of 4 while retaining 4 for a final decision.

Second, I would like to re-add section c and d from Section 2-68 about maintaining training for town employees and officials. The language as written in the Glastonbury code is sufficient removing the reference to their charter and naming the Mayor instead of the Town Manager.

Lastly, if you think the language specific to inquiries and complaints directly from the Glastonbury code is better overall, we can move forward with that language instead of the previously proposed language. All of the hearing and procedural language in the draft sent to you is directly from the previous draft.

Thank you for all the feedback and assistance you have provided to support effective legislation for Ledyard

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

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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 officials, Town employees, and Town 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.

The purpose of the Town of Ledyard Code of Ethics is to:

- ~~● Fulfill the requirement of establishing guidelines for ethical conduct, pursuant to Section 1101 of the Town Charter~~
- Identify standards of ethical conduct to guide all Town officials, including members of the Board of Education, and all Town and Board of Education officers, employees, and consultants as they conduct their public responsibilities.
- Clarify the role of the Ethics Commission,
- Outline a process that allows Town officials, including members of the Board of Education, and all Town and Board of Education employees, and consultants to seek guidance and advice about ethical issues connected with their public responsibilities, and
- Establish a process that enables citizens to report and the Ethics Commission to investigate and respond to possible violation of the Code.

Section 3. Definitions

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

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

2. “Beneficial interest” means any nonfinancial interest or special treatment that is not common to other citizens of the Town.
3. “Business associate” means a person joined together with another person through employment or to achieve a common financial and/or business-related objective.
4. “Business day” means a day other than a Saturday, Sunday, or other day on which the office of the Ledyard ~~Glastonbury~~ Town Clerk is closed to the public for business.
5. “Complainant” means a person or person who files a complaint under penalties of false statement against an official, employee, or consultant containing allegation of prohibited activities under the Code of Ethics.
6. “Confidential Information” means information acquired by a Town 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.
7. “Consultant” ~~means is~~ any independent contractor or professional person or firm that is by virtue of an award of a public bid or contract ~~as defined in Glastonbury Code of Ordinances sections 2-262 and 2-263,~~ engaged by and receives compensation from the Town or Board of Education for the purpose of providing professional, scientific, technical, or other specialized opinion, and is in a position to influence any decision of an agency, official, or employee.
8. “Employee” is any person receiving a salary, wages, or stipend from the Town or Board of Education for services rendered, whether full-time or part-time.
9. “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, lineal descendants, stepchildren, foster children, siblings, stepsiblings, foster siblings; lineal descendants of siblings, stepsiblings, and foster siblings of an official, employee, or consultant, or his/her spouse or domestic partner.
10. ~~Significant~~ “Financial Interest” means any interest that:
 - a. has a 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;
 - b. is not common to the other citizens of the Town. An individual’s financial interests shall include the financial interests of all members of his/her family, but shall not include any duly authorized compensation from the town.
11. ~~Valuable~~ “Gift” is a gift of more than ~~fifty dollars (\$50.00)~~ one hundred dollars (\$100.00) in value. A ~~valuable~~ gift includes, but is not limited to, entertainment, food, beverage, travel, and lodging to the extent that the gift value exceeds ~~fifty dollars (\$50.00)~~ ~~one hundred dollars (\$100.00)~~ for any one (1) occasion, and ~~one hundred dollars (\$100.00) total~~

in any one (1) year from the same person, as well as loans that are not commercially reasonable. A **valuable** gift may also include donations to a third party on behalf of an official, employee, or consultant for which she/he receives some favor, advantage, or consideration.

Gifts do not include:

1. A political contribution that is otherwise reported in accordance with the law.
 2. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.
 3. Any gift regardless of value received from: (i) any family member who resides in the same household as the recipient of the gift, or (ii) another family member unless the other family member who makes the gift is interested, directly or indirectly, in a business transaction or pending matter that is within the purview or responsibilities of (a) the recipient of the gift, or (b) another family member residing in the same household as the recipient of the gift.
 4. Certificates, plaques, or other ceremonial awards costing less than fifty dollars (\$50.00).
 5. 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.
 6. Honorary degrees.
 7. 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 official or Town employee participates in his/her official capacity.
 8. Any gift provided to a Town Official or Town Employee or to a family member of a Town Official or Town 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.
12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.
13. *"Official"* is any person holding elective or appointive office in the government of the town and shall include, but not limited to, the Town Council, Board of Education, ~~town plan & zoning commission,~~ Town commissions and committees, town attorney, or any other agency.
14. *"Respondent"* means a person who is the subject of a complaint.

Section 4. Confidential information ~~Section 2-60~~

Town 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.

Section 5. Conflict of Interest Provisions ~~Section 2-61 and 2-64~~

- a. A ~~A~~ **Town** 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 that is incompatible with the proper discharge of that individual's official responsibilities in the public interest or would tend to impair his/her independent judgment or action in the performance of official responsibilities.
- b. A **significant** 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** official, employee, or consultant has reason to believe or expect that he/she or any member of his family or business associate will obtain, secure, or advance such interest by reason of his/her actions in performance or nonperformance of his/her official responsibilities.
- c. A ~~A~~ **Town** 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, **his/her family members or business associate(s)** 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 G.S. 7-148h(b).
- d. **No Town official or employee may directly hire or supervise a member of his/her family.**
- e. **Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials, or property for personal convenience or profit. Personal convenience or profit refer to those matters that are not related to the individual's official duties.**
- f. **No Town official, employee, or consultant may use his/her public office or position or disclose or use confidential information, in order to obtain a financial or beneficial interest for herself, himself, or for his/her family, or for any business associate.**
- g. **No Town 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 6. Consultants **Section 2-59**

- a. The Code of Ethics shall be incorporated by reference into all contracts entered into by the Town of Ledyard and the Board of Education with a consultant.
- b. Persons or firms who are engaged by and receive compensation from other governmental entities, such as the state or federal government, and who are in a position to influence any decision of an agency, official, or employee shall be guided by the Code.

Section 7. Gifts and favors ~~Section 2-62~~

- a. No Town official, employee, or consultant, or any business associate, or member of his/her family nor any agency, employee organization, or group of employees shall solicit or accept any valuable gift, whether in the form of a service, a loan at a less than a commercially available rate, a material thing, or a promise, 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, consultant, agency, employee organization, or group of employees. No Town 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 an agency, commission, committee, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment, or services.
- b. This section shall not apply to any political contribution that is reported as required by law.

Section 8. Equal treatment ~~Section 2-63~~

Without proper authorization, no Town official, employee, or consultant shall accept, seek, grant, or cause to be granted any special consideration, treatment, or advantage to such individual, or his/her family by virtues of his/her position or business association.

Section 9. Disclosure and disqualification ~~Section 2-65~~

- a. Any Town official, employee, or consultant who has a conflict of interest, significant 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 section 9(b) through 9(e) ~~section 2-65(e)(1) through (6)~~. Such disclosure shall disqualify the official, employee, or consultant from participation in the matter, transaction, or decision.
- b. No Town 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 significant 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.
- c. All Town Councilors, Board of Education members, and the Mayor 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:
 1. All real estate located within the Town of Ledyard owned by such elected 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 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 five (5) percent of the legal or equitable interest in said corporation, trust, or partnership.
2. 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 (5) percent interest, and which firm, proprietorship, partnership, corporation, or limited liability 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.
 3. Any income, fees, salary, or wages directly or indirectly, received by such official from the Town of Ledyard or its political subdivisions during the two (2) years immediate proceeding such official's election to public office.
- d. If there is an uncertainty whether a **Town** 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 shall disclose such possible conflict of interest to the following:
1. For a **Town** official who is a member of an elective or appointive board, commission, committee, or authority - to the particular agency of which such official is a member.
 2. For **Town** employees and officials appointed by the **appropriate authorities** ~~the town manager to town manager~~.
 3. For Board of Education employees - to the superintendent of schools
 4. The **Town department directors** ~~manager~~- to the Town Council
 5. The superintendent of schools - to the Board of Education.
 6. For a consultant - to the agent executing contract on behalf of the Town or Board of Education.
- e. The appropriate authority to which the disclosure is made shall make an appropriate record of such disclosure and shall recommend to the **Town** official, employee, or consultant making the report whether such official, employee, or consultant should abstain from participating in the transaction or decision to which the possible conflict of interest relates and whatever other appropriate action should be taken.
- f. **Any such questions concerning a possible conflict of interest may be referred to the Ethics Commission pursuant to Section 13 for an advisory opinion.**

Section 10. Incompatible employment and activities

- a. No **Town** official or employee shall engage in or accept private employment or render services when the employment or services: (1) are incompatible with the proper discharge of the official duties of the official or employee; or (2) would tend to impair independence of judgment, or action by the official or employee in the performance of that individual's official duty. No consultant shall engage in employment or render services for interest other than the Town when such employment or services: (1) are incompatible with the proper discharge of his or her consulting duties on behalf of the town; or (2) would tend to impair the independence of the consultant's judgment or action on the matter for which the consultant has been engaged by the Town.

- b. No former **Town** official, employee, or consultant shall appear on behalf of any person or other entity before any agency with which he/she previously was employed or affiliated for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable prior advisory opinion by the Ethics Commission pursuant to **Section 13** following its review of the individual's written application and relevant facts.
- c. No former **Town** official, employee, or consultant shall appear on behalf of any person or other entity before any agency in regard to a matter in which that individual previously participated in the course of his/her official responsibilities for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable advisory opinion by the Ethics Commission pursuant to **Section 13**.
- d. Subsection (a), (b), and (c) of this section shall not prohibit any current or former **Town** official, employee, or consultant from appearing before any agency on his/her own behalf. To avoid an actual or perceived conflict, Town officials are strongly discouraged from appearing before the agency on which they are a member or officer, absent extenuating circumstances, unless he/she has received a prior favorable advisory opinion by the Ethics Commission pursuant to **Section 14(b)** prior to appearing.
- e. 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, G.S. 8-11, 8-21, and 22a-42(c) that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.
- f. To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of the Code, a **Town** official, not otherwise restrained by the Code, shall exercise care when appearing before other agencies and shall disclose whether he/she is appearing in his/her official capacity or as a private citizen.

Section 11. Penalty for violation ~~Section 2-67~~

A failure to comply with the Code shall be considered grounds for censure, reprimand, suspension, demotion, removal, or dismissal of **Town** officials, employees, and consultants as applicable. The remedies and procedures specified in 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. Acknowledgment form ~~Section 2-68~~

- a. The Town Clerk shall provide a copy of the Code ~~and Town Charter Section 1101~~ of Ethics to every Town official and employee within sixty (60) days of date that he/she begins his/her duties. Every Town official and employee shall sign and file with the Town Clerk an acknowledgment form indicating his/her awareness of the provisions of this Code ~~and of Section 1101 of the Town Charter~~.
- b. Each consultant shall sign and file with the Town Clerk an acknowledgment form indicating his or her awareness of the provisions of this Code ~~and Section 1101 of the Town Charter~~ on or before being retained by the Town, Board of Education, or other agency.

~~e. The town manager and superintendent of schools shall develop a protocol for periodic training of employees concerning this division and Town Charter Section 1101. 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 13. Ethics Commission ~~Section 2-58~~

a. Structure

1. The Ethics Commission shall be comprised of five (5) regular members and two (2) alternate members. All members of the Ethics Commission shall be electors of the Town.
2. 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 and one alternate member shall be unaffiliated with any political party. Both alternate members may not be affiliated with the same political party.
3. Members will not be compensated for their service on the Commission.
4. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary

b. Member and alternate member qualifications

- a. Members and alternate members must be residents of the Town of ~~Glastonbury~~ Ledyard.
- b. No member or alternate member shall:
 - a. Be employed by the Town;
 - b. Have been employed by the Town for a period of two years prior to being appointed to the Ethics Commission.
 - c. Hold or seek any Town office.
 - ~~d. Have campaigned for any other person seeking a Town office.~~
 - e. Have held any Town office for a period of two years prior to being appointed to the Ethics Commission.
 - f. Serve as a member of another Town agency.
 - g. Hold office in a political party or political committee.
 - h. Have been found in violation of state, local, or professional code of ethics.
- c. Method 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 six (6) ~~seven (7)~~ affirmative votes of the Town Council.
- d. Terms of appointment
 1. Members will be appointed for three (3) ~~four (4)~~ year terms.

2. 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.
3. 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.
4. Inaugural members shall be eligible to serve two (2) additional three (3) years term beyond his/her initial appointment.
5. 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.

e. Powers and duties

1. The Ethics Commission shall be authorized to consult the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council.
2. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.
3. The Ethics Commission has the power to render advisory opinions to any Town official, employee, or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. Individuals seeking an advisory opinion should follow the procedures outlined in Section 14 2-69(b) of the Code.
4. The Ethics Commission has the power to examine ~~inquiries or~~ complaints and to make a determination of probable cause, pursuant to the procedures outlined in Section 14 2-69(e) and 2-69(d) of the Code.
5. ~~The Commission itself, by majority vote, may initiate an inquiry or complaint.~~
6. The Ethics Commission has the power to 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.
7. The Ethics Commission has the power to review the Code of Ethics policies and procedures on an as-needed basis and will make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures.
8. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provision of this Code of Ethics ~~Section 2-60~~ or is otherwise prohibited by law.
9. The Ethics Commission will protect the personal privacy rights of any individual who is the subject of an inquiry or complaint, except as necessary to investigate and make determinations of probable cause. If there is a finding of no probable cause, the existence of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14 2-60.

10. The **Ethics** Commission may take action to increase public awareness of the Code of Ethics.

Section 14. Ethics Commission rules of procedure ~~Section 2-69~~

(a) These procedures shall be used by the Ethics Commission established in Section ~~14-2-58~~ hereof, and are designed to guide public officials, officers, employees, consultants, and citizens of the process to be followed if they seek advice or question the conduct of those in or affiliated with town government. Subsection (b), advisory opinions, describes a process for Town officers, officials, employees, or consultants, and other parties doing business with the Town who are seeking advice about their own conduct or the conduct of a Town office or function. ~~Subsection (c), inquiries, describes a process for resolving questions about specific conduct of a current town officer, official, employee or consultant, or about a town office or function.~~ Subsection (c)(d), complaints, describes a formal, public procedure for **filing complaints** ~~considering matters that cannot be resolved through the processes outlined in subsection (c) for inquiries.~~ Subsection (d) ~~(e)~~, other communications; miscellaneous, describes the process to be followed by anyone wishing to bring something to the attention of the **Ethics** Commission, without requesting an advisory opinion or filing a complaint.

(b) Advisory opinions

~~(1) Initiation~~

1. Any current, former, or prospective Town of **Ledyard** ~~Glastonbury~~ 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 official also may request an advisory opinion concerning the activities of any department over which he/she has jurisdiction or board or commission on which he/she serves.
2. 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 it.
3. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day 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.
4. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions.

(2) Proceedings

1. The chair will present the request to the **Ethics** Commission at its next regular meeting for ~~which no agenda has been filed yet with the Town Clerk~~ or at a special meeting **under executive session**, except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics, called by the **Ethics** Commission chair or vice-chair.
2. The **Ethics** Commission will meet in to review the request. At that time, it may decide to (1) Seek additional information, (2) Create a subcommittee of at least two (2) Commission members to make a recommendation for consideration by the full Ethics Commission, (3) hold an informal hearing to receive comments from the individual who request the advisory opinion and/or from the public, (4) Investigate the relevant facts and issues in order to render the advisory opinion, ~~and/or (5) treat the matter as an inquiry under subsection (e) hereof.~~

(3) Decisions

1. Advisory opinions will be made by a majority of **the Ethics** Commission members voting at a meeting at which a quorum is present.
2. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) 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 (30) days.
3. All advisory opinions must be in writing and communicated to the individual making the request.
4. 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.

(4) Confidentiality

1. Requests for advisory opinions will be reviewed in **executive session** except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics. ~~open session unless, upon review by the Commission chair or vice chair, it is determined that the matter would be more appropriately treated as an inquiry under subsection (e) hereof and pursuant to G.S. 1-82a.~~
2. Advisory opinions ~~for matters not treated as inquiries under subsection (e) hereof~~ reviewed **in open sessions** will be made available for public inspection by delivery to the Town Clerk's office.

~~(e) Inquiries:~~

~~———— (1) Initiation~~

- ~~a. Any member of the public may submit an inquiry asking whether a current official, consultant, or employee has failed to comply with the Code or asking about the appropriateness of conduct of a particular Town office, agency, or consultant.~~
- ~~b. The Commission may itself initiate an inquiry regarding a possible violation of the Code.~~
- ~~c. Individuals initiating an inquiry must do so by completing a form, available through the Glastonbury Town Clerk's office or through the town's web site at www.glastonbury-ct.gov. The initiating individual must sign the form under penalty of false statement. The form must contain a description of the relevant facts in sufficient detail so that the Commission and any person who is subject of the inquiry can reasonably be expected to understand the nature of the allegations.~~
- ~~d. Inquiries must be addressed in a sealed envelope to the Commission, c/o the Glastonbury Town Clerk, 2155 Main Street, Town Hall, Glastonbury, Connecticut, who will date stamp but not open, the envelope and forward same promptly to the chair or vice chair of the Commission.~~
- ~~e. The date an inquiry is received by the Town Clerk will mark the official date of receipt for purposes of deadlines for decisions.~~

~~(2) Preliminary review.~~

- ~~a. The chair or vice chair of the Commission will conduct a preliminary review of all inquiries to determine whether the matter should be dismissed or reviewed by the entire Commission.~~
- ~~b. The chair or vice chair may dismiss a matter on any of these grounds:
 - ~~i. The complainant does not allege a violation of, or does not give enough information to suggest a violation of, Sec. 2-60 through 2-66 of the Code.~~
 - ~~ii. The person who is the subject of the inquiry is a minor.~~
 - ~~iii. The person who is the subject of the inquiry is no longer an official, employee, or consultant of the town.~~
 - ~~iv. The matter occurred more than (3) years earlier of before the enactment of the Code by the Town of Glastonbury.~~
 - ~~v. The Commission has already taken action on the matter.~~~~
- ~~c. If a matter is dismissed by the chair or vice chair after a preliminary review, the chair or vice chair will notify the complainant within five (5) business days, by regular mail of the reasons for the dismissal.~~
- ~~d. If a matter is dismissed by the chair or vice chair after a preliminary review, no further action by the Commission, including notice to the respondent(s), is necessary.~~

- e. ~~Complainants may appeal a dismissal by the chair or vice chair by filing with the Town Clerk a new inquiry form that contains additional evidence that would warrant review by the entire Commission.~~

~~(3) Notice.~~

- a. ~~Within five (5) business days of the Town Clerk's receipt of the inquiry or initiation of an independent inquiry, the chair or vice chair will notify the respondent(s) by regular mail and will provide the person with a copy of the completed form and the Code. The Commission will confirm by regular mail to the person who initiates an inquiry that it was received by the Commission.~~
- b. ~~In the event that an inquiry contains allegations against multiple respondents, the chair or vice chair must notify each respondent individually. Respondents are subject to the confidentiality provisions of Sec. 2-60 and Sec. 2-69(c)(7) of the Code.~~
- c. ~~Respondents may file a written response with the chair of the Commission within ten (10) business days after receiving the notice. In response to allegations against multiple respondents, respondents may respond individually or collectively.~~

~~(4) Proceedings.~~

- a. ~~Unless the inquiry previously was dismissed by action of the chair or vice chair pursuant to Section 2-69(c)(2) above, the chair will present the inquiry and any response received from the subject to the Commission at its next regular meeting or in a special meeting held after receipt of the inquiry, the mailing of notice to the subject, and the passage of at least (10) additional business days.~~
- b. ~~The Commission will meet one (1) or more times in closed session from which the public is excluded to review the inquiry and to determine whether or not there exists probable cause that the Code has been violated. In those sessions, it may decide to: (1) seek additional information, (2) create a subcommittee of at least two (2) Commission members to make a recommendation for consideration by the full Commission, (3) proceed to investigate the relevant facts and issues in order to render a decision, (4) decline to review the matter further, pursuant to subsection (c)(5) hereof, (5) endeavor to resolve the matter by convening a confidential meeting that includes the individual who is the subject of the inquiry and others relevant to the issue, (6) make a finding of probable cause and treat the matter as a complaint under subsection (d) hereof, and/or (7) make a finding of no probable cause. If the Commission proceeds under steps (1), (2), (3), or (5) above, it will establish a schedule of meetings for consideration of the inquiry, subject to the provisions of subsection (c)(4)(a) hereof.~~
- c. ~~A finding of probable cause means that based on a review of the available information the Commission determines that reasonable grounds exist to believe that the respondent engaged in prohibited conduct outlined in Sec. 2-60 through 2-66 of the Code.~~

~~(5) The Commission may decline to review a matter on any of these grounds:~~

- ~~a. The alleged facts do not evidence the existence of probable cause of a violation of Sec. 2-60 through 2-66 of the Code.~~
- ~~b. The matter is judged to be vexatious, frivolous, groundless, or brought for the purpose of harassment. A vexatious matter is one that lacks any serious purpose or value that is designed to cause disruption or annoyance.~~
- ~~c. The person who is the subject of the matter has already taken corrective action and the Commission believes the action taken was appropriate in the circumstances and the matter should not be pursued.~~
- ~~d. There are other reasonable grounds for not taking action.~~

~~(6) Decisions:~~

- ~~a. As expeditiously as possible but in any event within one hundred twenty (120) days after the meeting at which the Town Clerk received the inquiry form, the Commission will decide that (1) the inquiry requires no further action because it was resolved or did not require further review under subsection (c)(5) hereof, or (2) probable cause exists that a violation of the Code occurred, in which case the inquiry will be treated as a complaint under subsection (d) hereof. The Commission may extend the time for decision if circumstances justify a delay.~~
- ~~b. No finding of the existence of probable cause may be made except upon the vote of at least (4) members of the Commission.~~
- ~~c. Within five (5) business days after making a decision under this subsection (c), the Commission will inform in writing both complainants and respondents of its decision and its reasons for the decision. It shall be sufficient that the Commission cite as a reason for its decision any of the reasons enumerated in section 2-69(c)(5), above.~~

~~(7) Confidentiality~~

- ~~a. If the Commission does not make a finding of probable cause, then the inquiry and the record of the Commission's investigation shall remain confidential, except upon the request of the respondent. If the inquiry alleged violations by multiple respondents, then the request to release information must be made by all respondents.~~
- ~~b. The Commission may publish decisions in whole or in part if it decides that publication would serve the public interest and publication can be made in such a way as to protect the personal identity and privacy of persons who were the subject of any evaluation of a possible violation of the Code.~~

(c) ~~(d)~~ Complaints

1. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day said request 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) days of receipt of the complaint. The Ethics Commission shall also notify the respondent 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:

- Name of the person accused (respondent).
- Name of the person filing the complaint.
- The specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

2. Evaluation and Acknowledgement

i. Within sixty (60) business days of the receipt of a complaint, 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.

ii. If the Ethics Commission makes a finding of probable cause, which shall require four (4) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation process.

3. Hearings

i. 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 attendance of witnesses and the production of books, documents, records, and papers, and to examine and cross-examine witnesses and inspect and copy relevant and material records, papers and documents not in such person's possession. 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 (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.

4. Final Decisions

- i. 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.
- ii. The Ethics Commission must render its decision within sixty (60) days of the closing of the hearing.
- iii. 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.
- iv. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) 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. A violation of the Code of Ethics may lead to any one or a combination of the following penalties:
 - b. Order to cease and desist the violation
 - c. Pay a civil penalty of up to the maximum amount permitted by State law.
 - d. Censure
 - e. Suspension without pay
 - f. Demotion
 - g. Termination of employment
 - h. Restitution of any benefits received because of the violation committed.

(d) Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the

communication. The communication should be addressed in a sealed envelope to the chair of the Ethics Commission, c/o the Ledyard Town Clerk, 741 Colonel Ledyard Highway, Ledyard, CT 06339-1511 who will date stamp, but not open, the envelope and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said communication 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 chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. 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.

Adopted by the Ledyard Town Council on: _____

Gary St. Vil, Chairman

Approve/Disapprove on: _____

Fred B. Allyn , III, Mayor

AN ORDINANCE ESTABLISHING A
TOWN OF LEDYARD CODE OF ETHICS

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 officials, Town employees, and Town 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.

The purpose of the Town of Ledyard Code of Ethics is to:

- Identify standards of ethical conduct to guide all Town officials, including members of the Board of Education, and all Town and Board of Education officers, employees, and consultants as they conduct their public responsibilities.
- Clarify the role of the Ethics Commission.
- Outline a process that allows Town officials, including members of the Board of Education, and all Town and Board of Education employees, and consultants to seek guidance and advice about ethical issues connected with their public responsibilities, and
- Establish a process that enables citizens to report, and the Ethics Commission to investigate and respond to possible violation of the Code.

Section 3. Definitions

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

1. “*Agency*” is any board, commission, authority, or committee of the Town, including the Town Council and Board of Education.
2. “*Beneficial interest*” means any nonfinancial interest or special treatment that is not common to other citizens of the Town.

3. “*Business associate*” means a person joined together with another person through employment or to achieve a common financial and/or business-related objective.
4. “*Business day*” means a day other than a Saturday, Sunday, or other day on which the office of the Ledyard Town Clerk is closed to the public for business.
5. “*Complainant*” means a person or person who files a complaint under penalties of false statement against an official, employee, or consultant containing allegation of prohibited activities under the Code of Ethics.
6. “*Confidential Information*” means information acquired by a Town 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.
7. “*Consultant*” means any independent contractor or professional person or firm that is by virtue of an award of a public bid or contract engaged by and receives compensation from the Town or Board of Education for the purpose of providing professional, scientific, technical, or other specialized opinion, and is in a position to influence any decision of an agency, official, or employee.
8. “*Employee*” is any person receiving a salary, wages, or stipend from the Town or Board of Education for services rendered, whether full-time or part-time.
9. “*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, lineal descendants, stepchildren, foster children, siblings, stepsiblings, foster siblings; lineal descendants of siblings, stepsiblings, and foster siblings of an official, employee, or consultant, or his/her spouse or domestic partner.
10. “*Financial Interest*” means any interest that:
 - a. has a 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;
 - b. is not common to the other citizens of the Town. An individual’s financial interests shall include the financial interests of all members of his/her family but shall not include any duly authorized compensation from the town.
11. “*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) for any one (1) occasion, and in any one (1) year from the same person, as well as loans that are not commercially reasonable. A gift may also include donations to a third party on behalf of an official, employee, or consultant for which she/he receives some favor, advantage, or consideration.

Gifts do not include:

1. A political contribution that is otherwise reported in accordance with the law.
2. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.
3. Any gift regardless of value received from: (i) any family member who resides in the same household as the recipient of the gift, or (ii) another family member unless the other family member who makes the gift is interested, directly or indirectly, in a business transaction or pending matter that is within the purview or responsibilities of (a) the recipient of the gift, or (b) another family member residing in the same household as the recipient of the gift.
4. Certificates, plaques, or other ceremonial awards costing less than fifty dollars (\$50.00).
5. 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.
6. Honorary degrees.
7. 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 official or Town employee participates in his/her official capacity.
8. Any gift provided to a Town Official or Town Employee or to a family member of a Town Official or Town 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.

12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

13. *"Official"* is any person holding elective or appointive office in the government of the town and shall include, but not limited to, the Town Council, Board of Education, Town commissions and committees, Town attorney, or any other agency.

14. *"Respondent"* means a person who is the subject of a complaint.

Section 4. Confidential information

Town 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.

Section 5. Conflict of Interest Provisions

- a. A Town 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 that is incompatible with the proper discharge of that individual's official responsibilities in the public interest or would tend to impair his/her independent judgement or action in the performance of official responsibilities.

- 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 official, employee, or consultant has reason to believe or expect that he/she or any member of his family or business associate 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 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, his/her family members or business associate(s) 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 G.S. 7-148h(b).
- d. No Town official or employee may directly hire or supervise a member of his/her family.
- e. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials, or property for personal convenience or profit. Personal convenience or profit refer to those matters that are not related to the individual's official duties.
- f. No Town official, employee, or consultant may use his/her public office or position or disclose or use confidential information, in order to obtain a financial or beneficial interest for herself, himself, or for his/her family, or for any business associate.
- g. No Town 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 6. Consultants

- a. The Code of Ethics shall be incorporated by reference into all contracts entered into by the Town of Ledyard and the Board of Education with a consultant.
- b. Persons or firms who are engaged by and receive compensation from other governmental entities, such as the state or federal government, and who are in a position to influence any decision of an agency, official, or employee shall be guided by the Code.

Section 7. Gifts and favors

- a. No Town official, employee, or consultant, or any business associate, or member of his/her family nor any agency, employee organization, or group of employees shall solicit or accept any gift, whether in the form of a service, a loan at a less than a commercially available rate, a material thing, or a promise, 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, consultant, agency, employee organization, or group of employees. No Town 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 an agency, commission, committee, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment, or services.

- b. This section shall not apply to any political contribution that is reported as required by law.

Section 8. Equal treatment

Without proper authorization, no Town official, employee, or consultant shall accept, seek, grant, or cause to be granted any special consideration, treatment, or advantage to such individual, or his/her family by virtues of his/her position or business association.

Section 9. Disclosure and disqualification

- a. Any Town 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 section 9(b) through 9(e). Such disclosure shall disqualify the official, employee, or consultant from participation in the matter, transaction, or decision.
- b. No Town 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.
- c. All Town Councilors, Board of Education members, and the Mayor 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:
 1. All real estate located within the Town of Ledyard owned by such elected 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 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 five (5) percent of the legal or equitable interest in said corporation, trust, or partnership.
 2. 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 (5) percent interest, and which firm, proprietorship, partnership, corporation, or limited liability 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.
 3. Any income, fees, salary, or wages directly or indirectly, received by such official from the Town of Ledyard or its political subdivisions during the two (2) years immediate proceeding such official's election to public office.
- d. If there is an uncertainty whether a Town 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 shall disclose such possible conflict of interest to the following:
 1. For a Town official who is a member of an elective or appointive board, commission, committee, or authority - to the particular agency of which such official is a member.

2. For Town employees and officials appointed by the appropriate authorities.
 3. For Board of Education employees - to the superintendent of schools
 4. The Town department directors - to the Town Council
 5. The superintendent of schools - to the Board of Education.
 6. For a consultant - to the agent executing contract on behalf of the Town or Board of Education.
- e. The appropriate authority to which the disclosure is made shall make an appropriate record of such disclosure and shall recommend to the Town official, employee, or consultant making the report whether such official, employee, or consultant should abstain from participating in the transaction or decision to which the possible conflict of interest relates and whatever other appropriate action should be taken.
 - f. Any such questions concerning a possible conflict of interest may be referred to the Ethics Commission pursuant to Section 13 for an advisory opinion.

Section 10. Incompatible employment and activities

- a. No Town official or employee shall engage in or accept private employment or render services when the employment or services: (1) are incompatible with the proper discharge of the official duties of the official or employee; or (2) would tend to impair independence of judgement, or action by the official or employee in the performance of that individual's official duty. No consultant shall engage in employment or render services for interest other than the Town when such employment or services: (1) are incompatible with the proper discharge of his or her consulting duties on behalf of the town; or (2) would tend to impair the independence of the consultant's judgement or action on the matter for which the consultant has been engaged by the Town.
- b. No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency with which he/she previously was employed or affiliated for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable prior advisory opinion by the Ethics Commission pursuant to Section 13 following its review of the individual's written application and relevant facts.
- c. No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency in regard to a matter in which that individual previously participated in the course of his/her official responsibilities for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable advisory opinion by the Ethics Commission pursuant to Section 13.
- d. Subsection (a), (b), and (c) of this section shall not prohibit any current or former Town official, employee, or consultant from appearing before any agency on his/her own behalf. To avoid an actual or perceived conflict, Town officials are strongly discouraged from appearing before the agency on which they are a member or officer, absent extenuating circumstances, unless he/she has received a prior favorable advisory opinion by the Ethics Commission pursuant to Section 14(b) prior to appearing.
- e. 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, G.S. 8-11, 8-21, and 22a-42(c) that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.

- f. To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of the Code, a Town official, not otherwise retrained by the Code, shall exercise care when appearing before other agencies and shall disclose whether he/she is appearing in his/her official capacity or as a private citizen.

Section 11. Penalty for violation

A failure to comply with the Code shall be considered grounds for censure, reprimand, suspension, demotion, removal, or dismissal of Town officials, employees, and consultants as applicable. The remedies and procedures specified in 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. Acknowledgement form

- a. The Town Clerk shall provide a copy of the Code of Ethics to every Town official and employee within sixty (60) days of date that he/she begins his/her duties. Every Town official and employee shall sign and file with the Town Clerk an acknowledgement form indicating his/her awareness of the provisions of this Code.
- b. Each consultant shall sign and file with the Town Clerk an acknowledgement form indicating his or her awareness of the provisions of this Code on or before being retained by the Town, Board of Education, or other agency.

Section 13. Ethics Commission

a. Structure

1. The Ethics Commission shall be comprised of five (5) regular members and two (2) alternate members. All members of the Ethics Commission shall be electors of the Town.
2. 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.
3. Members will not be compensated for their service on the Commission.
4. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary

b. Member and alternate member qualifications

- a. Members and alternate members must be residents of the Town of Ledyard.
- b. No member or alternate member shall:
 - a. Be employed by the Town;
 - b. Have been employed by the Town for a period of two years prior to being appointed to the Ethics Commission.
 - c. Hold or seek any Town office.
 - d. Have held any Town office for a period of two years prior to being appointed to the Ethics Commission.

- e. Serve as a member of another Town agency.
 - f. Hold office in a political party or political committee.
 - g. Have been found in violation of state, local, or professional code of ethics.
- c. Method 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 (6) affirmative votes of the Town Council.
- d. Terms of appointment
- 1. Members will be appointed for three (3) year terms.
 - 2. 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.
 - 3. 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.
 - 4. Inaugural members shall be eligible to serve two (2) additional three (3) years term beyond his/her initial appointment.
 - 5. 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.
- e. Powers and duties
- 1. The Ethics Commission shall be authorized to consult the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council.
 - 2. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.
 - 3. The Ethics Commission has the power to render advisory opinions to any Town official, employee, or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. Individuals seeking an advisory opinion should follow the procedures outlined in Section 14 of the Code.
 - 4. The Ethics Commission has the power to examine complaints and to make a determination of probable cause, pursuant to the procedures outlined in Section 14
 - 5. The Ethics Commission has the power to 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.
 - 6. The Ethics Commission has the power to review the Code of Ethics policies and procedures on an as-needed basis and will make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures.

7. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provision of this Code of Ethics or is otherwise prohibited by law.
8. The Ethics Commission will protect the personal privacy rights of any individual who is the subject of an inquiry or complaint, except as necessary to investigate and make determinations of probable cause. If there is a finding of no probable cause, the existence of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.
9. The Ethics Commission may take action to increase public awareness of the Code of Ethics.

Section 14. Ethics Commission rules of procedure

(a) These procedures shall be used by the Ethics Commission established in Section 14 hereof, and are designed to guide public officials, officers, employees, consultants, and citizens of the process to be followed if they seek advice or question the conduct of those in or affiliated with town government. Subsection (b), advisory opinions, describes a process for Town officers, officials, employees, or consultants, and other parties doing business with the Town who are seeking advice about their own conduct or the conduct of a Town office or function. Subsection (c), complaints, describes a formal, public procedure for filing complaints. Subsection (d), other communications; miscellaneous, describes the process to be followed by anyone wishing to bring something to the attention of the Ethics Commission, without requesting an advisory opinion or filing a complaint.

(b) Advisory opinions

1. Any current, former, or prospective Town of Ledyard 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 official also may request an advisory opinion concerning the activities of any department over which he/she has jurisdiction or board or commission on which he/she serves.
2. 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 it.
3. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day 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.
4. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions.

5. Proceedings

i. The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting under executive session, except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics, called by the Ethics Commission chair or vice-chair.

ii. The Ethics Commission will meet in to review the request. At that time, it may decide to (1) Seek additional information, (2) Create a subcommittee of at least two (2) commission members to make a recommendation for consideration by the full Ethics Commission, (3) Hold an informal hearing to receive comments from the individual who request the advisory opinion and/or from the public, (4) Investigate the relevant facts and issues in order to render the advisory opinion.

6. Decisions

i. Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present.

ii. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) 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 (30) days.

i. All advisory opinions must be in writing and communicated to the individual making the request.

ii. 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.

7. Confidentiality

i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.

ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

c. Complaints

1. 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, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day said

request 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) days of receipt of the complaint. The Ethics Commission shall also notify the respondent 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:

- Name of the person accused (respondent).
- Name of the person filing the complaint.
- The specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

2.Evaluation and Acknowledgement

i. Within sixty (60) business days of the receipt of a complaint, 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.

ii.If the Ethics Commission makes a finding of probable cause, which shall require four (4) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation process.

3.Hearings

i.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 attendance of witnesses and the production of books, documents, records, and papers, and to examine and cross-examine witnesses and inspect and copy relevant and material records, papers and documents not in such person's possession. 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 (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.

4. Final Decisions

i. 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.

ii. The Ethics Commission must render its decision within sixty (60) days of the closing of the hearing.

iii. 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.

iv. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) 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.

iii. Penalties for Violations of the Code of Ethics

- a. A violation of the Code of Ethics may lead to any one or a combination of the following penalties:
- b. Order to cease and desist the violation
- c. Pay a civil penalty of up to the maximum amount permitted by State law.
- d. Censure
- e. Suspension without pay
- f. Demotion
- g. Termination of employment
- h. Restitution of any benefits received because of the violation committed.

5. Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of the Ethics Commission, c/o the Ledyard Town Clerk, 741 Colonel Ledyard Highway, Ledyard, CT 06339-1511 who will date stamp, but not open, the envelope and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said communication 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 chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection

by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. 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.

Adopted by the Ledyard Town Council on: _____

Gary St. Vil, Chairman

Approve/Disapprove on: _____

Fred B. Allyn , III, Mayor

INTRODUCED: **OCTOBER 8, 2, 2013**
PUBLIC HEARING: **OCTOBER 22, 2013**
ADOPTED: **OCTOBER 22, 2013**
PUBLISHED: **OCTOBER 29, 2013**
EFFECTIVE DATE: **NOVEMBER 8, 2013**

DIVISION 3. CODE OF ETHICS
REVISION DATED OCTOBER 22, 2013

Sec. 2-56. - Declaration of policy and purpose.

Sec. 2-57. - Definitions.

Sec. 2-58. - Ethics Commission.

Sec. 2-59. - Consultants.

Sec. 2-60. - Confidential information.

Sec. 2-61. - Use of influence.

Sec. 2-62. - Gifts and favors.

Sec. 2-63. - Equal treatment.

Sec. 2-64. - Conflict of interest.

Sec. 2-65. - Disclosure and disqualification.

Sec. 2-66. - Incompatible employment and activities.

Sec. 2-67. - Penalty for violation.

Sec. 2-68. - Acknowledgment form.

Sec. 2-69. - Ethics Commission rules of procedure.

Sec. 2-70. - Reserved.

Sec. 2-56. - Declaration of policy and purpose.

It is the intent of the Glastonbury Town Council that Town officials, employees, and consultants adhere to high standards of ethical conduct, that they act impartially in the performance of their duties, do not abuse their authority or influence, and do not have interests that would be incompatible with the discharge of their official responsibilities. Officials, employees, and consultants are expected to comply with the standards of ethical conduct outlined in Sections 2-60 through 2-66 of the Town of Glastonbury Code of Ethics (“Code”).

The purpose of the Town of Glastonbury Code of Ethics is to:

- Fulfill the requirement of establishing guidelines for ethical conduct, pursuant to Section 1101 of the Town Charter.
- Identify standards of ethical conduct to guide officials, officers, employees, and consultants as they conduct their public responsibilities,
- Clarify the role of the Ethics Commission,
- Outline a process that allows town officials, employees, and consultants to seek guidance and advice about ethical issues connected with their public responsibilities, and
- Establish a process that enables citizens to report and the Ethics Commission to investigate and respond to possible violations of the Code.

Sec. 2-57. - Definitions.

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 associate means a person joined together with another person through employment or to achieve a common financial and/or business-related objective.

Business day means a day other than a Saturday, Sunday or other day on which the office of the Glastonbury Town Clerk is closed to the public for business.

Complainant: A person or persons who files a sworn statement, pursuant to Sec. 2-69(c)(1), against an official, employee, or consultant containing allegations of prohibited activities under the Code.

Consultant is any independent contractor or professional person or firm that is by virtue of an award of a public bid or contract as defined in Glastonbury Code of Ordinances sections 2-262 and 2-263, engaged by and receives compensation from the town or board of education for the purpose of providing professional, scientific, technical or other specialized opinion and is in a position to influence any decision of an agency, official or employee.

Employee is any person receiving a salary, wages or 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, grandparents, great-grandparents, lineal descendants, stepchildren, siblings, lineal descendants of siblings and stepsiblings of an official, employee, or consultant, or of his/her spouse or domestic partner.

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

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, board of finance, town plan & zoning commission, town attorney, or any other agency.

Respondent: A person who is the subject of an inquiry or complaint.

Significant financial interest means any interest that: (1) has a 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; and (2) is not common to the other citizens of the town. An individual's "significant financial interests" shall include the financial interests of all members of his/her family, but shall not include any duly authorized compensation from the town.

Valuable gift is a gift of more than fifty dollars (\$50.00) in value. A valuable gift includes, but is not limited to, entertainment, food, beverage, travel, and lodging to the extent that the gift value exceeds fifty dollars (\$50.00) for any one (1) occasion, and one hundred dollars (\$100.00) total in any one (1) year from the same person, as well as loans that are not commercially reasonable. A valuable gift may also include donations to a third party on behalf of an official, employee, or consultant for which s/he receives some favor or advantage or consideration.

Valuable gifts do not include:

- (1) A political contribution that is otherwise reported in accordance with the law.
- (2) A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.
- (3) Any gift regardless of value received from: (i) any family member who resides in the same household as the recipient of the gift, or (ii) another family member unless the other family member who makes the gift is interested, directly or indirectly, in a business transaction or pending matter that is within the purview or responsibilities of (a) the recipient of the gift, or (b) another family member residing in the same household as the recipient of the gift.
- (4) Certificates, plaques or other ceremonial awards costing less than fifty dollars (\$50.00).
- (5) Honorary degrees.
- (6) A meal, ticket, beverages, and lodging costing less than or equal to fifty dollars (\$50.00), but only if the total of all such gifts from a particular person does not exceed one hundred dollars (\$100.00) in any one (1) year.

Sec. 2-58. - Ethics Commission.

(a) Structure.

- (1) The Ethics Commission shall consist of five (5) regular members and two (2) alternate members.
- (2) No more than two (2) of the regular members may be affiliated with any one political party and the alternate members may not both be affiliated with the same political party. At all times, at least one regular member and one alternate member shall be unaffiliated with any political party.
- (3) Members will not be compensated for their service on the Commission.
- (4) The Commission shall elect a chair and vice chair/secretary who shall serve for two-year terms.

(b) Member and alternate member qualifications

- (1) Members and alternate members must be residents of the Town of Glastonbury.
- (2) No member or alternate member shall:
 - a. Be employed by the Town.
 - b. Have been employed by the Town for a period of two years prior to being appointed to the Commission.
 - c. Hold or seek any Town office.
 - d. Have campaigned for any other person seeking a Town office.
 - e. Have held any Town or State office for a period of two years prior to being appointed to the Commission.
 - f. Serve as a member of another agency.
 - g. Hold office in a political party or political committee.
 - h. Have been found in violation of any State, local, or professional code of ethics.

(c) Method of Appointment: The Town Council shall appoint Commission members in the manner provided in the Town Charter. Members of the Ethics Commission shall be appointed by a minimum of seven (7) affirmative votes of the Town Council.

(d) Terms of appointment.

- (1) Members will be appointed for four (4) -year terms.
- (2) 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.

(e) Powers and duties.

- (1) The Commission has the power to render advisory opinions to any official, employee, or consultant on whether conduct by that person would constitute a violation of the Code. Individuals seeking an advisory opinion should follow the procedures outlined in Section 2-69(b) of the Code.

- (2) The Commission has the power to examine inquiries or complaints and to make a determination of probable cause, pursuant to the procedures outlined in Sections 2-69(c) and 2-69(d) of the Code.
- (3) The Commission itself, by majority vote, may initiate an inquiry or complaint.
- (4) The Commission has the power to hold hearings concerning alleged violations of the Code, may administer oaths, and may compel the attendance of witnesses by subpoena to the extent permitted by law.
- (5) The Commission has the power to review Code policies and procedures on an as-needed basis and will make recommendations to the Town Council regarding changes to the Code policies and procedures.
- (6) The Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provision of this Code, Section 2-60, or is otherwise prohibited by law.
- (7) The Commission will protect the personal privacy rights of any individual who is the subject of an inquiry or complaint, except as necessary to investigate and make determinations of probable cause. If there is a finding of no probable cause, the existence of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 2-60.
- (8) The Commission may take action to increase public awareness of the Code.

Sec. 2-59. - Consultants.

The Code shall be incorporated by reference into all contracts entered into by the Town and Board of Education with a consultant.

Persons or firms who are engaged by and receive compensation from other governmental entities, such as the state or federal government, and who are in a position to influence any decision of an agency, official or employee shall be guided by the Code, and the Commission may make recommendations to the entity employing such persons.

Sec. 2-60. - Confidential information.

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.

Sec. 2-61. - Use of influence and/or intentional misrepresentation

- (a) No official, employee, or consultant may seek, demand, or obtain a significant financial interest or a beneficial interest in his/her favor or the favor of any member of his/her family or business associate.
- (b) No official, employee, or consultant may use her or his public office or position or disclose or use confidential information, in order to obtain a significant financial or beneficial interest for herself, himself, or for her or his immediate family, or for any business associate.
- (c) No official, employee, or consultant, except for police officers in the course of the police investigative process, may intentionally commit or omit any material fact designed to deceive others in the performance of his or her official duties.

(d) No 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.

Sec. 2-62. - Gifts and favors.

(a) No official, employee or consultant or any business associate or member of his/her family nor any agency, employee organization or group of employees shall solicit or accept any valuable gift, whether in the form of a service, a loan at a less than a commercially available rate, a material thing or a promise, 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, consultant, agency, employee organization or group of employees. No 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 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 an agency, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment or services.

(b) This section shall not apply to any political contribution that is reported as required by law.

Sec. 2-63. - Equal treatment.

Without proper authorization, no official, employee or consultant shall accept, seek, grant or cause to be granted any special consideration, treatment or advantage to such individual or his/her family by virtue of his/her position or business association.

Sec. 2-64. - Conflict of interest.

An 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 that is incompatible with the proper discharge of that individual's official responsibilities in the public interest or would tend to impair his/her independent judgment or action in the performance of official responsibilities.

A significant 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 official, employee or consultant has reason to believe or expect that he/she will obtain, secure or advance such interest by reason of his/her actions in performance or nonperformance of his/her official responsibilities.

An official, employee or consultant does not have a significant 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 as a member of a profession, occupation, or group to no greater extent than it accrues to any other member of the profession, occupation, or group with which he/she is affiliated as set forth in G.S. §7-148h(b).

Sec. 2-65. - Disclosure and disqualification.

(a) Any official, employee or consultant who has a conflict of interest, significant 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 section 2-65(c)(1) through (6). Such disclosure shall disqualify the official, employee or consultant from participation in the matter, transaction, or decision.

(b) No 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 a significant 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.

(c) If there is an uncertainty whether an official, employee or consultant has a conflict of interest, significant financial interest or beneficial interest that could disqualify that individual from participation in a matter, such individual shall disclose such possible conflict of interest to the following:

(1) For an official who is a member of an elective or appointive board, commission, committee, or authority to the particular agency of which such official is a member.

(2) For town employees and officials appointed by the town manager to town manager.

(3) For board of education employees to the superintendent of schools.

(4) The town manager to town council.

(5) The superintendent of schools to the board of education.

(6) For a consultant to the agent executing contract on behalf of the town or board of education.

(d) The appropriate authority to which the disclosure is made shall make an appropriate record of such disclosure and shall recommend to the official, employee or consultant making the report whether such official, employee or consultant should abstain from participating in the transaction or decision to which the possible conflict of interest relates and whatever other appropriate action should be taken.

(e) Any such questions concerning a possible conflict of interest may be referred to the Commission for an advisory opinion.

Sec. 2-66. - Incompatible employment and activities.

(a) No official or employee shall engage in or accept private employment or render services when the employment or services: (1) are incompatible with the proper discharge of the official duties of the official or employee; or (2) would tend to impair independence of judgment or action by the official or employee in the performance of that individual's official duty. No consultant shall

engage in employment or render services for interests other than the town when such employment or services: (1) are incompatible with the proper discharge of his/her consulting duties on behalf of the town; or (2) would tend to impair the independence of the consultant's judgment or action on the matter for which the consultant has been engaged by the town.

(b) No former official, employee or consultant shall appear on behalf of any person or other entity before any agency with which he/she previously was employed or affiliated for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable prior advisory opinion by the Ethics Commission following its review of the individual's written application and relevant facts.

(c) No former official, employee or consultant shall appear on behalf of any person or other entity before any agency in regard to a matter in which that individual previously participated in the course of his/her official responsibilities for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable advisory opinion by the Ethics Commission.

(d) Subsections (a), (b) and (c) of this section shall not prohibit any current or former official, employee or consultant from appearing before any agency on his/her own behalf. To avoid an actual or perceived conflict, officials are strongly discouraged from appearing before the agency on which they are a member or officer, absent extenuating circumstances, unless s/he has received a prior favorable advisory opinion by the Ethics Commission prior to appearing.

(e) 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, G.S. §§ 8-11, 8-21, and 22a-42(c) that restrict conduct of members of municipal zoning and planning authorities and members of wetlands and watercourses boards or commissions.

(f) To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of the Code, an official, not otherwise restrained by the Code, shall exercise care when appearing before other agencies and shall disclose whether s/he is appearing in his/her official capacity or as a private citizen.

Sec. 2-67. - Penalty for violation.

A failure to comply with the Code shall be considered grounds for censure, reprimand, suspension, demotion, removal, or dismissal of officials, employees and consultants as applicable. The remedies and procedures specified in 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.

Sec. 2-68. - Acknowledgment form.

(a) The Town Clerk shall provide a copy of the Code and Town Charter Section 1101 to every official consultant within sixty (60) days of date that s/he begins his/her official duties. Every

town official shall sign and file with the Town Clerk an acknowledgment form indicating his/her awareness of the provisions of this Code and of Section 1101 of the Town Charter.

(b)Each consultant shall sign and file with the Town Clerk an acknowledgment form indicating his/her awareness of the provisions of this Code, and Section 1101 of the Town Charter on or before being retained by the town, board of education, or other agency.

(c)The town manager and superintendent of schools shall develop a protocol for periodic training of employees concerning this division and Town Charter Section 1101. 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).

Sec. 2-69. - Ethics Commission rules of procedure.

(a)These procedures shall be used by the Ethics Commission established in section 2-58 hereof, and are designed to guide public officials, officers, employees, consultants and citizens of the process to be followed if they seek advice or question the conduct of those in or affiliated with town government. Subsection (b), advisory opinions, describes a process for town officers, officials, employees or consultants, and other parties doing business with the town who are seeking advice about their own conduct or the conduct of a town office or function. Subsection (c), inquiries, describes a process for resolving questions about specific conduct of a current town officer, official, employee or consultant, or about a town office or function. Subsection (d), complaints, describes a formal, public procedure for considering matters that cannot be resolved through the processes outlined in subsection (c) for inquiries. Subsection (e), other communications; miscellaneous, describes the process to be followed by anyone wishing to bring something to the attention of the Commission, without requesting an advisory opinion or filing an inquiry.

(b)Advisory opinions

(1)Initiation.

a.Any current, former or prospective Town of Glastonbury employee, official, or consultant may request an advisory opinion from the Commission as to whether conduct by that person or entity would violate the Code. Any current town official also may request an advisory opinion concerning the activities of any department over which he or she has jurisdiction or board or Commission on which he or she serves.

b.Individuals initiating a request for an advisory opinion must do so by completing a form available through the Glastonbury Town Clerk's Office or through the town's web site www.glastonbury-ct.gov. 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 Commission can reasonably be expected to understand the nature of the request. The individual making the request must sign it.

c. Requests must be addressed in a sealed envelope to the Commission, c/o the Glastonbury Town Clerk, 2155 Main Street, Town Hall, Glastonbury, Connecticut, who will date stamp, but not open, the envelope and forward same promptly to the chair or vice chair of the Commission. On the day said request is received by the Town Clerk, the Town Clerk or his or her representative shall notify the chair or vice chair of the Commission, or both, of same.

d. The date the request is received by the Town Clerk will mark the official date of receipt for purposes of deadlines for decisions.

(2) Proceedings.

a. The chair will present the request to the Commission at its next regular meeting for which no agenda has been filed yet with the town clerk or at a special meeting called by the Commission chair or vice chair.

b. The Commission will meet to review the request. At that time, it may decide to: (1) seek additional information, (2) create a subcommittee of at least two (2) Commission members to make a recommendation for consideration by the full Commission, (3) hold an informal hearing to receive comments from the individual who requested the advisory opinion and/or from the public, (4) investigate the relevant facts and issues in order to render the advisory opinion, and/or (5) treat the matter as an inquiry under subsection (c) hereof.

(3) Decisions.

a. Advisory opinions will be made by a majority of Commission members voting at a meeting at which a quorum is present.

b. The Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) days from the day it first considers the request. The Commission may extend the time for decision for up to an additional thirty (30) days.

c. All advisory opinions must be in writing and communicated to the individual making the request.

d. The Commission may decline to render an advisory opinion if (1) the subject matter is not covered by the Code, (2) the known facts are incomplete or incorrect and the omissions or misstatements are material to the advisory opinion requested, or (3) other reasonable grounds exist for not taking action. If the Commission decides to so act, it shall state its reasons.

(4) Confidentiality.

a. Requests for advisory opinions will be reviewed in open session unless, upon review by the Commission chair or vice chair, it is determined that the matter

would be more appropriately treated as an inquiry under subsection (c) hereof and pursuant to G.S. § 1-82a.

b. Requests for advisory opinions that are treated as inquiries under subsection (c) hereof will be reviewed in closed session, except upon the request of the person who is the subject of the inquiry.

c. Advisory opinions for matters not treated as inquiries under subsection (c) hereof will be made available for public inspection by delivery to the town clerk's office.

(c) Inquiries:

(1) Initiation.

a. Any member of the public may submit an inquiry asking whether a current official, consultant or employee has failed to comply with the Code or asking about the appropriateness of conduct of a particular Town office, agency, or consultant.

b. The Commission may itself initiate an inquiry regarding a possible violation of the Code.

c. Individuals initiating an inquiry must do so by completing a form, available through the Glastonbury Town Clerk's office or through the town's web site at www.glastonbury-ct.gov. The initiating individual must sign the form under penalty of false statement. The form must contain a description of the relevant facts in sufficient detail so that the Commission and any person who is the subject of the inquiry can reasonably be expected to understand the nature of the allegations.

d. Inquiries must be addressed in a sealed envelope to the Commission, c/o the Glastonbury Town Clerk, 2155 Main Street, Town Hall, Glastonbury, Connecticut, who will date stamp, but not open, the envelope and forward same promptly to the chair or vice chair of the Commission.

e. The date an inquiry is received by the Town Clerk will mark the official date of receipt for purposes of deadlines for decisions.

(2) Preliminary review.

a. The chair or vice chair of the Commission will conduct a preliminary review of all inquiries to determine whether the matter should be dismissed or reviewed by the entire Commission.

b. The chair or vice chair may dismiss a matter on any of these grounds:

- i. The complainant does not allege a violation of, or does not give enough information to suggest a violation of, Sec. 2-60 through 2-66 of the Code.
- ii. The person who is the subject of the inquiry is a minor.
- iii. The person who is the subject of the inquiry is no longer an official, employee, or consultant of the town.
- iv. The matter occurred more than three (3) years earlier or before the enactment of the Code by the Town of Glastonbury.
- v. The Commission has already taken action on the matter.

c. If a matter is dismissed by the chair or vice chair after a preliminary review, the chair or vice chair will notify the complainant within five (5) business days, by regular mail, of the reasons for the dismissal.

d. If a matter is dismissed by the chair or vice chair after a preliminary review, no further action by the Commission, including notice to the respondent(s), is necessary.

e. Complainants may appeal a dismissal by the chair or vice chair by filing with the Town Clerk a new inquiry form that contains additional evidence that would warrant review by the entire Commission.

(3) Notice.

a. Within five (5) business days of the Town Clerk's receipt of the inquiry or initiation of an independent inquiry, the chair or vice chair will notify the respondent(s) by regular mail and will provide the person with a copy of the completed form and the Code. The Commission will confirm by regular mail to the person who initiates an inquiry that it was received by the Commission.

b. In the event that an inquiry contains allegations against multiple respondents, the chair or vice chair must notify each respondent individually. Respondents are subject to the confidentiality provisions of Sec. 2-60 and Sec. 2-69(c)(7) of the Code.

c. Respondents may file a written response with the chair of the Commission within ten (10) business days after receiving the notice. In response to allegations against multiple respondents, respondents may respond individually or collectively.

(4) Proceedings.

a. Unless the inquiry previously was dismissed by action of the chair or vice chair pursuant to Section 2-69(c)(2) above, the chair will present the inquiry and any response received from the subject to the Commission at its next regular meeting

or in a special meeting held after receipt of the inquiry, the mailing of notice to the subject, and the passage of at least ten (10) additional business days.

b. The Commission will meet one (1) or more times in closed session from which the public is excluded to review the inquiry and to determine whether or not there exists probable cause that the Code has been violated. In those sessions, it may decide to: (1) seek additional information, (2) create a subcommittee of at least two (2) Commission members to make a recommendation for consideration by the full Commission, (3) proceed to investigate the relevant facts and issues in order to render a decision, (4) decline to review the matter further, pursuant to subsection (c)(5) hereof, (5) endeavor to resolve the matter by convening a confidential meeting that includes the individual who is the subject of the inquiry and others relevant to the issue, (6) make a finding of probable cause and treat the matter as a complaint under subsection (d) hereof, and/or (7) make a finding of no probable cause. If the Commission proceeds under steps (1), (2), (3), or (5) above, it will establish a schedule of meetings for consideration of the inquiry, subject to the provisions of subsection (c)(4)(a) hereof.

c. A finding of probable cause means that based on a review of the available information the Commission determines that reasonable grounds exist to believe that the respondent engaged in prohibited conduct outlined in Sec. 2-60 through 2-66 of the Code.

(5) The Commission may decline to continue to review a matter on any of these grounds:

a. The alleged facts do not evidence the existence of probable cause of a violation of Sec. 2-60 through 2-66 of the Code.

b. The matter is judged to be vexatious, frivolous, groundless, or brought for the purpose of harassment. A vexatious matter is one that lacks any serious purpose or value or that is designed to cause disruption or annoyance.

c. The person who is the subject of the matter has already taken corrective action and the Commission believes the action taken was appropriate in the circumstances and the matter should not be pursued.

d. There are other reasonable grounds for not taking action.

(6) Decisions.

a. As expeditiously as possible but in any event within one hundred twenty (120) days after the meeting at which the Town Clerk received the inquiry form, the Commission will decide that (1) the inquiry requires no further action because it was resolved or did not require further review under subsection (c)(5) hereof, or (2) probable cause exists that a violation of the Code occurred, in which case the inquiry will be treated as a complaint under subsection (d) hereof. The Commission may extend the time for decision if circumstances justify a delay.

b.No finding of the existence of probable cause may be made except upon the vote of at least four (4) members of the Commission.

c.Within five (5) business days after making a decision under this subsection (c), the Commission will inform in writing both complainants and respondents of its decision and its reasons for the decision. It shall be sufficient that the Commission cite as a reason for its decision any of the reasons enumerated in section 2-69(c)(5), above.

(7)Confidentiality.

a. If the Commission does not make a finding of probable cause, then the inquiry and the record of the Commission's investigation shall remain confidential, except upon the request of the respondent. If the inquiry alleged violations by multiple respondents, then the request to release information must be made by all respondents.

b. The Commission may publish decisions in whole or in part if it decides that publication would serve the public interest and publication can be made in such a way as to protect the personal identity and privacy of persons who were the subject of any evaluation of a possible violation of the Code.

(d)Complaints:

(1)Initiation.

a.After conducting an investigation of any inquiry under subsection (c) hereof, if the Commission finds probable cause exists, then it will make public by providing to the Town Clerk its findings and its record of the investigation not later than five (5) business days after its decision, except it may postpone public release of the record for up to fourteen (14) days for the purpose of resolving the matter with the person who is the subject of the inquiry. If no resolution is reached, the Commission will proceed in the manner described in this subsection (d).

b.The findings and record of the investigation shall include: (1) the inquiry; (2) evidence received or considered; (3) a reference to the particular section of the Code involved; and (4) a short and plain statement of the Commission's reason for finding probable cause.

c.Any member of the public who desires to file a complaint against a current officer, official, consultant or employee for allegedly violating the Code must first pursue the matter as an inquiry under subsection (c) hereof.

(2)Public hearings.

If the Commission decides, after its investigation under subsection (c) hereof, that probable cause of a violation of the Code exists, it will conduct a public hearing to determine whether or not a violation occurred. At the hearing, the person who is the subject of the hearing will have the right to be represented by legal counsel, to present

evidence and witnesses and compel attendance of witnesses and the production of books, documents, records and papers, and to examine and cross-examine witnesses and inspect and copy relevant and material records, papers and documents not in such person's possession. Not later than ten (10) days before the start of the hearing, the Commission will provide the person with a list of its intended witnesses. The Commission will make a record of the proceedings.

(3) Powers and conduct of hearings.

a. For the hearing, the Commission will have the power to administer oaths, question witnesses, consider oral and documentary evidence, subpoena witnesses under procedural rules adopted by the Commission as regulations in accordance with the provisions of G.S. Chapter 54 (Uniform Administrative Procedure Act) to compel attendance before the Commission, and require the production for examination by the Commission of any books and papers which it deems relevant in any matter under investigation or in question.

b. The Commission may require witnesses to testify under oath administered by the presiding officer or any other duly qualified person. The hearings shall be recorded and/or transcribed.

c. Hearings are not governed by the legal rules of evidence and any information relevant to the matter may be considered. The Commission will respect the rules of privilege recognized by the law. When a hearing will be expedited and the interests of the parties will not be prejudiced substantially, any part of the evidence may be received in written form. Documentary evidence may be received in the form of copies or excerpts, if the original is not readily available, and, upon request, parties and the Commission will be given an opportunity to compare the copy with the original.

(4) Decisions.

a. Decisions by the Commission that a person is in violation of the Code must result from the concurring vote of four (4) of its members.

b. The Commission must render its decision within sixty (60) days of the closing of the hearing.

c. Such finding and memorandum will be deemed to be the final decision of the Commission for the purposes of G.S. Chapter 54. The person who was the subject of the hearing may appeal to the superior court in accordance with the provisions of G.S. § 4-183.

d. If the Commission finds that the Code was violated, it will provide the party who was the subject of the hearing and the Glastonbury Town Council with a copy of its findings and memorandum within ten (10) days after its decision. It will also advise the party of the right of appeal under G.S. § 4-183. At the same time, it will provide a copy of its findings and memorandum to the Glastonbury Town Manager, if such party is an employee, consultant or official appointed or under the jurisdiction of the town manager,

or the superintendent of schools and the board of education of the Town of Glastonbury if such person is an employee, consultant or official appointed or under the jurisdiction of the superintendent or such board.

e. Other communications; miscellaneous:

The Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of the Commission, c/o the Glastonbury Town Clerk, 2155 Main Street, Town Hall, Glastonbury, Connecticut, who will date stamp, but not open, the envelope and forward same promptly to the chair or vice chair of the Commission. On the day said communication is received by the Town Clerk, the Town Clerk or his or her representative shall notify the chair or vice chair of the Commission, or both, of same. The chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Commission.

Sec. 2-70. - Reserved.



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 26-0085

Agenda Date: 2/25/2026

Agenda #: 2.

ORDINANCE

Motion/Request:

MOTION to adopt a proposed “*An Ordinance of the Town Of Ledyard Authorizing Avalonia Land Conservancy, Inc., to Receive Property Tax Exempt Status As of the Date of Purchase of Real Property to be Preserved And Maintained As Open Space*” as presented in the draft dated January 15, 2026.

Background:

Connecticut General Statutes 12-81dd enables conservation properties to be tax exempt with the adoption of an Ordinance by the Municipalities Legislative Body (Town Council).

At the time when Avalonia Land Conservancy, Inc., acquired property located at 154 Stoddards Wharf Road, Gales Ferry on October 27, 2025 it was a taxable property. Therefore, Avalonia Land Conservancy paid \$1,120.72 in taxes at the closing.

Since the process to remove the property from the tax roll did not occur when the property was purchased by Avalonia Land Conservancy, Inc., they received a tax bill. Once taxes were due, the Tax Assessor could not waive them without Town Council authorization.

Therefore, Avalonia has appealed to the Town Council for relief (see attached letter dated 1/12/2026).

The only way to resolve the issue was thru the following Town Council actions:

- (1) Adopt an Ordinance authorizing the Land Conservancy to receive a tax exempt status; and
- (2) Adopt a Resolution to waive the taxes owed

A proposed Resolution will follow this item.

Department Comment/Recommendation:

(type text here)

Mayor Comment/Recommendation:

(type text here)

Body:
(type text here)



Avalonia Land Conservancy, Inc.
 PO Box 49
 Old Mystic, CT 06372



Avalonia.org
 info@Avalonialc.org
 



860.884.3500

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Administrator

Ukiah Pastor

January 12, 2025

Fred Allyn, Mayor; Ledyard Town Council
 Ledyard Town Hall
 741 Colonel Ledyard Highway
 Ledyard, CT 06339

Dear Mayor Allyn & Ledyard Town Council members,
 Avalonia Land Conservancy, Inc. (ALC) recently acquired property for open space conservation in Ledyard.

In accordance with CGS 12-81dd:

“Any municipality may, upon approval by its legislative body, abate the real or personal property taxes due for any portion of a tax year or the interest on delinquent taxes with respect to any tax paid by a nonprofit land conservation organization that was due for a period before the date of acquisition, but which was paid subsequent to the date of acquisition”

We are requesting your Town legislative body’s approval of an abatement of the taxes and interest that ALC has paid. The total is \$1,120.72

We are also requesting an abatement of the taxes due January, 2026. The total is \$3098.96. and a copies of the tax and HuD statements are attached.

Sincerely,



Dennis S. Main, President
 Avalonia Land Conservancy, Inc.



Avalonia Land Conservancy, Inc. preserves natural habitats in southeastern Connecticut by acquiring and protecting lands and by communicating the value of these irreplaceable resources. Avalonia Land Conservancy is a 501(c)3, non-profit organization.

Make checks payable to:

LEDYARD TAX COLLECTOR

741 Colonel Ledyard Hwy
Ledyard, CT 06339
Phone: 860-464-3232 or 464-3233
Monday - Thursday, 7:30a.m.-4:15p.m.

REAL ESTATE TAX BILL

GRAND LIST OF OCTOBER 1, 2024



DESCRIPTION 154 STODDARDS WHARF RD					LIST NUMBER 127151 R 2024		
BK	GROSS ASSESSMENT	EXEMPTION	NET ASSESSMENT	MILL RATE	1st PAYMENT DUE	2nd PAYMENT DUE	TOTAL TAX DUE
	166,880		166,880	37.140	7/1/2025	1/1/2026	
					3,098.96	3,098.96	6,197.92



AVALONIA LAND CONSERVANCY INC
756 COLONEL LEDYARD HWY
LEDYARD, CT 06339

UNPAID TAX	0.00
INTEREST	0.00
FEES	0.00
LIEN	0.00
TOTAL	0.00

Payments Received: 3,098.96

Last Payment Date: 7/23/2025

RETURN WITH SECOND PAYMENT

DESCRIPTION 154 STODDARDS WHARF RD					LIST NUMBER 127151 R 2024		
BK	GROSS ASSESSMENT	EXEMPTION	NET ASSESSMENT	MILL RATE	1st PAYMENT DUE	2nd PAYMENT DUE	TOTAL TAX DUE
	166,880		166,880	37.140	7/1/2025	1/1/2026	
					3,098.96	3,098.96	6,197.92



AVALONIA LAND CONSERVANCY INC
756 COLONEL LEDYARD HWY
LEDYARD, CT 06339

UNPAID TAX	0.00
INTEREST	0.00
FEES	0.00
LIEN	0.00
TOTAL	0.00

Payments Received: 3,098.96

Last Payment Date: 7/23/2025

RETURN WITH FIRST PAYMENT

DESCRIPTION 154 STODDARDS WHARF RD					LIST NUMBER 127151 R 2024		
BK	GROSS ASSESSMENT	EXEMPTION	NET ASSESSMENT	MILL RATE	1st PAYMENT DUE	2nd PAYMENT DUE	TOTAL TAX DUE
	166,880		166,880	37.140	7/1/2025	1/1/2026	
					3,098.96	3,098.96	6,197.92



AVALONIA LAND CONSERVANCY INC
756 COLONEL LEDYARD HWY
LEDYARD, CT 06339

UNPAID TAX	0.00
INTEREST	0.00
FEES	0.00
LIEN	0.00
TOTAL	0.00

Payments Received: 3,098.96

Last Payment Date: 7/23/2025



B. TYPE OF LOAN:							
1. <input type="checkbox"/> FHA	2. <input type="checkbox"/> RHS	3. <input type="checkbox"/> Conv. Unins.	6. File Number	7. Loan Number	8. Mortgage Insurance Case Number		
4. <input type="checkbox"/> VA	5. <input type="checkbox"/> Conv. Ins.						
C. NOTE: This form is furnished to give you a statement of actual settlement costs. Amounts paid to and by the settlement agent are shown. Items marked "(p.o.c.)" were paid outside the closing; they are shown here for informational purposes and are not included in the totals.							
D. NAME AND ADDRESS OF BORROWER: Avalonia Land Conservancy, Inc. 756 Colonel Ledyard Highway Ledyard, CT 06339			E. NAME AND ADDRESS OF SELLER: Pfizer, Inc. 66 Hudson Blvd East New York, NY 10001		F. NAME AND ADDRESS OF LENDER:		
G. PROPERTY LOCATION: 154 Stoddards Wharf Ledyard, CT 06339			H. SETTLEMENT AGENT: Suisman Shapiro Wool Brennan Gray & Greenberg, PC 20 S. Anguilla Rd, Pawcatuck, CT 06379		H. SETTLEMENT DATE October 27, 2025		DISBURSEMENT DATE October 27, 2025
PLACE OF SETTLEMENT 20 S. Anguilla Rd, Pawcatuck, CT 06379							
J. SUMMARY OF BORROWER'S TRANSACTION				K. SUMMARY OF SELLER'S TRANSACTION			
100. GROSS AMOUNT DUE FROM BORROWER:				400. GROSS AMOUNT DUE TO SELLER:			
101. Contract sales price		175,000.00		401. Contract sales price		175,000.00	
102. Personal property				402. Personal property			
103. Settlement charges to borrower (from line 1400)		2,862.00		403.			
104.				404.			
105.				405.			
ADJUSTMENTS FOR ITEMS PAID BY SELLER IN ADVANCE:				ADJUSTMENTS FOR ITEMS PAID BY SELLER IN ADVANCE:			
106. City/town taxes		10/27/2025 to 12/31/2025		406. City/town taxes		10/27/2025 to 12/31/2025	
107. County taxes		to		407. County taxes		to	
108. Assessments		to		408. Assessments		to	
109.				409.			
110.				410.			
111.				411.			
112.				412.			
120. GROSS AMOUNT DUE FROM BORROWER:		178,982.72		420. GROSS AMOUNT DUE TO SELLER:		176,120.72	
200. AMOUNTS PAID BY OR IN BEHALF OF BORROWER:				500. REDUCTIONS IN AMOUNT DUE TO SELLER:			
201. Deposit or earnest money		4,000.00		501. Excess deposit (see instructions)			
202. Principal amounts of new loan(s)				502. Settlement charges to seller (line 1400)			
203. Existing loan(s) taken subject to				503. Existing loan(s) taken subject to			
204. Town of Ledyard donation		80,000.00		504. Payoff of first mortgage loan			
205.				505. Payoff of second mortgage loan			
206.				506. Deposit or earnest money		4,000.00	
207.				507.			
208.				508.			
209.				509.			
ADJUSTMENTS FOR ITEMS UNPAID BY SELLER:				ADJUSTMENTS FOR ITEMS UNPAID BY SELLER:			
210. City/town taxes		to		510. City/town taxes		to	
211. County taxes		to		511. County taxes		to	
212. Assessments		to		512. Assessments		to	
213.				513.			
214.				514.			
215.				515.			
216.				516.			
217.				517.			
218.				518.			
219.				519.			
220. TOTAL PAID BY/FOR BORROWER:		84,000.00		520. TOTAL REDUCTION IN AMOUNT DUE SELLER:		4,000.00	
300. CASH AT SETTLEMENT FROM/TO BORROWER:				600. CASH AT SETTLEMENT FROM/TO SELLER:			
301. Gross amount due from borrower (line 120)		178,982.72		601. Gross amount due to seller (line 420)		176,120.72	
302. Less amount paid by/for borrower (line 220)		84,000.00		602. Less total reductions in amount due seller (line 520)		4,000.00	
303. Cash (<input checked="" type="checkbox"/> From) (<input type="checkbox"/> To) Borrower		\$94,982.72		603. Cash (<input checked="" type="checkbox"/> To) (<input type="checkbox"/> From) Seller		\$172,120.72	

L. SETTLEMENT CHARGES			
		PAID FROM BORROWER'S FUNDS AT SETTLEMENT	PAID FROM SELLER'S FUNDS AT SETTLEMENT
700. TOTAL REAL ESTATE BROKER FEES			
Division of commission (line 700) as follows:			
701.	to		
702.	to		
703.	Commission paid at settlement		
704.			
800. ITEMS PAYABLE IN CONNECTION WITH LOAN:			
801.	Our origination charge	(from GFE # 1)	
802.	Your credit or charge (points) for the specific interest rate chosen	(from GFE # 2)	
803.	Your adjusted origination charges	(from GFE A)	
804.	Appraisal fee to	(from GFE # 3)	
805.	Credit report to	(from GFE # 3)	
806.	Tax service fee to	(from GFE # 3)	
807.	Flood certification to	(from GFE # 3)	
808.			
809.			
810.			
811.			
900. ITEMS REQUIRED BY LENDER TO BE PAID IN ADVANCE:			
901.	Daily interest charges from 10/27/2025 to 11/1/2025 (5 days) @ \$0.0000/day	(from GFE # 10)	
902.	Mortgage insurance premium for	(from GFE # 3)	
903.	Homeowner's insurance for to	(from GFE # 11)	
904.			
905.			
906.			
1000. RESERVES DEPOSITED WITH LENDER:			
1001.	Initial deposit for your escrow account	(from GFE # 9)	
1002.	Homeowner's insurance		
1003.	Mortgage insurance		
1004.	Property taxes		
1005.			
1006.			
1007.			
1008.	Aggregate Accounting Adjustment	\$0.00	
1009.			
1100. TITLE CHARGES:			
1101.	Title services and lender's title insurance	(from GFE # 4)	2,000.00
1102.	Settlement or closing fee to Suisman Shapiro	\$2,000.00	
1103.	Owner's title insurance to CATIC	(from GFE # 5)	765.00
1104.	Lender's title insurance to CATIC		
1105.	Lender's title policy limit		
1106.	Owner's title policy limit \$175,000.00		
1107.	Agent's portion of the total title insurance premium to Suisman Shapiro Wool Brennan Gray & Greenberg, PC	\$459.00	
1108.	Underwriter's portion of the total title insurance premium to CATIC	\$306.00	
1109.			
1200. GOVERNMENT RECORDING AND TRANSFER CHARGES:			
1201.	Government recording charges	(from GFE # 7)	97.00
1202.	Deed \$ 97.00 Mortgage \$ Releases \$		
1203.	Transfer taxes	(from GFE # 8)	
1204.	City/County tax/stamps Deed \$ Mortgage \$		
1205.	State tax/stamps Deed \$ Mortgage \$		
1206.			
1207.			
1300. ADDITIONAL SETTLEMENT CHARGES:			
1301.	Required services that you can shop for	(from GFE # 6)	
1302.			
1303.			
1304.			
1305.			
1400. TOTAL SETTLEMENT CHARGES		(enter on Line 103, Section J and line 502, Section K)	\$2,862.00
B=borrower S=seller L=lender R=broker I=investor O=other POC=paid outside closing by			

I have carefully reviewed the HUD-1 Settlement Statement, and, to the best of my knowledge and belief, it is a true and accurate statement of all receipts and disbursements made on my account or by me in this transaction. I further certify that I have received a copy of the HUD-1 Settlement Statement.

Borrower: _____ Date: 10/27/2025 Seller: _____ Date: 10/27/2025
Avalonia Land Conservancy, Inc. _____ Pfizer, Inc. _____
_____ Date: 10/27/2025 _____ Date: 10/27/2025

The HUD-1 Settlement Statement which I have prepared is a true and accurate account of this transaction. I have caused or will cause the funds to be disbursed in accordance with this statement.
Settlement Agent: _____ Date: 10/27/2025

Robert Avena Esq.
WARNING: It is a crime to knowingly make false statements to the United States on this or any other similar form. Penalties upon conviction can include a fine and imprisonment. For details see: Title 18 U.S. Code Section 1001 and Section 1010.



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 26-0254

Agenda Date: 2/25/2026

Agenda #: 3.

AGENDA REQUEST
GENERAL DISCUSSION ITEM

Subject:

Discussion and possible action on the Town Council's "*Goals Letter*"

Background:

(type text here)

Department Comment/Recommendation:

(type text here)



TOWN OF LEDYARD CONNECTICUT

741 Colonel Ledyard Highway
Ledyard, Connecticut 06339-1551
(860) 464-3203
towncouncil@ledyardct.org

Chairman Gary St. Vil

DRAFT

Dear Residents of Ledyard,

The Twenty-Eighth Town Council is committed to steady, thoughtful governance grounded in long-term planning and responsible fiscal management. While each Councilor brings different experiences and perspectives, we share a common responsibility: to ensure that Ledyard remains financially stable, well-managed, and positioned for the future.

The goals outlined below were identified by individual Councilors and reflect a broad effort to strengthen planning, improve coordination, increase transparency, and support sustainable growth. Together, they represent a roadmap for 2026 focused on practical results and sound stewardship of taxpayer resources.

I. Fiscal Responsibility & Long-Term Planning

• **Capital Improvement Process Development**

Establish a seven-member Ad Hoc Committee, including staff, committee members, and one community member with construction management experience, to develop a clear, end-to-end process for Capital Improvement Building Projects for the Town and Board of Education facilities. The objective is to create a defined process from project proposal through design, funding authorization, execution, and close-out.

• **Annual Budget Process Review**

Establish a Charter Revision Commission to review Chapter VII (“Finance & Taxation”), Section 6 (“Annual Town Meeting”), paragraphs 3 and 4, to examine whether adjustments to the Annual Budget approval process would provide greater direct taxpayer involvement.

• **Increase Collaboration & Reduce Expenses**

Explore opportunities for the Town and the Board of Education to collaborate in shared services, purchasing, and operational efficiencies to reduce costs and improve coordination.

• **Grant Funding Opportunities**

Investigate and pursue at least three grant opportunities aligned with priorities identified in the Town’s Long-Term Capital Plan.

• **Solar Farm – Revenue Generation**

Work with the Mayor’s Office to prepare and seek Requests for Proposals (RFPs) to lease the approximately 15-acre former capped landfill property at 889 Colonel Ledyard Highway for a solar energy installation to generate revenue for the Town.

II. Governance & Administrative Efficiency

• **Efficiency of Town Council Business and Meetings**

Increase the effectiveness and efficiency of Town Council meetings and improve the execution of Town business through clear procedures and disciplined agenda management.

• **Monitoring State Legislative Developments**

Stay informed through Office of Legislative Research (OLR) reports regarding new laws and potential grant opportunities that may impact or benefit Ledyard.

• **Council Goals Accountability**

Publish and track the Town Council’s 2026 goals and work collectively to achieve measurable progress by year-end.

III. Communication & Community Engagement

• **Improved Communication with Residents**

Facilitate informal community conversations such as Coffee Hours or Town Hall discussions to improve accessibility and strengthen communication between residents and their elected officials.

- **State Legislative Advocacy**
Work with Ledyard’s State Delegation and other district representatives to bring attention to issues that directly affect Ledyard and advocate effectively at the State level.

IV. Sustainability & Community Initiatives

- **Composting Program Expansion**
Expand the Town’s Food Waste Composting Program by increasing accessibility to compost bins at key locations.
- **Green & Clean Initiatives**
Support initiatives that conserve public spaces, improve recycling programs, increase energy efficiency (including LED lighting in public buildings), encourage responsible development, and address brownfield sites.
- **Sustainable CT Certification**
Continue working with the Sustainable CT Ad Hoc Committee to achieve Sustainable CT certification by implementing initiatives that promote efficiency, economic vitality, and environmental responsibility.
- **Access to Primary Care – Community Awareness Initiative**
Support ongoing volunteer efforts aimed at increasing awareness of access to primary care services.

Residents interested in learning more about these community-driven initiatives may contact the Town Council Office at (860) 464-3203 or towncouncil@ledyardct.org.

(This initiative reflects community engagement efforts and does not represent a municipal program or expenditure.)

The Town Council encourages residents to remain informed and engaged in local government. Strong communities are built through participation, respectful dialogue, and responsible decision-making.

We remain focused on long-term planning, fiscal discipline, and maintaining the stability that makes Ledyard a strong place to live and work. We look forward to working together throughout 2026 to advance these priorities.

Respectfully submitted,

Chairman Gary St. Vil

Councilor Bill Barnes

Ty Lamb

April Brunelle

Adrienne Pard

Jessica Buhle

Timothy Ryan

Carmen Garcia-Irizarry

James Thompson