

Roxanne Maher

From: Jessica Buhle
Sent: Wednesday, October 29, 2025 2:02 PM
To: Ritter, Matthew D.
Cc: Roxanne Maher
Subject: Re: Ethics Ordinance Clarifying Question - Administrator of Emergency Services

Matt,

Thank you again for your prompt reply. I will move forward with the language you have suggested and will send you a redline and clean copy tomorrow morning.

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

On Oct 29, 2025, at 1:47 PM, Ritter, Matthew D. <MRitter@goodwin.com> wrote:

Jessica – my suggestion would be to say:

1. 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.

-Does the Mayor get a car? Just curious. If so, I would include that position as well.

2. Penalties will be determined by a majority vote of the Town Council within sixty (60) days after receipt of the finding and memorandum from the Ethics Commission.

I am OK with this language.

3. Good luck this evening and please remember to send me a final clean and redline copy if you can so I can do one final review with all of these edits. Thanks, Matt

<image001.png>

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

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From: Jessica Buhle <Jbuh@ledyardct.org>
Sent: Wednesday, October 29, 2025 12:07 PM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Cc: Roxanne Maher <council@ledyardct.org>
Subject: Re: Ethics Ordinance Clarifying Question - Administrator of Emergency Services

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

Good afternoon,

I am sending you language for consideration to confirm legality and that it does not conflict with our ordinance.

In regards to the Town owned vehicles, I would like to add this language:

This does not apply to Town owned vehicles issued to emergency responders as “take home” vehicles, or vehicles issued to employees as part of an employment agreement or contract.

I have also received feedback to clarify who determines the penalty for an Ethics Violation. I would like to add the following language after the Penalties (Section 14.c.4.v.)

Penalties will be determined by a majority vote of the Town Council within sixty (60) days after receipt of the finding and memorandum from the Ethics Commission.

Again, thank you for your concise feedback and assistance in drafting this ordinance. I appreciate your time and effort.

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

On Oct 28, 2025, at 1:32 PM, Ritter, Matthew D. <MRitter@goodwin.com> wrote:

I would add one more thing... we can certainly be clearer to avoid these questions.

"Notwithstanding anything contained in this ordinance to the contrary, 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.”

<image001.png>

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From: Jessica Buhle <Jbuh@ledyardct.org>

Sent: Tuesday, October 28, 2025 1:23 PM

To: Ritter, Matthew D. <MRitter@goodwin.com>

Subject: Re: Ethics Ordinance Clarifying Question - Administrator of Emergency Services

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

Thank you. I will move forward with that language.

To confirm, this exemption in 5.a. would also cover town employees or Board of Education employees who are also entering into a contract as an instructor or camp counselor for Parks and Recreation, correct?

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

On Oct 28, 2025, at 12:46 PM, Ritter, Matthew D.

<MRitter@goodwin.com> wrote:

Hi Jessica – with respect to 5a. -- see suggested revisions below:

"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.”

If you say “and” will that cover the tshirt example? Maybe they get a public quote? I would delete the part about disclosing the “conflict” because it is no longer a conflict if that makes sense....

For the vehicles, maybe confirm with the Mayor if there are other vehicles in a similar situation? Probably good to exempt them all?

Thanks.

<image001.png>

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From: Jessica Buhle <Jbuh@ledyardct.org>
Sent: Tuesday, October 28, 2025 11:39 AM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Re: Ethics Ordinance Clarifying Question - Administrator of Emergency Services

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

Hi Matt,

I had interpreted b. and c. to be clarifying portions of a, as they read as such, defining what is and what is not a conflict.

However, in order to address the concerns you and I had discussed yesterday regarding the fire training and Parks and Recreation shirts and other services small business owned by town employees provide to our town, I am proposing the following addition:

Under section 5.a., add "A Town official, employee, or consultant may engage in a contract, transaction, decision, or rendering of service to the Town where the contract is publicly quoted or bid and the Town official, employee, or consultant is not involved in awarding the contract, and conflict is disclosed.”

Under Section 5.e., add “This does not apply to vehicles assigned to Town vehicles issued to members of Ledyard Fire Department and Gales Ferry Fire Company.”

Please let me know if either of these additions cause legal issues or invalidate portions of our ordinance.

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

On Oct 28, 2025, at 11:19 AM, Ritter, Matthew D.
<MRitter@goodwin.com> wrote:

Hi Jessica - no need to apologize 😊

1. Under the revised Code as currently drafted, Section 5(a) may prohibit a firefighter from having a contract with the Town because it generally prohibits Town employees from having contracts with the Town. However, Section 5(b) would not be an issue (unless it was a contract with the volunteer fire department) because it specifically requires the employee to be involved in the awarding of the contract somehow.

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.**

Maybe you could look at amending Section 5(a) by exempting any contracts that are publicly bid and that the individual employee has no involvement in the contract award process? Or maybe you merge Sections (a) and (b)?

Here is a hypothetical – can a teacher who owns a cleaning company have a contract with the Town to provide cleaning services at Town Hall?

Under 5(a), maybe not...with the revisions discussed above, it probably is OK. However, I think a Town Council member could not because they are involved in the awarding of the contract.

2. With respect to the Town vehicles, this is a policy decision. However, if you want to continue to allow the Chief or any other Town official to use the vehicle for personal business you will need to amend the ordinance.

Thanks, Matt

<image001.png>

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From: Jessica Buhle <Jbuh@ledyardct.org>
Sent: Tuesday, October 28, 2025 10:29 AM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Ethics Ordinance Clarifying Question - Administrator of Emergency Services

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

Good morning,

Sincerest apologies for monopolizing your time on this Ordinance recently, but working hard to address feedback.

I received a letter from the Administrator of Emergency Services.

His concerns regard Section 5.a-c, and 5.e. and his letter is attached. I have attached my feedback and interpretation, so I will look for your feedback to confirm or refute my interpretation, or any further comments you may have.

If his concerns are correct and are prohibited in the proposed ordinance, can you propose language to modify the ordinance to correct?

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

Begin forwarded message:

From: Jessica Buhle
<jessicab@ledyardct.org>
Subject: Re: AES Comments on Ethics Ordinance
Date: October 28, 2025 at 10:24:45 AM EDT
To: Roxanne Maher
<council@ledyardct.org>
Cc: Steve Holyfield
<admin.emergency@ledyardct.org>

Good morning Steve,

Regarding Section 5.a., “A Town official, employee, consultant has a conflict of interest when... the Town official, employee, or consultant has a financial or beneficial interest.” Section 5.b. clarifies that a financial or beneficial interest presents a conflict of 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.” This statement is further clarified by 5.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).”* Therefore, this Ordinance does not prohibit volunteer firefighters or Town employees from owning their own businesses.

When you say “conduct business with the Town,” are you referring to firefighters who are engaging in contracts with the Town?

During my conversations with the attorney, we discussed Town employees who own businesses which provide services and goods to the Town, and potential conflicts with the Ordinance. I expressed the intent to continue past practice in allowing those opportunities to continue. I would personally interpret 5.c. to allow a business owned by a Town employee to engage in a contract

with the Town as long as the contract was awarded without preference specific to that person, but toward the contract process set forth in An Ordinance for Purchasing, and conflict is disclosed per Section 9.a. I will forward your concerns to the Attorney to verify my interpretation.

To address your second concern regarding Town owned vehicles, I defer to the Attorney's recommendation in this regard. We certainly have no intention of creating a requirement that increases emergency response times in our community.

Best,

Jessica Buhle
Ledyard Town Council
Chair - Administration Committee
jessicab@ledyardct.org

On Oct 28, 2025, at
9:49 AM, Roxanne
Maher
<council@ledyardct.org> wrote:

From: Steve Holyfield
<admin.emergency@ledyardct.org>
Sent: Tuesday, October
28, 2025 9:47 AM
To: Roxanne Maher
<council@ledyardct.org>
>

Cc: Jon Mann
<lfld.chief@ledyardct.org>; Jeff Erhart
<Chief@gffc.org>
Subject: AES Comments
on Ethics Ordinance

Good morning,
Roxanne -

Attached is a document with some comments I have on the proposed Ethics Ordinance. Could you please share it with the council and the admin committee?

I have copied the fire chiefs on this email for their awareness since this directly affects their membership.

Thanks and have a good day!

Steve

*Stephen C.
Holyfield*

**Administrator of
Emergency Services**

Deputy Emergency
Management Director

Public Safety Commission,
Chair

Phone 860-449-3364

E-mail
- admin.emergency@ledyardct.org

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