



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, October 8, 2025

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://us06web.zoom.us/j/85818631326?pwd=ip77mxClINTQT5TDijHAJ3aj4OA2ii.1>

Audio Only: Telephone: +1 646 558 8656; Meeting ID: 858 1863 1326; Passcode: 571452

- I. CALL TO ORDER
- II. PLEDGE OF ALLEGIANCE
- III. ROLL CALL
- IV. PRESENTATIONS
- V. RESIDENT & PROPERTY OWNERS (COMMENTS LIMITED TO THREE (3) MINUTES)
- VI. COMMITTEE COMMISSION AND BOARD REPORTS
- VII. COMMENTS OF TOWN COUNCILORS
- VIII. REVIEW AND APPROVAL OF MINUTES

- MOTION to approve the following Town Council Minutes
- Special Meeting Minutes of September 10 2025 (Executive Session)
- Regular Meeting Minutes of September 10, 2025
- Public Hearing Minutes of September 24, 2025

Attachments: [TC-MIN-2025-09-10-SP-EX-SESS](#)
[TC-MIN-2025-09-10](#)
[TC-MIN-2025-09-24-PUBLIC HEAIRNG](#)

- IX. COMMUNICATIONS

Correspondence List - October 8, 2025

Attachments: SCHROEDER - Proposed Changes CoE 9_10_2025

Mayor out of Country-September 21- October 3-2025- ltr-2025-09-15

Action Ltr -Retirement Board Mtg-2025-09-16

ACTION LTR-TOWN COUNCIL MTG-2025-09-10

ACTION LTR-TOWN COUNCIL SP MTG-SUPERVISORS

CONTRACT-2025-09-10

Liaison Assignment-Parad-Inland Wetland & Water Courses

ltr-2025-09-15

Liaison Assignment-Parad-Planning & Zoning-ltr-2025-09-15

Liaison Assignment-Buhle-Farmers Market Committee-

ltr-2025-09-15

Liaison Assignment-St Vil -Retirment Board-ltr-2025-09-15

Parad-Partner-Mashantucket Pequot Tribal Nation & Town Healthcare

Parad-Inviation-Community outreach hope house-email-2025-09-19

X. REFERALS

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

5. Liaison Reports

XII. REPORT OF THE MAYOR

Mayor Report Fiscal Year 2025/2025

XIII. OLD BUSINESS

XIV. NEW BUSINESS

CONSENT CALENDAR

- *1. MOTION to reappoint the following members the Inland Wetland & Water Courses Commission for a two (2) year term ending October 31, 2027:

- Mr. Michael Marelli (D) 4 Lee Brook Drive 193 Iron Street, Ledyard
- Mr. Justin DeBrodt (U) 5 Erins Way, Ledyard.

Attachments: [Re-Appointment Recommendations -Inland Wetland d& Water Courses Commission-2025-09-02](#)

- *2. MOTION to reappoint the following members to the Library Commission for a two (2) year term ending November 7, 2027:

- Mr. John Bolduc (U) 14 Monticello Drive, Gales Ferry
- Ms. Ellin M. Grenger (D) 15 Bittersweet Drive, Gales Ferry
- Ms. Cynthina Wright (D) 6 Larule Leaf Drive, Gales Ferry
- Ms. Elizabeth Rumery (D) 2 Bluff Road, Gales Ferry.

Attachments: [Re-Appointment Recommendations -Library Commission-2025-09-02](#)

- *3. MOTION to approve two tax refunds in the combined total amount of \$6,393.90 each exceeding \$2,400.00 in accordance with tax collector departmental procedures.

- Lereta Tax Service for Kin Chan & Cuihua Zheng \$3,291.61
- Eric Carlson \$3,102.29

Attachments: [Carlson Tax Refund-2025-09-24](#)
[Lereta-Zheng+ Chan-Tax Refund-2025-09-24](#)

Administration Committee

7. MOTION to appoint Mr. James Thompson (D) 6 Pennywise Lane, Ledyard, to the Inland Wetland & Water Courses Commission to complete a two (2) year term ending October 31, 2026 filling a vacancy left by Ms. Lynmarie Thopmpson.

Attachments: [Re-Appointment Recommendations -Inland Wetland d& Water Courses Commission-2025-09-02](#)
[RESIGNATION-THOMPSON-INLAND WETLAND & WATER COURSES-2024-12-22](#)

8. Discussion and possible action to review and consider text amendments to the proposed “An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission” in preparation to present at a Public Hearing.

Attachments: [DRAFT CODE OF ETHICS AND ETHICS COMMISSION-ADMIN MTG-2025-09-10](#)
[AN ORDINANCE ESTABLISHING A TOWN OF LEDYARD CODE OF ETHICS AND ETHICS-ATTORNE RED LINE DRAFT](#)
[AN ORDINANCE ESTABLISHING A TOWN OF LEDYARD CODE OF ETHICS AND ETHICS-RITTER-22434477-v2](#)
[Ethics Ordinance - FAQ- J-Buhle-2025-09-10](#)
[DRAFT CODE OF ETHICS AND ETHICS COMMISSION-JESSICA-2025-09-08](#)
[Town Attroney-Ethics Odinance-email-2025-07-24](#)
[DRAFT _AN ORDINANCE ESTABLISHING A TOWN OF LEDYARD CODE OF ETHICS AND ETHICS COMMISSIONDRAFT-2025-06-11-CLEAN COPY](#)
[SCHROEDER - Proposed Changes CoE 9 10 2025](#)
[Ball-Ethics Commisison email-2025-08-21](#)
[Schroder ltr-Proposed Ordinance Creating a Code of Ethics & Ethics Commisison-Attorney Comments-2025-08-06](#)
[Acknowledgement Form-Code of Ethics-DRAFT.docx](#)
[Town Charter-Investigation-Conflict of Interest](#)
[Fraud Policy - Adopted-2014-05-28](#)
[CGS - CHAPTER 10-ETHICS PUBLIC EMPLOYEES.docx](#)
[Ethics Commission- Fothergill-dmail-2024-09-13](#)
[Ethics Commission- Franzone email-2024-09-13](#)
[Ethics Commission- Lyons-email-2024-09-13](#)
[Ethics Commission- Wilkinson-email-2024-09-13](#)
[Ethics Commission-Samos-email-2024-09-24](#)
[Ethics Commisison - Wilkinson-email-2024-11-18](#)
[Ethics Commission-Edwards email-2024-12-07](#)
[EThis Commission-Porazzi-email-2024-12-11](#)
[Ethics Commisison-Schroeder ltr-2024-12-11](#)
[Jelden-Ethics Commission-email-2024-12-16](#)
[Murray - Ethics Commission-email-2025-1-08](#)
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[Kil Ethics Commission email-2025-01-10](#)
[RTC Ethics Commission email-2025-01-10](#)
[S Pealer Ethics Commission email-2025-01-10](#)
[Saums Ethics Commission email-2025-01-10](#)
[Cherry-Ethics Commission Draft Ordinance-email-2025-02-12](#)
[D-Pealer-Ethics Commission-email-2025-02-12](#)
[Hellekson-Ethics Commissioneemail-2025-02-12](#)
[Lamb Third Party Flags-Ethics Commission--email- 2025-02-12](#)

[Cassidy -email-2025-02-11-Ethics Commission](#)
[D-Pealer Ethics Commission email-2025-02-11](#)
[Hurt-Ethics Commission- email-2025-02-11](#)
[Siegel-Miles-Ethics Commission--email-2025-02-11](#)
[Shelton email-Ethics Commission-2025-03-11](#)
[Roberts-Pierson-Ethics Commision-email-2025-04-01](#)
[Consolini -ETHICS COMMISSION-EMAIL-2025-04-07](#)
[Larson-Ethics Commission-2025-04-08](#)
[Schroeder -ETHICS COMMISSION-EMAIL-2025-04-07](#)
[Berry-Ethics Commisstion-ltr -2025-04-08- Page 1-](#)
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[Khors-Ethics Commisstion-ltr -2025-04-08](#)
[Christy-Fogg-DEI-In Schools-email-2025-04-08](#)
[Porazzi-Ethics Commisstion-ltr -2025-04-08](#)
[Zeronsa-Ethics Commisstion-ltr -2025-04-08](#)
[Atwood-Ethics Commission-email-2025-04-08](#)
[Franzone-Ethics Commisstion-ltr -2025-04-08](#)

Community Relations Committee for Diversity, Equity & Inclusion

MOTION to endorse the Community Relations Committee for Diversity, Equity & Inclusion's message to be distributed in the form of a Digital and possibly a Printed Flyer "We Encourage all Ledyard Residents to Listen, Collaborate, and Find Common Ground. Progress comes from Teamwork"

Attachments: Green White Illustrative Thank You Message Nonprofit Facebook Post#1

General Items

Discussion and possible action to review and consider text amendments to the proposed "An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission" in preparation to present at a Public Hearing.

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[Atwood-Ethics Commission-email-2025-04-08](#)
[Franzone-Ethics Commisstion-ltr -2025-04-08](#)

MOTION to set a Public Hearing (Hybrid Format - Video Conference and In-Person) Public Hearing date to be held on October 22, 2025 at 5:00 p.m. 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 And Ethics Commission” ..

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 #: 25-2532

Agenda Date: 9/24/2025

Agenda #:

MINUTES

Minutes:

- MOTION to approve the following Town Council Minutes
 - Special Meeting Minutes of September 10 2025 (Executive Session)
 - Regular Meeting Minutes of September 10, 2025
 - Public Hearing Minutes of September 24, 2025



Chairman Gary St. Vil

TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

MINUTES
LEDYARD TOWN COUNCIL – SPECIAL MEETING
WEDNESDAY, SEPTEMBER 10, 2025; 6:30 PM

- I. CALL TO ORDER – Chairman St. Vil Brunelle called the meeting to order at 6:35 p.m. at the Council Chambers, Town Hall Annex Building.
- II. 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	Present	In-Person
Carmen Garcia-Irizarry	Town Councilor	Present	In-Person
Kevin Dombrowski	Town Councilor	Present	In-Person
Tim Ryan	Town Councilor	Present	Remote
Tony Saccone	Town Councilor	Present	In-Person
Gary St. Vil	Town Councilor	Present	In-Person

III. BUSINESS OF THE MEETING

1. MOTION to enter into executive session for the purpose of reviewing records, reports and statements with respect to collective bargaining between the Town of Ledyard and the Supervises and Professionals AFSCME, Council 4, Local 818-45 for the period of July 1, 2025 – June 30, 2027.

This action is taken without prejudice and the Town Council’s right to discuss in private, strategy and/or negotiations with respect to collective bargaining pursuant to Connecticut Genera Statutes Chapter 14 Section 1-200 and 1-201(b).

The Executive Session to include all Town Councilors present, Mayor Allyn, III, Director of Human Resources Christine Dias, and Administrative Assistant Roxanne Maher.

Moved by Councilor Dombrowski, seconded by Councilor Brunelle

VOTE: 8 - 0 Approved and so declared

RESULT: APPROVED 8 - 0	
MOVER:	Kevin Dommbrwoski, Town Councilor
SECONDER	April Brunelle, Town Councilor
AYES:	Barnes, Brunelle, Buhle, Dombrowski, Garcia-Irizarry, Ryan, Saccone, St. Vil

Entered into executive session at 6:37 p.m.

Came out of executive session at 6:47 p.m.

2. MOTION to approve the request for funds necessary to implement the proposal between the Town of Ledyard and the Supervises and Professionals AFSCME, Council 4, Local 818-45 for the period of July 1, 2025 – June 30, 2027.

The Executive Session to include all Town Councilors present, Mayor Allyn, III, and Administrative Assistant Roxanne Maher.

Moved by Councilor Buhle, seconded by Councilor Dombrowski

VOTE: 8 - 0 Approved and so declared

RESULT: APPROVED 8 - 0
MOVER: Jessica Buhle, Town Councilor
SECONDER Kevin Dombrowski, Town Councilor
AYES: Barnes, Brunelle, Buhle, Dombrowski, Garcia-Irizarry, Ryan, Saccone, St. Vil

IV. ADJOURNMENT

VOTE: Councilor Buhle, moved to adjourn, seconded by Councilor Dombrowski
8 - 0 Approved and so declared. The meeting adjourned at 6:48 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 Special Town Council Meeting held on September 10, 2025

Gary St. Vil, Chairman



TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

Chairman Gary St. Vil

MINUTES
LEDYARD TOWN COUNCIL – REGULAR MEETING
WEDNESDAY, SEPTEMBER 10, 2025; 7:00 PM
HYBRID FORMAT
VIDEO CONFERENCE VIA ZOOM

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

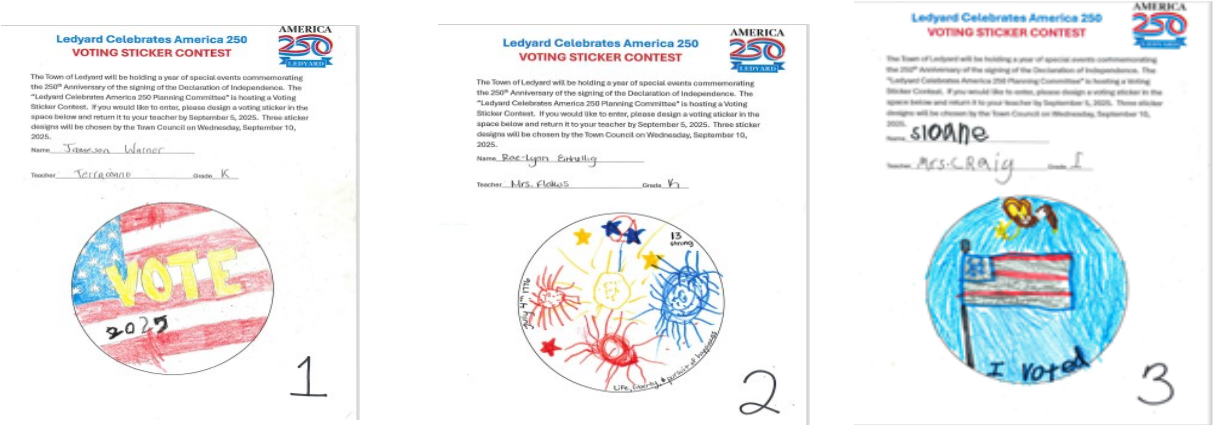
III. ROLL CALL –

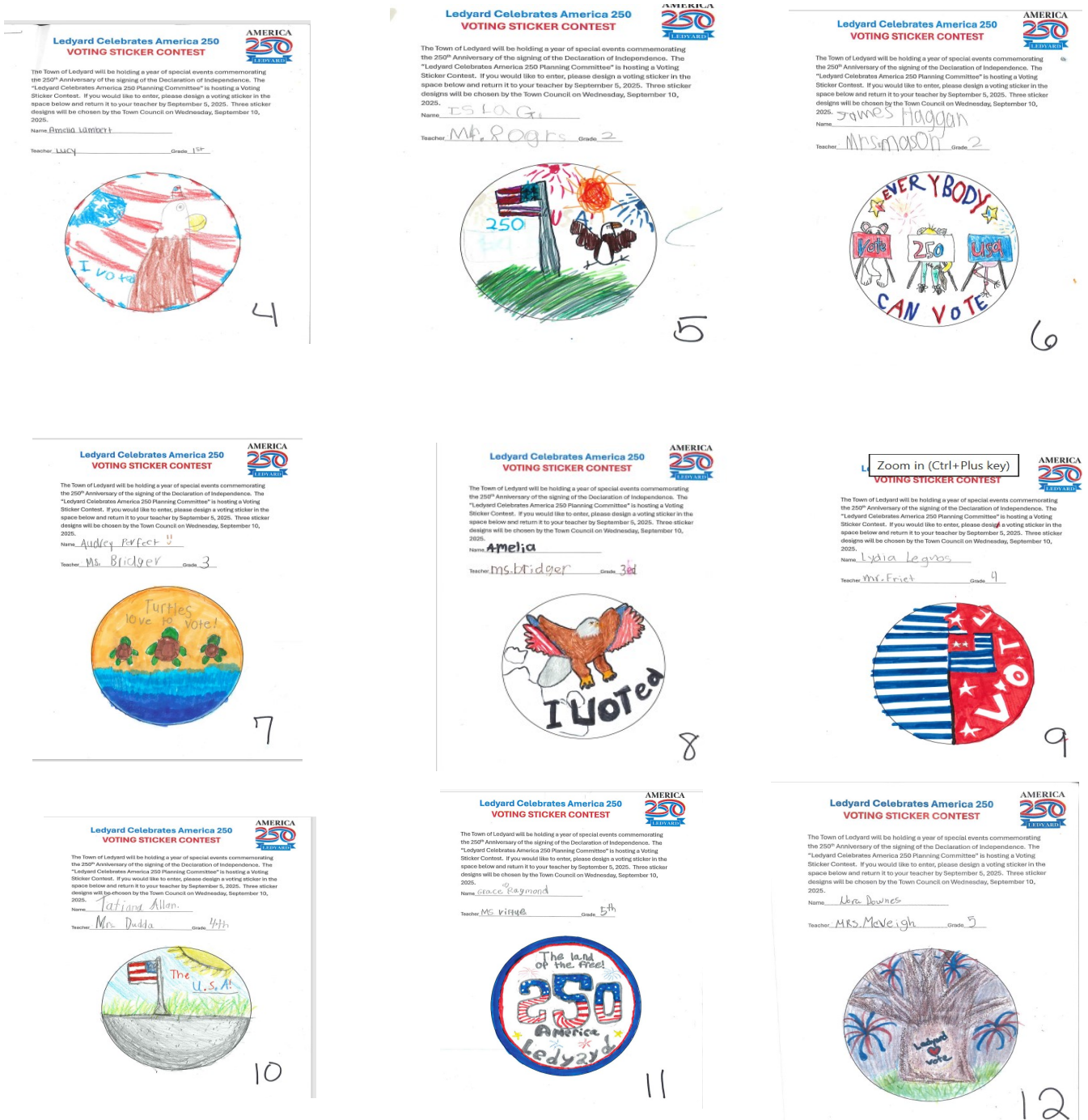
Attendee Name	Title	Status	Location
William Barnes	Town Councilor	Present	In-Person
April Brunelle	Town Councilor	Present	In-Person
Jessica Buhle	Town Councilor	Present	In-Person
Carmen Garcia-Irizarry	Town Councilor	Present	In-Person
Kevin Dombrowski	Town Councilor	Present	In-Person
Adrienne Parad	Town Councilor	Present	Remote
Tim Ryan	Town Councilor	Present	Remote
Tony Saccone	Town Councilor	Present	In-Person
Gary St. Vil	Town Councilor	Present	In-Person

IV. INFORMATIONAL ITEMS/PRESENTATIONS

Chairman St. Vil stated before the Town Council begins the business on tonight’s Agenda that he wanted to announce that the Town Council has been asked to be the Judges for the *Celebrate America 250 Voting Stickers*. He asked Mayor Allyn, III, to provide the background regarding this incredible Contest.

Mayor Allyn, III explained this coming July 4, 2026 will be Semiquincentennial Anniversary of the Signing of the Declaration of Independence and that Ledyard’s America 250 Committee has been planning events to Celebrate this important event. He stated to lead off this effort they asked the Ledyard’s elementary school students to design the stickers that are given out to Ledyard’s citizens after they have voted. He stated the *Celebrate America 250 Committee* was flooded with a number of entries and they narrowed the selection down to the top twelve designs, which were on display in the back of the Council Chambers this evening. He asked that the Town Council fill out ballots before they leave this evening listing their top three selections. He stated the top three “*I Voted*” design entries would be turned into stickers; and the student who designed the sticker would be at the Polls on November 4, 2025 to hand out their stickers. He stated that he thought that involving the kids with the election process was a novel idea, noting that the Celebrate America 250 Committee had to turn this initiative around quickly to meet the printing time constraint, the start of school, and the upcoming November 4, 2025 Election.





Chairman St. Vil asked the Town Councilors who were physically present this evening to pick up a Ballot from Administrative Assistant Roxanne Maher, fill it out with their top three picks, and turn it in before they leave this evening.

Chairman St. Vil continued by stating that tonight was a very special evening because they would be recognizing a member of Ledyard's Emergency 911- Communications Center - Chief Emergency Dispatcher Paula Jean Smith who has been serving the Town for thirty-years, noting that this was not common in today's employment environment, stating that most people only stay in a job for 2-3 years before moving on to the next opportunity. He continued by recognizing Police Chief John

Rich, Gales Ferry Fire Chief Jeff Erhart, and Ledyard Fire Department Deputy Fire Chief Todd Willis who were in the audience this evening. He stated before he presented Ms. Smith with a Town of Ledyard Proclamation, he invited Police Chief John Rich to say a few words.

Police Chief John Rich thanked Ms. Smith for everything she has done for Ledyard's Emergency Services all these years. He stated there was a tremendous amount of history here noting with the development of the Dispatch Center, the Town grew, and so did its Emergency Services and its personnel. He stated that Ms. Smith has been seen it all, and has been instrumental in implementation of so many important advancements and changes to their

Emergency Communications Center. He stated that Ms. Smith's guidance and input was also critical in designing Ledyard's Emergency-911 Communication Center that resides in their

new Police Facility Building which was celebrating their 10th Anniversary; and he commented on how fast the time flies. He stated that Ms. Smith has been a tremendous resource for the community, and to the safety of both Ledyard and Preston residents, noting that Ledyard also provides Emergency 911- Dispatch Services for the Town of Preston. He stated that he would like to personally thank Ms. Smith for everything she has done.

Gales Ferry Fire Chief Jeff Erhart stated that he worked with Ms. Smith as a part-time Dispatcher, when Ledyard only had three full-time Dispatchers, noting that their friendship now goes back a number of years. He stated as a Dispatcher for Ledyard, Ms. Smith has operated out of three different buildings in town, noting that the Dispatch Communication Center was located in the lower level of the Town Hall, then it moved to a building on Lorenze Parkway, and was now located in the Police Facility. He stated over the years the Emergency 911- Dispatch Communications Services has grown to what they have today, noting that Ms. Smith been involved in its evolution. He stated that Ms. Smith was rich in history, rich in spirit, and rich in the town, which Chief Rich pointed out. He also noted that what was really important was Ms. Smith's longevity, noting that Chairman St. Vil pointed out that longevity was an amazing thing these day. He stated that Ms. Smith has always been a friend, noting that she has been a member and active responder of the Fire Company for a number of years. He stated as the Gales Ferry Fire Chief he wanted to thank Ms. Smith for her friendship, and for everything that she has done for the town. He stated not only has she been an active participant in her community, but that she has been involved in his kids activities as well, noting that he brought his kids this evening, and that he appreciated all that she has done.

Town Councilor Tony Saccone, former Gales Ferry Fire Chief, humorously noted that it was his understanding that Chief Rich brought Ms. Smith to tonight's Town Council meeting to talk about radios. However, he stated the real reason was not to discuss radios but to recognize her incredible service to Ledyard. He stated although he wrote a few notes, that what he was going to say this evening comes from the heart.

Councilor Saccone stated that Ms. Smith has spent over half of her life serving the Town of Ledyard through the Ledyard Ambulance, Ledyard Fire Company, Gales Ferry Fire Company and thirty-years as an Emergency 911 Dispatcher. He stated that Ms. Smith has seen stressful atrocities that come into the 911 Dispatch Center. He explained when someone calls Emergency 911 the Dispatcher visually could see the active scene. Whether it was a car accident, and sone someone bleeding, or whatever it may be, the Dispatcher can visually see what was going on. He stated the Emergency 911 Dispatchers hear children playing with 911; they hear gunshots and screams that pierced every nerve in their body, they hear the voices of a crying baby that was just delivered. Councilor Saccone stated that all of us in this room cannot imagine the crying, the yelling, the fear in the voices calling out for help for someone who believed that it was the worst day of their lives, when they had to call Emergency 911. He explained that the Communication Dispatchers were First Responders, noting that every decision they make in the first few minutes to organize who has to go; the Police, Fire, Ambulance would set the tone for the entire emergency; which included protecting their First Responders who were on the scene. He stated for the Police, were they going into an active scene; for the Fire Department, was there a fire with people trapped and/or an Emergency Medical Call. He stated the Emergency 911 Dispatchers have to gain control of the Caller while there were people yelling and screaming. He stated the Dispatcher has to get the Caller's attention, they have to get the location; and get the nature of the emergency, noting that *They get control of the Scene*.

Councilor Saccone stated that he ran some numbers, noting for this year-to-date that the Emergency 911 Dispatch Communication Center has handled about 30,000 interactive calls, stating that based on the current trend the town would receive about 40,000 calls for the calendar year. He stated during the thirty-years of services that Ms. Smith has been with the town the Emergency 911 Communication Center has handled about 900,000 calls. He stated the Town of Ledyard, and its residents owe Paula Smith an immense debt of gratitude for her over three decades of service. He noted President John F. Kennedy stated: "*Let's find time to stop to thank those who made a difference of our lives*". Councilor Saccone thanked Ms. Smith for her years of service.

Chairman St. Vil asked Chief Dispatcher Ms. Smith, Police Chief Rich, Mayor Allyn, and Town Councilor Saccone to join him in front of the podium to present Ms. Smith with a *Town of Ledyard Proclamation*.

Mayor Allyn, III stated before Chairman St. Vil presented the Town of Ledyard Proclamation to Ms. Smith that he wanted to share a few words. He stated the Emergency 911 Dispatch Communication Center was a professional operation, and as the Mayor he has a radio; so he hears many of the E-911 Calls and the Dispatch Center’s responses. He commented on the chaos received over the E-911 Call which Ms. Smith converts very succinctly to their professional staff in the field stating the work she does was amazing, noting the stressful situations they face every day. He stated for someone to be sitting in that chair for 30 years and making all of that happen was amazing. He stated that he wanted to thank Ms. Smith for her service, both professionally and personally.

Chairman St. Vill thanked everyone for their comments this evening. He stated although he did not know Ms. Smith personally that he and his family have benefited and appreciated the work that she does.

Chairman St. Vil proceeded by presenting Smith with the following Town of Ledyard Proclamation:

• ***Proclamation Chief Emergency Communications Paula Smith***

BE IT KNOWN THAT THE TOWN OF LEDYARD
RECOGNIZES
PAULA JEAN SMITH
FOR HER THIRTY YEARS OF SERVICE

Ms. Smith has dedicated her life to helping those in need during medical and safety emergencies, initially volunteering her time in 1980 as a member the Ledyard Volunteer Emergency Squad (LVES); and later serving as a Volunteer Member of the Ledyard Center Fire Company and Gales Ferry Fire Company, providing sound medical attention to those during critical, often dangerous, and potentially life threatening situations.

After joining the Ledyard Emergency Communications Staff as a Dispatcher in 1997; Ms. Smith was appointed as the Chief Dispatcher by Mayor Susan B. Mendenhall in 2005 recognizing her complementary knowledge, expertise, and proficient operations of the 911 Emergency Communications Center; as well as her compassion in providing skillful support and guidance to those calling for help; all while providing clear and accurate direction to her fellow emergency responders bringing a sense of calmness to stressful and crisis situations.

Ms. Smith’s steady oversight of Ledyard’s 911 and Emergency Communications has been instrumental with the town’s implementation of the Computer-Aided Dispatch and Records Management Systems, Radio Equipment, Voice and Digital Recording Systems, Alarm Systems, and Cameras and Access Control Systems.

And Ms. Smith’s ability to embrace new technology assisted the Ledyard Police Department’s transition to the Connecticut Land Mobile Radio Network, creating vital radio interoperability with surrounding law enforcement agencies.

Ms. Smith’s interpersonal abilities have made her an asset as a Training Officer and in serving as Ledyard’s Liaison to the Department of Statewide Emergency Telecommunications.

Ms. Smith’s thorough understanding of the operational needs to provide outstanding emergency services and dispatch communications to Ledyard and Preston has been an asset to the community as she assists with the preparation and administration of the department’s Annual Budget and in identifying and developing their Capital Improvement Plan being mindful of taxpayers’ dollars, while prioritizing the safety of Ledyard’s dedicated first responders and aid to her fellow citizens.

Those of Us Who Witnessed her quiet, but steadfast approach will attest that **Paula Jean Smith** has been motivated by the highest ideals of public service. The citizens of Ledyard have benefited and will remain grateful for her tireless years of service, commitment, integrity and perseverance during a period of growth and change; and are fortunate to have been and will continue to be served by her forethought and leadership qualities.

The Town of Ledyard join with Ms. Smith’s friends and family to offer our congratulations and thank her for the Thirty Years of Service she has dedicated to her community; and extends its very best wishes on this memorable occasion and expresses the hope for her continued success.

Given this Tenth day of September, in the year 2025 at Ledyard, Connecticut.

Fred B. Allyn, III, Mayor

Gary St. Vil, Chairman
Ledyard Town Council

- **Presentation by national speaker, Dr. Michael Fine, on the topic of Primary Care For All Americans and possible benefits to Ledyard, CT**

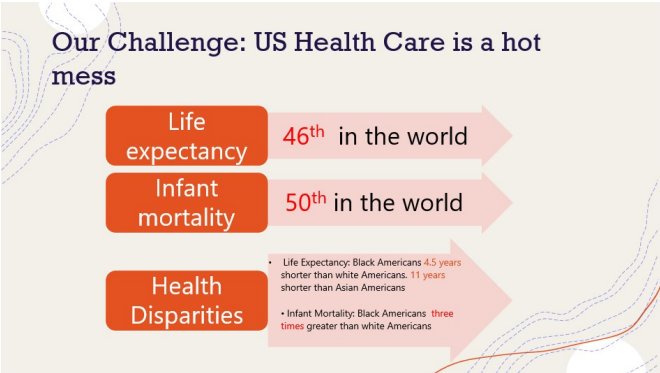
Chairman St. Vil stated that Dr. Michael Fine has been invited to give a presentation this evening regarding Primary Care. He asked Councilor Parad to introduce Dr. Fine.

Councilor Parad stated that it was a privilege to introduce Dr. Michael Fine, who is physician, author, and public health trailblazer whose work has redefined what community care can look like in America. She stated that Dr. Fine was one of the founders of the Scituate Health Alliance, a bold initiative that made Scituate, Rhode Island—population just 10,000—the first place in the United States where every resident is guaranteed access to primary care. Not just insurance coverage, but actual care: annual physicals, sick visits, screenings, and preventive services, all available for just \$10 per visit. It’s a model built on trust, local leadership, and the radical belief that healthcare should be a public good. She stated that Dr. Fine’s vision was rooted in decades of service. She stated that Dr. Fine served as Director of the Rhode Island Department of Health, where he championed population-based care and community health systems. He was also a prolific writer—authoring books like *Health Care Revolt* and *On Medicine as Colonialism*, which challenge us to rethink the economics and ethics of American healthcare. She stated that Dr. Fine was invited tonight because Ledyard, like many communities, was grappling with the impact of skyrocketing healthcare costs on their municipal budget. She stated that Dr. Fine’s approach offers a novel, community-based solution—one that has shown success in other parts of the country, but has yet to be piloted in Connecticut. She stated that she believed that Ledyard had the opportunity to lead the way to improve health outcomes for their residents and, as a secondary benefit, to stabilize and strengthen their budget over time. She asked the Town Council to join her in welcoming Dr. Michael Fine, physician who doesn’t just study systems, but builds bold alternatives to them.

Dr. Michael Fine stated that it was an honor to give the Town Council a presentation this evening and an honor to be introduced by Councilor Adrienne Parad, MD; and Dr. Andy Parad who was present this evening, noting that they have both been national leaders and pioneers to create a healthcare system that was for people, not for profit, around the country.

Dr. Fine proceeded by stating that he comes from Scituate, Rhode Island, noting that it was a town of 10,000; with a lot of different kinds of people. He stated about 25-years ago Primary Care For All Americans (PC4AA) figured out how to provide primary care to everyone in Rhode Island. He explained *Primary Care For All Americans* (PC4AA) was a social movement to build a health care system for the United States in which everyone in America has a primary care relationship. He stated *Primary Care For All Americans* (PC4AA) was the only national organization pursuing local and state level changes to recognize primary care as an affordable, essential service that has been proven to improve public health outcomes and lower costs.

Dr. Fine reviewed the following PowerPoint presentation:



And it's crazy expensive



\$5 trillion in 2023

- 19.7% of GDP
- TWICE the average cost of other developed nations
- Rises 4.9% per year
- \$15,000 per person per year
- Commercial insurance **\$9000 pp/\$25,592 per family per year**



Communities

- **\$150 million** for every community of 10,000 people
- The town budget for Scituate, RI, population about 10,000, was **\$43.8 million** in 2025
- **\$213 million for Ledyard**
- The 2026-2027 budget was **\$70 million**

The primary care triple superpower


Primary care improves health, reduces disparities and lowers costs when everyone has it

- By giving people an affordable option when they are sick (instead of the emergency room).
- By delivering effective prevention.
- By helping people with chronic disease get the treatments and prevention they need.

Too few Americans have primary care

No more than **43 percent** of the US population has a meaningful longitudinal primary care relationship

Only **65.7 percent** of Medicare beneficiaries had a PCP visit within the last year (2019)



• https://www.acgme.org/globalassets/pfassets/publicationsbooks/2021-2022_acgme_database_document.pdf

• Fitzgerald M, Gunja MZ, Tikkanen R. Primary care in high-income countries: how the US compares. *Commonwealth Fund*. Published March 2022.

• Barnett ML, Zhao X, Fine AJ, et al. Trends in outpatient care for Medicare beneficiaries and implications for primary care, 2000-2019. *Ann Intern Med*. 2021;174(12):1658-1665.

Primary care is affordable – it costs no more than other essential services cities and towns provide for their own residents

- + About 3.9 percent of the total health care spend
 - + **\$85 per person per year**
- + (The cost for advanced patient-focused team-supported primary care is likely **\$1000-1200** per person per year)
- + Similar to the costs of other services cities and towns provide for all their residents
 - + Police and fire protection – about **\$525** per person per year
 - + Water and sewer -- **\$400** per person per year
 - + Roads -- **\$622** per person per year
 - + Elementary and secondary education -- **\$2809** per person (not per student) per year




What can Ledyard do?

- + Study and report on Ledyard's primary care resources yearly
- + Help our students become the primary care clinicians of the future
- + - Create local scholarships with obligations for local practice
- + - Redo the purchase of health insurance for public employees
- + - Fund primary care for the uninsured

How can Ledyard get started?

- + Start a local workgroup
- + We'll help!



Primary Care for All Americans





- + www.primarycareforallamericans.org
- + Join us !
- + Volunteer!



HEALTH CARE REVOLT

michaelfinemd@gmail.com

www.michaelfinemd.com

MICHAEL FINE

ON MEDICINE AS COLONIALISM

Dr. Fine stated *Primary Care For All Americans* has 1,800 people across 40 of their United States working to bring Primary Care to all Americans by:

- Building a Platform using:
 - ✓ Local and State Workgroups
 - ✓ National Support model (resources, playbooks, training, deployment)
 - ✓ Robust social medial presence.
- Changing the Conversation
 - ✓ Primary care as an essential services and public health need
 - ✓ Practical ways to increase primary care workforce
 - ✓ New pathways to health professions for Students

- Engage Cities and Towns through
 - ✓ Local Residents
 - ✓ Community Leaders
 - ✓ Healthcare Leaders
 - ✓ Local Government Leaders
- Setting goals, measuring Progress
 - ✓ The number of primary care relationships in the Community
 - ✓ A Yearly Report on the Stats of the Primary Care in the Community.

Dr. Fine stated *Primary Care For All Americans* (PC4AA) was doing this work because the use of primary care was an incredible opportunity to take care of everybody. He stated that primary care physicians were particularly useful to cities and towns, because:

- It was inexpensive, and it helps save taxpayer dollars; as it improves people's health.
- The United States spend twice as much as the average other developed countries in the world.
- Life expectancy for Americans ranks us 46th in the world
- Infant mortality rate in the United States ranks 50th in the world

Dr. Fine stated he has been a Primary Care Physician for a long time and he noted as a nation the United States spent \$5 trillion dollars in 2023 for medical treatment which was 20% of the gross domestic product. He stated in addition to spending an average of \$15,000 per-person per-year for Commercial Health Insurance that Americans were now looking at the biggest Health Insurance Cost increases in 15-years. He stated that these cost increases were not only going to affect all our pocketbooks, that it would affect the bottom line budget for cities and towns as they pay the cost of healthcare insurance for town employees. He stated Scituate, Rhode Island, with a population of 10,000 people and an Annual Budget of \$43 million, would spend about \$150 million a year to pay for the healthcare.

Dr. Fine continued by stating as a Medical Professional he has had the opportunity to sit at every health policy table at the National, State, and Local level in the United States. Therefore, he stated that he could tell them that there was not going to be any meaningful change coming out of Washington, and it was not because one party or another was in power, noting that there has not been meaningful change coming out of Washington around healthcare for as long as he has been in the healthcare profession.

Dr. Fine went on to state as they have shown in Scituate, Rhode Island; and in Ashtabula, Ohio, and a couple of other places, that communities could do this for themselves and they could do it well, if they can harness the power of Primary Care. He noted that one of his colleagues in Massachusetts calls the Primary Care “*Triple Superpower*”.

Dr. Fine note the following benefits of Primary Care:

- 43% of Adult Americans have a robust primary care relationship.
- 65% of people have Primary Care Physicians, this was public health issue.
- Primary Care works by delivering effective prevention and reminding patients about routine screenings such as pap smears, mammograms, PSA Checks, and colonoscopies. Identifying chronic disease, like diabetes and heart disease early, through proper screenings that actually save lives and save money at the same time.
- Helps to reduce costs.
 - ✓ Average cost of Primary Care per person, per year, was about \$585.
 - ✓ Average cost of police and fire protection per person, per year was about 525.
 - ✓ Average cost of water and sewer per person, per year was about \$400.
 - ✓ Average cost of roads per person, per year was about \$622.
- Helps to improve the health of the population. In the United States they save about 50,000 lives a year, but they still lose 53,000 lives to treatable diseases such as colon or breast cancer.
- Primary Care provides people an option when they were sick. Instead of going to the Hospital Emergency Department, they can visit their Primary Care Physician. A Primary Care visit costs about \$100 - \$110 per visit.

- Every year there were 150 million Emergency Departments visits that typically cost between \$2,000 - \$10,000 per visit.
- Only about 12% of Emergency Department patients were admitted to the hospital. This data suggests that 88% of those people were spending \$2,500 or more per visit and probably did not need to go to the Emergency Department. These additional costs get passed on to the taxpayers and to others through the cost of insurance and through Medicaid, which covers all those costs.

Dr. Fine stated *Primary Care For All Americans* (PC4AA) was an opportunity to save money. He explained that Ashtabula, Ohio, and Scituate, Rhode Island saved 15% to 20% or about \$1.5 million on what they were spending for town employee healthcare insurance including their teachers. He stated that these healthcare insurance savings enabled these communities to put money back into the schools, and to do things like keep the late buses.

Dr. Fine provided the following road map for Ledyard to evaluate *Primary Care For All Americans* (PC4AA) as follows:

- Establish a Committee to study and report on how much access there was to Primary Care in Ledyard
 - ✓ Discuss and choose a couple of options.
 - ✓ Discuss whether Ledyard had enough Primary Care Doctors and Nurses.
- Develop Programs and Local Scholarships to:
 - ✓ Help students visualize Primary Care Careers.
 - ✓ Financial Support (Scholarship) to help Ledyard kids attend nursing and medical school, with an Agreement to come back and practice in Ledyard.
- Consider the purchase of other healthcare insurance for town employees.
 - ✓ Make sure every town employee has access to a Primary Care Doctor. Dr. Fine noted that Ashtabula, Ohio was able to cut their cost of their Healthcare Insurance by 15% to 20%. He stated the Ashtabula, Ohio model was easy to replicate, and they had a lot of experience with getting it set-up.
- Consider purchasing Primary Care for anyone in the community that does not have healthcare insurance.
 - ✓ Scituate, Rhode Island raised local funds to help its residents purchase healthcare insurance.
 - ✓ Scituate, Rhode Island raised funds to buy a Federally Qualified Community Health Center to provide Primary Care Services in their community.

Dr. Fine stated that *Primary Care For All Americans* (PC4AA) now had the resources, and a local playbooks to help guide people, noting that they know that there was no *One-Size Fits All Solution*. He stated every community was different, and that every community was going to do it its own way. However, he stated the way to make *Primary Care For All Americans* (PC4AA) part of your community's future was to get started; noting that *Primary Care For All Americans* (PC4AA) was available to help; stating that they can provide support and they have people that have done it; and they were all happy to help.

Dr. Fine stated that this concluded his presentation, and and he would be happy to answer questions.

Councilor Buhle thanked Dr. Fine for speaking with the Town Council this evening. She stated that her husband is navy active duty, and therefore, she had access to Tricare healthcare, which a lot of people hate. However, she stated that she would argue that it was the best healthcare insurance she has ever had in her life. She questioned what would happen to people in Scituate, Rhode Island who had private insurance such as Tricare or Medicare.

Dr. Fine responded to Councilor Buhle's question explaining that most people have private healthcare insurance, and most people find and use their own Primary Care Clinician. He stated that it was a little easier in Scituate, Rhode Island than it was in some other places in

Rhode Island, mainly because Situate does not have a lot of people without insurance, which helped them get this program done. He stated in Situate they hired a Town Nurse who keeps an eye on everybody; and she knows who was in trouble and helps them stop medical problems before they happen. He stated that she did a lot of programs around town to make sure people get the preventive services they need. He noted as an example that Situate gives out the Tick Tubes every year because like Connecticut they have a lot of Lyme Disease. He stated at the Lions Club June Breakfast they gave out Tick Tubes, and they raised a little money to help with programs in the community. He stated these types of programs used to happen 40-50-years ago; however, they fell by the wayside, and nobody noticed. Therefore, he stated *Primary Care For All Americans* (PC4AA) was trying to bring these programs back to help community's take care of themselves instead of depending on the Big Healthcare System in the city far away.

Councilor Barnes thanked Dr. Fine for his presentation. He stated Ledyard's budget process this year (fy 25/26) was challenging; and it looked as though it was going to be increasingly challenging in years to come. He questioned whether *Primary Care For All Americans* (PC4AA) was an opportunity to actually save money.

Dr. Fine responded to Councilor Barne's question stating that *Primary Care For All Americans* (PC4AA) was an opportunity to save money depending on the piece they chose to do. He noted that Ashtabula, Ohio saved 15% to 20% on what they were spending for town employee healthcare insurance including teachers. He stated for Scituate, Rhode Island the savings was about \$1.5 million per year, noting this was real money that they were able to put back into the schools, to do things such as keep the late buses, and not have to make budget cuts that everyone really does not want to make. He stated often cities and towns get pushed into the corner because of rising healthcare costs; and he noted that healthcare costs were going to go up big time this coming year.

Mayor Allyn, III, stated 15% of the Ledyard's Healthcare Insurance Cost was \$1.80 million of their total budget. He stated Ledyard's Healthcare Insurance Costs were more than 10% of their total Budget, noting that it was a huge number and that it grows every year. Dr. Fine stated if the Town assigned every person they were giving insurance to a Primary Care Clinician, that it would cut the costs of the whole business, because it would give people a place to go instead of going to the Emergency Room at the Hospital; or from getting very high priced Magnetic Resonance Imaging Scan (MRI) and Computed Tomography Scans (CT) by talking to somebody who listened to them.

Chairman St. Vil thanked Dr. Fine for his interesting presentation this evening. He stated Dr. Fine's presentation was attached to the Town Council's agenda for anyone who was looking for more information, noting that there was also a website listed and QR Code for folks to scan to learn more about the *Primary Care For All Americans* (PC4AA). He stated that they also have Councilor Parad, M.D., who introduced Dr. Fine this evening, noting that she was a huge resource.

V. RESIDENTS AND PROPERTY OWNERS

Dr. Andy Parad, Family Medicine Physician, 5 Birch Street, Ledyard, stated that it was a great treat to have Dr. Fine present this evening, noting that Dr. Fine had loads of experiences, as you learned. Dr. Parad stated that he would also like to mention that there were many complicated issues with the budget as Dr. Fine described. Dr. Parad stated that it really comes down to healthcare, which was going up every year, noting that so much money was wasted. He pointed out that although all of this may seem overwhelming at the moment; that usually a small group of people could make the biggest difference even in healthcare. He noted as an example, that he was part of a dedicated small group within the *American Academy of Family Physicians* which a physician group that represented about a 100,000 physicians. However, he stated that essentially there were 6 Core Members that push the National Academy's Policy and have advocated in Washington. He stated Policy that up until a few years ago supported the current pluralistic, fragmented system they currently have today. He stated a lot of the changes that the American Academy of Family Physicians have made would seem like common sense, noting that the Academy had to fight tooth and nail noting that *Healthcare is a Human Right* which the American Academy of Family Physicians now puts that on t-shirts

and promotes. However, he stated that he along with Dr. Michael Fine, and Dr. Michael Capwell actually pushed for that, stating that healthcare should be equitable and should be funded appropriately to provide not only coverage, but actual access to healthcare, noting that healthcare should not be tethered to employment, which was a problem here in Ledyard and in other communities. He stated economic systems and economics of healthcare should be important lecture topics and have provided opportunities for Dr. Fine and himself to give lectures across the country on this important and often misunderstood topic.

Dr. Parad continued by explaining that providing education on healthcare has turned some of the American Academy of Family Physicians staunchest opponents into their biggest advocates, noting that former Executive Vice President of the Academy, who for years had been against the Academy wanting to phase-out Medicare Advantage; came out in support of their initiative last week. He stated any change may seem daunting; however, he stated that it all starts with education and with small groups. He stated with receiving this type of information that he would urge the Town Council to continue the discussion about how Ledyard could do things better locally and perhaps become a model for other communities in our State, and even on a national level.

Chairman St. Vil opened the floor for questions from the Town Council. Hearing none, he thanked Dr. Andy Parad for his comments.

- VI. COMMITTEE COMMISSION AND BOARD REPORTS – None.
- VII. APPOINTMENTS TO STANDING COMMITTEES AND LIAISON ASSIGNMENTS

Chairman St. Vil stated with the departure of former Chairman Rodriguez and the addition of Councilor Parad, that he would like to announce the following changes to the Town

Council’s Standing Committees and Liaison Assignments:

Town Council Standing Committees

- **Community Relations Committee For Diversity, Equity & Inclusion**
 - ✓ Councilor Parad has been assigned to fill a vacancy left by himself
- **Land Use/Planning/Public Works Committee:**
 - ✓ Councilor Garcia-Irizarry has been assigned as the Committee Chairman
 - ✓ Councilor Parad has been assigned to fill a vacancy left by himself.

Town Council Liaison Assignments

- | | |
|--|------------------|
| • Inland Wetland & Water Courses Commission: | Councilor Parad |
| • Ledyard Farmers Market | Councilor Buhle |
| • Planning & Zoning Commission | Councilor Parad |
| • Retirement Board | Chairman St. Vil |

- VIII. COMMENTS OF TOWN COUNCILORS

Councilor Barnes stated they were a few hours away from the tragic events that took place on September 11, 2001. He stated that he did not want to leave this evening’s meeting without saying a few words in remembrance of those who lost their lives that day. He stated that he was filled with a sense of sadness for those who suffered from the tragedy that shocked the world. He stated in today’s news Charlie Kirk was assassinated while speaking at a public demonstration in Utha, noting that the first observation was that it looked like the assentation was politically motivated, stating that it was horrific. He stated in a small town like Ledyard that they had the opportunity to reflect on the many special things in their lives. He stated that he hoped each of them and their families, and their guests tonight, would take a moment tomorrow to be thankful for everything they have, stating there was no guarantee of tomorrow; and he asked that they all please treasure every moment.

Councilor Brunelle asked that motorist slow down, noting a recent accident in the Highlands area involving a car and bicyclist. She stated that fortunately no one was seriously injured.

Councilor Brunelle continued by noting that next week would be the last Farmers Market of the 2025 Summer Season, and she encouraged everyone to visit the Market.

Councilor Buhle thanked Chief Dispatcher Paula Smith for her service to the town. She stated this was her first term serving on the Town Council, noting that although she did not grow-up in Ledyard, she has made it her home. Councilor Buhle stated that one day she stopped by the Police Department and while she was there Ms. Smith offered to show her the Dispatch Center and how it all worked. She stated that this was not something that special that Ms. Smith did for her, noting that this was something that Ms. Smith would do for anyone. She stated that she loved to know the care and diligence that Ledyard and Preston residents were getting when they were potentially in the worst day of their life. She stated she was grateful for Ms. Smith and she was pleased that the Town Council took the opportunity to honor her this evening.

Councilor Ryan, attending remotely via Zoom, stated that he would echo Councilor Buhle's comments regarding Chief Dispatcher Paula Smith, noting that it was amazing that she has been in this field of work for so many years, and that he appreciated her service to the Town, noting the amount of stress they undergo as Emergency Dispatchers.

Councilor Ryan continued by noting that he would also like to echo Councilor Barnes' comments, stating that it was amazing that it was almost a quarter of a century that the horrific events of September 11, 2001 occurred. He stated that it was still very fresh, noting that many people remember where they were that day when the airplanes crashed into the World Trade Center in New York, in Arlington, Virginia; and in Shanksville, Pennsylvania. He stated the lessons learned from that day were still not fully digested in our society, which was unfortunate. However, he stated that he believed that they had the opportunity to continue to learn from those events and from the events that took place today in Utah. He stated as Councilor Barnes' mentioned it was an advertent act; noting that he did not have the words to describe it. He stated the videos and pictures on-line were difficult to look at, noting that there was also a shooting at a school in Dever today. He stated the overall state of affairs were very worrying; commenting that he would like to think that this should not be a political issue, but unfortunately the media frames it that way, and we have to do our best to rise above that. He stated there was a lot of things to reflect on today and to digest.

Councilor Parad, attending remotely via Zoom, stated that since this was her first Town Council Meeting that she would like to begin by expressing her sincere gratitude to Mayor Allyn, III, Chairman St. Vil and the entire Town Council for welcoming her, and for giving her the opportunity to speak tonight. She stated that it was an honor to join this dedicated body and serve our community. She stated for those that she has not met yet that her name is Adrienne Parad, and that she has come to this role with deep compassion and empathy. These qualities have guided her throughout her career as a family physician; and in her most cherished roles as a wife, mother of three school-age children, and a proud navy veteran. She stated that her commitment to Ledyard runs deep noting that she previously served as the Chair of the Ledyard Nursing Board, and she was now serving as the President of the Ledyard Education Advancement Foundation (LEAF), where she has had the privilege to work alongside many of you to celebrate and support our educators, students, and families. She stated that she wished that she could be with the Town Council in person tonight to mark this special moment. However, she stated in true 2020 fashion she tested positive for COVID-19 this morning. Therefore, she stated instead of shaking hands, that she would be waving from behind a screen, which was not quite the debut she imagined, but that she was grateful for the chance to connect, nonetheless.

Councilor Parad continued by stating that tonight marks a new chapter, not just for her personally, but for what she hoped they could accomplish together. She stated that she believed in collaboration and listening, and lifting each other up. She stated that her focus was to work with all of you to make their town the best it can be, not just for today, but for generations to come. She stated the initiative she was introducing tonight was bold; and that it may push them beyond their comfort zones, but she believed that was where growth happens;

that was where innovation lives; and that was how they achieve better outcomes for their residents. Councilor Parad concluded her comments by thanking the Town Council for this for this opportunity to serve with them. She stated that she looked forward to the work ahead with humility, determination, and a deep love for this town that we all call home.

Chairman St. Vil stated that he would like to piggyback on Councilor Barnes’ and Councilor Ryan’s comments this evening regarding the tragic event that happened in Utah today, where a Thought Leader was assassinated and the media was crafting it out to be political in nature, and he commented that was unfortunate. He stated it was unfortunate because throughout his 25+ year career he was very accustomed to debating ideas and thoughts passionately, noting that he never felt that his safety was in jeopardy; and/or the passion of a debate by himself or someone else meant that they did not appreciate each other as people and as individuals. He stated that he felt the same way about the time he has spent both on committees and commissions in Ledyard as well as on the Town Council with his fellow Town Councilors, whether they were a Democrat or a Republican; noting that he admired and respected his peer Counselors, and that he hoped that their community sees the example that they were setting in which they could disagree and at the same time appreciate and respect the ideas that differ from our own. He stated as Councilor Barnes’ said, tomorrow's promise is to no one; and that they all appreciate the moments that they do have. He asked that they all think about this young Thought Leader’s Family, stating that his two young children were not going to have a Dad; and his wife that was not going to have a Husband. He asked that they all keep them in their collective prayers.

IX. REVIEW AND APPROVAL OF PRIOR MEETING MINUTES

MOTION to approve the following:

- Special Town Council Meeting of August 6, 2025 (Executive Session)
- Special Meeting Minutes of August 6, 2025

Moved by Councilor Dombrowski, seconded by Councilor Buhle

VOTE: 8 – 0 - 1 Approved and so declared (Parad abstained)

X. COMMUNICATIONS

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

COMMUNICATIONS LISTING FOR SEPTEMBER 10, 2025

INCOMING CORRESPONDENCE

1. Mayor ltr dated 7/9/2025 re: Recommend Cherry Appointment Southeaster CT Water Authority(SCWA) (Mayor Representative)
2. Mayor ltr dated 7/10/2025 re: Appoint ltr Aherne Economic Development Commission (EDC)
3. Mayor ltr dated 7/10/2025 re: Appoint ltr Buttermore – Ledge Light Health District
4. Mayor ltr dated 7/10/2025 re: Appoint ltr Jay Pealer e – Ledge Light Health District
5. Mr. Ellingberg email dated 7/10/2025 re: July 8, 2025 Referendum Question – Juliet W. Long School Heating Ventilation & Air Condition System (HVAC)
6. Ms. Berry email dated 7/15/2025 re: Mystic Watershed Presentation July 19, 2025
7. DTC Appointment Application/Recommendation dated 7/15/2025 re: Bingham -Board of Assessment Appeals
8. DTC Appointment Application/Recommendation dated 7/15/2025 re: Lockhart – Planning & Zoning Commission
9. Agricultural Commission Reappointment Recommendation dated 7/20/2025
10. DTC Reappointment Recommendation dated 7/20/2025 re: Ledyard Beautification Committee
11. RTC Reappointment Recommendation dated 7/20/2025 re: Ledyard Beautification Committee
12. Ms. Schneider email dated 7/29/2025 re: Resignation – Ledyard Beautification Committee
13. DTC Appointment Recommendation ltr dated 7/25/2025 re: Adrenne Parade to fill Town Council vacancy (Rodriguez)

14. Water Pollution Control Authority (WPCA) ltr dated 7/24/2025 re: Action Ltr Meeting of July 22, 2025
15. Permanent Municipal Building Cmt ltr dated 8/5/2025 re: PMBC Meeting of August 4, 2025
16. Mr. Schroeder ltr dated 8/6/2025 re: Recommendations – proposed Draft Ordinance Establishing a Code of Ethics & Ethics Commission
17. Board of Education ltr dated 7/29/2025 (received 8/6/2025) re: Request additional Agri-Science Funding (ASTE) be appropriated to BOE – Agri-Science Capital Purchases
18. Board of Education ltr dated 7/29/2025 (received 8/6/2025) re: Request additional Impact Aid Funding (ASTE) be appropriated to BOE for Capital Projects
19. Retirement Board Action ltr dated 8/19/2025 re: Meeting of August 19, 2025
20. Ms. Ball email dated 8/21/2025 re: Proposed Draft Ordinance Establishing a Code of Ethics & Ethics Commission
21. Agricultural Commission ltr dated 8/27/2025 re: Clark Farm Lease – Majcher- Assist with Lease Process
22. Planning & Zoning Commission ltr 9/2/2025 re: Reappointment Recommendation Planning & Zoning Commission Members
23. Inland Wetland & Water Courses Commission-DTC ltr 9/2/2025 re: Reappointment Recommendation Planning & Zoning Commission Members & Move Alternate Member Thompson to Regular Member
24. Library Commission-DTC ltr 9/2/2025 re: Reappointment Recommendation Library Commission Members
25. Planning & Zoning Commission email dated 9/8/2025 re: Term Expiration Member Craig

OUT GOING CORRESPONDENCE

- 1 Admin Asst ltr to Mayor dated 7/10/2025 re: Action ltr. Town Council Regular Meeting of July 9, 2025
- 2 Admin Asst ltr to Mayor dated 7/12/2025 re: Action ltr. Town Council Special Meeting of July 23, 2025
- 3 Admin Asst ltr to Mayor dated 8/7/2025 re: Action ltr. Town Council Special Meeting of August 6, 2025- Election of New Town Council Chairman St. Vil
- 4 Admin Asst ltr to Mayor dated 8/7/2025 re: Action ltr. Town Council Special Meeting of August 6, 2025
- 5 Admin Asst ltr to Parad dated 8/7/2025 re: New Town Councilor – Welcome ltr
- 6 LTC Memo dated 7/9/2025 re: Request Recommendations – Sustainable CT Ad Hoc Committee
- 7 Chairman Rodriguez memo dated 7/10/2025 re: Chairman Pro-tem Saccone /Assignment of Duties July 11 – 13, 2025
- 8 LTC ltr to Mr. Ellingberg re: Response to email dated 7/10/2025 re: July 28, 2025 Referendum Question – Juliet W. Long School Heating Ventilation & Air Condition System (HVAC)
- 9 LTC ltr to Board of Education Finance Cmt Lamb re: Response to question at BOE Meeting Referendum Question – Juliet W. Long School Heating Ventilation & Air Condition System (HVAC)
- 10 Chairman Rodriguez ltr dated 7/28/2025 re: Resignation Town Council – Relocation to New Jersey.
- 11 Admin Asst ltr(s) to IWWC-DTC dated 8/5/2025 re: Request Reappointment Recommendation/Endorsement – Inland Wetland & Water Courses Commission Members
- 12 Admin Asst ltr(s) to Library-RTC-DTC dated 8/5/2025 re: Request Reappointment Recommendation/Endorsement – Library Commission Members
- 13 Admin Asst ltr to Planning & Zoning dated 8/5/2025 re: Request Reappointment Recommendation/Endorsement Planning & Zoning Commission Members
- 14 LTC ltr to Angelini dated 7/7/2025 re: Re-Appoint Angelini -Agricultural Commission
- 15 LTC ltr to Marelli dated 8/7/2025 re: Re-Appoint Marelli -Agricultural Commission
- 16 LTC ltr to dated 8/7/2025 re: Re-Appoint Yuhas -Agricultural Commission
- 17 LTC ltr to Martic dated 8/7/2025 re: Re-Appoint Martic (Alternate) -Agricultural Commission

- 18 LTC ltr to Bingham dated 8/7/2025 re: Appoint Bingham –(Alternate) Board of Assessment Appeals
- 19 LTC ltr to Philopena dated 8/7/2025 re: Appoint Philopena Board of Assessment Appeals
- 20 LTC ltr to Cherry dated 8/7/2025 re: Re-Appoint Cherry (Mayor’s Representative) South Eastern CT Water Authority (SCWA)
- 21 Chairman St. Vil memo dated 8/9/2025 re: Chairman Pro-tem Ryan /Assignment of Duties August 10 - 17, 2025
26. LUPPW Cmt ltr to Historic District Commission dated 8/25/2025 re: Spicer Homestead Ruins – Status of Work - Process for Historic Designation

NOTICE OF AGENDAS

1. Permanent Municipal Building Committee Agenda 8/4/2025; 9/8/2025
2. Housing Authority Agenda 7/7/2025 – Cancelled
3. Housing Authority Agenda 8/4/2025
4. Housing Authority Agenda 9/2/2025- Cancelled
5. Ledyard Beautification Cmt Agenda 8/5/2025; 9/2/2025
6. Economic Development Commission Agenda 8/5/2025; 9/2/2025
7. Inland Wetland & Water Courses Commission Agenda 8/5/2025; 9/2/2025
8. Farmers Market Committee Agenda 8/6/2025 Cancelled; 9.3/2025 - Cancelled
9. Conservation Commission Agenda 7/8/2025; 8/12/2025; 9/9/2025
10. America 250 Planning Cmt Agenda 7/8/2025; 8/12/2025; 9/9/2025
11. Planning & Zoning Agenda Sp. 7/31/2025; 8/14/2025; 9/11/2025
12. Parks, Recreation & Senior Citizens Agenda 7/15/2025; 8/19/2025
13. Agricultural Commission Agenda 7/15/2025; 8/19/2025
14. Retirement Board Agenda 7/15/2025 Cancelled
15. Retirement Board Agenda 8/19/2025
16. Zoning Board of Appeals 6/18/2025 Cancelled
17. Historic District Commission Agenda 7/21/2025; 8/18/2025
18. Library Commission Agenda 7/21/2025; 8/18/2025
19. Water Pollution Control Authority Agenda 7/22/2025; 8/26/2025
20. Finance Cmt Agenda 7/16/2025; 8/6/2025; Sp. Joint TC & BOE Agenda 8/20/2025
21. Finance Cmt Regular Agenda 8/20/2025 – Cancelled
22. LUPPW Cmt Agenda 8/4/2025
23. LUPPW Cmt Agenda 9/8/2025- Cancelled
24. Administration Cmt Sp. Agenda 8/6/2025; 9/10/2025
25. Administration Cmt Agenda 8/13/2025- Canceled
26. Community Relations Cmt for DEI Agenda 7/16/2025- Cancelled
27. Community Relations Cmt for DEI Agenda 8/20/2025
28. Town Council Agenda 7/23/2025 – Cancelled
29. Town Council Sp. Agenda 8/6/2025
30. Town Council 8/27/2025 - Cancelled
31. Town Council Agenda 9/10/2025

MINUTES

1. Permanent Municipal Building Committee Sp. Minutes 7/7/2025; 8/4/2025
2. Housing Authority Minutes 6/12/2025
3. Ledyard Beautification Cmt Minutes 7/1/2025; 8/5/2025
4. Economic Development Commission Minutes 7/1/2025; 8/5/2025
5. Inland Wetland & Water Courses Commission Minutes 7/1/2025; 8/5/2025
6. Conservation Commission Minutes 7/8/2025; 8/12/2025
7. America 250 Planning Cmt Minutes 7/8/2025; 8/12/2025
8. Planning & Zoning Minutes 7/10/2025; Sp. Mtg 7/31/2025; 8/14/2025
9. Parks, Recreation & Senior Citizens Minutes 6/17/2025; 7/15/2025
10. Agricultural Commission Minutes 6/17/2025; 7/15/2025
11. Retirement Board Minutes 6/16/2025
12. Historic District Commission Minutes 6/16/2025; 7/21/2025
13. Library Commission Minutes 6/16/2025; 7/21/2025
14. Water Pollution Control Authority Minutes 6/24/2025; 7/22/2025

15. Finance Cmt Minutes 7/16/2025; Sp. Joint TC & BOE Minutes 8/20/2025
16. LUPPW Cmt Minutes 7/7/2025
17. Administration Cmt Minutes 7/9/2025; Sp. Mtg 8/6/2025
18. Community Relations Cmt for DEI Minutes 6/18/2025
19. Town Council Sp. Exec Session Minutes 8/6/2025; Sp. Mtg 8/6/2026

MISCELLANEOUS

1. Ms. Berry email dated 7/15/2025 re: Mystic Watershed Presentation July 19 - 21, 2025
2. Department of Emergency Services Public Safety email dated 7/21/2025 – Presentation July 23, 2025
3. Dinner at the Bill Library 9/20/2025
4. Ledge Light Health District – Stephen Hill – September 25, 2025

REFERRALS

Administration Committee

1. Recommendation/Endorsement – Inland Wetland & Water Courses Commission Members
2. DTC Reappointment Recommendation dated 7/20/2025 re: Ledyard Beautification Committee
3. RTC Reappointment Recommendation dated 7/20/2025 re: Ledyard Beautification Committee

XI. COUNCIL SUB COMMITTEE, LIAISON REPORTS

Administration Committee

Councilor Buhle stated the Administration Committee met earlier this evening and in addition to forwarding several appointments and Job Description updates to the Town Council that the Committee also approved to forward a draft “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” and a recommendation to set a Public Hearing date to receive comments on the proposed Ordinance for September 24, 2025. She stated the Administration Committee received a lot of public comments regarding the proposed Ordinance.

Community Relations Committee for Diversity Equity & Inclusion

Councilor Brunelle stated the Community Relations Committee for Diversity, Equity & Inclusion next meeting would be held on September 17, 2025.

Finance Committee

Councilor Saccone stated the Finance Committee met on September 3, 2025 and have a number of items on tonight’s agenda.

Land Use/Planning/Public Works Committee

Chairman St. Vil stated the LUPPW Committee met on August 4, 2025 and addressed the following standing agenda items: (1) Evaluate the need for a Noise Ordinance based on a resident’s feedback. Chairman St. Vil stated after some consultation and utilizing/leveraging town resources with Police Chief John Rich, Land Use Director/Town Planner Elizabeth Burdick, and Public Works Director Steve Masalin, they seem to have corrected the issue; and therefore, there does not appear to be a need for any additional ordinances to mitigate noise

issues. Therefore, the LUPPW Committee retired this agenda item; (2) Spicer Homestead Ruins Historic Designation – Chairman St. Vil explained that the Historic District Commission was overseeing the initiative to seek a historic designation of the Spicer Homestead Ruins. He stated the LUPPW Committee issued a letter dated August 21, 2025 to the Historic District Commission to outline the next steps should the Historic District Commission decide to formally seek a historic designation of the area. He stated the LUPPW Committee looked forward to receiving the Historic District Commission’s feedback. He stated the LUPPW Committee also retired this standing agenda item, until they hear back from the Historic District Commission.

Conservation Commission

Councilor Barnes stated the Conservation Commission identified that there has been a series of some type of litter including human waste at the Kettle Hole Trail at Glacier Park. He noted that Conservation Commission Chairman Michael Marreili was present this evening and he questioned whether there was something they could do outside of this meeting to engage the Ledyard Police Department to provide some type of observation/surveillance of the environment. He stated this has been a problem in the past and that it has gotten worse in recent months.

Mayor Allyn, III, stated that they could address the matter outside of tonight's meeting, noting that another proposal for the Glacier Park Property would be coming forward in the not too distance future.

Permanent Municipal Building Committee

Councilor Brunelle stated the PMBC met on September 8, 2025. However, she stated she was not able to attend because she was attending another meeting, and she has not had a chance to look at the meeting video.

Social Services Board

Councilor Brunelle stated the Social Services Board has not met.

Public Safety-Emergency Services

Councilor Saccone stated recognizing Chief of Dispatch Paula Smith earlier this evening was a great honor. He stated the public does not realize what Emergency 911 Dispatcher go through in managing emergency calls for help. He stated many Emergency 911 Dispatcher suffer from Post Traumatic Brain Injury Disorder (PTSD) because of the things they hear over the telephone and radio calls. He stated that it was amazing that Ms. Smith has lasted for thirty-years, noting that studies indicate most Emergency 911 Dispatcher only stay in the job for about ten-years because of the stress of what they deal with every day. He congratulated Ms. Smith for her thirty-years of service at the Ledyard Emergency 911 Communications Center; and thanked her for her service.

Library Commission

Councilor Garcia-Irizarry stated the Library Commission met on August 18, 2025 and she reported on the following: (1) Hoopla was reinstated – Councilor Garcia-Irizarry explained that Hoopla was a digital service provided by public libraries that allows patrons to borrow and stream a wide variety of content, including eBooks, audiobooks, movies, music, and comics, for free using their library card. She stated due to limited funding for the program that the Library had discontinued offering Hoopla to its patrons. However, she stated that the *Friends of the Library* would be providing more funding to support Hoopla, which has enabled the Library to reinstate the program. However, she noted to make the funding last longer the Library would be limiting patrons to 3 Hoopla borrows per month instead of the previous 4 borrows; and (2) Library Consortium Study Group was Disbanded - Councilor Garcia-Irizarry stated the Study Group was set-up to evaluate whether Ledyard should stay with Libraries On Line (LION) or change to another Consortium. She explained that LION was a consortium of public and academic libraries in Connecticut that share technology, digital collections, and IT support which was designed to enhanced services to the Consortium members and to the Libraires patrons. She stated because LION's cost has been increasing, while services were decreasing that Library Consortium Study Group was formed to consider other options. However, she stated because the new Library Director was not familiar with all that has been going on the Study Group was disbanded with the plan to allow the new Director to come up-to-speed and get acquainted with everything; and then reestablish the Library Consortium Study Group at a later time.

Board of Education

Councilor Garcia-Irizarry stated the Board of Education met on September 9, 2025 and she reported on the following: (1) Enrollment was very close to Assistant Superintendent Hogston's projection for the 2025/2026 School year. The Middle School had about 14 more students than expected; (2) Next Generation Science Standards Test (NGSS) – Students were tested in Grades 5, 8, 11 for *At or Above Proficient*. Grade 5 Students improved from 55% to

63%; Grade 8 Students improved from 56% to 63%; and Grade 11 improved from 57% to 71%. Councilor Garcia-Irizarry noted the Grade 11 Students were in Grade 5 in 2022 which was coming out of the Covid Pandemic noting that the improvement was outstanding; (3) Standardized College Admissions Test (SAT) – 78% of Ledyard’s Juniors who took the SAT met or exceeded the college and career readiness benchmarks. Ledyard’s students outperformed the 58% State Average. The benchmark scores were as follows: Reading and Writing 480–800; and for Math 530–800;(4) Standardized Tests – The following results and comparisons were provided: English Language Arts (ELA) for the 2023-2024 School Year 18.5% of the students did not meet the benchmark; and for 2024/2026 that number was reduced to only 6.86% of the students did not meet the benchmark. The number of students that exceed the ELA benchmark for 2023-2024 was 12.14; and in 2024-2025 the number of students that exceed the benchmark was 21.14%. For Math the number of students that did not meet the benchmark in 2023-2024 was 26.59%; and in 2024-2025 it was 19.43%. The students that met or exceed the Math benchmark in 2023-2024 was 38% which exceed the 31% State Average. Councilor Garcia-Irizarry noted that Ledyard students test scores have improved, however, the Board of Education knows they still had work to do; (5) Board of Education Projected Fiscal Year 2024/2025 Budget Surplus \$213,446 – The Board of Education voted to move the \$213,466 surplus funds into their Capital Non-Recurring Fund to be used for Capital Projects; (6) Per Pupil Expenditure Calculation – The following expenses were included in Ledyard’s \$17,000 Per Pupil Expenditure Calculation: a portion of the Director of Finance’s Salary; a portion of the Treasurer’s Salary; Nursing Director Salary, Nurses Salaries, Nurses Aid Salaries, and many other things; (7) Adult Education \$52,000 - The State mandates that every town offer Adult Education for people to obtain their General Education Development (GED). Because Ledyard does not have an Adult Education Program they contract with Norwich for a costs of \$52,000 per year, whether one Ledyard student was enrolled or 20 students were enrolled; (8) Board of Education Meeting Time – The Board of Education agreed to change their meeting time to 6:00 p.m. and also made changes to their subcommittee meeting times.

Economic Development Commission

Councilor Buhle stated she was not able to attend the EDC’s September 2, 2025 meeting noting that she would provide a report at the Town Council’s September 24, 2025 meeting.

XII. MAYOR’S REPORT

Mayor Allyn, III, reported on the following: (1) Connecticut Main Street August 25, 2025 Meeting was held in Norwich – Mayor Allyn stated the Connecticut Main Street Group was commissioned by the State through Eversource Funding and tasked to visit all 169 Connecticut Towns to help them with some type of Main Street Development. He stated the proposal for Ledyard was “*Nature Place Making*” to emphasize the Thames River, Trail Connections and how to connect Trails to Town Centers to spur economic development; (2) Founders Preserve Property Conveyance to Avalonia Land Conservancy – Mayor Allyn stated at a Special Town Meeting that was held on October 28, 2020 the townspeople approved to transfer approximately 96.52 +/- acres (Founders Preserve) *located at* 332 (which was now 334) Colonel Ledyard Highway), to the Avalonia Land Conservancy to remain open to the public for passive recreation and to be protected in perpetuity under the Conservancy’s care. He stated because there were some boundary line issues that involved subdivision and resubdivision that it has taken years to get all that straightened out and clarified. The paperwork has been filed, and the property transfer was finalized; (3) Habitat for Humanity and Department of Housing Meeting – Mayor Allyn stated work continues on the proposal for 30-Housing Units on Colby Drive (see Town Council Minutes 5/19/2025; 6/4/2025 & Public Hearing Minutes 6/4/2025). He explained the driveway off Colonel Ledyard Highway to access the Salty Hefer Restaurant would become the continuation of Colby Drive, noting that it would break to the left and connect to the rest of Fairway Drive and Colby Drive. He stated

Habitat for Humanity had \$7 million of capital funding in-place to construct the infrastructure, noting that this was an 8-30g Subdivision; and expected to take five-years to complete the project; (4) Nuclear Safety Drill – September 4, 2025 – Mayor Allyn apologized to Chairman St. Vil for wasting his time in attending the Drill. Mayor Allyn stated that it was probably the one of worst and poorly executed Drills Ledyard had experienced. He explained during the 4-

hour Drill Ledyard only had one “inject” which was a partial lane closure on Route 12, Gales Ferry, which the Public Works department quickly resolved. He stated that he appreciated Chairman St. Vil attending the Nuclear Safety Drill and having an opportunity to see the Emergency Operations Center (EOC) located in the High School basement; (5) Southeastern Connecticut Enterprise Region (seCTer) Economic Development September 7, 2025 Meeting – Mayor Allyn stated he Chaired the meeting noting that CBIA Vice President (Connecticut Business Industry Association) Chris Davis presented the 2025 Connecticut Business Survey noting the following: 91% of responding business stated the cost of doing business in Connecticut was rising; 76% were having difficulty hiring; 27% cited the lack of skilled applicants hindered growth; followed by uncertainty of Legislative Action in the State; as well as high business taxes. Mayor Allyn stated that it was a lengthy Report and that he would email the document to anyone interested in reviewing the Report; (6) Emergency Planning & Preparedness Initiative (EPPI) Drill September 9, 2025 – Mayor Allyn the EPPI Drill ran much better than the September 4, 2025 Nuclear Safety Drill. He apologized to the residents living in the Highlands, noting that was the target involving a severe drought followed by a wild fire that conveyed from house to house to house and was followed by flooding from 5-10 inches of rain; (7) Connecticut Conference of Municipalities (CCM) Legislative Committee Meeting – Mayor Allyn stated the Legislative Committee has started their work for the 2026 Legislative Session. He explained 2026 would be a Short Session in Hartford because it was not a State Budget year; however, he stated that they would be working on a lot of Bills; (8) Southeastern Connecticut Council of Government (SCCOG) Legislative Committee Meeting – Mayor Allyn stated he Chaired the SCCOG Legislative Committee Meeting, noting that they were trying to partner with COST and CCM to get on the same page with the number of requests; (9) Open Space and Watershed Land Acquisition (OWSA) Grant - 154 Stoddards Wharf Road – Mayor Allyn stated the OWAS Grant was approved for Avalonia Land Conservancy to move forward with the acquisition of 154 Stoddards Wharf Road, which was a 36-acre parcel that was adjacent to other Avalonia Land Conservancy open space properties and potential to access the Tri-Town Trail. He noted at their November 13, 2024 meeting the Town Council authorized an allocation of \$80,000 from Account #210-101210-12101-58920 (Open Space Fund) to provide financial support to Avalonia Land Conservancy with the acquisition of 154 Stoddard’s Wharf Road. He noted Account #210-101210-12101-58920 (Open Space Fund) had a balance in the amount of \$535,000 minus the \$80,000, which would be released to Avalonia Land Conservancy at the time of closing on the property; (10) Trailer at 8 Rosemary Court- Mayor Allyn stated due to unsafe conditions the town removed the Trailer that was damaged from a fire that occurred in the middle of the night. He stated the Town has placed a Demolition Lien on the property, stating that the town would be made whole and the property was now a clean, safe condition; (11) Foreclosed on Blight Lien Colonel Ledyard Highway – Mayor Allyn stated the Town foreclosed on a Blight Lien for a property on Colonel Ledyard Highway. He provided some background explaining this process started in May, 2022, and the town provided the property owner many opportunities to address the heavy blight. He stated the property owner did not seem to address the matter; therefore, the town was waiting for the Court to approve the Sale that occurred on September 6, 2025.

Questions to the Mayor

Councilor Garica-Irizarry questioned whether anyone was living in the Blighted Property on Colonel Ledyard Highway. Mayor Allyn stated the owner does not occupy the property.

XIII. OLD BUSINESS – None.

XIV. NEW BUSINESS

- MOTION to Amend the Agenda to add
MOTION to set a Public Hearing (Hybrid Format - Video Conference and In-Person) Public Hearing date to be held on September 24, 2025 at 5:00 p.m. 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 And Ethics Commission*” .
Moved by Councilor Buhle, seconded by Councilor Garcia-Irizarry

VOTE: 6 – 3 Approved and so declared (Barnes, Dombrowski, Ryan not in favor)

RESULT:	APPROVED 6 - 3
MOVER:	Jessica Buhle, Town Councilor.
SECONDER:	Carmen Garcia-Irizarry, Town Councilor
AYES:	Brunelle, Buhle, Garcia-Irizarry, Parad, Saccone, St. Vil
NAYES:	Barnes, Dombrowski, Ryan

Chairman St. Vil announced that this would be added as Item #6 on tonight’s Agenda.

Finance Committee

1. Discussion and possible action on the
MOTION to appropriate \$3,634.21 to Account #21020301-57300-G0015 (Fire Marshall - New Equipment - State Grant).

In addition, authorize the expenditure of up to \$3,634.21 to purchase the Emergency Operations Center (EOC) Server Rack as part of the upgrades to Emergency Operations Center (EOC) .

The funding source for this project is the Town of Ledyard’s FY 2026 Nuclear Safety Emergency Program Funding Allocation.

Moved by Councilor Buhle, seconded by Councilor Ryan
Discussion: Administrator of Emergency Management/Fire Marshal Jim Mann explained that over the past few years Ledyard has been using the Nuclear Safety Emergency Program Funding (NESP) to upgrade the equipment at the Emergency Operations Center that was located in the lower level of the High School, which included the purchase of a new server. He stated about eight months ago a sewer line broke at the High School; noting they were lucky that it missed the new server by about two-feet. He stated that MIS Director Justin Dube strongly recommended that the EOC purchase a Server Cabinet to prevent the servers from getting damaged in the future. He stated that the Town would need to purchase the Server Cabinet and submit the paid invoice to the State to receive the grant funding reimbursement. He stated to date they have spent about \$10,000 from the Nuclear Safety Emergency Program Funding (NESP).

Mayor Allyn, III, stated for the 2025/2026 Fiscal Year that Ledyard was awarded \$22,500 from the Nuclear Safety Emergency Program Funding (NESP).

VOTE: 9 – 0 Approved and so declared

RESULT:	APPROVED 9 - 0
MOVER:	Jessica Buhle, Town Councilor
SECONDER:	Tim Ryan, Town Councilor
AYES:	Barnes, Brunelle, Buhle, Dombrowski, Garcia-Irizarry, Parad, Ryan, Saccone, St. Vil

2. MOTION to appropriate and transfer \$250,636 from Account #10188210-59300 (Transferred Funds) to Account #2250101-49002 (BOE CNR Transfers In)

In addition, appropriate \$250,636 to Account #22570101-58261 (BOE CNR Ag-Science).

Ledyard Public Schools ASTE revenue/VoAgtuition 1017002-42018/47010 FY2025			
Date	Received by Town of Ledyard	Town of Ledyard Budgeted Revenue	Variance
7/17/2024	377,163		
10/9/2024	377,163		
1/6/2025	377,163		
4/7/2025	377,163		
Total ASTE receipts	1,508,652	850,000	658,652
Total VoAg tuition	356,160	764,176	-408,016
	1,864,812	1,614,176	250,636

ASTE 2025				
Item	Description	Educational Value to Students/Purpose	Estimate	Vendor
Blue Ridge Ergonomics Stool	7 stools for in the Small Animal Lab for at the veterinary counter (currently do not have any seating)	Will allow students to sit at the counter when performing laboratories, rather than standing. Sitting can be more comfortable for extended microscope	<u>\$1,500.00</u>	Global Industrial
Outdoor rabbit enclosures	3 dog kennels to be adapted for rabbit use.	Will provide a secure environment for rabbits to be housed outside, protected from predators and weather elements.	<u>\$6,150.00</u>	Backyard Discovery
Hardware cloth	2 rolls of hardware cloth to line rabbit enclosures.	Further predator proof the exterior rabbit enclosures.	<u>\$300.00</u>	Amazon
Roof over outdoor rabbit area	Roof structure over exterior rabbit area.	Roof will provide protection from weather elements for students to properly maintain an outdoor rabbit area that will be inhabited all seasons	<u>\$18,000.00</u>	Vendor Quote - Upside Innovations
Rabbit & Guinea Pig Agility Equipment	Rabbit agility starter kit, additional jumps for hopping contests, guinea pig agility starter equipment	Students in the Animal Behavior & Training class always teach a variety of skills to these two species, these sets are professionally made to match the	<u>\$805.55</u>	Adventure Bunny Hopping & Agility
Tables & Chairs	New tables and chairs for the small animal classroom	Provides students with flexible seating and sturdier tables	<u>\$3,995.88</u>	School Specialty
Canine CPR Trainer	CPR Dog allows students to practice proper CPR techniques	Replacement for our current dog which pre-dates my employment in Ledyard and is falling apart beyond repair. This mannequin is critical to reinforce the	<u>\$2,750.00</u>	Reality Works
Squeekmus Rat Mannikin from Avantor	Mannikins that simulate blood draws, ear notching, etc. in the laboratory animal setting to support new course	Supports hands-on laboratory activities in Laboratory Animal Science class allowing students to practice essential industry skills	<u>\$4,225.00</u>	Avantor
Kennel/Dog Guillotine Dog Door	Additional guillotine dog door with lift mechanism to put in right side kennel	Only want this if it is also possible to fence off part of the concrete (working on quote) to allow use of indoor/outdoor area to keep groups of daycare dogs separated.	<u>\$400.00</u>	Moore Pet Supplies
Kennel/Dog Guillotine Dog Door Install	Masonry work to install the dog access door	Only want this if it is also possible to fence off part of the concrete (working on quote) to allow use of indoor/outdoor area to keep groups of daycare dogs separated.	<u>\$1,600.00</u>	Vendor Quote - Upside Innovations
Fence off additional dog run	160" chain link fence, 4 foot high, w/ gate to further divided exterior space for multiple dog groups	Only want this if it is also possible to fence off part of the concrete (working on quote) to allow use of indoor/outdoor area to keep groups of daycare dogs separated. price includes rabbit area fencing and gate and gates	<u>\$9,325.00</u>	Luther Fence
Shades for windows in cat/rabbit room	Shades to cover windows in rabbit/cat room to keep room cooler during hotter months and block out night time exterior lighting.	Facility improvement for temperature and light regulation in animal housing area, exhibiting proper animal management standards.	<u>\$700.00</u>	Alpha Aero Draperies
Reef Aquarium Supplies and Upgrades	Reef Aquariums supplies to advance our reef system to the next stage. Upgrades include improved lighting, filtration and testing equipment	Water testing and analysis, control and adjustments of chemicals and nutrients, algae control, coral growth and reproduction, aquatic organism health, filtration management	<u>\$4,415.00</u>	Wet Pets
Fish Processing and Cooking Supplies	Equipment for processing, storing and cooking fish	Students will participate in the 'farm to fork' process. Students will safely and efficiently process, store and cook our Tilapia, Catfish and Trout.	<u>\$572.71</u>	Amazon
Fishing Supplies and Materials	Outdoor recreation equipment.	Students will experience different methods of fish capture.	<u>\$2,082.82</u>	Amazon
4 sets - 61 in. W x 23 in D Heavy Duty 15-Drawer Mobile Workbench with Mechanics Tool Set (290-Piece)	290 Piece tool set with rolling storage chest.	Tools with rolling tool storage will allow students to easily access and securely store tools when working anywhere in the shop.	<u>\$4,992.00</u>	HomeDepot
2 sets - Husky Rolling Tool Chest Combo	2 Rolling tool storage carts	Rolling tool storage will accomodate existing tools while allowing students to easily access and securely store tools and small parts when working anywhere in the shop.	<u>\$2,196.00</u>	HomeDepot
Millermatic 255 MIG Welding Machine w/ EZ Latch cart 951766	MIG welding machine - Upgrade to existing MIG machines which, while functional, are antiquated (1990's tech), lack features and require maintenance.	MIG welding is a common industrial practice. Students interested in metal fabrication benefit from familiarity with and skill in using this technology. This is the same model welder used in the metals shop.	<u>\$4,633</u>	Airgas Waterford
Miller® 300 Amp .030" - 1/16" XR-Aluma-Pro™ MIG Gun With 15' Cable 301568	Push-pull gun to be used with the Millermatic 255 for MIG welding aluminum.	Students will learn to use push-pull welding guns, which are industry-standard for welding aluminum with MIG	<u>\$3,611.00</u>	Airgas Waterford
4 Sets Stihl KMA 135 R power head , each with 2 batteries, charger and Stihl FS-KM Liine trimmer head	Electric power head, battery and charger for the Stihl Kombi system	This will allow up to 4 students to simultaneously practice string trimmer operation or use any of our existing Kombi System attachments with battery power	<u>\$2,967.84</u>	Gano's Colchester CT
Qidi Plus4 3D Printer	Large volume 3-D printer	Expand ability to perform 3-D prints as student interest increases. Currently only one print can be made at a time and may take many hours. Staying with a Qidi product will facilitate using the same software across platforms	<u>\$769.00</u>	Amazon
Jet Model IBG-8 Bench Grinder with light and pedestal stand	Bench grinder and stand for shaping metal	To replace existing antiquated pedestal grinder used for shaping metal in metal fabrication class.	<u>\$918.99</u>	Amazon

Refrigeration	Designated refrigeration unit for greenhouse produce and fish	As part food processing and preservation, students will use the refrigerator to package and store products for display, sale or consumption.	\$2,620.69	Home Depot
Waders	Waterproof chest waders - We use these on our stocking and collection field trips. A leaking wader is counterproductive and 10 out of our 12 pairs of waders leak. Like me, they are old and tired.	Assisting the state with distribution of trout in Trout Management Areas by live cart release. We also collect aquatic organisms for research and identification from areas such as Bluff Point and Sawmill Pond.	\$1,359.76	Amazon
Aquaculture Pump, Air Pumps and Chiller Replacements	Replacement pumps, aeration devices and chillers for our lab recirculating systems. The current equipment is approaching life expectancy.	Growth and reproduction of warm water and coldwater aquaculture species.	\$10,409.19	Pentair
Greenhouse Supplies	Testing equipment, germination equipment and curtain installation	Seed germination and protection in an aquaponics greenhouse.	\$1,434.99	Farmtek
Laminar Flow Hood	Laminar Flow Hood for aseptic technique, plant tissue culture and sterile media prep	This provides students the opportunity to learn and practice aseptic technique common in biological and biotech industries.	\$729.00	Amazon
3 Pieces - Uline 72"x 48" steel assembly table	Replace existing welding tables which are damaged after many years of welding on them.	Level and smooth working surfaces facilitate student learning of welding technique.	\$1,830.00	Uline
12 pcs. Radnor Blue Vinyl Welding Curtain 6 x 8	Transparent Blue welding curtains to replace worn and torn existing curtains in the welding area	New curtains will increase safety of students in the welding area while allowing better supervision than is possible with the current opaque curtains.	\$754.56	Airgas Waterford
Fruit bushes and plants	strawberries, black berries, raspberries and blue berries	Allows students to expand their knowledge of different crop growths	\$705	Johnny's Selected Seeds
Indoor dwarf fruiting trees	a variety of tropical and unique fruiting shrubs	Allows students to expand their knowledge of crops they are growing and also allows students to be able to grow	\$511.45	Logees
Greenhouse update	Greenhouse electrical update. \$30,000 was approved in the 2022-23 ASTE Purchases, but this transaction was not completed before a major price increase.	This was previously approved in the 2022-2023 ASTE purchases. This is an updated quote showing the cost increases since this was originally quoted. Current greenhouses have a lot of electrical issues and replacement parts are no longer available. Shades don't close automatically and one greenhouse no longer has the time to run the greenhouse controls.	\$45,925	Griffin/Bever Electric
VEVOR Aluminum Truck, 2 in 1	Hand truck / dolly for moving heavy objects	Permits students to safely move heavy objects within the shop area and the department	\$142.50	Amazon
Mojack Riding Lawn Mower Lift	For lifting lawn tractors up for blade changes and maintenance	Provides the opportunity to practice landscape equipment maintenance.	\$300.00	Amazon
ARCAN Tools 3-Ton Quick Rise Aluminum Floor Jack with Dual Pump Pistons & Reinforced Lifting Arm (A20018_A20019)	Low Profile floor jack	Permits students to safely lift heavy pieces of equipment for maintenance	\$316.49	Amazon
Powermatic 1Hp Mortising Machine with table and bits	Mortising machine with table and bits for making mortises in wood	Facilitates making mortise and tenon joints to hold together table legs, beams, etc....	\$1,364	Amazon
Tables & Chairs	New tables and chairs for the Livestock classroom	Provides students with flexible seating and sturdier tables	\$3,641.76	School Specialty
Hay Storage	Provides for a large quantity of hay storage. Metal with a concrete floor	Provides animals with appropriate nutrition while being able to store the hay out of the barn to prevent fire hazards.	\$22,000	Vendor Quote
Livestock Learning Lab Kits	Horse, Beef & Poultry Learning Lab Kits	Supports all livestock classes for all grades to learn about managing livestock, breed characteristics, veterinary skills and management practices.	\$2,837.00	Ohio 4-H Youth Development
Sheep & Goat Show Equipment	Sheep & Goat Stands, Mineral Feeders	Supports the students as they prepare the animals for show. More students can be actively working when we have more sheep/goat stands.	\$2,845	Sydell
Updated Promotional Materials	Includes up to date signage to replace what is currently in and around our department	Supports educating about our program outside of learning within our classroom	\$6,268	Fast Signs

Food Science Items	Refrigerator	Supports our Food Science Curriculum	<u>\$775</u>	Amazon
Veterinary & Grooming Supplies	A variety of veterinary and grooming supplies for all classes of livestock	Supports keep the animals safe and healthy	<u>\$3,631.90</u>	Premier 1
Official FFA Dress	Includes 15 jackets, scarfs and ties	Supports students attending FFA events by utilizing Chapter owned jackets so they can participate without worrying about financial struggles to purchase their own	<u>\$1,385</u>	National FFA Organization
Official FFA Dress	Include dress skirts, pants, shirts and nylons	Supports students attending FFA events by utilizing Chapter owned pants, skirts and tops so they can participate without worrying about financial struggles to purchase their own	<u>\$3,504</u>	Amazon
Livestock Gates	2 Kidding panel gates and 2 galvanized gates	To add movement between the outdoor animal pens from each pen as well as extra enclosure to the barn	<u>\$866</u>	Shagbark
Duck Shelter	Duck Shelter and Run	To provide housing for a flock of ducks	<u>\$3,135</u>	Flemings Feed Store
CVA Manuals	20 Certification in Veterinary Assisting Manuals (equals 30 total so each teacher has enough for 15/class)	With Manzi & O'Keefe running concurrent Veterinary Science Courses we need more CVA manuals for students to use.	<u>\$3,474</u>	Texas Veterinary Medical Association
Cold Frame	Expanding the types of plants my students are able to grow and learn about. Introducing fruiting bushes and plants such as blueberries, strawberries, blackberries and raspberries.	another means to growing crops and flowers. Allows students to work with another type of greenhouse. Students will learn how to extend growing seasons and grow flowers for	<u>\$3,655</u>	Farmers Friend

Greenhouse Update Electrical	The cost to install the electrical update for the greenhouses.	Students will be able to learn how to use the greenhouses with the updated equipment in the 25-26 school year.	\$15,000	Beaver Electric
mulch	weed barrier	Mulch for the various areas around Ag4, new cold frame and berry patch	<u>\$1,920</u>	EA Quinn
Fishing materials	a variety of fishing equipment	Students in Natural Resource products and Outdoor recreation will be able to practice learn and practice a skill that is currently only discussed in these courses	\$750	
Water containment wall in boiler room		Prevent boiler water or pump leaks from flowing into the carpeted area in the media center.	\$10,000	
Add requested Cameras		Add additional camera to the middle of the east west hall and camera to cover the student restroom entrances.	\$3,040	
New white board and installation of new projectors in Ag classrooms	Includes new white boards projector installation with ceiling speakers same set up at the regular classrooms.	Add new white boards and install the nes projectors purchased by the town with ARPA funds	\$15,000	
TOTAL			\$249,039.71	

Moved by Councilor Saccone seconded by Councilor Buhle
Discussion: Councilor Saccone noted the Board of Education’s letter dated July 29, 2025 and received on August 6, 2025 included a list of capital items that the ASTE Grant Funding would be used to purchase.

Councilor Barnes questioned whether there was anything in the budget that the town provided in the Agri-Science (Vo-Ag) Program that they would not have provided for if they had been aware of these additional funds coming in.

Councilor Buhle stated during the Fiscal Year 2024/2025 Budget year the State changed the funding stream for Agri- Science (Vo-Ag) Program explaining the Vo-Ag Program had been primarily funded by the tuition collected from other towns sending students to Ledyard’s Vo-Ag Program. However, she went on to explain that the State removed them from a Tuition-Based system to relying on State Grant funding. Therefore, she stated the Agri-Science (Vo-Ag) Grant funding for Fiscal Year 2024/2025 was well above the amount that was budgeted, and the Tuition was below the amount that was budgeted; however, there was still a delta of \$250,636. Therefore, she stated the Board of Education has requested the additional Agri-Science (Vo-Ag) Grant Funding be allocated to their Capital Non-Recurring Account to make purchases for the Agri-Science Program. She went on to note in the Fiscal Year 2025/2026 Budget that Agri-Science Grant Revenue and Tuition should be more in-line with what the town would be receiving. Therefore, she stated now that they town has made the adjustment from the Agri-Science being Tuition based to State Funding going forward that she did not think they would see a \$250,000 surplus in Agri-Science Grant Funding again, unless the State makes additional changes to the funding stream for the Agri-Science Program.

Councilor Dombrowski stated the Board of Education’s request to use the additional Agri-Science Grant Funding for Capital Items for Program was not unusual. He explained that rather than use the additional funding toward on-going recurring operating expenses for the Agri-Science Program, that each year the Board of Education submits a list of the capital items that they would purchase using the additional grant funding to support the Agri-Science Program.

Councilor Buhle noted that the Board of Education’s July 29, 2025 letter included a secondary request for the use of additional Impact Aid funding. However, she stated the Finance Committee has not moved that request forward yet.

Councilor Garcia-Irizarry stated that the Board of Education provides conservative revenues projections for grants from the State and Federal Government in preparing the annual budget, because if the grant funding comes in lower than projected they have to figure out where they were going to get the money to fund those things. She stated a lot of the stuff the Board of Education was using the ASTE Funding for were things that they need; and that those items would not be in the next year’s budget.

Councilor Ryan stated during their September 3, 2025 meeting the Finance Committee discussed the need for more accurate budgeting. He stated had they known that the Agricultural Science Technology Education (ASTE) Grant was going to come in \$250,636 higher that it could have been used to lessen the tax burden. He stated he was not implying that there was anything nefarious about this; and that they would always take additional money from the State, stating additional funding from the State was a good thing.

Councilor Ryan continued by noting that the Finance Committee also discussed the need to look at the trends from the last few budget cycles with regard to the Budgeted Revenues versus the Actual Revenues Received. He stated in most cases they have seen that they were within a few percentage points, maybe less than 10%. However, he stated that this amount may be more than that. He stated that the data may point to a formula to try to more accurately project their revenues. However, he stated more importantly, the Finance Committee also talked about engaging more with their State Legislators to make them understand that when these formulas were changing, or when the structure of the guidelines were changing for how the revenue was being divided up for municipalities; that the town needed to be kept *in the know*, so that they could have the most accurate budget numbers as possible. He stated that he understands that the State’s structural change for the ASTE Program funding was not approved until after Ledyard’s budget cycle was completed. However, he stated that their State Legislators could have at least filled them in, noting that they knew the change was coming. He stated although the change had not been approved at the State level, that their State Legislators probably had a good idea that it was going to be approved. He stated that it would help their taxpayers if the town had more accurate revenue numbers. He stated that he looked forward to continuing this discussion in at the Finance Committee meetings.

Councilor Dombrowski stated to Councilor Ryan’s point, although the town would have an estimate of the State Revenues to the town; that they do not really know what they would be receiving from the State. He stated because of the timing for the budget approval process that there were years when the town had to pass a budget without knowing what State funding they would be receiving, because the State Legislature had not finished their work at time of the Town’s Annual Budget Referendum.

VOTE: 9 – 0 Approved and so declared

RESULT:	APPROVED 9 - 0
MOVER:	Tony Saccone, Town Councilor
SECONDER:	Jessica Buhle, Town Councilor
AYES:	Barnes, Brunelle, Buhle, Dombrowski, Garcia-Irizarry, Parad, Ryan, Saccone, St. Vil

- 3. MOTION to authorize the expenditure of up to \$25,000 from account #21090305-58915 CNR Undesignated to hire a consultant to assist with cost segregation analysis and form 990-T filings in order to secure investment tax credits available under IRC section 6417.

In addition, upon receipt of said tax credit, restore funding in the same amount to the Undesignated line in CNR.

Moved by Councilor Ryan, seconded by Councilor Buhle

Discussion: Councilor Saccone explained that Federal Form 999 was for tax exempt organizations such as the Town, Volunteer Fire Companies, etc. He stated in 2022 the law was changed to allow tax exempt organization to apply for and receive tax credits, known as a “Direct Payment” on things that they did not pay taxes on at the time they purchase the items, such as the Solar Array Panels that were being installed on the School Roofs.

Mayor Allyn provided additional background stating the town’s Auditor CliftonLarsonAllen, LLP., recommended that Ledyard conduct a *Cost Segregation Analysis for the Solar Arrays* on the School Buildings to receive tax credits which would cover the 38% of the non-reimbursable portion from the State Grant funding for the cost of the Solar Array Panels. He stated the town would receive about \$500,000 from the tax credits “*Direct Payment*”, which they would use to lower the amount of money the town would need to borrow in their final financing for the School Projects.

Councilor Saccone stated that some of these tax programs were sunseting and that the town believed that they could make the timeframe to apply and receive the Direct Payment. Mayor Allyn explained that one of the most recent Federal Laws included a requirement that the Solar Panels had to be made in the United States. He stated work was completed and would meet the requirements for one of the Schools. However, he stated the Gales Ferry School has had on-going issues with the roof installation and related work. Therefore, he stated it remained to be seen if they could even source the Solar Array Pannels in the United States to get that project done. He stated even with only having one of the Schools qualify that they would receive \$250,000 in the Direct Payment, which they would use to lower the amount of money the town would need to borrow in their final long-term financing for the School Projects, which would help to lessen the town’s 20-year bond burden.

VOTE: 9 – 0 Approved and so declared

RESULT:	APPROVED 9 - 0
MOVER:	Tim Ryan, Town Councilor
SECONDER:	Jessica Buhle, Town Councilor
AYES:	Barnes, Brunelle, Buhle, Dombrowski, Garcia-Irizarry, Parad, Ryan, Saccone, St. Vil

4. MOTION to grant a Bid Waiver to Wastewater Services Inc., DBA *Skips Wastewater Service* due to receiving fewer than the required three bids in response to Bid #2026-01 (Thickened Sludge Solids Removal) in accordance with Ordinance #200-001 (rev 1) “*An Ordinance for Purchasing*”
Moved by Councilor Buhle, seconded by Councilor Saccone
Discussion: Councilor Saccone explained the process for the Rotary Drum Thickener at the Wastewater Facility on Town Farm Road. He stated that periodically the Thickened Sludge Solids have to be removed from the Rotary Drum to continue to operate the facility . He stated the Water Pollution Control Authority solicited bids for this work; however, only two bids were received, noting that Wastewater Services Inc., DBA Skips Wastewater Service was the low bid.

Councilor Barnes questioned the amount of the contract. Mayor Allyn, III, explained that the cost was on a per ton basis. Chairman St. Vil noted that Wastewater Services Inc., bid came in as follows: Year 1- \$800.00 per ton; Year 2- \$880.00 per ton; and Year 3- \$968.00 per ton.

VOTE: 9 – 0 Approved and so declared

RESULT:	APPROVED 9 - 0
MOVER:	Jessical Buhle, Town Councilor
SECONDER:	Tony Saccone, Town Councilor
AYES:	Barnes, Brunelle, Buhle, Dombrowski, Garcia-Irizarry, Parad, Ryan, Saccone, St. Vil

5. MOTION to appropriate up-to \$1,500 from Account #21090305-58920 (CNR Acquisition of Open Space); and authorize the Mayor to hire a professional firm to appraise 480R Shewville Road.
Moved by Councilor Saccone, seconded by Councilor Buhle
Discussion: Mayor Allyn, III, explained in 1994 the town purchased an 11-acre parcel and constructed the Loftus Well Field on Shewville Road when the town created its own public water system to supply water to the Highlands area, when their wells dried up. He stated in 2017after the town connected to Groton Utilities Water Supply the Lofts Wellfield was abandoned, the 1,500 square foot steel building they built on the property was cleaned out, and the wells were filled in.

Mayor Allyn went on to explain when the town purchased the property in 1994 from the Loftus Family it included deed restrictions, noting that the property could only be used for a water supply, storage tank, and related infrastructure. Therefore, he stated because the town cannot use the surplus property for any other purpose, that he would like to obtain a professional appraisal of the property to understand the value of the parcel, should the Town Council authorize him to offer the property for sale.

Councilor Saccone questioned whether there has been any conversations with Groton Utilities about maintaining the Loftus Wellfield as a backup water supply. Mayor Allyn stated because the wells have been filled in they no longer exist. However, he stated that Groton Utilities had more than a trillion gallons of water supply in the reservoir; and they have never had an issue. He also noted that Groton Utilities has been continuing to expand the reservoir off of Buddington Road to grow their surface supply.

Councilor Dombrowski stated in 2011 the Water Pollution Control Authority identified that the Loftus Wells were in danger of collapsing, which was when they began to negotiate with Groton Utilities to consider options for a long-term water supply for the Highlands area. He stated in 2017 when the Water Pollution Control Authority tied into the Groton Unities system they discussed the other uses such as using the Loftus property for a water bottling plant, however, he stated because of the deed limitations they were unable to do anything they could think of to use the property. He stated the property served its purpose during the 1990’s; however, he stated because of the deed limitations; and because the parcel was landlocked, that the property no longer served to benefit to the town, and therefore, he stated the town should get rid of the property.

Councilor Buhle stated during the Finance Committee’s September 3, 2025 meeting they discussed that the way the property was divided, it would not be a permitted subdivision at this point for zoning purposes. Therefore, she questioned whether it was fair to say that the only party that would be interested in buying the 11-acre parcel was the original owner; and whether that would restrict the town’s ability to sell the property at market value.

Mayor Allyn responded to Councilor Buhle’s question, stating that it could. However, he stated that they had an obligation to determine the market value of the property, per the appraiser, and that hopefully they could negotiate from there.

Chairman St. Vil questioned how the town acquired the Loftus Well Field property. Mayor Allyn stated that it was a direct purchase in which the town bought the 11-acre parcel for \$275,000 and then built the steel building. He stated the total investment was about \$500,000 - \$600,000 in the property.

VOTE: 9 – 0 Approved and so declared

RESULT:	APPROVED 9 - 0
MOVER:	Tony Saccone, Town Councilor
SECONDER:	Jessica Buhle, Town Councilor
AYES:	Barnes, Brunelle, Buhle, Dombrowski, Garcia-Irizarry, Parad, Ryan, Saccone, St. Vil

6. MOTION to set a Public Hearing (Hybrid Format - Video Conference and In-Person) Public Hearing date to be held on September 24, 2025 at 5:00 p.m. 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 And Ethics Commission*” .
Moved by Councilor Buhle, seconded by Councilor Garcia-Irizarry
Discussion: 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.

VOTE: 6 – 3 Approved and so declared (Barnes, Dombrowski, Ryan not in favor)

RESULT:	APPROVED 6 - 3
MOVER:	Jessica Buhle, Town Councilor.
SECONDER:	Carmen Garcia-Irizarry, Town Councilor
AYES:	Brunelle, Buhle, Garcia-Irizarry, Parad, Saccone, St. Vil
NAYES:	Barnes, Dombrowski, Ryan

XV. ADJOURNMENT

VOTE: Councilor Buhle, moved to adjourn, seconded by Councilor Brunelle.
9 - 0 Approved and so declared. The meeting adjourned at 8:37 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 September 10, 2025.

Gary St. Vil, Chairman



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

5:00 PM; SEPTEMBER 24, 2025

- I. CALL TO ORDER – Chairman St. Vil called to order the Public Hearing at 5:00 p.m. regarding a proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission*” as presented in the draft dated September 10, 2025.

- 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*” noting that they would be called upon during the Public Comment portion of tonight’s meeting.

Chairman St. Vil stated they should all appreciate their differences in perspectives and viewpoint; and therefore, he asked that they all respect one another as they express their viewpoints this evening. He stated if something was out of bounds, that he would preempt it.

- 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, September 24, 2025 at 5:00 p.m.
to receive comments/recommendations regarding a Proposed

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

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

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

Please join the video conference meeting from your computer, tablet, or smartphone at:

<https://us06web.zoom.us/j/86939760385?pwd=DHa2p2bE3BeJWMNbr1HqRBmGzO5CxR.1>

or by audio only dial: +1 646 558 8656 Meeting ID: 869 3976 0385; Passcode: 723306

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 11th day of September, 2025.

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

Please Publish on Monday, September 15, 2025

V. PRESENTATIONS

Chairman St. Vil called upon Councilor Buhle to present the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission*” as contained in the draft dated September 10, 2025.

DRAFT: 9/10/2025

Ordinance # XXX-XXX

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, and Town employees be independent, impartial, and responsible to the people; that governmental decisions and policies be made in the proper channels of governmental structure; that public office and employment not be used for personal gain; and that the public has confidence in the integrity of its government.

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

Section 3. Applicability

The Code of Ethics shall apply to all Town officials, including members of the Board of Education, and all Town and Board of Education employees.

Section 4. Definitions

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

1. “*Complainant*” means any person who signs a complaint under penalties of false statement alleging a violation of this Code.
2. “*Confidential Information*” means information acquired by a Town official or Town employee 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.
3. “*Financial Interest*” means:
 - a. any interest that has a monetary value of more than one hundred dollars (\$100.00) in any calendar year and is not common to the other citizens of the Town;
 - b. pecuniary or material benefit accruing to a Town official or Town employee, spouse or minor child of an official or employee of the Town as a result of a contract, transaction, zoning decision or other matter which is, or may be, the subject of an official act or action by or with the Town of Ledyard except for such contracts of transactions which by their terms and by the substance of their provisions confer the opportunity and right to realize the accrual of similar benefits to all persons and/or property similarly situated;
 - c. shall be deemed to exist if any Town official, Town employee, immediate family of a Town official or employee might, directly or indirectly, derive financial gain or suffer loss from any purchase, contract, transaction, zoning decision, or other matter involving any such Town office, board, commission, authority or committee, and shall also be deemed to exist if a business or professional enterprise in which the Town official or employee has any financial interest as owner, member, partner, officer, employee or stockholder or has any other form of participation which will be affected by the outcome of the matter under consideration.
4. “*Gift*” means anything of economic value in excess of one hundred dollars (\$100.00), including but not limited to entertainment, food, beverage, travel, and lodging. A gift does not include:
 - a. A political contribution that is otherwise reported in accordance with the law.
 - b. Services provided by persons volunteering their time.
 - c. A commercially reasonable loan that is made on terms not more favorable than loans made in the ordinary course of business.
 - d. A gift received from a member of a person’s immediate family or fiancé.
 - e. Goods or services which are provided to the municipality and facilitate government actions or functions.
 - f. A certificate, plaque, or other ceremonial award.
 - g. A rebate or discount on the price of anything of value made in the ordinary course of business, without regard to that person’s status.
 - h. Printed or recorded information germane to municipal action or functions.
 - i. An honorary degree.
 - j. Costs associated with attending a conference or business meeting and/or the registration or entrance fee to attend such conference or business meeting in which the Town official or Town employee participates in his or her official capacity.
 - k. Any gift provided to a Town Official or Town Employee or to an immediate 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.

5. *“Immediate family”* means spouse, fiancé, child, parent, grandchild, brother, sister, grandparent, niece, nephew, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, brother-in-law, or anyone living in the same household.
6. *“Respondent”* means any person accused of violating this Code.
7. *“Town Official”* means any person holding elective or appointive office in the government of the Town, including members of the Board of Education.
8. *“Town Employee”* means any person receiving a salary, wages, or stipend from the Town or the Board of Education for services rendered, whether full-time or part-time.

Section 5. Conflict of Interest Provisions

1. A Town official, Town employee, or any member of his or her immediate family shall not engage in or participate in any business or transaction, nor have an interest, direct or indirect, which is incompatible with the proper discharge of that person or persons’ independent judgement or action in the performance of that person or persons’ official duties.
2. A Town official or any member of his or her immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment or contractual services furnished to or used by the board, agency or commission of which that person is an elected or appointed member.
3. A Town employee or any member of his or her immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment, or contractual services that is within the purview of such Town employee.
4. The Mayor of the Town of Ledyard and members of the Town Council of the Town of Ledyard, members of the Board of Education of the Town of Ledyard, and any members of their immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment, or contractual services furnished to or used by the Town of Ledyard.
5. A Town official or employee shall refrain from voting upon or otherwise participating in any matter on behalf of the municipality if he or she, a member of his or her immediate family, or a business with which the person is associated has a financial or personal interest in the transaction or contract, including but not limited to the sale of real state, material, supplies, or services to the municipality. If such participation is within the scope of the Town official’s or Town employee’s responsibility, he or she shall be required to provide written disclosure, that sets forth in detail the nature and extent of such interest.
6. A Town official or Town employee shall not accept or receive, directly or indirectly, from any person or business to which any contract or purchase order may be awarded by the Town of Ledyard or any of its boards, agencies, or commissions any money, rebate, or gifts, or any promise, obligation, or contract for future reward or compensation.
7. No Town officials or employees shall accept a gift or engage in private employment or render services when the gift, employment, or services are incompatible with the proper discharge of the official duties of the Town official or Town employee, or could tend to impair independence of judgement or action by the Town official or Town employee, in the performance of his or her official duties. If a prohibited gift is offered to a Town official or a Town employee, he or she shall refuse it, return it, or pay the donor the market value of the gift.
8. To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of this Code, a Town official or a Town employee, not otherwise restrained by the Code, shall exercise care when appearing before other Agencies and shall disclose whether he or she is appearing in his or her official capacity or as a private citizen.
9. A Town official or employee who have a financial or personal interest in any transactions or contract with the Town, including but not limited to the sale of real estate, materials, supplies, or services to the Town, on which that person or persons may be called upon to act in that persons official capacity shall not vote or otherwise participate in the transaction on behalf of the Town. The Town official or employee shall declare on the record that he or she has or have a conflict of interest.

10. No Town official or Town employee shall solicit or accept a gift from any person or business entity which is interested directly or indirectly in any business transaction or pending matter that is within the purview of such Town official or Town employee.
11. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials, or property for personal convenience or profit.
12. No Town official or Town employee shall disclose or use confidential information acquired in the course of and by reason of his or her official duties for personal or financial gain or for the personal or financial gain of a member of his or her immediate family.
13. No Town official or Town employee may directly hire or supervise a member of his or her immediate family or participate in influencing the appointment or hiring of his or her immediate family.
14. No former Town official shall represent anyone before any Town agency, board, commission, council, or committee in which he or she was formerly an elected or appointed member for a period of one (1) year following the end of such former member's service on such agency, board, commission, council, or committee.
15. No former Town employee shall represent anyone before any Town agency or department for which he or she was formerly employed for a period of one (1) year following the end of such former employee's employment with the Town.

Section 6. Disclosure of Interests Required

1. Any Town official or Town employee who has a private financial interest in any action, legislative or otherwise, by any Town agency and who is a member of, participates in discussion with or give an official opinion to such Town agency shall disclose on the written records of such agency the true nature and extent of such interest. This section shall not apply to:
 - a. Contracts awarded to the lowest responsible bidder after public advertisement.
 - b. Unpaid appointed officials during a declared state of emergency.
 - c. Matters requiring disclosure to or approval by a court.
 - d. The Town Attorney, Town Engineer, or similar Official, who is participating in or offering an opinion on behalf of said agency, and whose financial interest is merely in being paid for such services.
2. 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:
 - a. All real estate located within the Town of Ledyard owned by such elected official or held under a lease for a term exceeding five years, excluding, however, his or her principal residence. The foregoing shall also apply to real estate owned or leased, as aforesaid, by a corporation, trust or partnership in which any such elected official is the legal or equitable holder of at least 5% of the legal or equitable interest in said corporation, trust, or partnership.
 - b. 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) per annum to the Town of Ledyard during the two 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 or its political subdivisions during the two years immediate proceeding such official's election to public office.

Section 7. Establishment of an Ethics Commission

1. Membership

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.

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

- b. No regular member or alternate member of the Ethics Commission shall:
 - i. Be a Town official or Town employee of the Town of Ledyard or be a member of the immediate family of any Town official;
 - ii. Have held any elected Town or State office for a period of one (1) year prior to being appointed to the Ethics Commission.
 - iii. Be a member of a Town committee or commission.
 - iv. Serve as a member of another Town agency, board, commission, council, or committee.
 - v. Have been employed by the Town for a period of one (1) year prior to being appointed to the Ethics Commission.
 - vi. Have any financial interest in matters before the Town or the Board of Education;
 - vii. Have been found in violation of any federal, state, municipal, or professional Code of Ethics.

2. Terms of Appointment

- a. Members shall be appointed by the Town Council for a term of three (3) years and shall serve until their successor has qualified or is removed by the Town Council.
- b. 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.
- c. Inaugural members shall be eligible to serve two (2) additional three (3) year term beyond his or her initial appointment.
- d. Any vacancy on the Ethics Commission, other than by expiration of term, shall be filled for the unexpired portion of the term by the Town Council.
- e. 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 or her duties.
- f. 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.

3. Authority/Duties

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

- a. To consult with the Town Attorney or another attorney hired by the Ethics Commission if so authorized by the Town Council.
- b. To request that the Town Attorney provide advisory opinions.

4. Filing of Complaints

A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission and signed under penalty of false statement. The form shall be delivered to the Town Clerk who shall transmit a copy of the complaint to the Chairperson of the Ethics Commission 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:

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

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

5. Evaluation and Acknowledgement

- 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 four (4) affirmative votes, it shall so advise both the complainant and the respondent within ten (10) business days of its finding and begin a formal investigation process.

6. 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 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.

7. Final Decisions

- a. 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.
- b. The Ethics 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 final decision of the commission for the purposes of the UAPA. The respondent may appeal to the superior court in accordance with the provision of Section 4-183 of the Connecticut General Statutes.
- d. 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 or her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

8. 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;
- g. Restitution of any pecuniary benefits received because of the violation committed;

Section 8. Severability

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

Adopted by the Ledyard Town Council on: _____

Gary St. Vil, Chairman

Approve/Disapprove on: _____

Fred B. Allyn, III

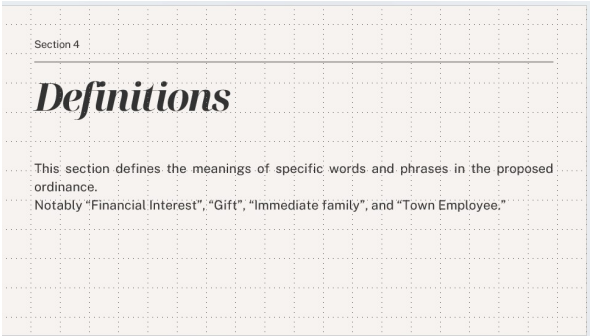
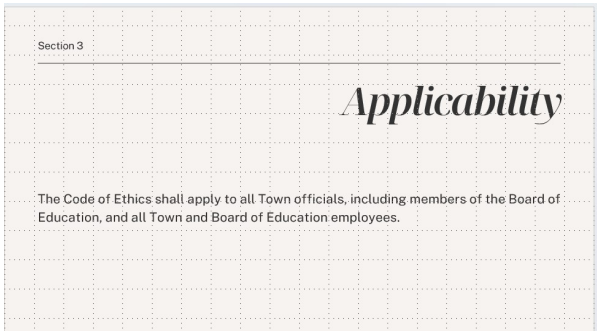
Published on: _____

Effective Date: _____

Patricia A. Riley, Town Clerk

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

Councilor Buhle reviewed the following PowerPoint Presentation



Section 5

Conflict of Interest Provisions

The [Conflict of Interest](#) Provisions in the proposed ordinance define specific situations that constitute a conflict of interest. These definitions remove ambiguity and uncertainty regarding what is and is not considered a conflict of interest.

Section 6

Disclosure of Interests

This section has two parts, which I've summarized below:

Part one requires all Town officials or Town employees who have a private financial interest in any action, legislative or otherwise, that they participate in discussion on or are a part of to disclose the true nature and extent of such interest.

Part two requires all Town Councilors, Board of Education Members, and the Mayor to file a statement under oath containing property they own in Ledyard outside of their principal residence, any companies they own at least 5% of that have done business with the town of Ledyard in the amount of over \$10,000, and any income received directly or indirectly from the Town of Ledyard.

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Section 7.1-2

Establishment of an Ethics Commission

The Ethics Commission shall be comprised of 5 regular members and 2 alternate members.

- No more than 2 regular members may be affiliated with the same political party. Both alternate members may not be affiliated with the same political party. At least one regular member must be registered as unaffiliated.
- Members may not be a town employee, on any town committee, be elected or immediate family of [a](#) Town official; may not be a past elected official or employee for a period of 1 year, and may not have been found in violation of any Code of Ethics.
- Terms of 3 years, with staggering first appointments. Other terms follow the same standards as other existing commissions.

Section 7.3-5

Establishment of an Ethics Commission

The Commission can seek advisory opinions from the Town Attorney or another attorney to provide consultation for complaints.

Complaints are filed under penalty of false statement and include the complainant's name, the respondent's name, and the specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

The Ethics Commission must determine probable cause within 60 days of the receipt of a complaint. 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.

Section 7.6-7

Establishment of an Ethics Commission

If the Ethics Commission decides that probable cause of a violation of the Code of Ethics exists, it will conduct a public hearing.

The respondent has the right to legal counsel, to present evidence and witnesses, and to compel attendance of witnesses and the production of books and records. The Commission must render its decision within 60 days of the closing of the hearing. The Commission will provide the respondent, the Mayor, and the Town Council with a copy of its findings and memorandum within 10 days after its [decision](#), [and](#) will advise the respondent of their rights to appeal to the Superior Court.

Section 7.8:

Establishment of an Ethics Commission

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;
- g. Restitution of any pecuniary benefits received because of the violation committed.

Section 8

Severability

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

Why an Ethics ordinance?

“Ethics is not about the way things are, but about the way they ought to be.”

John Rawls
Political Philosopher

79% ↑

133 towns in Connecticut (79%) have a Code of Ethics, an Ethics Ordinance, an Ethics Commission, or a Board of Ethics, with two more currently in progress (Ledyard and Goshen).

Inspiration

The following towns' ordinances were read to collaborate ideas and inspiration for an ordinance that reflects the needs of Ledyard.

- Glastonbury
- Simsbury
- Norwich
- Stonington
- Essex
- Madison
- and more...

Questions & Public Comment

Councilor Buhle concluded her presentation by providing an overview of the timeline to present the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission*” dated September 10, 2025 at tonight’s Public Hearing as follows:

- Administration Committee drafted the proposed Ordinance.
- June 23, 2025 - Administration Committee forwarded the draft Ordinance to Town Attorney Matt Ritter for a legal review and recommendations.
- June 24, 2025 Councilor Buhle and Attorney Ritter spoke by telephone regarding the proposed Ordinance.
- July 14, 2025 Town Attorney provided a red line document with recommendations to Councilor Buhle. In the July 14, 2025 draft Attorney Ritter removed parts of the proposed Ordinance, even though he had verbally advised Councilor Buhle that they were admissible.
- August 6, 2025 Administration Committee reviewed Attorney Ritter’s recommendations and agreed to provide comments at their September 10, 2025 meeting.\
- September 10, 2025 Councilor Buhle stated she provided a revised draft Ordinance dated September 8, 2025, which included some parts that Attorney Ritter had removed (July 14, 2025 draft) for the Administration Committee to review.
- September 10, 2025 Administration Committee provided additional revisions to the proposed Ordinance; and forwarded the draft dated September 10, 2025 to the Town Council for tonight’s Public Hearing.

VI. PUBLIC COMMENT

Chairman St. Vil thanked Councilor Buhle for her prestation regarding the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission*”. He stated at this time he would open the floor to residents comments; and he asked residents to keep their comments to 3 minutes or less. He also asked that if residents have already submitted written comments to the Town Council, that they not read their written communication, because the Town Council has already received their comments, and to allow time for all those who would like to speak this evening. He stated the written communications were already part of the record, noting that residents were welcome to provide other comments that they have not already been submitted. He also asked for those attending on-line to please put their name and address in the “*Chat*” and they would be called on in the order that they were signed up.

Mr. Eric Treaster, 10 Huntington Way, Ledyard, stated that he was only representing himself this evening. He stated that he provided written communications this afternoon. He stated that he would not review the twelve points in his written communication; however, he would like to identify the following:

- **Enabling State Statute** – Mr. Treaster stated the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission*” should reference the enabling the State Statute for Ethics Boards.

- **Section 6 “Disclosure of Interests Required”** Mr. Treaster noted that he believed that this Section should be deleted, because he thought that it would discourage people from running for elected office.
 - ✓ Section 6; Paragraph (1) – Mr. Treaster pointed out that this text allowed a town official or town employee *to participate in a discussion; or give an official opinion if he/she disclosed the nature and extent of his/her financial interest in the issue being decided*. However, he stated in Section 5 “Conflict of Interest”; Paragraph (5) the *elected official was not allowed to participate if he/she had a financial interest in the issue*. He stated the text of these two Sections were in conflict with each other because Section 6; paragraph (1) does not permit participation, even with disclosure. Therefore, he stated that these types of things within the proposed Ordinance needed to be resolved before the Town Council moved forward to consider the adoption of the proposed Ordinance.
- **Hearings** – Mr. Treaster stated everywhere the proposed Ordinance talked about “Public Hearing” there should be an option for an Executive Session, noting that the Executive Session should come first, because he thought that it was only fair to the respondent to first discuss the matter in an Executive Session.
- **Section 7 “Final Decision:”** – Mr. Treaster noted that the maximum of each Phase of the process would take 155 days for something to happen.
- **Section 8 “Penalties for Violations of the Code of Ethics”** – Mr. Treaster stated that it was unclear whether the Penalties issued by an Ethics Commission were *Orders* or *Suggestions*. He noted for example:
 - ✓ Order to cease and desist the violation - Mr. Treaster questioned whether there was an opportunity to make restitution of community benefits; if appropriate.
 - ✓ Pay a civil penalty of up to the maximum amount permitted by State law – Mr. Treaster noted that there were unanswered questions about the civil penalty. What would happen if the civil penalty was not paid.
 - ✓ Censure.
 - ✓ Suspension without pay – Mr. Treaster stated there were questions regarding suspension without pay.
 - ✓ Demotion - Mr. Treaster stated there were questions regarding *Demotion*; noting that it should be a suggestion.
 - ✓ Termination of employment - Mr. Treaster stated there were questions regarding *Termination*; noting that it should be a suggestion.
- **Section 7; Subsection 2 “Terms”** – Mr. Treaster stated the three-year term limit was too short, noting that there should not be a term limit. He stated if everyone was doing a good job they should let them go on forever; in 3-year increments, but be allowed to continue to serve on the Ethics Commission.

Mr. Treaster concluded his comments stating that he favored an Ethics Commission, noting that the proposed Ordinance was about 90% there. He stated that it needed to be amended so that **non-financial issues would be included in the Ordinance**.

Ms. Kristen Chapman, Executive Assistant to the Mayor stated that she was present this evening to read into the record a letter from Mayor Allyn, III; as he was already scheduled to be out of town before this September 24, 2025 Public Hearing was scheduled. Ms. Chapman read the following:

“Councilors,

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

- 1) *CT General Statutes 7-148(h). A municipality in Connecticut can cite this section to incorporate the state’s ethical conduct rules into local investigations of misconduct by officials or employees.*

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

Ms. Kristen Chapman, Executive Assistant to the Mayor stated as the Administrator of Liability-Auto-Property (LAP) Insurance Claims on the behalf of the Town, that she would like to make the Town Council aware of the potential costs related to the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”. She stated per CGS 7-101a **Protection of Municipal Officers and Municipal Employees from Damage Suits:** “*Each municipality shall protect and save harmless any such municipal officer or municipal employee from financial loss and expense, including legal fees and costs, if any, arising out of any claim, demand or suit instituted against such officer or employee by reason of alleged malicious, wanton or willful act or ultra virus act, on the part of such officer or employee while acting in the discharge of his duties*”. Ms. Chapman stated that the insurance deductibles related to such claims range from \$1,000 to \$10,000 per claim.

Ms. Patricia Riley, Town Clerk, thanked the Town Council for the opportunity to provide comment this evening regarding the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” noting that she wanted to discuss the following concerns regarding the proposal as it would directly affect her and the Town Clerk’s Office:

- **Section 7; Paragraph 4,** The Town Clerk shall transmit a copy of the Complaint Form to the Chairperson of the Ethics Commission and the respondent within 5 days. Ms. Riley stated that this was a major problem noting the following:
 - ✓ Ms. Riley questioned what would happen if she was on vacation for a week, the 5 days would have already passed. If the Town Clerk’s Office cannot accept the Complaint Form; while she was out of the Office would the person need to come back when she returned to the office; and she questioned how this type of situation be handled.
 - ✓ Ms. Riley noted if that she was not available or out of the office and unable to receive the initial Complaint Form; that she had concerns that this would cause complaints against her.
 - ✓ Ms. Riley questioned whether Town Staff (Herself or Assistant Town Clerk) should have knowledge of complaints of other employees.
 - ✓ Ms. Riley questioned what if the complaint was about an Ethics Commission Member. What would that process be.

- **Section 6; Paragraph 2,** - All Town Councilors, Board of Education Members and Mayor shall file each year by January 1st a form with a statement under oath. Who will give that oath? Ms. Riley stated that it would be a conflict of interest for the Town Clerk to give the oath since she was also going to be the only one accepting the Complaint Forms. She suggested that perhaps the Complaint Form should be notarized by someone other than the Town Clerk's Office.

- ***Not a matter of public record or knowledge unless a probable cause exists.***

Ms. Riley stated after some research, it appeared for the towns that have an Ethics Commission that their Ordinance/Code of Ethics was written so that all the Complaint Forms would go directly to the Ethics Commission. She stated that she thought this made sense because she was also an employee and she should not have access to those confidential records.

- ***FOIA Concerns vs. Ethics Exemptions*** – Ms. Riley questioned the following:
 - ✓ What about the Ethics Commission Members emails.
 - ✓ What happens to the paperwork/emails when they come off the Commission relative to the FOIA/Retention requirements.
 - ✓ Where would she as Town Clerk store the confidential records away from staff. She stated her Assistant Town Clerk had access to all locked and unlocked spaces in the Town Clerk's Office.
 - ✓ As Town Clerk that she did not have access to the Board of Education Members to send notifications in the event of a complaint. Would the MIS Director be required to get all Board of Education Members into the Town's Outlook email system.
- ***Record Retention Schedule Requirements*** – Ms. Riley questioned whether anyone researched the Record Retention for ethics documents with the State Library.
- ***Freedom of Information Act (FOIA) Requirements*** – Ms. Riley questioned whether anyone researched FOIA Laws against Ledyard's Town Charter, Employee Handbook & Union Contracts regarding Ethics Commission vs any exemptions. She stated that she would have liked the opportunity to research other towns and to consult with the State FOIA Commission about these concerns.

Ms. Riley stated that she strongly recommended that if the Town Council wished to proceed with an Ethics Commission that they consider one of the following:

1. Consider a Code of Ethics that refers the ethics complaints to be submitted under the Mayor for Town employees, Superintendent for Board of Education employees, and elected officials under Town Council. This would align with the official documents already in place such as the Town Charter, Employee Handbook, and Union Contracts.

-OR-

2. Refer all ethics complaints to the Ethics Commission directly.

Ms. Riley concluded her comments by stating on September 10, 2025, she attended the Administration Committee to bring forward these concerns. However, she stated that no member from the Administration Committee or Town Council has reached out to her to have a conversation. She stated that she would have hoped that there would have been a discussion on these topics; and that she was disappointed that her concerns were not acknowledged.

Mr. Jeff Eilenberger, 2 Village Drive, Ledyard, noted the Town Clerk's concerns and he questioned whether this was the first time the Town Council heard about all of the concerns the Town Clerk had with the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*". Councilor Buhle stated that Ms. Riley provided comments at the Administration Committee's September 10, 2025 meeting. Chairman St. Vil interjected explaining that this was a Public Hearing; and that Mr. Eilenberger was free to speak this evening and that his comments would be entered into the record. However, he stated that they were not going to get into discourse. Mr. Eilenberger continued by questioning and commenting on the following:

- ***Town Clerk's Concerns*** – Mr. Eilenberger questioned whether anyone talked to the Town Clerk during the last fourteen-days to try to iron some things out.
- ***Legal Fees*** - Mr. Eilenberger noted the \$4,000 cost for the Town Attorney to provide a legal review and recommendations regarding the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Ordinance*”, noting that it did not make sense to disregard the Attorney’s recommendations.
- ***Budget to Support the work of the Ethics Commission*** – Mr. Eilenberger questioned the budget for the first year; and the cost per year to maintain. He stated if there was no budget to go along with the proposal that anyone would be insane to vote for it.

Mr. Scott Johnson, Jr., Parks, Recreation & Senior Citizens Director, stated that he hoped he could provide his comments in the three-minute allotted time, noting that he would try to fit it all in. He stated as a Parks & Recreation Professional, equity and inclusion were at the forefront of every decision they make. Whether it was ensuring fair play in sports or equal opportunities in programming, noting that ethics played a vital role in our profession and was something they take very seriously.

Mr. Johnson noted that he has held this position in Ledyard for six- years; and every Town Council except the current one has consulted with Department Heads on various ordinances and decisions being made, especially when it would affect the department they oversee. He stated the town’s Directors were experts in their respective fields, they were versed in laws, regulations, and industry standards within their disciplines. He stated the Department Heads were one of the greatest tools at the town’s disposal and he urge the Town Council going forward to utilize this tool to ensure they were making informed decisions.

Mr. Johnson went on to state that previous Town Councils would have emailed a draft of their proposed Ordinance to all the Department Heads to ask for their input or concerns long before a bringing the proposal to a Public Hearing. He stated this process was not only a professional courtesy but would ensure that taxpayers’ dollars were not being wasted like they were in this situation. He stated having this type of dialog would have allowed Town Councilors and Department Heads to work together to develop and draft a proposed Ordinance that would have been worthy of being sent to the Town Attorney. He noted as they say in the Parks & Recreation Department “*Teamwork makes the Dream work*”.

Mr. Johnson stated he was present this evening to strongly oppose the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” . He stated the Town already had measures in place through the Town Charter, Employee Handbook, Policies & Procedures, and most importantly Connecticut General Statutes. He stated that these measures have proven to protect the town in the past without affecting town operations or eliminating services for residents.

Mr. Johnson noted as he mentioned this evening, that if a simple email was sent, that he would have provided all these concerns prior to the town wasting over \$4,000 in attorney fees. He stated that he would like to believe that no one wrote the proposed Ordinance with the intention of eliminating recreational programs, raising summer camp fees, or creating a significant loss of revenue for the Parks, Recreation & Senior Citizens Department. He commented that signing the proposed Ordinance would instantly eliminate more than 15 programs that were enjoyed by over 500 residents, noting that those Programs generated \$30,690 in Program Fes last year increasing the in revenue into their Department’s Special Revenue Account. He stated this revenue was used to help keep summer camp costs down for parents who were already struggling to make ends meet. He stated this revenue provided an opportunity to subsidize the Senior Center Programs using \$10,000 from their General Fund. He stated a town Commission was eliminated when they merged the Parks & Recreation Commission with the Senior Citizens Commission, explaining that merger saved the town money, which this proposed Ordinance would add right back. He stated this proposed Ordinance would undo the three-years of hard work he has put into saving the Town thousands of dollars.

Mr. Johnson continued by stating that members of the Town Council may be asking themselves “*How an Ethics Ordinance would have such a catastrophic effect on the Parks, Recreation, & Senior Citizens Department’s operation?*”. With that he would ask them the following question: “*What type of person makes the best Program Instructors?*” He stated the answer was “*The Parks & Recreation Professionals, Summer Camp Staff, Teachers, and Coaches*”. He stated these individuals were town employees in some capacity that Parks & Recreation then contracts with to teach many of their Programs.

Mr. Johnson explained at the end of each summer, the Parks & Recreation Department surveys their staff to see if they have any skills that could be used for Programs and if they would be available during the school year. He stated for those interested they then pay them as a Contractor to offer some of their Preschool Sports Programs such as T-Ball, Little Tykes’ Soccer and Peanut Basketball. He stated that all of these Programs would disappear if this proposed Ordinance were to pass because it would eliminate the Feeder Programs for Ledyard’s Youth Sport Leagues. He stated that they have Parks, Recreation, & Senior Center union employees that run the Rowing and Fencing Programs. He explained that both of these Programs were something their Department brags about offering, as they were unique. He stated over the years they have put in a lot of effort to develop and grow these programs. Whether it was the countless hours coordinating with the Board of Education to have participants dropped off at the Boat Launch after school, to the thousands of dollars spent on equipment needed to start the Fencing Program, noting that these Programs would also disappear if this proposed Ordinance were to be enacted.

Mr. Johnson went on to note that his next concern was with their Coaches. He questioned “*Did this proposed Ordinance only pertain to staff working directly for this department?*” He explained that the Parks & Recreation Department works with the High School Coaches to offer Clinics and Camps during the off seasons. He stated the CIAC, the State’s Body that oversees High School Sports Ethics, makes it very clear “*That no coach can hold team practices in the off season as it was an unfair advantage*”. However, he explained that those coaches could offer clinics or camps through the local Recreation Department in the off season. He stated the State Organization responsible for High School Sports Ethics not only allows for clinics and camps to be offered, but encourages them. He stated because the proposed Ethics Ordinance would deem this practice unethical they would potentially lose all Clinics provided by High School Coaches simply because they were already paid to coach through the Board of Education.

Mr. Johnson stated that one of his biggest concerns was that this proposed Ordinance would eliminate all the town’s current inclusive programing. He stated in Connecticut it was illegal for a public entity to remove inclusive recreation programs unless it was due to non-discriminatory budget cuts, low participation, or safety concerns.

Chairman St. Vil stated that Mr. Johnson’s three-minutes were up. Mr. Johnson stated he was almost done with his comments and asked if he could finish. Chairman St. Vil explained that they had to allow time for everyone present this evening that would like to speak.

Mr. Jay Pealer, 48 Highland Drive, Ledyard, stated that he would be reading comments provided by his son, Daniel, who could not be present this evening.

“Dear Mr. Chair and Members of the Council:

Thank you for the opportunity to address you. I write to express my strong opposition to the proposed ordinance titled “An Ordinance Establishing A Town of Ledyard Code of Ethics and Ethics Commission,” dated September 10, 2025.

This ordinance raises serious legal concerns. It risks violating existing union contracts and intrudes upon personnel matters already governed by collective bargaining agreements. To be clear, this is not a question of values—it is a question of law.

Key Legal Issues:

- **Conflict with Labor Law:** *The ordinance appears to grant investigatory and disciplinary authority to the Ethics Commission over unionized employees, disregarding the grievance procedures and protections enshrined in their contracts. This directly conflicts with Connecticut labor law, which guarantees just cause standards, progressive discipline, and arbitration rights. These are binding and enforceable—not optional.*

- **Unfair Labor Practice:** By introducing new oversight and penalties outside the scope of negotiated agreements, the ordinance effectively alters terms and conditions of employment without bargaining. This constitutes an unfair labor practice and exposes the Town to legal liability.
- **Failure to Differentiate Roles:** The ordinance does not distinguish between classified civil service positions and appointed or at-will roles. It treats all Town employees uniformly, ignoring the contractual protections unionized workers depend on. Disciplining union members outside the grievance procedure may be legally indefensible.
- **Lack of Due Process:** The Ethics Commission is empowered to impose penalties - including suspension and termination—without specifying representation rights, evidentiary standards, or appeal mechanisms. For union members, this omission bypasses contractual safeguards and invites arbitrary enforcement.
- **Statutory Conflict:** The ordinance conflicts with Connecticut General Statutes §7-474, which require municipalities to negotiate in good faith with recognized bargaining units over employment conditions. Applying the ordinance broadly to “Town employees” disregards this statutory framework and risks preemption by state law.

Specific Concern: Town Clerk’s Role

The ordinance assigns the Town Clerk sole responsibility for receiving and transmitting ethics complaints within five days, without naming an alternate or providing a backup mechanism. This creates a structural bottleneck that effectively prevents the Clerk from taking any leave longer than five days. Such a provision may violate the Clerk’s rights under the collective bargaining agreement and imposes unreasonable work conditions. In cases of illness, emergency, or protected leave, the Ethics Commission’s operations could be paralyzed—undermining the very governance the ordinance seeks to uphold.

Conclusion

This ordinance is legally insufficient. It places the Town at risk, undermines negotiated contracts, and imposes undue burdens on unionized employees. I respectfully urge the Council to reconsider. Please engage in meaningful consultation with union representatives, legal counsel, and the public.

*Thank you for your time and consideration.
Sincerely, Daniel Pealer”*

Mrs. Sharon Pealer, 48 Highland Drive, Ledyard, stated that she attended the September 10, 2025 Administration Committee at which the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” to listen. She noted that what she heard from the people who were both for and against the proposal such as Mr. M. Dave Schroeder, Jr., Councilor Dombrowski and Councilor Ryan: “*That the proposed Ordinance was not ready*”. She went on to state that drawing a line through the strictest penalties would not do away with the violation of the union labor contracts and it would not fix the fact that no one bothered to talk to the Town Clerk, the one person that would be most affected by the stipulations written in the proposed Ordinance. She noted at the September 10, 2025 Administration Committee meeting that Councilor Buhle said: “*She was concerned about letting perfect get in the way of good enough*”. However, Mrs. Pealer stated the Town should be concerned with “*Unfinished getting passed*”. She stated the proposed Ordinance as presented in the draft dated September 10, 2025 was incomplete and as such was not ready for passage.

Ms. Christine Dias, Director of Human Resources, stated although the Employee Handbook has already been brought up this that she would bring it up again. She stated that the Town Employees were already required to follow the *Employee Handbook*, which was last revised and approved by the Town Council on April 26, 2023; noting that she was sure that the Board of Education had their own Policies and Handbook. She explained that the Employee Handbook included the following Sections and Appendices:

- ✓ Conflict of Interest
- ✓ Nepotism Policy
- ✓ Outside Employment

Ms. Dias stated that she was very concerned with the Section 7; Subsection 8 “*Penalties and Violations of the Code of Ethics*”. She explained that the Town had seven Collective

Bargaining Agreements, and the Board of Education had six Collective Bargaining Agreements. She stated the following penalties as listed in the proposed Ordinance may conflict with their Collective Bargaining Agreements:

- ✓ Pay a civil penalty of up to the maximum amount permitted by State law.
- ✓ Censure.
- ✓ Suspension without pay.
- ✓ Demotion.
- ✓ Termination of employment.

Ms. Dias stated while the Town Attorney reviewed the prior draft Ordinance, that his review was as it related to Connecticut General Statutes; not how it related to these 14 Collective Bargaining Agreements and the Employee Handbook, noting that the Town's Labor Attorney had not reviewed the proposal. She stated the town already had ways to handle employees, so maybe the proposed Ordinance needed to be just be for the Town's Elected Officials and Volunteers.

Mrs. Pamela Ball, 674 Shewville Road, Ledyard, noted that she had more than three-minutes of material, therefore, she asked if there was time at the end of the Public Hearing that she hoped the Town Council would allow her time to finish her comments. Mrs. Ball proceed with her comments noting that she has submitted four letters in opposition to the proposed Ordinance. She stated that they would not be discussing this proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" if people were not disappointed in what was going to happen with the Sweet Hill Farm Property. She stated that she thought if people were happy with the proposal for the property that they might not be discussing this proposed Ordinance. She stated that she thought having a Code of Ethics laid out in an Ordinance was fine; however, she stated that she thought having an Ethics Commission was a terrible idea. She stated just because 30 of Connecticut's 169 towns have an Ethics Commission was not a reason for Ledyard to have one. She stated only 30 of Connecticut towns had a Mayor-Town Council form of government, noting that the other 139 towns had a form of governance that was not or different from a Mayor-Town Council structure.

Mrs. Ball continued by addressing the following:

- **Volunteers** – Mrs. Ball stated Volunteers should be excluded from the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*". She stated that the town's volunteers donate hundreds and hundreds of hours of time to this town. She stated as an example, that all it would take to turn someone's whole life upside down was for somebody to say, "*Oh, I saw somebody take money out of the donation jar at the Farmer's Market*".
- **Ethics Commission Members** – Mrs. Ball stated the volunteers serving on the Ethics Commission were not a jury of peers, noting that a jury and a judge were trained people. She stated that juries were vetted for every single instance when they were needed. She stated that she would use the Farmers Market again as an example, questioning: *What if somebody complains to the Farmer's Market; and what if there were people on the Ethics Commission that know people on the Farmer's Market, or they were familiar with the situation. Would those volunteer Ethics Commission Members be removed, and would new people be vetted to serve on the Ethics Commission?*
- **Complaint Form** – Mrs. Ball stated that the Complaint Form and proposed Ordinance should state which issues would be excluded. She state the proposed Ordinance should not be voted on without the Complaint Form, because it was an integral part of the process.
- **Financial Matters** – Mrs. Ball stated that she understands that it was implied that only financial things would be addressed under the Code of Ethics and Ethics Commission. However, she stated that the Compliant Form and Ordinance should list the types of things that were not applicable.
- **Conflict of Interest**- Ms. Ball suggested outlining all the details of what constituted a "*Conflict of Interest*" in Chapter IX; Section 6, of the Town Charter to include the text in the proposed Ordinance. She stated that the town should fix the Town Charter; so they would not have neighbors sitting in judgment of neighbors.

- ***Town Charter*** – Mrs. Ball stated that she believed that all this could be addressed by a Charter Revision. She stated if they had the time and energy to form an Ethics Commission and to educate the town, then she thought that they had time to revise the Town Charter, and educate the people about the amendments to the Town Charter.
- ***Impartiality*** – Mrs. Ball addressed a comment about the Town Council struggling to be impartial, noting that as the Town’s Elected Officials that the Town Council had a duty to be impartial. She stated that she did not think that if the Town Council was struggling with impartiality, they could see an impartial Ethics Commission. She stated that there was no guarantee that an Ethics Commission would be impartial, because so many people know so many other people in their small town.
- ***Legal Costs*** - Mrs. Ball stated that all it would take was one lawsuit from somebody who was accused of something to have their life ruined. She stated although the accuser could file the *Form Under Penalty of False Statement*, and they could truly believe their accusation was true; that the accusation still might not be right. She stated that it does not have to be a deliberate lie to be untrue.
- ***Frequently Asked Questions and Answers*** – Mrs. Ball noted the *Frequently Asked Questions and Answers* included the following Questions: “*Why do we need this?*” She stated that she did not think the town needed the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”. She stated that she believed that they needed to make the Town Charter more clear. She stated that she thought it was awful for people in town to be judging other people in town or judging town volunteers, or judging town employees; and then making recommendations about their employment.
- ***Commission Member Terms*** – Mrs. Ball stated the Section 7; Paragraph 2 in the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” stated that members would be removed if they missed three consecutive meetings. She stated what Ethics Commission members bullied people; or; or harassed people on Social Media. She stated that none of those reasons were listed as reasons to be removed from the Commission; noting the only one reason listed was for missing three consecutive meetings. She stated if they were going to have an Ethics Commission that passes judgment on people in their community that they need to have better guidance as to what it would take to get them kicked off the Commission.

Mrs. Deborah Edwards, 30 Bluff Road West, Gales Ferry, stated that she would try to be brief as she has spoken on the topic of an Ethics Commission previously. She stated that this has been a long process and not the first time their Town has been requested to create a Code of Ethics and Ethics Commission, noting that the systems that were in place have failed to address any issue of misconduct, and she thought that it was important to note. She stated that there were many people who have come forward to roll up their sleeves and put in the work to help get this established, so that their Town has very clear guidance on their values of both ethical conduct and transparency. She stated that she was in full support of getting this across the finish line and moving forward with confidence in town operations. With that said, that she did not believe the draft “*Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” presented tonight accomplished that goal. She stated that she did not think it was far off, and with a few thoughtful modifications that it could be achieved. She noted that an example was a review that was submitted by Mr. Schroeder that illuminated some of the potential loopholes that exist in the current draft, and he also offered suggestions on how to close those gaps. She stated the town needed a strong and clear Code, as well as an impartial Commission that could support it. She stated that she did not believe leaving Ethics issues to be addressed by the Town Council was in the town’s best interest or in the best interest of their Council members. She stated the Town Council does a wonderful job and at your personal expense of time, but the Town Council was a political body and showed itself in discussions on serious matters. Further, she stated that Town Councilors interact with employees and other committee members frequently as part of their duties. She stated that she thought it was unfair to put them in the difficult position of handling sensitive ethics issues regarding “co-workers” and that she was not sure the results would satisfy the impartiality required to instill confidence in the outcome. She stated for that reason, she was here today to urge the Town Council to forgo a vote tonight, to take in all the information presented, make modifications where suggested, and then present and

vote upon a document that closer achieved the stated goal of forming guidance that was explicit in its intentions to help prevent questionable actions, as well as to receive, investigate and advise on questions of ethics when they arise. She concluded her comments by stating that she was in full support of a clear Code of Ethics and the creation of a strong Ethics Commission, when they have a proposal before them. She noted that Councilor Buhle stated; “*She does not want to see “perfect” getting in the way of “good”*”. However, Mrs. Edwards stated that they can do better. Thank you.

Mr. Bruce Edwards, 30 Bluff Road West, Gales Ferry, stated that he wanted to be clear; that there was a standing need for an Ethics Commission, commenting that they were about 40-50-years late. However, he stated that he was grateful for the efforts that were being put into drafting the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”. He stated to keep this simple, the Town needed a kind of a bumper system to protect it from wrongdoing. He stated that his comments were not to suggest that there was wrongdoing, but that if something arises the Ethics Commission was a way for the public to question things. He stated that tonight was a good example, noting not that there was anything wrong, but that he cannot come before the Tow Council and ask questions; such as “*How do I handle an ethics question?*” He questioned whether he should pick one Town Councilor and pull them off to the side, noting that he did not know. Therefore, he stated that they just need an avenue for the public to ask questions.

Mr. Edwards continued by stating that he has been a resident and or landowner in this town since 1965, noting that he was 73 years old, which was a long time. He stated that there have been ethics violations in this town; some of them serious, noting that he knows that was an absolute fact. He stated at one time his family was subject to an ethics violation, and that he was not going to get into the details this evening, but that it does happen. He stated for anybody to sit around here and paint a pretty picture like it does not happen in Ledyard that he would tell them that they were naive. He stated that he was sorry to say that, but it was the truth, it was naive. He stated that there were motivations in this world that we conceive all around us and they were not right; and the public had a right to question it. He stated the public has a right for an impartial Ethics Commission to look at ethics issues. Thank you

Mr. Brandon Sabbag, 16 Nutmeg Drive, Gales Ferry, stated that he was definitely opposed to the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” for the following reasons:

- **Small Town – Small Government** – Mr. Sabbag stated that Ledyard was a small town, and therefore, he believed they we should have small government. He stated adding more things that were already covered by the Town Charter, which many have said this evening, would just adding more money and more time, which were two valuable things to all of them.
- **Taxes** - Mr. Sabbag stated that Ledyard just saw the highest tax increase in 20 years. He stated the townspeople voted on the Budget two times, and the Town Council completely negated the votes of the townspeople.
- **Staff Concerns** - Mr. Sabbag stated today they have heard comments from the Mayor, the Mayor’s Executive Assistant, the Town Clerk, the Director of Human Resources and the Director of Parks, Recreation & Senior Citizens. He stated their comments and concerns were very clear that they were against the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”. He stated that these were people that work full-time every day for their town and that he thought their concerns were something they should strongly consider.
- **Local Election** – Mr. Sabbag stated that Ledyard was literally one month away from an election. Therefore, he stated if anything else, that maybe they should wait to let the townspeople speak and see the results of the November 4, 2025 Election before they move forward with the proposed Ordinance, noting that there might be some new appointments to see what that Town Council would say.

Mr. Sabbag stated in closing that he if possible, he would like to yield the rest of his time to the gentleman from the Parks & Recreation Department to complete his comments.

Chairman St. Vil stated that he would allow Mr. Sabbag to yield the remainder of his time which was 1 minute and 42 seconds to the Director of Parks, Recreation & Senior Citizens Scott Johnson, Jr.

Mr. Scott Johnson, Jr. Director of Parks, Recreation & Senior Citizens thanked Mr. Sabbag and Chairman St. Vil for the opportunity to finish his comments that he started earlier this evening (see above) noting that this was the most important part of what he had to say. He stated the provisions in the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*", would be a direct violation of the Americans with Disabilities Act (ADA) and Connecticut General Statutes 46a-64. He stated enacting an Ordinance that restricted the town from hiring the individuals that were the most qualified to teach inclusive programs was not an allowable situation because it would eliminate inclusive programing.

Mr. Johnson stated everything he explained tonight was not only ethical but the Industry Standard in the Parks & Recreation field. He stated that he would use himself as an example, noting that when he was working for the City of New London that he was on payroll as the Recreation Supervisor, while he was also being paid as a contractor to instruct their Kids Marathon Program, Youth Triathlon Team, Kindergarten Fitness Enrichment Classes, and an Adaptive Sports Class for Children on the Autism Spectrum. He stated in accordance with the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*", to do this would be an ethics violation.

Mr. Johnson stated that he wanted to reiterate that passing this proposed Ordinance in its current form would have a detrimental effect on the Parks, Recreation & Senior Citizens Department and the residents of Ledyard, because it would result in a loss of Programs, Registrations Fees, and Revenue, while increasing Camp Fees, requiring moneyto be added back into the general fund, and creating staffing challenges across their entire operation. He stated that it was important for the Town Council to have the full picture.

Mr. M. Dave Schroeder, Jr., stated he was present this evening to speak in support of suggested amendments titled "*Citizens Concerns to the proposed 'An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission'*" because they thought the draft dated September 10, 2025 was insufficient.. Mr. Schroeder stated that he provided written communication that included suggested Amendments that were put together by Concerned Citizens and they also provided Justifications that provided the arguments to support their suggested amendments. He explained his name was attached to the documents because he was presenting the *Concern Citizens Suggested Amendments*, noting that they were not solely his suggestions. He stated the residents wanted to attend tonight's Public Hearing essentially to review their a Point-by-Point Arguments, and the reasons as to why they thought the current draft Ordinance dated September 10, 2025 was insufficient. However, he stated because Chairman St. Vil has stated that the Town Council has received a copy of the *Concerned Citizens Suggested Amendments and Justifications* and that they would read them, that instead of him reading what the Concerned Citizens submitted that he would like to point out a couple of things as follows:

- **Monitor the adequacy of the Ordinance** – Mr. Schroeder suggested the proposed "*An Ordinance Establishing a Code of Ethics and Ethics Commission*" include a Section for the Ethics Commission to monitor the adequacy of the Ordinance and to report back and advise to the Town Council when they think amendments needed to be made. He stated they were going to come up with a 100% amazing thing right from the get-go. He stated as others have already mentioned the people that would serve on the Commission were going to be fully invested in this, and would be able to advise the Town Council.
- **Advisory Role** – Mr. Schroeder noted that it was his understanding that the Ethics Commission was going to essentially be an Advisory Role. He stated the Ethics Commission was not going to be the Judge, Jury, and Executioner. He stated that the Commission's role would be to investigate complaints; and to come up with a decision, and then they would advise the proper authority, whether that was the Town

Council or the Mayor, or the Superintendent of Schools, as proposed in the Ordinance. He stated it was important to point out that they were not setting up some kind of an inquisition or something like that. He stated the Ethics Commission would be advisory, and ultimately the Town Council would retain all the power as the authority to change anything they want in the ordinance. However, he stated the current September 10, 2025 draft Ordinance does not yet achieve that. He stated that he was hoping by reading the suggestions, that they would be included as part of the town's records, that they would convince and show the Town Council a way to remedy that. He stated Ledyard citizens deserve a Code of Ethics and an Ethics Commission that was fair and workable.

- **Transparency and Accountably** – Mr. Schroeder addressed the need for Transparency and Accountability, noting there was no reason and no need to accept anything less.

Mr. Schroeder concluded his comments by stating that he broadly supported everything that Mrs. Deborah Edwards said this evening. He asked that the Town Council work on the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” to consider the suggested amendments and give Ledyard the best Code of Ethics and Ethics Commission they can.

Mr. Carlo Porazzi, 30 Chapman Lane, Gales Ferry, stated although he did not have any prepared comments, that in listening to other residents comments that he has been making some notes. He stated pointed out the following:

- **Town Charter-Chapter IX; Section 6 “Conflict of Interest”** – Mr. Porazzi stated that it was not sufficient.
- **Advisory Role** – Mr. Porazzi noted as Mr. Schroeder mentioned the Ethics Commission would be Advisory; and that he believed that it would only be used for Grievous Reporting and Grievous Conduct.
- **Impact on Programs** – Mr. Porazzi stated that he personally cannot see how having an Ethics Commission would impact Programs. He stated if he was not well educated on that, that he would like to be.
- **Fees** – Mr. Porazzi stated if there was a fee for something like this, that he thought that it would be small, and irrelevant in the big picture of the town budget.
- **Government Transparency** – Mr. Porazzi stated that he thought having an Ethics Commission would go a long way for governmental transparency. He stated that he felt strongly that there needed to be an impartial panel to vet suspected violations; or else the public would be left with possible partisan local Town Councils; and any existing biases. He stated that this would mean that someone could complain all day and it was only going to go so far depending on the channels available.

Mr. Porazzi stated that Mr. Schroder mentioned that the Town Council has received all the written submissions; and that Chairman St. Vil mentioned the Town Council has received the written communications that were submitted for tonight's Public Hearing and that they would be included as part of the record; therefore, he stated let's not go other those again. Mr. Porazzi stated as he alluded to earlier, and to be quite honest, that he did not believe the current channels for Ethics, where there were Conflicts of Interest, were working; and that he would leave it at that, noting that Mrs. Deborah Edwards also alluded to that as well.

Mr. Porazzi concluded his comments by stating, that if the proposed “*An Ordinance Establishing a Code of Ethics and Ethics Commission*” does not go any further that he believed that it would go to vote, so the people of the town will have the final say. Thank you.

Mr. Samuel Roudebush, 63 Hurlbutt Drive, Gales Ferry, began by stating that Mr. Edwin Murray, 26 Devonshire Drive, Gales Ferry, provided written comments and although he would not read them this evening, that he would submit them for the record on Mr. Murray's behalf.

*“Ledyard Town Council: 09/24/2025
Public Hearing on Adopting a Code of Ethics*

Good evening Councilors,

A Code of Ethics provides clear expectations for how our town officials, employees, and volunteers should conduct themselves. By formally stating these values, we make it clear that public service in Ledyard requires honesty, accountability, and integrity.

It is surprising that our town—despite its educated and engaged leadership—has not yet adopted a Code of Ethics when roughly 87% of Connecticut municipalities already have one. Corporations, nonprofits, and governments at every level rely on such codes. They are not window dressing; they are public commitments to ethical behavior.

The draft before you is a worthy start, but it falls short of its purpose. Residents have identified specific weaknesses and offered constructive options for improvement. These deserve serious consideration before moving forward.

I'm also concerned about the process. Eighteen months of limited public input is not enough, and the public hearing tonight is scheduled for only two hours—hardly sufficient for a decision of this importance. Likewise, if the Council approves a ballot question, the proposed 40-day window is too short to educate thousands of voters and allow meaningful discussion.

For these reasons, I urge the Council to revise the ballot question. Instead of asking residents to vote yes or no on this draft, ask whether they support forming an ad hoc committee to develop a stronger Code of Ethics and bring that final document back for public approval.

A code of ethics is not something to fear. It is simply a pledge to accountability—something every resident has the right to expect. If there is confusion or opposition, let's take the time to resolve it and get this right.

Ledyard deserves a clear, thoughtful, and truly effective Code of Ethics. Please give our community the time and process it needs to achieve that goal.

Thank you.

Edwin Murray

26 Devonshire Drive, Gales Ferry, Connecticut”

Mr. Samuel Roudebush, 63 Hurlbutt Drive, Gales Ferry, continued by stating the comments he prepared for tonight were no longer relevant. However, he stated what he has heard this evening was that there was not much disagreement with the concept of having an Ethics Commission, but that there was a sort of a reaction to the process. He noted as an example Director of Parks, Recreation & Senior Citizens Director Scott Johnson, Jr., brought up some excellent points about the way the Parks & Recreation Programs were run that leverage other capabilities already within the town. He stated that these opportunities would be considered in conflict with the current language of the proposed “An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission” as presented in the draft dated September 10, 2025. However, Mr. Roudebush stated that it was an easy fix so the Parks, Recreation & Senior Citizens Department would not have to lose \$30,000 in the revenue for the 12 or 16 Programs. He stated that they could create exemptions that they could work into the proposed Ordinance, where appropriate. He stated the same would go for the Town Clerk, noting that he thought those procedures may take some discussion and negotiation, but that they could be worked out and that it would be worth it. He stated the pushback they were getting on the proposed Ordinance reminded him of when the Federal Inspector General Act was passed post-President Nixon. He stated at that time there was a lot of pushback saying that Departments that could manage their own discipline. However, he stated that during the last 40 years, 50 years, that he believed that it has been proven that the Inspector General Program at the Federal Level had merit and has worked well.

Mr. Roudebush went on to state that having an independent commission that was politically independent was critical for the integrity of the process. He stated if the proposed Ordinance moves in that direction that he was in support of having a Code of Ethics and Ethics Commission. He noted that others already mentioned that Ethics was already addressed in several places within the Town Charter, within the Employee Handbook, and so forth. He stated that those Policies were important and should not be overlooked or in the way of what the Ethics Commission does. He stated the proposed *"An Ordinance Establishing a Town of Ledyard a Code of Ethics and Ethics Commission"* would create a process that would allow those policies to be implemented properly, fairly, and without undue interference from the existing structure.

Mr. Roudebush continued by noting a comment made earlier this evening regarding the process for adjudicating complaints and that it would violate the current Human Resources processes in terms of Union Labor Contract Agreements. He stated that the proposed Ordinance could also address this. He stated as one speaker mentioned this evening that the proposed Ordinance provided an Independent Investigation, Recommendations, and then then Actual Actions that would be taken by those who have the Authority.

Mr. Roudebush concluded his comments by stating that there has been a tremendous amount of work done on this document. He stated that he supported the concept and the majority of the language that was in the current draft Ordinance. However, he stated that he did think they could do better, noting that the decision whether to go forward was up to the Administration Committee and the Town Council. He suggested that it may be better to move forward with the proposed Ordinance and fix it later, than not to enact it because it may be dropped or forgotten, or left untouched. Thank you,

Ms. Angela Cassidy, 62 Hurlbutt Road, Gales Ferry, stated that she read some posts on Social Media today in which a few stated that having an Ethics Commission would be a witch hunt. She noted that she was hearing so many injectors tonight that were just not true; however, she stated that it makes her raise an eyebrow and ask, *"Why would anybody even think that"*. She stated if they were having those thoughts, then maybe there was a problem, and they need an Ethics Commission, and a Code of Ethics even more. She questioned why anybody would fight against having a Code of Ethics, noting that she thought the draft *"An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* that Councilor Buhle and many others worked so diligently on was almost there. She stated that they should all be questioning *"Why Ledyard would not want that"*. She stated that over 80% or about 150 of Connecticut's 169 towns already have a Code of Ethics, noting that this information was on the Connecticut State website, if anyone was questioning her numbers. She stated that both Republicans and Democrats have been strongly calling for an Ethics Commission for more than 18-months, noting that it was not partisan, it was about Accountability, Trust, and Protecting their community. She stated the proposed draft *"An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* has been reviewed by experts, including their Town Attorney, noting that several experts have already examined the draft Ordinance to make sure it was fair; and that some of those people were here tonight. She stated that she would ask any concerned citizens to please read the proposed Code of Ethics before making judgments. She stated that she did not think the response she was hearing from the public was what this Code of Ethics was about; and that she doubted that many have read the Code of Ethics. She stated that if she was running a personal business and she wanted to volunteer as a commissioner, that she just needed to disclose her properties, and possibly anything that she was receiving a large amount of over 10% from an investment. She stated that it seemed to be fair game for anybody who was playing honest. She stated that there was no reason they should not want this from their politicians and from people working for their community. She stated the proposed *"An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* only required town officials, town employees, and town volunteers to disclosure their potential *Conflicts of Interest* and recuse themselves if necessary. Therefore, she stated if people think there might be a *Conflict of Interest*, that as long as it was disclosed, and people decided that it was okay, they could still do that, noting that it was not necessarily stopping the person. She went on to state that as far as the money situation goes, she

thought that the town would be paying attorney's fees anyway; whether there was a Code of Ethics or not. She stated that unfortunately she thought that they would need some training for the Ethics Commission members; as well as annual trainings. She stated that a Code of Ethics was not just a formality, noting that it was a promise to their citizens where decisions would be made with honesty, openness, and fairness. She stated that it would protect their town and would strengthen their public trust. She stated that she thought the general message that has been online and everywhere else was not what they were making it out to be. She stated the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" was fair and it was simple. . She noted as Mr. Roudebush stated the Ethics Commission would provide an opinion and recommendations to the Town Council and/or Mayor; and then the Town Council and/or Mayor would make the decision.

Mr. Jacob Hurt, 6 Nugget Hill Drive, Gales Ferry, stated that he was speaking for himself tonight. He stated that he strongly support the adoption of "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*"; noting that the Ordinance was not just an unfunded mandate from the State. He stated the last budget cycle showed that their town needed to urgently and responsibly grow their Grand List and reduce the tax burden on their property owners; so they could stop having to cut everything. He stated that there were people who might exploit the town's need to benefit for themselves. In other words, he stated some people may use public office to benefit privately. Therefore, he stated that an Ordinance like this meets the state requirements and was an important way to deter; and if necessary, hold accountable, anyone who used their position of public trust to benefit themselves. He stated that Ledyard simply had too much history of elected officials failing to hold each other accountable, no matter how strong the case for doing so. He stated the proposed Ordinance was necessary to provide a way to confidentially raise a question, and not have to hope that the right people won the last election in order for the right thing to be done. However, he stated more than that, they have plenty of examples of government officials obstructing investigations, blocking efforts of transparency, and interfering with the process to benefit themselves.

Mr. Hurt went on to state that he wanted to register his disappointment with the Mayor tonight. He noted the Mayor's letter that was read into record and he stated that they just saw him use his Office, and the knowledge it gives him, to obstruct and play *gotcha* with the creation of this Ordinance and the Commission; instead of collaborating with the Town Council and to ensure stakeholders got involved to get the best outcome for the town. He stated the Mayor's letter was a shining example of why they need this Ordinance and why they needed this process. He stated that people who have to win popularity contests cannot be trusted to tell on themselves, noting that they now have another great example as to why.

Mr. Hurt stated that he has talked a lot about the number of towns that have Ethics Ordinances in place, and have functioning Ethics Commissions, noting that it was large number. He stated that the Ethics Commission in the many other towns do not appear to be detrimental or deterring anyone from entering public service. He stated that there was also no apparent evidence that these Ethics Commissions were being weaponized against individuals. He stated in fact the proposed Ordinance was one way to deal with those potential issues instead of allowing mis-information and gossip to fill an information void; and then it becomes a question. He stated instead of letting gossip go around, that the issue would either meet the threshold to fill a Complaint Form, or not. He stated in summary, that he did not find any argument against adopting a Code of Ethics to be sound. He stated although he did support some of these proposed changes, that he did not see any of them as showstoppers, just improvements. He noted as Mr. Schroeder mentioned earlier this evening that he was also very curious to see what feedback the first Commissioners provide, and hope they would have a way to hear and address those ideas as well. Thank you.

Mr. Steve Munger, 12 Nutmeg Drive, Gales Ferry, began by stating as he always says when he addressed the Town Council that he appreciated all of their time that they were putting into the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*". He stated whether they agree or disagreed on the outcome, that he would still appreciate the people that contributed their talents for the electorate.

Mr. Munger went on to state that it was his understanding that there were a few issues that occurred in town some time ago and they were taken care of. He stated if he was wrong about this information than he would admit that for some who were on the other side of the aisle.

Mr. Munger noted that the problem was that a lot of people complained about the increase of their taxes, noting that he was one of them, but they had a low voter turnout. He noted the number of residents present this evening because of their concerns about the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”, stating that he has not seen some of these residents before. Therefore, he stated if all of these people were really concerned about the things that happen in a town then they need to get involved.

Mr. Munger continued by stating that he wanted to address the following:

- ***If it's not broke don't fix it*** – Mr. Munger stated that he uses common sense, noting that he does not look at numbers or statistics. He stated “*If it's not broke don't fix it*. He stated that he has done this his whole life, and it has been pretty successful.
- ***A Committee that doesn't lean one way or the other*** - Mr. Munger stated that they need to look at the climate in the country right now, noting that it was pretty much split. Therefore, he stated that he would find it really hard to believe they could find 3 people who say, “*Oh, I won't, I won't, I won't.*” He stated if the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” does get passed that he would like to make sure that those people would be very strongly looked at before being appointed to the Commission, and that he would follow what they decide after each incident.
- ***80% of Connecticut Towns have an Ethics Commission*** - Mr. Munger stated that he did not care about what other towns were doing. He stated this was Ledyard and that they should be concerned about what happens in Ledyard. He questioned because 80% of Connecticut Towns have an Ethics Commission would that also mean if 100 people stand at a cliff and 80 people jump over; should the rest of them jump over the cliff too; commenting “*No we do not have to jump over the cliff*” . He stated he was not saying the 80% towns were right or wrong. However, he stated he did not see any reason why they keep bringing those other people into a Ledyard issue. He stated this was something they have to discuss, argue, and fight about; and the decide amongst themselves in Ledyard and do what was best for their town.
- ***Just pass the Ordinance, we will fix it later*** – Mr. Munger noted comments made this evening that they should pass the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” and fix it later. He stated although he did not like to bring federal politics into this, that the best analogy he has was when House Representative Nancy Pelosi said: “*Oh let's just pass this, we'll read it later*”. Mr. Munger stated what they got was terrible. Therefore, he stated if they were going to move forward with an Ethics Commission, noting that he would support whatever way it goes; that they do not rush it and they should make sure it was right before they adopt the Ordinance, so they do not run into problems later. He stated let's not have a cavalier attitude, like, “*Oh, let's just pass it, and we'll worry about it later*. He stated that was not the way they should operate. He stated that they need to make sure they have it right the first time, and then pursue it, noting that he personally did not want to see the town form an Ethics Commission.

Mr. Mike Cherry, 5 Whippoorwill Drive, Gales Ferry, provided for the record:

- Connecticut General Statutes -Chapter 124 – Zoning
 - Section 8-11 “*Disqualification of Members of Zoning Authorities*”
- Connecticut General Statutes - Chapter 128 – Municipal Planning Commission
 - Section 8-21- “*Disqualification of Planning Commission Members*”

- Connecticut General Statutes - Chapter 440 – Wetlands and Watercourses
 - Section 22a-42(c)
- Connecticut General Statutes - Chapter 98- Municipal Powers
 - 7-148t- *Conflict of Interest for Members of Land Use and Purchasing Commissions*
- Connecticut General Statutes - Chapter 113 – Municipal Employees
 - Section 7-479 “*Conflicts of Interest*”
- Ledyard Town Charter
 - Chapter III; Section 9 “*Investigation*”
 - Chapter IV; Section 9 “*Appointments and Removals*”
 - Chapter IX; Section 6 “*Conflicts of Interest*”

Mr. Cherry continued by noting in February, 2025 he stated that he was ambivalent about an Ethics Commission; however, he stated that now he was in support of the town having an Ethics Commission. However, he stated that tonight he wanted to talk about the deficiencies in the proposed draft “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” in terms of fixes noting the following:

- ***Code of Ethics*** – Mr. Cherry stated although he saw the words *Code of Ethics* that he did not see a *Code of Ethics* in the draft Ordinance dated September 10, 2025, noting that what he saw was a *Conflict of Interest List*. He explained that a Code of Ethics was something they could hang on the wall listing the positive things that they want to live by. He noted that the a good example of a *Code of Ethics* was provided in the Board of Education’s Handbook as Attachment A “*Policy Notes*” and on the next page, it provided *Conflict of Interest Rules*. He stated the proposed draft “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” dated September 10, 2025 was missing this type of information. He stated during his lifetime he has been part of Government Organizations which included the Engineers Nuclear Society, noting that event the Military has a Code that they live by.
- ***Does the proposed “An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission” apply to the Board of Education*** – Mr. Cherry stated the Board of Education has their own *Code of Ethics and Conflict of Interest List*; therefore, he questioned whether the proposed Ordinance would conflict with what the Board of Education has published and had in place for a while.
- ***Section 5 “Conflict of Interest Provisions”***- Mr. Cherry stated Connecticut General Statute Section 7-479 says that the town can establish an ordinance saying what a *Conflict of Interest* is; noting that it was covered by state statute.
- ***Section 7 “Establishment of an Ethics Commission” Paragraph 1 (b)*** - Mr. Cherry stated he was not sure what they were talking about noting that it looked like there was a difference between what the Town Attorney said, in what they published. He suggested this section be looked at.

Mr. Cherry noted the language “*serve as a member of any other town agency, board, commission, council, or committee*”. He questioned whether they were being redundant, or whether he missed something in the definitions.

Mr. Cherry stated that Mr. Schroeder suggested some good words that solved problems with the proposed draft Ordinance, noting that Mr. Schroeder added words to give the Commission some duties and responsibilities other than calling a lawyer. He noted the language was in the original draft Ordinance; however, it came out with the Town Attorney’s red line lawyers markup, and the Administration Committee did not vote to put the language back in. Therefore, the language in Section 7; Paragraph (3) “*Authority/Duties*” was for the Ethics Commission to contact one of two lawyers.

- ✓ **Section 7; Paragraph 6 “Hearings”** Mr. Cherry stated these sections and others in the proposed “*An Ordinance Establishing a Code of Ethics and Ethics Ordinance*” mentions public hearings or executive sessions and he questioned whether they were talking about labor things, or individuals. He stated for privacy that he was not sure that a public hearing was the right answer. He suggested the Town Council talk with the Director of Human Resources.
- ✓ **Section 7; Paragraph 7 Final Decisions** – Mr. Cherry stated that Mr. Schroeder did a good job with the wording that would require the Ethics Commission to write a report, and make recommendations to provide to the people with the authority to implement the recommended actions. He noted that Mr. Schroeder indicated that the words needed to be workable and clear and to improve existing draft Ordinance.
- **Sunset Clause** – Mr. Cherry suggested they think about including a Sunset Clause to force the Town Council in 2 or 3-years to review the Ordinance.
- **Training** – Mr. Cherry stated that he agreed with the comment to require training for the Ethics Commission. He suggested that they also require training for all those who were covered by the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” including all the employees, all the volunteers, all the board members. He stated if they're covered by the Ordinance, they ought to be trained in what the Ordinance says.

Mr. Cherry concluded his comments by stating that although the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Ordinance*” was not ready for a vote tonight, because it does not give the Ethics Commission a job, other than tell them to contact the Attorney. He stated with the suggested words that were provided tonight that he thought the Ordinance was getting close to being done. Thank you.

Mr. Dan Pealer, 48 Highland Drive, Ledyard, stated that he comes before the Town Council this evening having recently submitted comments by email. However, he stated that he would not focus on the written communication he already submitted. He proceeded by urging the Town Council not to factor the cost fallacy into their decision regarding the adoption of a “*Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”. He noted the hours that have been spent drafting, debating, and refining the proposed Ordinance does not make it a good policy. He stated the time invested was not a reason to proceed. He stated, “*The amount of effort poured into making a mud pie does not make it anything other than a mud pie*”. He stated labor does not transform substance; and sentiment does not substitute for scrutiny. He stated the Town Council’s job tonight was not to defend the process; and not to factor in the process that was used to get here, noting that it was to evaluate the product of that process. He stated the Town Council must weigh the proposed Ordinance on its actual merits and its demerits, not on how much work has already gone into it, or how hard it would be to change. He stated that good intentions are not actions; and they do not shield anybody; and they do not correct any flaws that were present in the proposed Ordinance, noting that only clear-eyed governance could do that. He stated that he was pleading with the Town Council not to be the stewards of the effort, but to please use their sound judgment to choose what was right; and not to mistake momentum for wisdom. Thank you.

Chairman St. Vil thanked all those who spoke this evening. He explained that unfortunately, as it stands at this moment, the Town Council does not have a quorum this evening for their 7:00 p.m. Regular Meeting, and therefore, they were going to have to cancel the meeting. He stated the Town Council would revisit the topic of the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” at their October 8, 2025 meeting.

VII. ADJOURNMENT

Chairman St. Vil stated hearing no further public comment, that the Public Hearing was adjourned at 6:27 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 September 24, 2025

Attest: _____
Gary St. Vil, Chairman



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2533	Agenda Date: 9/24/2025	Agenda #:
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AGENDA ITEM
CORRESPONDENCE

Subject:
Correspondence List - October 8, 2025

Correspondence List:
(type text here)

Proposed Amendments to 24-0481 - DRAFT CODE OF ETHICS AND ETHICS COMMISSION -JESSICA-2025-09-08

Section 3. Applicability

The Code of Ethics shall apply to all Town officials, including members of the Board of Education[, and all Town and Board of Education employees[, and to those conducting business with the Town of Ledyard and to all contractors retained by the Town, including attorneys.

Section 4. Definitions

9. **Contractor.** Any business, proprietorship, firm, partnership, person in a representative or fiduciary capacity, association, venture, trust or corporation, whether paid or unpaid, including members of any board, committee or commission thereof.¹

Section 5. Conflict of Interest Provisions

(All provisions need to be reviewed to include "Contractor", where applicable)

Section 7.1. Membership

Note: EITHER

The Ethics Commission shall be comprised of five (5) regular members and two (2-3) alternate members. All members of the Ethics Commission shall be electors of the Town.

a. No more than two (2 1) Regular Members may be affiliated with any one political party. Both Alternate Members may not be affiliated with the same political party. At least one three Regular Member(s) shall be registered as an unaffiliated.

OR

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.

¹ Norwich Code of Ethics - Ord. No. 909, Section 2-52 b

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

Section 7.3 Authority /Duties

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

- a. To **receive, review, investigate, and adjudicate complaints** alleging violations of the Town Code of Ethics, in accordance with the procedures set forth in this Ordinance.
- b. To conduct hearings, issue findings, and impose penalties as provided herein.
- ~~a~~ c. To consult with the Town Attorney or another attorney hired by the Ethics Commission if so authorized by the Town Council.
- ~~b~~ d. To request that the Town Attorney provide advisory opinions.
- e. To provide formal advisory opinions, upon request, to Town officials, Town employees, or other parties subject to this Code of Ethics, for the purpose of clarifying the application of the Code to specific situations.

Section 7.4 Filing of Complaints

In the application of this Code of Ethics, care will be given to distinguish between concerns of management of Town employees and violations of the public trust. The daily management of employee performance is the responsibility of the Mayor or School Superintendent in the case of the employees of Ledyard Public Schools. Personnel policies should be the first guide in those areas where applicable. Similarly, the routine activities of the Commission should be governed by its rules and regulations. **This in no way compromises the Commission's mandate to investigate complaints on such matters.**

Section 7.5 Evaluation and Acknowledgement

- b. If the Ethics Commission makes a finding of probable cause which shall require ~~four~~ **three** (4 **3**) affirmative votes, it shall so advise both the complainant and the respondent within ten (10) business days of its finding and begin a formal investigation process.³

² Norwich Code of Ethics - Ord. No. 909, Section 2-55 (a) 1

³ Norwich Code of Ethics - Ord. No. 909, Section 2-55 (c) 3

Section 7.7 Final Decisions

- d. 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~~ *Report of Recommendations* within ten (10) days after its decision. It will also advise the respondent of his or her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.
- e. **Report of recommendations.** When there has been a finding of a violation the commission shall report the finding and a recommendation for action to the town council. The commission shall also report to such other officer or board of the City with the power granted by the charter or state statute to remove the officer, official or employee found to have committed the violation, when such power of removal exists.⁴
- f. When the power of removal exists, the officer or board of the City with the power to remove the violator shall within sixty (60) days of receiving a report of violation, report back to the Ethics Commission the disposition of the matter. In all other cases, a report of disposition may be made by the council at their discretion.⁵

Section 7.9 Advisory Opinions

- a. **ADVISORY OPINIONS.** Any officer, official or employee may seek from the commission, upon written request, an advisory opinion as to the application of any provision of this article to a particular situation or as to an interpretation of any such provision. The commission shall act on a written request within sixty (60) days of receipt. Such action may be an affirmative vote to decline ruling on the matter. In the event the commission fails to achieve a majority vote for any proposal, such failure shall be construed as an affirmative vote to decline ruling on the matter. The city clerk shall maintain a file of advisory opinions.⁶

Dear Commissioners,

Please consider the above revisions to the current Code of Ethics draft:

24-0481 - DRAFT CODE OF ETHICS AND ETHICS COMMISSION-JESSICA-2025-09-08

Sincerely,

David Schroeder Jr.

290 Whalehead Rd.

⁴ Norwich Code of Ethics - Ord. No. 909, Section 2-55 (c) 7

⁵ Norwich Code of Ethics - Ord. No. 909, Section 2-55 (c) 8

⁶ Norwich Code of Ethics - Ord. No. 909, Section 2-56



TOWN OF LEDYARD CONNECTICUT OFFICE OF THE MAYOR

Fred B. Allyn III
Mayor

Kristen Chapman
Executive Assistant

741 Colonel Ledyard Highway
Ledyard, CT 06339-1551
PH (860) 464-3222
FAX (860) 464-1126

Date: September 15, 2025

To: Gary St. Vil, Ledyard Town Council Chairman
Chief John Rich
Chief Dispatcher, Paula Smith
Chief Jon Mann, LFC
Chief Jeff Erhart, GFFC

Subject: Mayor out of Country

This memo is to notify you that I will be out of the country beginning on the morning of Sunday, September 21, 2025 and returning to CT the evening of Friday October 3, 2025.

In accordance with the Town of Ledyard Charter, Chapter III, Section 2 the Town Council Chairman shall be the Acting Mayor. Contact Chairman St. Vil at (860) 980-0656 or Gsvil@Ledyardct.org

I will have extremely limited cell and email communications during this time.

Sincerely,

Fred B. Allyn III
Mayor



Chairman John Rodolico

TOWN OF LEDYARD CONNECTICUT RETIREMENT BOARD

741 Colonel Ledyard Highway
Ledyard, CT 06339-1551
(860) 464-3220

September 16, 2025

Mayor Fred B. Allyn, III
741 Colonel Ledyard Highway
Ledyard, Connecticut 06339

Dear Mayor Allyn:

At its Regular Meeting held on September 16, 2025, the Retirement Board took the following actions.

- Approved the termination benefit for Shawn Schultz in the form of a refund of accumulated member contribution balance (in lieu of a monthly annuity benefit). The accumulated employee contribution balances with and without interest will be \$29,469.50 and \$20,582.75, respectively, as of September 1, 2025.
- Approved payment of invoice #609_09302025, to Fiducient Advisors, dated September 9, 2025, in the amount of \$12,849.65, for consulting costs for the Town of Ledyard Defined Benefit Pension Plan for billing period July 1, 2025, to September 30, 2025.
- Approved payment for USI invoice #90114374, dated August 30, 2025, including a \$400.00 benefit calculation for Shawn Shultz and \$8,750 for core installment fee for actuarial services plan year 2025, for a total amount of \$9,150.00.

Respectfully submitted,

Christina Hostetler
Town Hall Assistant

cc: Director of Finance
Director of Human Resources
Treasurer
Town Council



Chairman Gary St. Vil

TOWN OF LEDYARD CONNECTICUT

TOWN COUNCIL

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

September 11, 2025

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

Dear Mayor Allyn:

At its Regular Meeting held on September 10, 2025 the Town Council took the following action:

- Amended the Agenda to add
MOTION to set a Public Hearing (Hybrid Format - Video Conference and In-Person) Public Hearing date to be held on September 24, 2025 at 5:00 p.m. 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 And Ethics Commission* as presented in the draft dated September 10, 2025 .

- Appropriated \$3,634.21 to Account #21020301-57300-G0015 (Fire Marshall - New Equipment - State Grant).

In addition, authorized the expenditure of up to \$3,634.21 to purchase the Emergency Operations Center (EOC) Server Rack as part of the upgrades to Emergency Operations Center (EOC) .

The funding source for this project is the Town of Ledyard's FY 2026 Nuclear Safety Emergency Program Funding Allocation.

- Appropriated and transferred \$250,636 from Account #10188210-59300 (Transferred Funds) to Account #2250101-49002 (BOE CNR Transfers In)

In addition, appropriated \$250,636 to Account #22570101-58261 (BOE CNR Ag-Science).

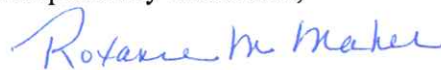
- Authorized the expenditure of up to \$25,000 from account #21090305-58915 CNR Undesignated to hire a consultant to assist with cost segregation analysis and form 990-T filings in order to secure investment tax credits available under IRC section 6417.

In addition, upon receipt of said tax credit, restore funding in the same amount to the Undesignated line in CNR.

- Granted a Bid Waiver to Wastewater Services Inc., DBA *Skips Wastewater Service* due to receiving fewer than the required three bids in response to Bid #2026-01 (Thickened Sludge Solids Removal) in accordance with Ordinance #200-001 (rev 1) "*An Ordinance for Purchasing*"
- Appropriated up-to \$1,500 from Account #21090305-58920 (CNR Acquisition of Open Space); and authorize the Mayor to hire a professional firm to appraise 480R Shewville Road.
- Set a Public Hearing (Hybrid Format - Video Conference and In-Person) Public Hearing date to be held on September 24, 2025 at 5:00 p.m. 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 And Ethics Commission*" as presented in the draft dated September 10, 2025 .

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
Administrator of Emergency Services
Board of Education
Director of Emergency Management
Water Pollution Control Authority



Chairman Gary St. Vil

TOWN OF LEDYARD CONNECTICUT TOWN COUNCIL

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

September 11, 2025

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

Dear Mayor Allyn:

At its Special Meeting held on September 10, 2025 the Town Council took the following action:

- Entered into executive session for the purpose of reviewing records, reports and statements with respect to collective bargaining between the Town of Ledyard and the Supervisors and Professionals AFSCME, Council 4, Local 818-45 for the period of July 1, 2025 – June 30, 2027.

This action is taken without prejudice and the Town Council's right to discuss in private, strategy and/or negotiations with respect to collective bargaining pursuant to Connecticut General Statutes Chapter 14 Section 1-200 and 1-201(b).

The Executive Session to Include All Town Councilors Present, Mayor Allyn, Director Human Resources Christine Dais; and Administrative Assistant Roxanne Maher.

Entered Executive Session at: 6:37 p.m.

Came out of Executive Session at: 6:47 p.m.

- Approved the request for funds necessary to implement the proposal between the Town of Ledyard and the Supervisors and Professionals AFSCME, Council 4, Local 818-45 for the period of July 1, 2025 – June 30, 2027.

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
Human Resources Director



TOWN OF LEDYARD

CONNECTICUT

TOWN COUNCIL

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

Chairman Gary St. Vil

September 15, 2025

Mr. Justin DeBrodt, Chairman
Inland Wetland & Water Courses Commission
5 Erins Way
Ledyard, Connecticut 06335

Dear Mr. DeBrodt:

At the Town Council's September 10, 2025 meeting Chairman St. Vil made adjustments to the liaison assignments. Councilor Adrienne Parad has been assigned as the liaison to the Inland Wetland & Water Courses Commission and may be reached at the following address:

Councilor Adrienne Parad
5 Brich Street
Ledyard, Connecticut 06339
Telephone: (401) 374-9381
e-mail address: adrienneP@ledyardct.org

Councilor Parad has been added to the Granicus Meeting Portal and will be receiving the Inland Wetland & Water Courses Commission's meeting materials.

Should you have any questions feel free to contact Councilor Parad, Town Council Chairman Gary St. Vil at telephone (860) 980-0656, or myself at telephone (860) 464-3203.

Sincerely,

Roxanne M. Maher
Administrative Assistant to the
Town Council

cc: Land Use Director/Town Planner
Assistant to the Director of Planning



Chairman Gary St. Vil

TOWN OF LEDYARD CONNECTICUT TOWN COUNCIL

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

September 15, 2025

Mr. Marcelle Wood, Chairman
Ledyard Planning & Zoning Commission
11 South Glenwoods Road
Gales Ferry, Connecticut 06335

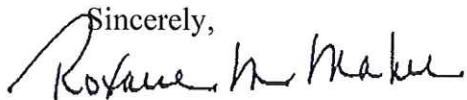
Dear Mr. Wood:

At the Town Council's September 10, 2025 meeting Chairman St. Vil made adjustments to the liaison assignments. Councilor Adrienne Parad has been assigned as the liaison to the Planning & Zoning Commission and may be reached at the following address:

Councilor Adrienne Parad
5 Brich Street
Ledyard, Connecticut 06339
Telephone: (401) 374-9381
e-mail address: adrienneP@ledyardct.org

Councilor Parad has been added to the Granicus Meeting Portal and will be receiving the Planning & Zoning Commission's meeting materials.

Should you have any questions feel free to contact Councilor Parad, Town Council Chairman Gary St. Vil at telephone (860) 980-0656, or myself at telephone (860) 464-3203.

Sincerely,


Roxanne M. Maher
Administrative Assistant to the
Town Council

cc: Land Use Director/Town Planner
Assistant to the Director of Planning



Chairman Gary St. Vil

TOWN OF LEDYARD

CONNECTICUT

TOWN COUNCIL

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

September 15, 2025

Mrs. Pamela Ball, Chairman
Ledyard Farmers Market Committee
95 Lambtown Road
Ledyard, Connecticut 06339

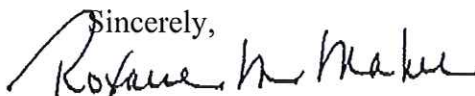
Dear Mrs. Ball:

At the Town Council's September 10, 2025 meeting Chairman St. Vil made adjustments to the liaison assignments. Councilor Jessica Buhle has been assigned as the liaison to the Ledyard Farmers Market Committee and may be reached at the following address:

Councilor Jessica Buhle
65 Pheasant Run Drive
Gales Ferry, Connecticut 06335
Telephone: (708) 307-6572
e-mail address: jbuh@ledyardct.org

Councilor Buhle is in the Granicus Meeting Portal and will be receiving the Ledyard Farmers Market Committee's meeting materials.

Should you have any questions feel free to contact Councilor Buhle, Town Council Chairman Gary St. Vil at telephone (860) 980-0656, or myself at telephone (860) 464-3203.

Sincerely,


Roxanne M. Maher
Administrative Assistant to the
Town Council

cc: Administrative Assistant

/rm



Chairman Gary St. Vil

TOWN OF LEDYARD CONNECTICUT TOWN COUNCIL

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

September 15, 2025

Mr. John Rodolico, Chairman
Retierment Board
40 Long Pond Road
Ledyard, Connecticut 06339

Dear Mr. Rodolico:

At the Town Council's September 10, 2025 meeting Chairman St. Vil made adjustments to the liaison assignments. Chairman St. Vil will be serving as the liaison to the Retirement Board Commission and may be reached at the following address:

Chairman Gary St. Vil
2 Thompson Street
Ledyard, Connecticut 06339
Telephone: (860) 980-0656
e-mail address: gsvil@ledyardct.org

Chairman St. Vil is in the Granicus Meeting Portal and will be receiving the Retirement Board's meeting materials.

Should you have any questions feel free to contact Chairman Gary St. Vil at telephone (860) 980-0656, or myself at telephone (860) 464-3203.

Sincerely,

Roxanne M. Maher
Administrative Assistant to the
Town Council

cc: Mayor's Office Assistant II

Roxanne Maher

From: Roxanne Maher
Sent: Thursday, September 18, 2025 11:11 AM
To: Town Council Group
Cc: Roxanne Maher
Subject: FW: Opportunity for MPTN and Ledyard partnership for health initiatives

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

From: Adrienne L. Parad <AdrienneP@ledyardct.org>
Sent: Thursday, September 18, 2025 10:03 AM
To: Setu K Vora <svora@mptn-nsn.gov>
Cc: Roxanne Maher <council@ledyardct.org>
Subject: Opportunity for MPTN and Ledyard partnership for health initiatives

Good morning Dr. Vora,

The Town Council committee on Community Relations and DEI met last night and we discussed reaching out to you. The MPTN has a wonderful health care program and we would love to learn more about how you ensure that your whole community is cared for. We had a great presentation by Dr. Michael Fine at the last full Town Council meeting and the community is now engaged in the research and planning required to institute a progressive plan to make a “Primary Care for all Americans” pilot in Ledyard. Would this be something that you would consider partnering with us to do? We are always looking for more ways to make our communities more cohesive!

Thank you for your consideration,
Adrienne Parad

Sent from my iPhone

Roxanne Maher

From: Roxanne Maher
Sent: Saturday, September 20, 2025 9:29 AM
To: Town Council Group
Subject: FW: Community outreach/hope house

From: Adrienne L. Parad <AdrienneP@ledyardct.org>
Sent: Friday, September 19, 2025 11:47 AM
To: Roxanne Maher <council@ledyardct.org>
Subject: Community outreach/hope house

I have been in contact with Annette of the Hope House and she invited me for a tour of the facility. I am scheduled for 9/30/25 at 10:00AM.

I would like to extend the invitation to any council members and/or the Mayor to join me in this community outreach discussion.

Thank you,

Adrienne Parad

Per Annette, this is her rationale:

What We Need from the Members of Government of the Town of Ledyard

We welcome the opportunity to meet with you and encourage you to invite anyone who may have an interest in our work. Our goals for building this relationship are twofold:

1. **Awareness & Collaboration** – We want you to have a clear understanding of who we are, the services we provide, and how these services can be utilized to better support the residents of Ledyard.
2. **Partnership & Funding Opportunities** – We hope to explore ways to partner with the Town, particularly in seeking financial assistance through available resources such as opioid settlement funding or cannabis revenue allocations.

By working together, we can strengthen the community response to recovery, prevention, and support services in Ledyard.



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2156

Agenda Date: 9/24/2025

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: 9/24/2025

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: 9/24/2025

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: 9/24/2025

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: 9/24/2025

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 #: 25-2433

Agenda Date: 9/24/2025

Agenda #: 4.

APPOINTMENT

Motion/Request:

MOTION to reappoint the following members the Inland Wetland & Water Courses Commission for a two (2) year term ending October 31, 2027:

- Mr. Michael Marelli (D) 4 Lee Brook Drive 193 Iron Street, Ledyard
- Mr. Justin DeBrodt (U) 5 Erins Way, Ledyard.

Background:

As members terms come due to expire the Committee and the Member's respective parties are solicited for their recommendations regarding the reappointment of the members.

Administrative Notes:

Both Mr. Debrodt and Mr. Marelli are interested in continuing to serve on the Inland Wetland & Water Courses Commission their reappointment shave been endorsed by the Commission and her respective parties.

Nominating Committee Recommendation:

Minority Representation - CGS 9-167a:

In accordance with Chapter IV; Section 8 of the Town Charter "Except as otherwise provided for in this Charter, the Town Council may appoint members to fill vacancies in other offices, boards, and commissions established by this Charter and by ordinance as vacancies may occur, and appointing members to such offices, boards, and commissions as may be created in the future. Such appointments shall be made by the Town Council for such terms and upon such conditions as provided in the respective ordinance".

Chapter IV, Section 9: "In making appointments and removals, the Town Council shall act by the affirmative votes of at least a majority of all its members.

All members of boards, commissions, and committees contained in this Charter, or subsequently created under this Charter, except members of the Building Code Board of Appeals, the Fire Marshal, and the Deputy Fire Marshal(s), shall be electors of the Town at the time of their appointment and during their terms of office."

Connecticut General Statutes

Sec. 9-167a. Minority representation. (a) (1) Except as provided in subdivision (2) of this subsection, the maximum number of members of any board, commission, legislative body, committee or similar body of the state or any political subdivision thereof, whether elective or appointive, who may be members of the same political party, shall be as specified in the following table:

Total Membership	Maximum from One Party
3	2
4	3
5	4
6	4
7	5
8	5
9	6
More than 9 Two-thirds of total membership	

(2) The provisions of this section shall not apply (A) to any such board, commission, committee or body whose members are elected wholly or partially on the basis of a geographical division of the state or political subdivision, (B) to a legislative body of a municipality (i) having a town meeting as its legislative body or (ii) for which the charter or a special act, on January 1, 1987, provided otherwise or (C) to the city council of an unconsolidated city within a town and the town council of such town if the town has a town council and a representative town meeting, the town charter provides for some form of minority representation in the election of members of the representative town meeting, and the city has a city council and a body having the attributes of a town meeting or (D) to the board of directors and other officers of any district, as defined in section 7-324, having annual receipts from all sources not in excess of two hundred fifty Thousand dollars.

(b) Prior to any election for or appointment to any such body, the municipal clerk, in cases of elections, and the appointing authority, in cases of appointments, shall determine the maximum number of members of any political party who may be elected or appointed to such body at such election or appointment. Such maximum number shall be determined for each political party in the following manner: From the number of members of one political party who are members of such body at the time of the election or appointment, subtract the number of members of such political party whose terms expire prior to the commencement of the terms for which such election or appointment is being held or made and subtract the balance thus arrived at from the appropriate number specified in column II of subsection (a) of this section.



TOWN OF LEDYARD CONNECTICUT OWN COUNCIL

741 Colonel Ledyard Highway
Ledyard, CT 06339-1551
(860) 464-3203
FAX (860) 464-1485
E-Mail Address:
council@ledyardct.org

August 5, 2025

Mr. Justin DeBrodt, Chairman
Inland Wetland and WaterCourses Commission
5 Erins Way
Ledyard, Connecticut 06339

Dear Mr. DeBrodt:

Members of the Inland Wetland and WaterCourses Commission are due for re-appointment as listed below. The Administration Committee of the Town Council would like your recommendations.

Please complete the shaded areas of each Commission members block and kindly return to the Town Council Office.

IWWC

Member's Name	Party Affiliat	Term Expiration	Commission Recommendation	Town Committee Endorsement	2 Year Term
					Attendance
Mr. Michael Marelli 4 Lee Brook Drive Ledyard, Connecticut 06339	D	10/31/2025	(Y) N	Y N	{ } Excellent { } Good { } Fair { } Poor
Mr. Justin DeBrodt 5 Erins Way Ledyard, CT 06339	U	10/31/2025	(Y) N	Y N	{ } Excellent { } Good { } Fair { } Poor

Committee Comments:

Recommend appointing Mr. James Thompson as a Regular Member to fill the open seat.

Your assistance is greatly appreciated. Thank you for your attention regarding this request.

Sincerely,
Roxanne M. Maher

Roxanne M. Maher
Administrative Assistant
to the Ledyard Town Council



TOWN OF LEDYARD CONNECTICUT OWN COUNCIL

741 Colonel Ledyard Highway
Ledyard, CT 06339-1551
(860) 464-3203
FAX (860) 464-1485
E-Mail Address:
council@ledyardct.org

Ms. Wendy Hellekson, Chairman
Democratic Town Committee
14L Lakeside Drive
Ledyard, Connecticut 06359

Dear Ms. Hellekson:

Members of the Inland Wetland and WaterCourses Commission are due for re-appointment as listed below. The Administration Committee of the Town Council would like your recommendations.

Please complete the shaded areas of each Commission members block and kindly return to the Town Council Office.

IWWC

Member's Name	Party Affiliat	Term Expiration	Commission Recommendation	2 Year Term	
				Town Committee Endorsement	Attendance
Mr. Michael Marelli 4 Lee Brook Drive Ledyard, Connecticut 06339	D	10/31/2025	Y N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Excellent <input checked="" type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor
Mr. Justin DeBrodt 5 Erins Way Ledyard, CT 06339	U	10/31/2025	Y N	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor

Committee Comments:

Your assistance is greatly appreciated. Thank you for your attention regarding this request.

Sincerely,

Roxanne M. Maher
Administrative Assistant
to the Ledyard Town Council



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2434

Agenda Date: 9/24/2025

Agenda #: *2.

APPOINTMENT

Motion/Request:

MOTION to reappoint the following members to the Library Commission for a two (2) year term ending November 7, 2027:

- Mr. John Bolduc (U) 14 Monticello Drive, Gales Ferry
- Ms. Ellin M. Grenger (D) 15 Bittersweet Drive, Gales Ferry
- Ms. Cynthia Wright (D) 6 Larule Leaf Drive, Gales Ferry
- Ms. Elizabeth Rumery (D) 2 Bluff Road, Gales Ferry.

Background:

As members terms come due to expire the Committee and the Member's respective parties are solicited for their recommendations regarding the reappointment of the members.

Administrative Notes:

All of these Members are interested in continuing to serve on the Inland Wetland & Water Courses Commission their reappointment have been endorsed by the Commission and her respective parties.

Ms. Barbara Candler 's term will also expire on November 7, 2025. However, she has indicated that she was not interested in continuing to serve on the Commission.

Nominating Committee Recommendation:

Minority Representation - CGS 9-167a:

In accordance with Chapter IV; Section 8 of the Town Charter "Except as otherwise provided for in this Charter, the Town Council may appoint members to fill vacancies in other offices, boards, and commissions established by this Charter and by ordinance as vacancies may occur, and appointing members to such offices, boards, and commissions as may be created in the future. Such appointments shall be made by the Town Council for such terms and upon such conditions as provided in the respective ordinance".

Chapter IV, Section 9: "In making appointments and removals, the Town Council shall act by the affirmative votes of at least a majority of all its members.

All members of boards, commissions, and committees contained in this Charter, or subsequently created under this Charter, except members of the Building Code Board of Appeals, the Fire Marshal, and the Deputy

Fire Marshal(s), shall be electors of the Town at the time of their appointment and during their terms of office.”

Connecticut General Statutes

Sec. 9-167a. Minority representation. (a) (1) Except as provided in subdivision (2) of this subsection, the maximum number of members of any board, commission, legislative body, committee or similar body of the state or any political subdivision thereof, whether elective or appointive, who may be members of the same political party, shall be as specified in the following table:

Total Membership	Maximum from One Party
3	2
4	3
5	4
6	4
7	5
8	5
9	6
More than 9 Two-thirds of total membership	

(2) The provisions of this section shall not apply (A) to any such board, commission, committee or body whose members are elected wholly or partially on the basis of a geographical division of the state or political subdivision, (B) to a legislative body of a municipality (i) having a town meeting as its legislative body or (ii) for which the charter or a special act, on January 1, 1987, provided otherwise or (C) to the city council of an unconsolidated city within a town and the town council of such town if the town has a town council and a representative town meeting, the town charter provides for some form of minority representation in the election of members of the representative town meeting, and the city has a city council and a body having the attributes of a town meeting or (D) to the board of directors and other officers of any district, as defined in section 7-324, having annual receipts from all sources not in excess of two hundred fifty Thousand dollars.

(b) Prior to any election for or appointment to any such body, the municipal clerk, in cases of elections, and the appointing authority, in cases of appointments, shall determine the maximum number of members of any political party who may be elected or appointed to such body at such election or appointment. Such maximum number shall be determined for each political party in the following manner: From the number of members of one political party who are members of such body at the time of the election or appointment, subtract the number of members of such political party whose terms expire prior to the commencement of the terms for which such election or appointment is being held or made and subtract the balance thus arrived at from the appropriate number specified in column II of subsection (a) of this section.



TOWN OF LEDYARD CONNECTICUT TOWN COUNCIL

741 Colonel Ledyard Highway
Ledyard, CT 06339-1551
(860) 464-3203
FAX (860) 464-1485
E-Mail Address:
council@ledyardct.org

August 5, 2025

Mr. John Bolduc
Library Commission
14 Monticello Drive
Gales Ferry, Connecticut 06335

Dear M. Bolduc:

Members of the Library Commission are due for re-appointment as listed below. The Administration Committee of the Town Council would like your recommendations.

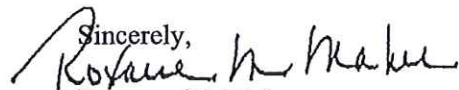
Please complete the shaded areas of each Commission members block and kindly return to the Town Council Office.

Library Commission					2 Year Term
Member's Name	Party Affiliation	Term Expiration	Commission Recommendation	Town Committee Endorsement	Attendance
Mr. John Bolduc 14 Monticello Drive Gales Ferry, CT 06335	U	11/7/2025	<input checked="" type="radio"/> Y <input type="radio"/> N	Y N	<input checked="" type="checkbox"/> Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor
Mr. Ellin M. Grenger 15 Bittersweet Drive Gales Ferry, CT 06335	D	11/7/2025	<input checked="" type="radio"/> Y <input type="radio"/> N	Y N	<input checked="" type="checkbox"/> Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor
Ms. Barbara Candler 3 Goulart Road Ledyard, CT 06339	D	11/7/2025	Y <input checked="" type="radio"/> N	Y N	<input checked="" type="checkbox"/> Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor
Cynthia Wright 6 Laurel Leaf Drive Gales Ferry, CT 06335	D	11/7/2025	<input checked="" type="radio"/> Y <input type="radio"/> N	Y N	<input checked="" type="checkbox"/> Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor
Ms. Elizabeth Rumery 2 Bluff Road Gales Ferry, CT 06339	D	11/7/2025	<input checked="" type="radio"/> Y <input type="radio"/> N	Y N	<input checked="" type="checkbox"/> Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor

Committee Comments:

BARBARA CANDLER DOES NOT WISH TO BE
REAPPOINTED

Your assistance is greatly appreciated. Thank you for your attention regarding this request.

Sincerely,

Roxanne M. Maher
Administrative Assistant
to the Ledyard Town Council



TOWN OF LEDYARD CONNECTICUT TOWN COUNCIL

741 Colonel Ledyard Highway
Ledyard, CT 06339-1551
(860) 464-3203
FAX (860) 464-1485
E-Mail Address:
council@ledyardct.org

Ms. Wendy Hellekson
Democrat Town Committee
14L Lakeside Drive
Ledyard, Connecticut 06339

August 5, 2025

Dear Chairman Hellekson:

Members of the Library Commission are due for re-appointment as listed below. The Administration Committee of the Town Council would like your recommendations.

Please complete the shaded areas of each Commission members block and kindly return to the Town Council Office.

Library Commission

Member's Name	Party Affiliation	Term Expiration	Commission Recommendation	Town Committee Endorsement	2 Year Term Attendance
Mr. John Bolduc 14 Monticello Drive Gales Ferry, CT 06335	<input checked="" type="radio"/>	11/7/2025	Y N	Y N	<input type="checkbox"/> Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor
Mr. Ellin M. Grenger 15 Bittersweet Drive Gales Ferry, CT 06335	D	11/7/2025	Y N	<input checked="" type="radio"/> Y N	<input type="checkbox"/> Excellent <input checked="" type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor
Ms. Barbara Candler 3 Goulart Road Ledyard, CT 06339	D	11/7/2025	Y N	<input checked="" type="radio"/> Y N	<input type="checkbox"/> Excellent <input checked="" type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor
Cynthia Wright 6 Laurel Leaf Drive Gales Ferry, CT 06335	D	11/7/2025	Y N	<input checked="" type="radio"/> Y N	<input type="checkbox"/> Excellent <input checked="" type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor
Ms. Elizabeth Rumery 2 Bluff Road Gales Ferry, CT 06339	D	11/7/2025	Y N	<input checked="" type="radio"/> Y N	<input type="checkbox"/> Excellent <input checked="" type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor

Committee Comments:

Your assistance is greatly appreciated. Thank you for your attention regarding this request.

Sincerely,

Roxanne M. Maher
Administrative Assistant
to the Ledyard Town Council



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2512

Agenda Date: 9/24/2025

Agenda #: 1.

TAX REFUND

Motion/Request:

MOTION to approve two tax refunds in the combined total amount of \$6,393.90 each exceeding \$2,400.00 in accordance with tax collector departmental procedures.

- Lereta Tax Service for Kin Chan & Cuihua Zheng \$3,291.61
- Eric Carlson \$3,102.29

Background:

In accordance with policies established for the Tax Collection Department, refunds to taxpayers exceeding \$2,400.00 are to be approved by the Town Council.

Both tax refunds are due to the double payment.

Finance Director Comment/Recommendation:

(type text here)

Mayor Comment/Recommendation:

(type text here)

Application for Refund of Taxes Paid

Return to: Ledyard Tax Collector's Office
741 Colonel Ledyard Highway
Ledyard, CT 06339

Amount of Refund

\$3,102.29

Date: June 25, 2025



<i>Eric Carlson</i>
<i>206 N Daniels St</i>
<i>Elmwood, IL 61529</i>

PLEASE READ, SIGN, AND DATE BELOW:

I am entitled to this refund because I have made the payments from funds under my control, and no other party will be requesting this refund.

I understand that false or deliberately misleading statements subject me to penalties for perjury and/or for obtaining money under false pretenses.

I hereby apply for a refund of taxes paid in accordance with Conn. Gen Sate. 12/129.

ERIC W. CARLSON

Print Name of Applicant/Agent

E. W. Carlson

Signature of Applicant/Agent

(Title of agent, where applicable)

7-21-2025

Date Signed

[Signature]

Tax Collector's Signature

9/1/25

Date

Do Not Write Below This Box -- Office Use Only

Date of Payment: 6/17/2025

Grand List Year: 2020

Grand List Number: 143490

Payment Type: Check

☒ Received by mail/email

Tax Type: MV PP RE SMV

Reason: Return of Refund from Corelogic on E. Carlson's behalf

Property Owner: Eric Carlson

Property Location: 68 Vinegar Hill Rd

Hand delivered in the office

ACTION TAKEN BY GOVERNING BODY

At a regular meeting of the Ledyard Town Council, held on the 24 day of September, 2025, it was voted to refund property taxes amounting to \$3,102.29 to Eric Carlson

Gary St. Vil, Chairman

Application for Refund of Taxes Paid

821049116

Return to: Ledyard Tax Collector's Office
741 Colonel Ledyard Highway
Ledyard, CT 06339

Amount of Refund

\$3,291.61

Date: February 24, 2025

Lereta Tax
Attn: Central Refund
901 Corporate Center Dr
Pomona, CA 91768



PLEASE READ, SIGN, AND DATE BELOW:

I am entitled to this refund because I have made the payments from funds under my control, and no other party will be requesting this refund.
I understand that false or deliberately misleading statements subject me to penalties for perjury and/or for obtaining money under false pretenses.
I hereby apply for a refund of taxes paid in accordance with Conn. Gen Stat. 12-129.

✓ Myma Mares
Signature of Applicant/Agent
(Title of agent, where applicable)

[Signature]
Tax Collector's Signature

✓ 6-10-25
Date Signed

9/10/2025
Date

Do Not Write Below This Box -- Office Use Only

Date of Payment: 12/30/2024
Grand List Year: 2023
Grand List Number: 121870
Payment Type: Check
☒ Received by mail/email

Tax Type: MV PP RE SMV
Reason: Double payment for Jan 2025 installment
Property Owner: Kin Chan + Cuihua Zheng
Property Location: 15 Oakridge Dr
Hand delivered in the office

ACTION TAKEN BY GOVERNING BODY

At a regular meeting of the Ledyard Town Council, held on the 24 day of September, 2025, it was voted to refund property taxes amounting to \$3,291.61 to Lerta Tax



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2457

Agenda Date: 9/24/2025

Agenda #: 7.

APPOINTMENT

Motion/Request:

MOTION to appoint Mr. James Thompson (D) 6 Pennywise Lane, Ledyard, to the Inland Wetland & Water Courses Commission to complete a two (2) year term ending October 31, 2026 filling a vacancy left by Ms. Lynmarie Thompson.

Background:

Ms. Lynmarie Thompson resigned on December 12, 2024 (Please see attached)

Administrative Notes:

IWWC Chairman DeBrodt has requested that Alternate Member Mr. James Thompson be moved/appointed as a Regular Member to fill Ms. Thompson's vacancy.(Please see attached)

Nominating Committee Recommendation:

Minority Representation - CGS 9-167a:

In accordance with Chapter IV; Section 8 of the Town Charter "Except as otherwise provided for in this Charter, the Town Council may appoint members to fill vacancies in other offices, boards, and commissions established by this Charter and by ordinance as vacancies may occur, and appointing members to such offices, boards, and commissions as may be created in the future. Such appointments shall be made by the Town Council for such terms and upon such conditions as provided in the respective ordinance".

Chapter IV, Section 9: "In making appointments and removals, the Town Council shall act by the affirmative votes of at least a majority of all its members.

All members of boards, commissions, and committees contained in this Charter, or subsequently created under this Charter, except members of the Building Code Board of Appeals, the Fire Marshal, and the Deputy Fire Marshal(s), shall be electors of the Town at the time of their appointment and during their terms of office."

Connecticut General Statutes

Sec. 9-167a. Minority representation. (a) (1) Except as provided in subdivision (2) of this subsection, the maximum number of members of any board, commission, legislative body, committee or similar body of the

state or any political subdivision thereof, whether elective or appointive, who may be members of the same political party, shall be as specified in the following table:

Total Membership	Maximum from One Party
3	2
4	3
5	4
6	4
7	5
8	5
9	6
More than 9 Two-thirds of total membership	

(2) The provisions of this section shall not apply (A) to any such board, commission, committee or body whose members are elected wholly or partially on the basis of a geographical division of the state or political subdivision, (B) to a legislative body of a municipality (i) having a town meeting as its legislative body or (ii) for which the charter or a special act, on January 1, 1987, provided otherwise or (C) to the city council of an unconsolidated city within a town and the town council of such town if the town has a town council and a representative town meeting, the town charter provides for some form of minority representation in the election of members of the representative town meeting, and the city has a city council and a body having the attributes of a town meeting or (D) to the board of directors and other officers of any district, as defined in section 7-324, having annual receipts from all sources not in excess of two hundred fifty Thousand dollars.

(b) Prior to any election for or appointment to any such body, the municipal clerk, in cases of elections, and the appointing authority, in cases of appointments, shall determine the maximum number of members of any political party who may be elected or appointed to such body at such election or appointment. Such maximum number shall be determined for each political party in the following manner: From the number of members of one political party who are members of such body at the time of the election or appointment, subtract the number of members of such political party whose terms expire prior to the commencement of the terms for which such election or appointment is being held or made and subtract the balance thus arrived at from the appropriate number specified in column II of subsection (a) of this section.



TOWN OF LEDYARD CONNECTICUT OWN COUNCIL

741 Colonel Ledyard Highway
Ledyard, CT 06339-1551
(860) 464-3203
FAX (860) 464-1485
E-Mail Address:
council@ledyardct.org

August 5, 2025

Mr. Justin DeBrodt, Chairman
Inland Wetland and WaterCourses Commission
5 Erins Way
Ledyard, Connecticut 06339

Dear Mr. DeBrodt:

Members of the Inland Wetland and WaterCourses Commission are due for re-appointment as listed below. The Administration Committee of the Town Council would like your recommendations.

Please complete the shaded areas of each Commission members block and kindly return to the Town Council Office.

IWWC

Member's Name	Party Affiliat	Term Expiration	Commission Recommendation	Town Committee Endorsement	2 Year Term
					Attendance
Mr. Michael Marelli 4 Lee Brook Drive Ledyard, Connecticut 06339	D	10/31/2025	(Y) N	Y N	{ } Excellent { } Good { } Fair { } Poor
Mr. Justin DeBrodt 5 Erins Way Ledyard, CT 06339	U	10/31/2025	(Y) N	Y N	{ } Excellent { } Good { } Fair { } Poor

Committee Comments:

Recommend appointing Mr. James Thompson as a Regular Member to fill the open seat.

Your assistance is greatly appreciated. Thank you for your attention regarding this request.

Sincerely,
Roxanne M. Maher

Roxanne M. Maher
Administrative Assistant
to the Ledyard Town Council



TOWN OF LEDYARD CONNECTICUT OWN COUNCIL

741 Colonel Ledyard Highway
Ledyard, CT 06339-1551
(860) 464-3203
FAX (860) 464-1485
E-Mail Address:
council@ledyardct.org

Ms. Wendy Hellekson, Chairman
Democratic Town Committee
14L Lakeside Drive
Ledyard, Connecticut 06359

Dear Ms. Hellekson:

Members of the Inland Wetland and WaterCourses Commission are due for re-appointment as listed below. The Administration Committee of the Town Council would like your recommendations.

Please complete the shaded areas of each Commission members block and kindly return to the Town Council Office.

IWWC

Member's Name	Party Affiliat	Term Expiration	Commission Recommendation	2 Year Term	
				Town Committee Endorsement	Attendance
Mr. Michael Marelli 4 Lee Brook Drive Ledyard, Connecticut 06339	D	10/31/2025	Y N	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Excellent <input checked="" type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor
Mr. Justin DeBrodt 5 Erins Way Ledyard, CT 06339	U	10/31/2025	Y N	Y N	<input type="checkbox"/> Excellent <input type="checkbox"/> Good <input type="checkbox"/> Fair <input type="checkbox"/> Poor

Committee Comments:

Your assistance is greatly appreciated. Thank you for your attention regarding this request.

Sincerely,
Roxanne M. Maher

Roxanne M. Maher
Administrative Assistant
to the Ledyard Town Council

RECEIVED FOR RECORD

2024 DEC 17 AM 11:28

[Handwritten signature]

December 12, 2024

Ledyard Town Council
Ledyard Town Hall
Ledyard, CT 06335

Dear Council Members,

Please accept my resignation from the Inland Wetland and Watercourses Commission, effective February 1, 2025.

I wish to thank and acknowledge the many volunteer IWWC members who have given time and support over the thirty-plus years that I have served. I also want to acknowledge the support of the Land use staff in critical areas such as preparation and management of the process. As development becomes increasingly complex, I can only hope that the Council, the Town, and citizenry continue to support and recognize the efforts of the IWWC staff and volunteers in fulfilling the IWWC's legally mandated work.

Sincerely yours,

[Handwritten signature of Lynn Marie R. Thompson]
Lynn Marie R. Thompson

Cc: e-mail to Land Use
e-mail to IWWC Chair



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 24-0481

Agenda Date: 10/8/2025

Agenda #:

ORDINANCE

Motion/Request:

Discussion and possible action to review and consider text amendments to the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission*” in preparation to present at a Public Hearing.

Background:

Public Hearing- September 24, 2025

As a follow-up to September 24, 2025 Public Hearing, Chairman St. Vil requested from the Town Council the following deliverables.

1) Resident Questions & Responses

For the September 24, 2025 Public Hearing on the proposed “**Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission**” (draft attached), please submit:

- **The question** you wish to address (as stated at the hearing).
- **Your written response** (suitable for the official record).
- **Deadline:** Wednesday, October 1, 2025 (email to Town Council Office).

These Q&As will be included in the 9/24/2025 Public Hearing Minutes as “Post Meeting Notes.”

2) Proposed Amendments

A discussion on the proposed ordinance is planned for the October 8, 2025 Town Council meeting. To ensure a productive, collaborative session:

- Review the draft ordinance and the hearing video (**Town Council - 2025-09-24 5:00 PM - Public Hearing**).
- If there are issues preventing your support, **propose solutions in full amendment text** (additions/removals), ready for debate and a vote for inclusion on October 8.
- **Deadline:** Wednesday, October 1, 2025 (email amendment text to the Town Council to be included the meeting packet).

The Administration Committee began working to draft a Code of Ethics and Ethics Commission on June 12, 2024 under the Committee Chairmanship of Councilor Garcia-Irizarry.

March, 2025 changes were made Standing Committees with Councilor Buhle being assigned as Committee Chairman of the Administration Committee.

The Committee spent several months receiving residents comments and drafting a proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”.

- **June 23, 2025** the Administration Committee forwarded a draft Ordinance dated June 11, 2025 to Town Attorney Matt Ritter for his legal review and recommendations.
- **June 25, 2025** Councilor Buhle and Attorney Ritter spoke by telephone about the proposed Ordinance.
- **July 14, 2025** Attorney Ritter provided a Red Line document with his legal recommendations
- **August 6, 2025** Administration Committee Meeting; Councilor Buhle asked the Administration Committee to review Attorney Ritters comments and recommendation for discussion at their September 01, 2025 meeting.
- **September 8, 2025** Councilor Buhle provided a revised draft “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethic Commission*”.(dated July 8, 2025).
- **September 10, 2025** Administration Committee Meeting the Committee reviewed the revised draft provided by Councilor Buhle and made a change to the Section 8 “*Penalties for Violations of the Code of Ethics*”(f) to strike the following language “**and/or removal from elected or appointed office**” as noted below:
 - Termination of employment **and/or removal from elected or appointed office;**
- And forwarded a proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethic Commission*” presented in the draft dated September 10, 2025 to the Town Council for approval and also recommend setting a Public Hearing on September 24, 2025.
- **September 10, 2025** Town Council Meeting - Set Public Hearing on September 24, 2025 to receive public comment on the *An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethic Commission*” presented in the draft dated September 10, 2025.
- **September 24, 2025** Public Hearing - 20 Residents/Town Staff provided comments regarding the proposed Ordinance.

June, 2024 At the request of Residents, Chairman Rodriguez referred the subject of an Ethics Commission to the Administration Committee.

Over the years previous Town Councils have discussed establishing an Ethics Commission.

Please find attached the following documentation:

- Draft Ordinance Establishing a Town of Ledyard Code of Ethics
- Acknowledgement Form
- Fraud Policy
- Town Charter- Investigation-Conflict of Interest
- Attorney Dietter email re: Review draft Ordinance
- ACC Municipal Ethics Minimum Provisions
- Former State Representative France email dated 3/4/2019
- CGS Chapter 10 Ethics Public Employees
- State Representative Reynolds memo dated July 9, 2008 re: House Bill 6502- Ethics Reform

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, ~~Section 8~~ of the Town Charter, there is hereby established a Town of Ledyard Code of Ethics ~~and Ethics Commission~~.

Section 2. Declaration of Policy and Purpose

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

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

Section 3. Applicability

The ~~Ethics~~ Code of Ethics shall apply to all Town ~~Officials, Town Officers, and Town Employees, whether elected and/or appointed, paid or unpaid.~~ The Ethics Code shall also apply to those conducting business with the Town of Ledyard officials, including members of the Board of Education, and all Town and Board of Education employees.

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

Section 4. Definitions

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

- ~~1. “Persons governed by this Code” means ALL Town/municipal officials, municipal officers, and municipal employees, whether elected and/or appointed, paid or unpaid.~~
- ~~2. “Business” means any entity through which activity for profit or not for profit is conducted including, but not limited to a corporation, limited liability corporation, partnership, proprietorship, firm, enterprise, franchise, association, organization, or self-employed individual.~~
- ~~1. 3. “Complainant” means any person who signedsigns a complaint under penalties of false statement alleging a violation of this Code.~~
- ~~2. 4. “Confidential Information” means information, ~~whether transmitted orally or in writing, which is obtained~~ acquired by a Town official or Town employee in the course of and by reason of ~~the public position of office held, that is not, at the time of transmission,~~performing an individual’s official duties and which is not a matter of public record or public knowledge.~~
- ~~5. “Confidential Investigation” means the examination, prior to the finding of probable cause, of both written and oral evidence, that is not to be disclosed to any third party by anyone connected with the investigation, except upon the written request of the respondent.~~
- ~~3. “Financial Interest” means any interest that has a monetary value of more than one hundred dollars (\$100.00) in any calendar year and is not common to the other citizens of the Town.~~
- ~~6. “Financial Interest” means pecuniary or material benefit accruing to a town official/employee, spouse or minor child of an officer, official or employee of the Town as a result of a contract, transaction, zoning decision or other matter which is, or may be, the subject of an official act or action by or with the Town of Ledyard except for such contracts of transactions which by their terms and by the substance of their provisions confer the opportunity and right to realize the accrual of similar benefits to all persons and/or property similarly situated.~~

~~“Financial Interest” shall be deemed to exist if any municipal/Town officer, member, employee, immediate family of a municipal officer, official or employee of the Town might, directly or indirectly, derive financial gain or suffer loss from any purchase, contract, transaction, zoning decision, or other matter involving any such Town office, board, commission, authority or committee and shall also be deemed to exist if a business or professional enterprise in which the municipal officer, employee, member or commission has any financial interest as owner, member, partner, officer, employee or stockholder or has any other form of participation which will be affected by the outcome of the matter under consideration.~~
- ~~4. 7. “Gift” means anything of economic value in excess of one hundred dollars (\$25.00100.00), including but not limited to entertainment, food, beverage, travel, and lodging, ~~given or paid.~~~~

A gift does not include:

- a. A political contribution ~~reported as required by law or a donation or payment as described in subdivision (9) or (11) of subsection (b) of 9-333b~~ that is otherwise reported in accordance with the law.
- b. Services provided by persons volunteering their time.
- c. A commercially reasonable loan that is made on terms not more favorable than loans made in the ordinary course of business.
- d. A gift received from a member of a person's immediate family ~~or fiancé.~~
- e. Goods or services which are provided to the municipality and facilitate government actions or functions.
- f. A certificate, plaque, ~~or~~ other ceremonial award.
- g. A rebate or discount on the price of anything of value made in the ordinary course of business, without regard to that person's status.
- ~~h. Printed or recorded information germane to government action or functions.~~
- h. i. ~~An honorary degree bestowed upon a public official or public employee by a public or private university.~~
- i. j. ~~A meal provided at an event~~ Costs associated with attending a conference or business meeting and/or the registration or entrance fee to attend such ~~an event, conference or business meeting~~ in which the public Town official or public Town employee participates in his or her official capacity.
- ~~k. A meal provided in the home by a Ledyard resident.~~
- j. Any gift provided to a Town Official or Town Employee or to an immediate 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.
- ~~l. Gift giving occasions recognized by the public, including, Christmas, Chanukah, birthdays, the birth or adoption of a child, weddings, First Communions, Confirmations, or Bar/Bat Mitzvahs, provided the total value of such gifts for each event shall not exceed \$25.00.~~
- 5. ~~8.~~ *"Immediate family"* means spouse, fiancé, child, parent, grandchild, brother, sister, grandparent, niece, nephew, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, and brother-in-law.

9. ~~“On The Record” means in writing, signed and dated, or a directive to the secretary taking the minutes of a meeting to note in the minutes of the meeting a special disclosure or statement.~~
10. ~~“Personal Beneficial Interest” means any interest, other than financial, which would affect the action of the official or employee, except if that interest is based solely on the responsibility of his/her town office or employment. Membership in or affiliation with a social, fraternal, charitable, service, educational, religious, governmental or similar non-profit organization is not deemed to automatically create a presumption of personal interest unless the official employee is also an employee of the organization.~~
11. ~~“Probable Cause” is defined by determining whether the facts would warrant a reasonable person to believe that a Town official, officer, or employee violated this Code; the belief should be more than mere suspicions, but less than proof beyond a reasonable doubt.~~
6. 12. ~~“Respondent” means any person accused of violating this Code.~~
7. 13. ~~“Town Official, Officer, or Employee” means an individual whether elected or appointed, whether paid or unpaid, full or part time”~~ means any person holding elective or appointive office in the government of the Town, including members of boards, commissions, and committees in the service of the Town of Ledyard the Board of Education.
8. “Town Employee” means any person receiving a salary, wages or stipend from the Town or the Board of Education for services rendered, whether full-time or part-time.

Section 5. Conflict of Interest Provisions

1. ~~Persons governed by this Code shall not engage in or participate in any business or transaction, nor have an interest, direct or indirect, which is incompatible with the proper discharge of that person or persons’ independent judgement or action in the performance of that person or persons’ official duties.~~
1. 2. ~~Persons governed by this Code shall not be financially interested or have any personal beneficial~~ A Town official or any member of his or her immediate family shall not have a financial interest, ~~in any contract or purchase order for any supplies, materials, equipment or contractual services furnished to or used by the board, agency or commission of which that person~~ or persons is or are an employee(s) is an elected or appointed member.
2. A Town employee or any member of his or her immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment or contractual services that is within the purview of such Town employee.
3. ~~It is further provided, notwithstanding the above, that the~~ The Mayor of the Town of Ledyard, and members of the Town Council of the Town of Ledyard, ~~members of the Board of Education of the Town of Ledyard shall not be financially interested, or have any personal beneficial interest, either directly or indirectly, and any members of their immediate family shall not have a financial interest~~ in any contract or purchase order

for any supplies, materials, equipment, or contractual services furnished to or used by ~~any board, agency, or commission of~~ the Town of Ledyard.

- ~~A. A Town official, officer, or employee shall refrain from voting upon or otherwise participating in any matter on behalf of the municipality if he/she, a member of his/her immediate family, or a business with which the person is associated has a financial or personal interest in the transaction or contract, including but not limited to the sale of real estate, material, supplies, or services to the municipality.~~
~~If such participation is within the scope of the municipal official's or municipal employee's official responsibility, he or she shall be required to provide written disclosure, that sets forth in detail the nature and extent of such interest, to the Town clerk.~~
~~Notwithstanding the prohibition in subsection 5(A) a Town official, officer, or employee may vote or otherwise participate in a matter if it involves a determination of general policy, and the interest is shared with a substantial segment of the population of the Town of Ledyard.~~
- ~~B. Persons governed by this Code shall not accept or receive, directly or indirectly, from any person or business to which any contract or purchase order may be awarded by the Town of Ledyard or any of its boards, agencies, or commissions any money, rebate, or gifts, or any promise, obligation, or contract for future reward or compensation.~~
~~No Town officials or employees shall accept a gift or engage in private employment or render services when the gift, employment, or services are incompatible with the proper discharge of the official duties of the Town official or Town employee, or could tend to impair independence of judgement or action by the Town official or Town employee, in the performance of his or her official duties. If a prohibited gift is offered to a Town official or a Town employee, he or she shall refuse it, return it, or pay the donor the market value of the gift.~~
- ~~C. To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of this Code, a Town Official or Town employee, not otherwise restrained by the Code, shall exercise care when appearing before other Agencies and shall disclose whether he or she is appearing in his or her official capacity or as a private citizen.~~
- ~~D. Persons governed by this Code who have a financial or personal interest in any transactions or contract with the Town, including but not limited to the sale of real estate, materials, supplies, or services to the Town, on which that person or persons may be called upon to act in that persons official capacity shall not vote or otherwise participate in the transaction on behalf of the Town. That person (or persons) shall declare on the record that person (or persons) has or have a conflict of interest.~~
- ~~E. Persons governed by this Code shall not request or permit the use of Town-owned vehicles, equipment, facilities, materials, or property for personal convenience or profit, except when such are available to the public generally, or provided a municipal policy for the use of such Town official/employee in the interest of the Town.~~
- ~~F. No Town official or Town employee shall use his or her position or office and any confidential information acquired by a Town official or Town employee through his or her office or position to further such official's or employee's personal or financial interest, or interest of his or her spouse, child, child's spouse, parent, grandparent, brother or sister,~~

~~cousin, niece, nephew, father in law; mother in law; brother in law; sister in law; or a business with which the person is associated.~~

4. ~~G. No Town official or Town employee may appoint or hire or participate in influencing the appointment or hiring of his or her spouse, child, child's spouse, parent, grandparent, brother or sister, cousin, niece, nephew, father in law; mother in law; brother in law; sister in law; or a business with which the person is associated for any type of employment with the Town, including by contract, unless the contract is competitively bid. No Town official or Town employee may directly supervise his or her family member or any business with which the person is associated. No Town official or Town employee may exercise authority or make recommendations with regard to personnel actions involving such family member or any business with which the person is associated.~~ shall solicit or accept a gift from any person or business entity which is interested directly or indirectly in any business transaction or pending matter that is within the purview of such Town official or Town employee.
5. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials or property for personal convenience or profit.
6. ~~H. No Town official or Town employee, or shall disclose or use confidential information acquired in the course of and by reason of his or her official duties for financial gain or for the financial gain of a member of his or her immediate family, or a business with which the person is associated shall enter into a contract with the Town valued at five hundred (500) dollars or more, other than a contract of employment as a Town employee, or pursuant to a court appointment, unless the contract has been awarded through a process of public notice and competitive bidding.~~
- ~~I. No persons in their capacities as Town official or Town employee shall represent anyone, other than the Town, concerning any matter before any board, commission, council, committee, or department of the Town. Nothing herein shall prohibit or restrict a Town official or Town employee from appearing before any board, commission, council, committee, or department of the Town on his or her own behalf, or on behalf of a member of his or her immediate family, or from being a party in any action, proceeding or litigation brought by or against such Town official or Town employee to which the Town is a party.~~
7. No Town official or Town employee may directly hire or supervise a member of his or her immediate family.
8. ~~J. No former Town official or Town employee member shall represent anyone for compensation before any Town agency, board, commission, council, or committee, or department in which he or she was formerly employed at any time within an elected or appointed member for a period of one (1) year after termination of his or her following the end of such former member's service with the Town on such agency, board, commission, council or committee.~~
9. ~~K. No former Town official or Town employee shall represent anyone other than the Town concerning any particular matter in~~ for compensation before any Town agency or

department for which he or she ~~participated personally and substantially while in Town service.~~

~~L. was formerly employed for No former Town official or Town employee shall disclose or use confidential information acquired in the course of and by reason of his or her official duties, for financial gain for himself or herself or others.~~

~~M. No former Town official or Town employee who participated substantially in the negotiation or award of a Town contract obliging the Town to pay an amount of twenty-five thousand (25,000) dollars or more, or who supervised the negotiation or award of such contract shall seek or accept employment with a party to the contract other than the Town for a period of one (1) after his or her resignation from Town office or position if his or her resignation occurs less than one year after the contract is signed year following the end of such former employee's employment with the Town.~~

~~N. Willful violation by any such officer or employee of the provisions of this Code shall be grounds for his/her removal in accordance with Chapter IX, Section 6 of the Town Charter. Violation of this section with the knowledge, express or implied, of any person or corporation participating in such contract, transaction, or decision shall render the same voidable by the Town Council, or by a court of competent jurisdiction.~~

~~Section 6. Disclosure of Interests Required~~

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

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

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

- ~~1. All real estate located within the Town of Ledyard owned by such elected official or held under a lease for a term exceeding five years, excluding, however, his or her principal residence. The foregoing shall also apply to real estate owned or leased, as aforesaid, by a corporation, trust or partnership in which any such elected official is the legal or equitable holder of at least 5% of the legal or equitable interests in said corporation, trust or partnership.~~
- ~~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-percent interest, and which firm, proprietorship, partnership, corporation, or limited liability corporation has sold or supplied goods or services in excess of \$10,000 per~~

~~annum to the Town of Ledyard during the two years immediately preceding such official's election to office.~~

3. ~~Any income, fees, salary, or wages directly or indirectly received by such elected official from the Town of Ledyard or its political subdivisions during the two years immediately preceding such official's election to public office.~~

Section ~~7~~6. ~~Establishment of An~~ Ethics Commission

1. Purpose

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

1. 2. Membership

The Ethics Commission shall be comprised of five (5) regular members and two (2) ~~alternates of whom~~alternate members. All members of the Ethics Commission shall be electors of the Town. ~~Political minority rules shall apply for the membership of this commission.~~

~~The Regular Members shall include:~~

- A. ~~• At~~The five (5) Regular Members of the Commission shall include at least one ~~member with Legal background (attorney, or paralegal (current or retired)~~
• ~~and at~~ At least one member with ~~Financial~~a financial background.
• ~~Three Members from the Community at Large~~

- B. No more than two (2) Regular Members may be affiliated with any one political party. Both Alternate Members may not be affiliated with the same political party. At least one Regular Member and one Alternate Member shall be registered as an unaffiliated. ~~Minority Representation shall apply separately to each of the subsets: Regular Members and Alternate Members.~~

- C. ~~Members and alternate members must be residents of the Town of Ledyard. No~~Regular member or ~~alternate~~Alternate member of the Ethics Commission shall:

- A. Be a ~~public~~Town official or ~~public~~Town employee of the ~~municipality; or an~~Town of Ledyard or be a member of the immediate family of any Town official;
~~official; or employee of a quasi public agency of the municipality.~~
- B. Have held any elected Town or State ~~Office~~office for a period of one (1)-year prior to being appointed to the Ethics Commission.
- C. ~~Hold office in a political party or political~~Be a member of a town committee.
- D. Serve as a member of another Town agency, board, commission, council or committee.

~~E. Hold or campaign to seek any Town Office.~~

- E. ~~F.~~ Have been employed by the Town for a period of one (1) prior to

An Ordinance Establishing an Ethics Commission for the Town of Ledyard

being appointed to the Ethics Commission.

~~G. Serve as an member of any other Town Committee, Commission, or Board, or be part of the immediate family of any Town official or Town employee.~~

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

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

2. ~~3.~~ Terms of Appointment

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

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

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

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

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

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

3. ~~4.~~ Authority/Duties

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

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

4. 5. Procedures

aA. Filing of Complaints

~~Complaints of~~A complaint alleging any violation of the ~~code~~Code of Ethics ~~related to unethical behavior concerning any municipal official, officer, or employee of the Town of Ledyard may be made by any person and shall be made in person~~shall be made on a form prescribed by the Ethics Commission and signed under penalty of false statement ~~before the Ledyard Town Clerk; or Assistant Town Clerk.~~ The form shall be delivered to the Town Clerk who shall transmit a copy of the complaint to the Chairperson of the Ethics Commission 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~~Code of Ethics unless it is filed with the Ethics Commission within ~~four~~three (43) years after the violation alleged in the complaint has been committed, ~~and within six (6) months of discovery. If multiple violations are alleged, the four (4) year limitation shall be applied separately to each such alleged violation.~~

The Complaint shall include:

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

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

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

B. ~~b.~~ Evaluation and Acknowledgement

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

~~respondent(s) shall have ten (10) business days to submit any response to the Ethics Commission.~~

~~iv. If the Complaint is applicable to this Code, the Town Council shall request the Ethics Commission convene an executive session within fourteen (14) business days of the issuance of notification to the complainant.~~

~~c. Investigation of Probable Cause Confidential Investigation~~

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

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

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

~~i. Within thirty~~thirty~~sixty (30~~30~~60) business days after the response period specified in the previous paragraph of the receipt of a complaint, the Ethics Commission shall ~~meet in an executive session to review and~~ determine ~~if whether~~ there is probable cause that a violation of the Code of Ethics has occurred. ~~In so doing, A finding of probable cause means that based on a review of the available information~~ the Ethics Commission ~~shall only consider the information submitted by~~ 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 ~~does not find~~makes a finding of probable cause ~~of a violation of the Code, it shall notify in writing to, which shall require four (4) affirmative votes, it shall so advise~~ both the complainant and ~~the~~ respondent ~~within five (5) business days of its findings and a summary of the reasons and the complaint, and the record of investigation shall remain confidential. Upon a finding of no probable cause, the case file will be sealed and all matters pertaining thereto shall remain confidential.~~and began a formal investigation process.~~

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

~~Council will authorize the Ethics Commission to perform an investigation. An investigation shall be conducted within (90) business days of determining whether the complaint is in violation of this Code.~~

~~All notifications under this section shall be sent via certified mail, return receipt requested. In the conduct of its investigation, the Ethics Commission shall have the power to hold hearings, administer oaths, examine witnesses, receive oral and documentary evidence, subpoena witnesses, and to require the production for examination by the Commission of any books and papers as permitted by law which are relevant in any manner under investigation or in question.~~

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

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

C. d. 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.

D. 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 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. ~~The~~If the Ethics Commission ~~shall conduct a hearing to determine if a violation of the code has occurred; and confidentiality of complaints, evaluations of possible violations, and investigations shall be maintained~~determines that the Code of Ethics was violated, it will provide the respondent and 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 or her right to appeal the decision pursuant to Section 1-82a4-183 of the Connecticut General Statute. Unless a judge trial referee makes a finding of probable cause, a complaint alleging a violation of this part shall be confidential except upon the request of the respondentStatutes.

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

E. Penalties for Violations of the Code of Ethics.

~~i. Of an accused to confront and cross-examine his/her accuser.~~

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

~~ii. Of every witness or party to be represented by an attorney at law of his/her Choice.~~

~~iii. Of every witness to decline to answer questions in accordance with the Fifth Amendment to the Constitution of the United States.~~

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

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

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

e. Finding/Sanctions

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

~~Upon finding of a violation of any provision of the Code, the Ethics Commission will refer the matter to the appropriate appointing or supervisory authority. The authority~~

~~affected will report within thirty (30) business days to the Ethics Commission the action taken, if any. Violators of the Code of Ethics are subject to penalties that may consist, but not limited to, any one or a combination of the following:~~

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

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

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

~~f. Appeals~~

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

~~g. Interpretation~~

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

Section ~~8~~7. Severability

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

Adopted by the Ledyard Town Council on: _____

S. Naomi Rodriguez, Chairman

Approve/Disapprove on: _____

Fred B. Allyn, III, Mayor

DRAFT

Summary report: Litera Compare for Word 11.9.1.1 Document comparison done on 7/14/2025 3:11:00 PM	
Style name: Default Style	
Intelligent Table Comparison: Active	
Original DMS: iw://cloudimanager.com/SG/22434477/1	
Modified DMS: iw://cloudimanager.com/SG/22434477/2	
Changes:	
<u>Add</u>	176
Delete	279
Move From	0
<u>Move To</u>	0
<u>Table Insert</u>	0
Table Delete	0
<u>Table moves to</u>	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	455

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.

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 and Town employees be independent, impartial, and responsible to the people; that governmental decision and policies be made in the proper channels of governmental structure; that public office and employment not be used for personal gain; and that the public has confidence in the integrity of its government.

Section 3. Applicability

The Code of Ethics shall apply to all Town officials, including members of the Board of Education, and all Town and Board of Education employees.

Section 4. Definitions

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

1. “*Complainant*” means any person who signs a complaint under penalties of false statement alleging a violation of this Code.
2. “*Confidential Information*” means information acquired by a Town official or Town employee 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.
3. “*Financial Interest*” means any interest that has a monetary value of more than one hundred dollars (\$100.00) in any calendar year and is not common to the other citizens of the Town.

4. “*Gift*” means anything of economic value in excess of one hundred dollars (\$100.00), including but not limited to entertainment, food, beverage, travel and lodging.

A gift does not include:

- a. A political contribution that is otherwise reported in accordance with the law.
 - b. Services provided by persons volunteering their time.
 - c. A commercially reasonable loan that is made on terms not more favorable than loans made in the ordinary course of business.
 - d. A gift received from a member of a person’s immediate family.
 - e. Goods or services which are provided to the municipality and facilitate government actions or functions.
 - f. A certificate, plaque or other ceremonial award.
 - g. A rebate or discount on the price of anything of value made in the ordinary course of business, without regard to that person’s status.
 - h. An honorary degree.
 - i. Costs associated with attending a conference or business meeting and/or the registration or entrance fee to attend such conference or business meeting in which the Town official or Town employee participates in his or her official capacity.
 - j. Any gift provided to a Town Official or Town Employee or to an immediate 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.
5. “*Immediate family*” means spouse, fiancé, child, parent, grandchild, brother, sister, grandparent, niece, nephew, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, and brother-in-law.
6. “*Respondent*” means any person accused of violating this Code.
7. “*Town Official*” means any person holding elective or appointive office in the government of the Town, including members of the Board of Education.

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

Section 5. Conflict of Interest Provisions

1. A Town official or any member of his or her immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment or contractual services furnished to or used by the board, agency or commission of which that person is an elected or appointed member.
2. A Town employee or any member of his or her immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment or contractual services that is within the purview of such Town employee.
3. The Mayor of the Town of Ledyard and members of the Town Council of the Town of Ledyard and any members of their immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment, or contractual services furnished to or used by the Town of Ledyard.
4. No Town official or Town employee shall solicit or accept a gift from any person or business entity which is interested directly or indirectly in any business transaction or pending matter that is within the purview of such Town official or Town employee.
5. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials or property for personal convenience or profit.
6. No Town official or Town employee shall disclose or use confidential information acquired in the course of and by reason of his or her official duties for financial gain or for the financial gain of a member of his or her immediate family.
7. No Town official or Town employee may directly hire or supervise a member of his or her immediate family.
8. No former Town official shall represent anyone for compensation before any Town agency, board, commission, council or committee in which he or she was formerly an elected or appointed member for a period of one (1) year following the end of such former member's service on such agency, board, commission, council or committee.
9. No former Town employee shall represent anyone for compensation before any Town agency or department for which he or she was formerly employed for a period of one (1) year following the end of such former employee's employment with the Town.

Section 6. Ethics Commission

1. Membership

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.

- A. The five (5) Regular Members of the Commission shall include at least one attorney or paralegal (current or retired) and at least one member with a financial background.
- B. No more than two (2) Regular Members may be affiliated with any one political party. Both Alternate Members may not be affiliated with the same political party. At least one Regular Member and one Alternate Member shall be registered as an unaffiliated.
- C. No Regular member or Alternate member of the Ethics Commission shall:
 - A. Be a Town official or Town employee of the Town of Ledyard or be a member of the immediate family of any Town official;
 - B. Have held any elected Town or State office for a period of one (1)-year prior to being appointed to the Ethics Commission.
 - C. Be a member of a town committee.
 - D. Serve as a member of another Town agency, board, commission, council or committee.
 - E. Have been employed by the Town for a period of one (1) prior to being appointed to the Ethics Commission.
 - F. Have any financial interest in matters before the Town or the Board of Education.
 - G. Have been found in violation of any federal, state, municipal or professional code of ethics.

2. Terms of Appointment

- A. Members shall be appointed by the Town Council for a term of three (3) years and shall serve until their successor has qualified or is removed by the Town Council.
- B. In making the original appointments under this ordinance, the Town Council shall designate two (2) regular members to serve for three (3) years, two (2) regular members to serve for two (2) years; one (1) regular member to serve for (1) year; one (1) alternate member to serve for three (3) years and one alternate member to serve for two (2) years. Thereafter, vacancies shall be filled for a three (3) year term.

- C. Inaugural members shall be eligible to serve two (2) additional three (3) year term beyond his/her initial appointment.
- D. Any vacancy on the Ethics Commission, other than by expiration of term, shall be filled for the unexpired portion of the term by the Town Council.
- E. 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.
- F. 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.

3. Authority/Duties

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

- A. To consult with the Town Attorney or another attorney hired by the Ethics Commission if so authorized by the Town Council.
- B. To request that the Town Attorney provide advisory opinions. Advisory opinions rendered by the Town Attorney, until amended or revoked by the Ethics Commission, shall be binding and shall be deemed to be final decisions.

4. Procedures

A. Filing of Complaints

A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission and signed under penalty of false statement. The form shall be delivered to the Town Clerk who shall transmit a copy of the complaint to the Chairperson of the Ethics Commission 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.

B. 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 respondent and began a formal investigation process.

C. 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.

D. 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 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 and 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 or her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

E. Penalties for Violations of the Code of Ethics.

- i. A violation of the Code of Ethics may lead to any one or a combination of the following the following penalties:
 1. Order to cease and desist the violation.
 2. Pay a civil penalty of up to the maximum amount permitted by State law.
 3. Censure.
 4. Suspension without pay.
 5. Demotion.
 6. Termination of employment.
 7. Restitution of any pecuniary benefits received because of the violation committed.

Section 7. Severability

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

Adopted by the Ledyard Town Council on: _____

S. Naomi Rodriguez, Chairman

Approve/Disapprove on: _____

Fred B. Allyn, III, Mayor

DRAFT

Frequently Asked Questions

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

Q&A as written by Jessica Buhle

These are my responses and opinions on this ordinance, and I do not speak for the Council or Administration Committee as a whole. I have received and heard these questions several times and wanted to take the time to address them one by one in a format that is conversational and easy to understand.

Q: Doesn't the Town Charter cover us in these situations? Why do we need an Ordinance and a Commission?

A: The Town Charter has provisions which cover Investigation and Conflicts of Interest. The Charter does not outline specifically what constitutes a Conflict of Interest, and also requires the Town Council to vote to perform an Investigation. I personally feel that the Council would struggle to remain impartial against other councilors or Town officials there may be speculation against. Creating a Code of Ethics outlines what constitutes a Conflict of Interest in participation in the town, and creates a nonpartisan Commission which can respond to any filed complaints.

Per Chapter 9, Section 6 of the Town Charter, “The Town Council may by ordinance specify what is, or what is not, a conflict of interest for officials and employees of the Town.” This ordinance falls in line with that language.

Q: Will this result in political weaponization to attack people anyone disagrees with politically?

A: I believe this Code of Ethics is specific enough to outline what does and does not constitute a breach of the Code of Ethics, and Complaints are filed under penalty of false statement, so I do not believe frivolous complaints will be filed to weaponize the Commission against anyone politically.

In fact, as mentioned in the above question, I believe the current system has more potential to be politically weaponized, as current investigation requirements require a majority of the Council, a partisan group.

Q: The Town Attorney recommended a different version. Why are you supporting this version?

A: Where possible, we adopted all the Town Attorney's recommendations. The Town Attorney had removed provisions that we had considered important to the submitted draft Ordinance (specifically section 6, which he had verbally advised me was legally admissible). There are limited other sections which were modified or re-added after verifying they were following Connecticut General Statutes. This proposed draft incorporates most of the Town Attorney's recommendations while maintaining the provisions we felt would best protect the town.

Q: Will this cost us any money?

A: While legal and other fees may be incurred through investigations and legal advisory, all commissioners are unpaid volunteers, and this Ordinance has the potential to protect the towns' reputation and integrity. Many Ethics Commissions across the state meet very rarely and very rarely have complaints; I expect us to follow a similar pattern.

Q: Who does this Ordinance apply to?

A: As it is written, this Ordinance applies to all Town officials, elected or appointed, including all members of committees, commissions, and boards, and all Town employees, including Board of Education members and employees.

Some provisions, such as the disclosure statement in Section 6, only apply to Town Councilors, Board of Education members, and the Mayor.

Q: I am a volunteer or employee for the town. Should I be worried about someone filing a false complaint against me?

A: The Ordinance as it is written only pertains to ethical misconduct relating to financial benefit of the Respondent. As mentioned, complaints are filed under penalty of false statement. The Ordinance cannot be used to file a complaint against someone if they are unhappy with a decision or unhappy with the service they have received at a town office or event. After a complaint is received, the process to determine Probable Cause is entirely confidential, and any complaints that are unwarranted and have no Probable Cause will be dismissed and remain confidential.

Q: We don't need this. Why waste any time creating a commission?

A: We have low crime rates in Ledyard, but we have an excellent police department to respond when we need them. I've never had a fire in my home (and fingers crossed I don't in the future), but I want Ledyard to have a great fire department. Most in this town believe we have an ethical town government, but I want to make sure we have an ordinance in place to protect us from future unscrupulous behavior and to set the standard for what our town considers financial benefit and conflict of interest.

Also, the last I knew, Ledyard was one of twenty-four towns in Connecticut without an Ethics ordinance or Code of Ethics. I do not see harm in establishing a Code of Ethics to protect our town as many of our neighboring towns have done.

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, and Town employees be independent, impartial, and responsible to the people; that governmental decisions and policies be made in the proper channels of governmental structure; that public office and employment not be used for personal gain; and that the public has confidence in the integrity of its government.

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

Section 3. Applicability

The Code of Ethics shall apply to all Town officials, including members of the Board of Education, and all Town and Board of Education employees.

Section 4. Definitions

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

1. “*Complainant*” means any person who signs a complaint under penalties of false statement alleging a violation of this Code.
2. “*Confidential Information*” means information acquired by a Town official or Town employee 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.
3. “*Financial Interest*” means:
 - a. any interest that has a monetary value of more than one hundred dollars (\$100.00) in any calendar year and is not common to the other citizens of the Town;
 - b. pecuniary or material benefit accruing to a Town official or Town employee, spouse or minor child of an official or employee of the Town as a result of a contract, transaction, zoning decision or other matter which is, or may be, the subject of an official act or action by or with the Town of Ledyard except for such contracts of transactions which by their terms and by the substance of their provisions confer the opportunity and right to realize the accrual of similar benefits to all persons and/or property similarly situated;
 - c. shall be deemed to exist if any Town official, Town employee, immediate family of a Town official or employee might, directly or indirectly, derive financial gain or suffer loss from any purchase, contract, transaction, zoning decision, or other matter involving any such Town office, board, commission, authority or committee, and shall also be deemed to exist if a business or professional enterprise in which the Town official or employee has any financial interest as owner, member, partner, officer, employee or stockholder or has any other form of participation which will be affected by the outcome of the matter under consideration.
4. “*Gift*” means anything of economic value in excess of one hundred dollars (\$100.00), including but not limited to entertainment, food, beverage, travel, and lodging. A gift does not include:
 - a. A political contribution that is otherwise reported in accordance with the law.
 - b. Services provided by persons volunteering their time.
 - c. A commercially reasonable loan that is made on terms not more favorable than loans made in the ordinary course of business.
 - d. A gift received from a member of a person’s immediate family or fiancé.
 - e. Goods or services which are provided to the municipality and facilitate government actions or functions.
 - f. A certificate, plaque, or other ceremonial award.

- g. A rebate or discount on the price of anything of value made in the ordinary course of business, without regard to that person's status.
 - h. Printed or recorded information germane to municipal action or functions.
 - i. An honorary degree
 - j. Costs associated with attending a conference or business meeting and/or the registration or entrance fee to attend such conference or business meeting in which the Town official or Town employee participates in his or her official capacity.
 - k. Any gift provided to a Town Official or Town Employee or to an immediate 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.
5. "*Immediate family*" means spouse, fiancé, child, parent, grandchild, brother, sister, grandparent, niece, nephew, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, brother-in-law, or anyone living in the same household.
 6. "*Respondent*" means any person accused of violating this Code.
 7. "*Town Official*" means any person holding elective or appointive office in the government of the Town, including members of the Board of Education.
 8. "*Town Employee*" means any person receiving a salary, wages, or stipend from the Town or the Board of Education for services rendered, whether full-time or part-time.

Section 5. Conflict of Interest Provisions

1. A Town official, Town employee, or any member of his or her immediate family shall not engage in or participate in any business or transaction, nor have an interest, direct or indirect, which is incompatible with the proper discharge of that person or persons' independent judgement or action in the performance of that person or persons' official duties.
2. A Town official or any member of his or her immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment or contractual services furnished to or used by the board, agency or commission of which that person is an elected or appointed member.

3. A Town employee or any member of his or her immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment, or contractual services that is within the purview of such Town employee.
4. The Mayor of the Town of Ledyard and members of the Town Council of the Town of Ledyard, members of the Board of Education of the Town of Ledyard, and any members of their immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment, or contractual services furnished to or used by the Town of Ledyard.
5. A Town official or employee shall refrain from voting upon or otherwise participating in any matter on behalf of the municipality if he or she, a member of his or her immediate family, or a business with which the person is associated has a financial or personal interest in the transaction or contract, including but not limited to the sale of real state, material, supplies, or services to the municipality. If such participation is within the scope of the Town official's or Town employee's responsibility, he or she shall be required to provide written disclosure, that sets forth in detail the nature and extent of such interest.
6. A Town official or Town employee shall not accept or receive, directly or indirectly, from any person or business to which any contract or purchase order may be awarded by the Town of Ledyard or any of its boards, agencies, or commissions any money, rebate, or gifts, or any promise, obligation, or contract for future reward or compensation.
7. No Town officials or employees shall accept a gift or engage in private employment or render services when the gift, employment, or services are incompatible with the proper discharge of the official duties of the Town official or Town employee, or could tend to impair independence of judgement or action by the Town official or Town employee, in the performance of his or her official duties. If a prohibited gift is offered to a Town official or a Town employee, he or she shall refuse it, return it, or pay the donor the market value of the gift.
8. To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of this Code, a Town official or a Town employee, not otherwise restrained by the Code, shall exercise care when appearing before other Agencies and shall disclose whether he or she is appearing in his or her official capacity or as a private citizen.
9. A Town official or employee who have a financial or personal interest in any transactions or contract with the Town, including but not limited to the sale of real estate, materials, supplies, or services to the Town, on which that person or persons may be called upon to act in that persons official capacity shall not vote or otherwise participate in the transaction on behalf of the Town. The Town official or employee shall declare on the record that he or she has or have a conflict of interest.

10. No Town official or Town employee shall solicit or accept a gift from any person or business entity which is interested directly or indirectly in any business transaction or pending matter that is within the purview of such Town official or Town employee.
11. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials, or property for personal convenience or profit.
12. No Town official or Town employee shall disclose or use confidential information acquired in the course of and by reason of his or her official duties for personal or financial gain or for the personal or financial gain of a member of his or her immediate family.
13. No Town official or Town employee may directly hire or supervise a member of his or her immediate family or participate in influencing the appointment or hiring of his or her immediate family.
14. No former Town official shall represent anyone before any Town agency, board, commission, council, or committee in which he or she was formerly an elected or appointed member for a period of one (1) year following the end of such former member's service on such agency, board, commission, council, or committee.
15. No former Town employee shall represent anyone before any Town agency or department for which he or she was formerly employed for a period of one (1) year following the end of such former employee's employment with the Town.

Section 6. Disclosure of Interests Required

1. Any Town official or Town employee who has a private financial interest in any action, legislative or otherwise, by any Town agency and who is a member of, participates in discussion with or give an official opinion to such Town agency shall disclose on the written records of such agency the true nature and extent of such interest. This section shall not apply to:
 - a. Contracts awarded to the lowest responsible bidder after public advertisement.
 - b. Unpaid appointed officials during a declared state of emergency.
 - c. Matters requiring disclosure to or approval by a court.
 - d. The Town Attorney, Town Engineer, or similar Official, who is participating in or offering an opinion on behalf of said agency, and whose financial interest is merely in being paid for such services.
2. 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:

- a. All real estate located within the Town of Ledyard owned by such elected official or held under a lease for a term exceeding five years, excluding, however, his or her principal residence. The foregoing shall also apply to real estate owned or leased, as aforesaid, by a corporation, trust or partnership in which any such elected official is the legal or equitable holder of at least 5% of the legal or equitable interest in said corporation, trust, or partnership.
- b. 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) per annum to the Town of Ledyard during the two 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 or its political subdivisions during the two years immediate proceeding such official's election to public office.

Section 7. Establishment of an Ethics Commission

1. Membership

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.

- a. No more than two (2) Regular Members may be affiliated with any one political party. Both Alternate Members may not be affiliated with the same political party. At least one Regular Member shall be registered as an unaffiliated.
- b. No regular member or alternate member of the Ethics Commission shall:
 - i. Be a Town official or Town employee of the Town of Ledyard or be a member of the immediate family of any Town official;
 - ii. Have held any elected Town or State office for a period of one (1) year prior to being appointed to the Ethics Commission.
 - iii. Be a member of a Town committee or commission.
 - iv. Serve as a member of another Town agency, board, commission, council, or committee.
 - v. Have been employed by the Town for a period of one (1) year prior to being appointed to the Ethics Commission.
 - vi. Have any financial interest in matters before the Town or the Board of Education;

- vii. Have been found in violation of any federal, state, municipal, or professional Code of Ethics.

2. Terms of Appointment

- a. Members shall be appointed by the Town Council for a term of three (3) years and shall serve until their successor has qualified or is removed by the Town Council.
- b. 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.
- c. Inaugural members shall be eligible to serve two (2) additional three (3) year term beyond his or her initial appointment.
- d. Any vacancy on the Ethics Commission, other than by expiration of term, shall be filled for the unexpired portion of the term by the Town Council.
- e. 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 or her duties.
- f. 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.

3. Authority/Duties

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

- a. To consult with the Town Attorney or another attorney hired by the Ethics Commission if so authorized by the Town Council.
- b. To request that the Town Attorney provide advisory opinions.

4. Filing of Complaints

A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission and signed under penalty of false statement. The form shall be delivered to the Town Clerk who shall transmit a copy of the complaint to the Chairperson of the Ethics Commission 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:

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

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

5. Evaluation and Acknowledgement

- 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 four (4) affirmative votes, it shall so advise both the complainant and the respondent within ten (10) business days of its finding and begin a formal investigation process.

6. Hearings

- a. 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.

7. Final Decisions

- a. 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.
- b. The Ethics 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 final decision of the commission for the purposes of the UAPA. The respondent may appeal to the superior court in accordance with the provision of Section 4-183 of the Connecticut General Statutes.
- d. 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 or her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

8. 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 and/or removal from elected or appointed office;
- g. Restitution of any pecuniary benefits received because of the violation committed;

Section 8. Severability

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

Adopted by the Ledyard Town Council on: _____

Gary St. Vil, Chairman

Approve/Disapprove on: _____

Fred B. Allyn, III, Mayor

Roxanne Maher

From: Ritter, Matthew D. <MRitter@goodwin.com>
Sent: Tuesday, June 24, 2025 1:05 PM
To: Kristen Chapman; Jessica Buhle
Cc: Fred Allyn, III; Roxanne Maher
Subject: RE: Request Town Attorney Review - Ledyard Draft Ethics Ordinance

Chair Buhle – would you have time this week to discuss the draft ordinance?

Thanks, Matt



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

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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: Roxanne Maher <council@ledyardct.org>
Sent: Monday, June 23, 2025 5:58 PM
To: Kristen Chapman <mayoral.asst@ledyardct.org>
Cc: Roxanne Maher <council@ledyardct.org>; Jessica Buhle <jbuh@ledyardct.org>; Fred Allyn, III <mayor@ledyardct.org>
Subject: Request Town Attorney Review - Ledyard Draft Ethics Ordinance

Good Afternoon Kristen:

Could you please forward the email below and attached draft Ordinance to Attorney Ritter.

Should you have any questions, please do not hesitate to contact me.

Thank you,
Roxanne

Hello Attorney Ritter:

The Ledyard Town Council's Administration Committee has drafted the attached "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" dated 6/11/2025; and respectfully requests your legal review and recommendations/suggestions prior to them setting a Public Hearing date.

Should you have any questions or need additional information regarding the Committee's draft Ordinance, please contact Administration Committee Chairman Jessica Buhle at: Telephone (708) 307-6572; or email: Email: jbuh@ledyardct.org; or me.

The Administration Committee looks forward to your comments and recommendations.

Thank you,
Roxanne

Roxanne M. Maher
Administrative Assistant to
The Ledyard Town Council
(860) 464-3203
council@ledyardct.org

Town Hall Hours:
Monday – Thursday 7:45 a.m. – 4:45 p.m.
Closed on Friday



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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, Section 8 of the Town Charter, there is hereby established a Town of Ledyard Code of Ethics and Ethics Commission.

Section 2. Declaration of Policy and Purpose

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

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

Section 3. Applicability

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

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

Section 4. Definitions

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

1. *"Persons governed by this Code"* means ALL Town/municipal officials, municipal officers, and municipal employees, whether elected and/or appointed, paid or unpaid.
2. *"Business"* means any entity through which activity for profit or not for profit is conducted including, but not limited to a corporation, limited liability corporation, partnership, proprietorship, firm, enterprise, franchise, association, organization, or self-employed individual.
3. *"Complainant"* means any person who signed a complaint under penalties of false statement alleging a violation of this Code.
4. *"Confidential Information"* means information, whether transmitted orally or in writing, which is obtained by reason of the public position of office held, that is not, at the time of transmission, a matter of public record or public knowledge.
5. *"Confidential Investigation"* means the examination, prior to the finding of probable cause, of both written and oral evidence, that is not to be disclosed to any third party by anyone connected with the investigation, except upon the written request of the respondent.
6. *"Financial Interest"* means pecuniary or material benefit accruing to a town official/employee, spouse or minor child of an officer, official or employee of the Town as a result of a contract, transaction, zoning decision or other matter which is, or may be, the subject of an official act or action by or with the Town of Ledyard except for such contracts of transactions which by their terms and by the substance of their provisions confer the opportunity and right to realize the accrual of similar benefits to all persons and/or property similarly situated.

"Financial Interest" shall be deemed to exist if any municipal/Town officer, member, employee, immediate family of a municipal officer, official or employee of the Town might, directly or indirectly, derive financial gain or suffer loss from any purchase, contract, transaction, zoning decision, or other matter involving any such Town office, board, commission, authority or committee and shall also be deemed to exist if a business or professional enterprise in which the municipal officer, employee, member or commission has any financial interest as owner, member, partner, officer, employee or stockholder or has any other form of participation which will be affected by the outcome of the matter under consideration.
7. *"Gift"* means anything of economic value in excess of \$25.00, including but not limited to entertainment, food, beverage, travel, lodging, given or paid.

A gift does not include:

- a. A political contribution reported as required by law or a donation or payment as described in subdivision (9) or (11) of subsection (b) of 9-333b.
- b. Services provided by persons volunteering their time.

- c. A commercially reasonable loan made on terms not more favorable than loans made in the ordinary course of business.
 - d. A gift received from a member of a person's immediate family or fiancé.
 - e. Goods or services which are provided to the municipality and facilitate government actions or functions.
 - f. A certificate, plaque, or other ceremonial award.
 - g. A rebate or discount on the price of anything of value made in the ordinary course of business, without regard to that person's status.
 - h. Printed or recorded information germane to government action or functions.
 - i. An honorary degree bestowed upon a public official or public employee by a public or private university.
 - j. A meal provided at an event or business meeting and/or the registration or entrance fee to attend such an event, in which the public official or public employee participates in his official capacity.
 - k. A meal provided in the home by a Ledyard resident.
 - l. Gift giving occasions recognized by the public, including, Christmas, Chanukah, birthdays, the birth or adoption of a child, weddings, First Communion, Confirmations, or Bar/Bat Mitzvahs, provided the total value of such gifts for each event shall not exceed \$25.00.
8. *"Immediate family"* means spouse, child, parent, grandchild, brother, sister, grandparent, niece, nephew, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, and brother-in-law.
 9. *"On The Record"* means in writing, signed and dated, or a directive to the secretary taking the minutes of a meeting to note in the minutes of the meeting a special disclosure or statement.
 10. *"Personal Beneficial Interest"* means any interest, other than financial, which would affect the action of the official or employee, except if that interest is based solely on the responsibility of his/her town office or employment. Membership in or affiliation with a social, fraternal, charitable, service, educational, religious, governmental or similar non-profit organization is not deemed to automatically create a presumption of personal interest unless the official employee is also an employee of the organization.

11. *“Probable Cause”* is defined by determining whether the facts would warrant a reasonable person to believe that a Town official, officer, or employee violated this Code; the belief should be more than mere suspicions, but less than proof beyond a reasonable doubt.
12. *“Respondent”* means any person accused of violating this Code.
13. *“Town Official, Officer, or Employee”* means an individual whether elected or appointed, whether paid or unpaid, full or part time, including members of boards, commissions, and committees in the service of the Town of Ledyard.

Section 5. Conflict of Interest

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

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

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

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

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

- B. Persons governed by this Code shall not accept or receive, directly or indirectly, from any person or business to which any contract or purchase order may be awarded by the Town

of Ledyard or any of its boards, agencies, or commissions any money, rebate, or gifts, or any promise, obligation, or contract for future reward or compensation.

No Town officials or employees shall accept a gift or engage in private employment or render services when the gift, employment, or services are incompatible with the proper discharge of the official duties of the Town official or Town employee, or could tend to impair independence of judgement or action by the Town official or Town employee, in the performance of his or her official duties. If a prohibited gift is offered to a Town official or a Town employee, he or she shall refuse it, return it, or pay the donor the market value of the gift.

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

- H. No Town official or Town employee, or a member of his or her immediate family, or a business with which the person is associated shall enter into a contract with the Town valued at five hundred (500) dollars or more, other than a contract of employment as a Town employee, or pursuant to a court appointment, unless the contract has been awarded through a process of public notice and competitive bidding.
- I. No persons in their capacities as Town official or Town employee shall represent anyone, other than the Town, concerning any matter before any board, commission, council, committee, or department of the Town. Nothing herein shall prohibit or restrict a Town official or Town employee from appearing before any board, commission, council, committee, or department of the Town on his or her own behalf, or on behalf of a member of his or her immediate family, or from being a party in any action, proceeding or litigation brought by or against such Town official or Town employee to which the Town is a party.
- J. No former Town official or Town employee member shall represent anyone for compensation before any Town board, commission, council, committee, or department in which he or she was formerly employed at any time within a period of one (1) year after termination of his or her service with the Town.
- K. No former Town official or Town employee shall represent anyone other than the Town concerning any particular matter in which he or she participated personally and substantially while in Town service.
- L. No former Town official or Town employee shall disclose or use confidential information acquired in the course of and by reason of his or her official duties, for financial gain for himself or herself or others.
- M. No former Town official or Town employee who participated substantially in the negotiation or award of a Town contract obliging the Town to pay an amount of twenty-five thousand (25,000) dollars or more, or who supervised the negotiation or award of such contract shall seek or accept employment with a party to the contract other than the Town for a period of one (1) after his or her resignation from Town office or position if his or her resignation occurs less than one year after the contract is signed
- N. Willful violation by any such officer or employee of the provisions of this Code shall be grounds for his/her removal in accordance with Chapter IX, Section 6 of the Town Charter. Violation of this section with the knowledge, express or implied, of any person or corporation participating in such contract, transaction, or decision shall render the same voidable by the Town Council, or by a court of competent jurisdiction.

Section 6. Disclosure of Interests Required

- A. Any officer, official or employee who has a private financial interest in any action, legislative or otherwise, by any Town agency and who is a member of, participates in discussion with or gives an official opinion to such Town agency shall disclose on the

written records of such agency the true nature and extent of such interest. This section shall not apply to:

1. Contracts awarded to the lowest responsible bidder after public advertisement.
 2. Unpaid appointed officials during a declared state of emergency.
 3. Matters requiring disclosure to or approval by a court.
 4. The Town Attorney, Town Engineer or similar Official, who is participating in or offering an opinion on behalf of said agency, and whose financial interest is merely in being paid for such services.
- B. Every elected official, excluding Justices of the Peace shall, on or before January 1 each year, file with the Town Clerk, on a form to be prepared by the Town Attorney, a statement, under oath, containing the following information:
1. All real estate located within the Town of Ledyard owned by such elected official or held under a lease for a term exceeding five years, excluding, however, his or her principal residence. The foregoing shall also apply to real estate owned or leased, as aforesaid, by a corporation, trust or partnership in which any such elected official is the legal or equitable holder of at least 5% of the legal or equitable interests in said corporation, trust or partnership.
 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-percent interest, and which firm, proprietorship, partnership, corporation, or limited liability corporation has sold or supplied goods or services in excess of \$10,000 per annum to the Town of Ledyard during the two years immediately preceding such official's election to office.
 3. Any income, fees, salary, or wages directly or indirectly received by such elected official from the Town of Ledyard or its political subdivisions during the two years immediately preceding such official's election to public office.

Section 7. Establishment of An Ethics Commission

1. Purpose

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

2. Membership

The Ethics Commission shall be comprised of five (5) regular members and two (2) alternates of whom shall be electors of the Town. Political minority rules shall apply for the membership of this commission.

The Regular Members shall include:

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

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

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

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

- A. Be a public official or public employee of the municipality; or an official; or employee of a quasi-public agency of the municipality.
- B. Have held any Town or State Office for a period of one(1)-year prior to being appointed to the Commission.
- C. Hold office in a political party or political committee.
- D. Serve as a member of another agency.
- E. Hold or campaign to seek any Town Office.
- F. Have been employed by the Town for a period of *one (1)* prior to being appointed to the Commission.
- G. Serve as ~~an~~ member of any other Town Committee, Commission, or Board, or be part of the immediate family of any Town official or Town employee.
- H. Have any beneficial interest or financial interest in matters before the Town or the Board of Education.
- I. Have been found in violation of any federal, state, municipal or professional code of ethics.

3. Terms of Appointment

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

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

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

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

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

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

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

4. Authority/Duties

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

- Review assignments and determine whether or not the Ethics Commission would have jurisdiction, if the allegation(s) is true, and if it would be a violation of this Code.
- Consult with the Town Attorney or an Attorney, and other professionals specially appointed by the Town Council to conduct its duties on assignments, as authorized by the Town Council on a case-by-case basis.
- Request the Attorney provide advisory opinions with regard to the requirements of this Code pertaining to the subject assignment. Advisory opinions rendered by the Town

Attorney, until amended or revoked by the Ethics Commission, shall be binding and shall be deemed to be final decisions.

- Conduct hearings and issue subpoenas or subpoenas pursuant to Sections 7-148(c) (10)(B) of the Connecticut General Statutes.
- Compile and maintain a record with the Town Clerk of all reports, advisory opinions, statements, and memoranda filed by and with the Commission to facilitate public access to such reports and statements unless doing so would violate the confidentiality provision of this Code or is otherwise prohibited by law.
- Report to the Town Council when an investigation is complete, and a decision is rendered.
- Annually report to the Town Council on the status of investigations, while maintaining confidentiality as applicable; summarizing the activities of the commission.
- Agendas and Minutes of the Ethics Commission, not including those protected by confidentiality, are public information and will be made available to the public through the Town's meeting portal and the Town Clerk's Office in accordance with Sections 1-200, 1-225 of the Connecticut General Statutes. Executive session discussion will be confidential.

5. Procedures

a. Filing of Complaints

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

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

The Complaint shall include:

- Name of the person accused (respondent).
- Name of the person filing the complaint.
- The specific acts alleged to constitute the violation of Section 4 of this code, and when they occurred.

- Whether or not these allegations have been presented to other administrative or judicial authorities.

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

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

b. Evaluation and Acknowledgement

- Within thirty (30) business days of the receipt of the specific charge(s) and/or complaints, the Ethics Commission shall call an executive session to evaluate if the filing is not in violation or is not in the proper form.
- If the complaint is not in the proper form and/or the Ethics Commission determines that the allegations, even if true, would not constitute a violation of this Code then the Ethics Commission shall dismiss the complaint and duly notify the complainant in writing, with a copy to the Town Council and Mayor, of said fact and the reasons thereof; by registered or certified mail not later than ten (10) business days after said decision. Allegations applicable to other administrative, or judicial authority will be referred to the proper authority.
- If the Ethics Commission determines that the complaint is in proper form and the allegations, if true would, constitute a violation of this Code then the Ethics Commission shall, not later than ten (10) business days after said determination, provide a copy of the complaint to the Town Council, Mayor and by registered or certified mail to all respondents against whom such complaint is filed, and shall provide notice of the receipt of such complaint to the complainant. The respondent(s) shall have ten (10) business days to submit any response to the Ethics Commission.
- If the Complaint is applicable to this Code, the Town Council shall request the Ethics Commission convene an executive session within fourteen (14) business days of the issuance of notification to the complainant.

c. Investigation of Probable Cause-Confidential Investigation

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

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

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

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

If the Ethics Commission does not find probable cause of a violation of the Code, it shall notify in writing to both the complainant and the respondent within five (5) business days of its findings and a summary of the reasons and the complaint, and the record of investigation shall remain confidential. Upon a finding of no probable cause, the case file will be sealed and all matters pertaining thereto shall remain confidential.

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

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

In the conduct of its investigation, the Ethics Commission shall have the power to hold hearings, administer oaths, examine witnesses, receive oral and documentary evidence, subpoena witnesses, and to require the production for examination by the Commission of

any books and papers as permitted by law which are relevant in any manner under investigation or in question.

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

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

d. Hearings

The Ethics Commission shall conduct a hearing to determine if a violation of the code has occurred; and confidentiality of complaints, evaluations of possible violations, and investigations shall be maintained pursuant Section 1-82a of the Connecticut General Statute. Unless a judge trial referee makes a finding of probable cause, a complaint alleging a violation of this part shall be confidential except upon the request of the respondent

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

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

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

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

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

e. Finding/Sanctions

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

Upon finding of a violation of any provision of the Code, the Ethics Commission will refer the matter to the appropriate appointing or supervisory authority. The authority affected will report within thirty (30) business days to the Ethics Commission the action taken, if any. Violators of the Code of Ethics are subject to penalties that may consist, but not limited to, any one or a combination of the following:

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

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

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

f. Appeals

Any person aggrieved by any final decision of the Ethics Commission may appeal such decision in accordance with the provisions of Sections 4-175 or Section 4-183 of the

Connecticut General Statutes. If successful, any and all reasonable legal fees will be paid by the Town of Ledyard.

g. Interpretation

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

Section 8. Severability

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

Adopted by the Ledyard Town Council on: _____

S. Naomi Rodriguez, Chairman

Approve/Disapprove on: _____

Fred B. Allyn, III, Mayor

Proposed Amendments to 24-0481 - DRAFT CODE OF ETHICS AND ETHICS COMMISSION -JESSICA-2025-09-08

Section 3. Applicability

The Code of Ethics shall apply to all Town officials, including members of the Board of Education[, and all Town and Board of Education employees[, and to those conducting business with the Town of Ledyard and to all contractors retained by the Town, including attorneys.

Section 4. Definitions

9. **Contractor.** Any business, proprietorship, firm, partnership, person in a representative or fiduciary capacity, association, venture, trust or corporation, whether paid or unpaid, including members of any board, committee or commission thereof.¹

Section 5. Conflict of Interest Provisions

(All provisions need to be reviewed to include "Contractor", where applicable)

Section 7.1. Membership

Note: EITHER

The Ethics Commission shall be comprised of five (5) regular members and two (2-3) alternate members. All members of the Ethics Commission shall be electors of the Town.

a. No more than two (2 1) Regular Members may be affiliated with any one political party. Both Alternate Members may not be affiliated with the same political party. At least one three Regular Member(s) shall be registered as an unaffiliated.

OR

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.

¹ Norwich Code of Ethics - Ord. No. 909, Section 2-52 b

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

Section 7.3 Authority /Duties

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

- a. To **receive, review, investigate, and adjudicate complaints** alleging violations of the Town Code of Ethics, in accordance with the procedures set forth in this Ordinance.
- b. To conduct hearings, issue findings, and impose penalties as provided herein.
- ~~a~~ c. To consult with the Town Attorney or another attorney hired by the Ethics Commission if so authorized by the Town Council.
- ~~b~~ d. To request that the Town Attorney provide advisory opinions.
- e. To provide formal advisory opinions, upon request, to Town officials, Town employees, or other parties subject to this Code of Ethics, for the purpose of clarifying the application of the Code to specific situations.

Section 7.4 Filing of Complaints

In the application of this Code of Ethics, care will be given to distinguish between concerns of management of Town employees and violations of the public trust. The daily management of employee performance is the responsibility of the Mayor or School Superintendent in the case of the employees of Ledyard Public Schools. Personnel policies should be the first guide in those areas where applicable. Similarly, the routine activities of the Commission should be governed by its rules and regulations. **This in no way compromises the Commission's mandate to investigate complaints on such matters.**

Section 7.5 Evaluation and Acknowledgement

- b. If the Ethics Commission makes a finding of probable cause which shall require ~~four~~ **three** (4 **3**) affirmative votes, it shall so advise both the complainant and the respondent within ten (10) business days of its finding and begin a formal investigation process.³

² Norwich Code of Ethics - Ord. No. 909, Section 2-55 (a) 1

³ Norwich Code of Ethics - Ord. No. 909, Section 2-55 (c) 3

Section 7.7 Final Decisions

- d. 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~~ *Report of Recommendations* within ten (10) days after its decision. It will also advise the respondent of his or her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.
- e. **Report of recommendations.** When there has been a finding of a violation the commission shall report the finding and a recommendation for action to the town council. The commission shall also report to such other officer or board of the City with the power granted by the charter or state statute to remove the officer, official or employee found to have committed the violation, when such power of removal exists.⁴
- f. When the power of removal exists, the officer or board of the City with the power to remove the violator shall within sixty (60) days of receiving a report of violation, report back to the Ethics Commission the disposition of the matter. In all other cases, a report of disposition may be made by the council at their discretion.⁵

Section 7.9 Advisory Opinions

- a. **ADVISORY OPINIONS.** Any officer, official or employee may seek from the commission, upon written request, an advisory opinion as to the application of any provision of this article to a particular situation or as to an interpretation of any such provision. The commission shall act on a written request within sixty (60) days of receipt. Such action may be an affirmative vote to decline ruling on the matter. In the event the commission fails to achieve a majority vote for any proposal, such failure shall be construed as an affirmative vote to decline ruling on the matter. The city clerk shall maintain a file of advisory opinions.⁶

Dear Commissioners,

Please consider the above revisions to the current Code of Ethics draft:

24-0481 - DRAFT CODE OF ETHICS AND ETHICS COMMISSION-JESSICA-2025-09-08

Sincerely,

David Schroeder Jr.

290 Whalehead Rd.

⁴ Norwich Code of Ethics - Ord. No. 909, Section 2-55 (c) 7

⁵ Norwich Code of Ethics - Ord. No. 909, Section 2-55 (c) 8

⁶ Norwich Code of Ethics - Ord. No. 909, Section 2-56

Roxanne Maher

From: Roxanne Maher
Sent: Thursday, August 21, 2025 7:06 PM
To: Town Council Group; Adrienne Parad
Subject: Fwd: Ethics Committee Letter #2

Begin forwarded message:

From: Pamela Ball <pcball@earthlink.net>
Date: August 21, 2025 at 4:50:28 PM EDT
To: Roxanne Maher <council@ledyardct.org>
Subject: Ethics Committee Letter #2

Dear Council,

I write again in opposition of the proposed "Ethics Committee". In addition to my comments in my first letter (reproduced below), I would like to add the following:

I do not believe that Council has made a good case for needing this Committee. The town charter provides for instances where it is necessary to investigate suspect activities committed by elected, paid or volunteer town personnel. There is no instance in which the guidelines in place can be imagined to fail to resolve an issue and do so without public humiliation. You may say that if you have nothing to hide, then it shouldn't be a problem but that is a horrible way to look at a situation in which someone has to defend themselves even when they are blameless.

Why does Council choose not to do this part of their job? It is not burdensome as the town has only used the processes in place a few times. Is it not their job as elected officials to represent the town when conflict arises? Dealing with matters of conflict in a confidential manner resides with Council and not with any townsfolk who think they should be able to judge people. This is passing the buck and shirking their duties.

Lastly, as a volunteer and current manager of the farmers market, I have many interactions with townspeople. Some interactions are pleasant while others are confrontational, unpleasant, and uncomfortable. With this committee in place, I could now have to defend any decision I make should the person not liking the decision go to the committee. I, and my team, as VOLUNTEERS should not be put in a position where an unpopular decision could cause personal turmoil. As I mentioned in my first letter, a friend of mine in charge of her town farmers market was run out of town for making a decision that followed market rules. It wasn't fair to her and it would not be fair to ANY volunteer who freely helps to support this town.

Here is a recent example: At one market, we were very short handed and the market table was unattended for some time. A person rang the market bell very loudly so I went over to see what they wanted. I ended up getting berated for not having a food truck from Ledyard on the premises and informed that we should have their truck at the market because they were from Ledyard. No matter what explanation I offered (out of space, no trucks from Ledyard applied, etc.) I was met with an argument. It was apparently my fault that they did not know about the application time frame for the market and when I told them how we distributed information I was met with "I'm not on FB" or "I don't read the Events magazine". Then I was chastised for using taxpayer money to run the market to which I explained that the market runs on vendor fees. Then this person argued again that it was their taxpayer dollars that allowed us to use the space

free of charge and he deserved and had the right to have his food truck at the market because he was a taxpayer. I would rather the market pay for the space than have to deal with this kind of criticism. I won't even go into the harassment the team and I had to endure running the market during Covid where we had to require people to follow masking, distancing, and glove guidelines.

I do not want a person with this attitude making a complaint about me, a VOLUNTEER, for making any decision for the market. This person was not nice to interact with and is just the kind of person I could imagine would lodge a complaint and want to be judge and jury against other townspeople. I do not need or want this kind of potential threat in my life nor in the lives of any other team member.

Also as I mentioned in my first letter, what makes one person qualified to judge another? In this political climate, I believe that it would be impossible for some people to be impartial in judging a person or situation. Juries are vetted for each particular trial and I do not recall a provision for this in the proposed resolution. This is proverbial witch hunt waiting to happen.

If this committee does go through, I would more than likely no longer volunteer my services to the town. It's not a threat; I simply do not need this kind of cloud in the background of my life. It is sad to think that Council is willing to allow their elected, paid and volunteer personnel be publicly dragged over the coals for when all issues should be handled by Council, privately and with attorney-client privilege.

At the least, volunteers should be exempt from complaints made to an "ethics committee"; complaints about volunteers should go directly to Council to be handled discretely and under privilege.

Thank you,

Pam Ball

Dear Council,

Having read the proposed ordinance and letters from town residents in support of the ordinance to create an Ethics Committee (EC), several issues and questions come to mind.

Being subjected to an "ethics" investigation, especially without an attorney, can have serious lifelong negative effects. I know of a situation in another town where a resident volunteering on a town committee made a decision that was correct, proper and in keeping with the duties of the committee but was not popular with the townsfolk. At a town meeting, I witnessed first hand how the town select person simply refused to listen to and consider any comments in support of her and the decision she made. Several of us gave statements that were rudely ignored. There was unflattering newspaper coverage and she was treated poorly by town residents and town authorities. She was subjected to such harsh treatment that she felt forced to - and did - move out of town to escape the hostility. This person was an acquaintance of mine and I know first hand how horrible this was for her.

Once an accusation is made to the EC, since there are no attorneys involved and thus no attorney-client privilege, is it not discoverable? Cannot all of the "confidential" information that is part of any EC investigation, from the filing of the complaint to the final decision, be discovered by a FOIA request? Would an accused have to turn over their personal

email, texts or other documents to five members of the EC and could that information be discovered by anyone else via a FOIA request? Would all of their social media posts be subject to scrutiny? All it would take is one person in town with an issue with the accused to use that information to start rumors, post negative things on social media, post content of personal emails, etc. because without attorney-client privilege, isn't the information accessible through a FOIA request? Potential employers could find out if a person was called before the EC and, without attorney-client privilege, wouldn't the town have to reveal that information if the employer filed a FOIA? Even if a person subjected to an accusation is found to be "innocent" there is no way to repair their reputation, their standing in the community, to gain back the hours of time spent in defense, or to be repaid expenses incurred to defend themselves. Once negative comments are out there, they are out there forever.

Will there be any requirements to be an EC committee member other than to be a registered voter in town? How will you determine if a committee member is qualified to sit in judgement of other townspeople? Will they receive any training such as intrinsic bias training? Will Council read the social media posts of potential EC members to see if they have made political, insulting or other disparaging comments against other residents? Who will determine what information should or should not be redacted from subpoenaed personal communications of the accused? Who will do the research to make sure that any documentation that an accuser submits is valid? Who will and how can an EC make sure that any proceedings are free from personal or political bias? If an attorney is not involved, could anyone make a FOIA request of the members of the EC to reveal information from their discussions and any communications on the topic?

Going before the EC has been compared to being judged by a jury of peers but that activity is carried out in a courtroom with a judge, attorneys (*i.e.*, trained professionals) and a jury selected to hear the case at hand; that is not the situation proposed here. Here you would have five untrained individuals who would sit in judgement on a fellow townsman. What if a person on the EC knows the accused or is familiar with the situation? In a jury selection process, that person would be removed; is Council going to vet and seat a new member each time this occurs? If the EC determines that a complaint is not valid, what plans will there be to stop the accuser from making their accusations public in other ways? The accused has no protection or privacy until an attorney is involved so the simple act of filing a complaint puts the accused in a position of needing one. What if they don't have the money to hire a lawyer? You may argue that a FOIA could be requested for any proceedings under the current policies, but under the current policies situations are handled by professionals, not neighbors, and attorney-client privilege would likely be in place.

What kind of complaints have ECs in other towns received and what kinds of actions have they taken? Did they need an EC to address the issues or would the policies in place have worked just as well? I believe that it would be a good idea to reach out to other towns to see how their EC was used and to talk to the accusers and accused to see how they were affected, especially those who went through the process and were found innocent. I do not know if a formal EC was in place for the situation I described above. Regardless, it devolved into a situation of neighbor attacking neighbor with awful consequences.

Have there been any "ethical violations" that have been identified that have not been or could not be adequately addressed by policies already in place? I understand that there have been some unpopular goings on in town (proposed blasting, proposed apartment complex) but just because a decision is unpopular does not mean it is a violation of ethics.

Some arguments for the committee included noting that Ledyard was one of the few towns in the state that didn't have an EC. Since we have policies in place, we don't need a committee. Other comments were directed to preparedness; there are policies in place so the town is prepared. And the last argument was that if you haven't done anything wrong, you don't have anything to worry about. All it will take is for someone in town to suspect you of doing wrong, filing a complaint and your life could be changed. Knowing that you haven't done anything wrong isn't going to protect you from an investigation. It's like arguing that you don't care about privacy because you have nothing to hide; do you really want people poking around in your life even if you haven't done anything wrong?

It seems to me that what is really needed is to make everyone aware of the policies already in place to handle complaints in a professional manner with trained personnel rather than asking five townspeople to make a judgement on another. Maybe the existing policies could be updated to include information from the ordinance about the "ethical

violations” that would be subject to an investigation and outline the steps to file a complaint under the current system. Such an amendment would address those who say that the current guidelines are too vague.

Is Council going to make a town wide announcement should this committee be established? If so, why not make a town wide announcement to educate folks as to the (updated) policies in place?

If this committee is put in place, all present and future volunteers should be made aware that anyone in town can file an ethics complaint against them. My friend was simply volunteering to make a good thing happen for the town. If the situation had been handled professionally, perhaps she wouldn't have been harassed so badly as to have to move away. Who would want to be a volunteer in Ledyard knowing that anyone could make a complaint against them? Volunteering should be rewarding, not a risk.

Thank you for reading,

Pam Ball

Good Evening Councillors,

Before I begin, I would like to be very clear: my comments are not intended as a personal critique of Attorney ^{Keller} Avena. I sincerely appreciate the time and expertise he has contributed in editing the draft document. His insights are clearly thoughtful, grounded in legal reasoning, and I recognize that I'm speaking without the benefit of having heard his full explanation for the revisions that have been made.

That said, in the interest of keeping this discussion focused on the content rather than individuals, I'll refer to the proposed revisions simply as "the attorney edits" or "the edits."

As someone who is not legally trained, I understand that some of these edits may be intended to streamline the language—removing redundant definitions or simplifying structure. Where that's the case, I fully support those changes. Clarity and simplicity serve everyone.

However, there are other edits that I find more difficult to understand—and, in some cases, entire sections of the draft have been eliminated. I worry that these edits may substantially alter the intent or effectiveness of the ethics code itself.

Did the state not provide model templates or example language to help municipalities establish effective codes of ethics and ethics commissions? After more than a year of effort, it's worth asking: have we simply recreated what already existed, or have we truly improved upon it? Was it really this challenging to arrive at a workable ethics code with clear enforcement mechanisms, and have we even managed to do that?

It would be helpful to understand how this edited draft compares to those already adopted by neighboring towns—many of which have relied on more standardized, broadly accepted language.

Given the time and energy invested in this process, one would hope this Committee has produced a document that not only reflects best practices, but sets a high standard. Otherwise, we risk ending up with a code that appears substantial but ultimately lacks the scope, authority, and enforceability needed to be truly effective. And if it's not effective, the town would have been better served with the model template(s) and generic language.

Thank You,
Dave Schroeder Jr.
290 Whattlehead Rd

Comment on Section 1

For example, in Section 1, the phrase "...there is hereby established a Town of Ledyard Code of Ethics" originally included the additional words "and Ethics Commission," which have been struck in the edits. Yet, in the revised Section 6—titled "Ethics Commission"—a commission is clearly established, with defined membership, terms of appointment, duties, and procedures. This raises a question: if the Ethics Commission is no longer explicitly established in Section 1, does that omission undermine or potentially nullify the authority outlined later in Section 6?

Comment on Section 4 Definitions

I assume the defined terms that were struck from the draft are legally unnecessary? Does this mean that they're defined already in some other statute or that their definition is not relevant to this ordinance?

Comment on Section 5 – Conflict of Interest Provisions:

Thank you for the clarification between officials and employees—that's a helpful improvement.

However, I'm concerned about the removal of the original language in **Subsection 5.1** that prohibited any interest—direct or indirect—that could compromise a person's independent judgment. This language addressed a broad spectrum of ethical concerns, including non-financial conflicts of interest, and provided a vital safeguard for maintaining public trust.

By narrowing the focus only to financial interests in contracts or purchases, the revised language may unintentionally weaken the scope of the ethics code. Ethical conflicts don't always come down to money—they can involve personal relationships, affiliations, or outside obligations that impair objectivity.

I would recommend reinstating or adapting the original "independent judgment" clause to preserve its broader intent, while still benefiting from the added clarity and structure introduced in the new draft.

Subsection 5.3 "Personal beneficial interest" and "directly or indirectly" have been removed. These terms were important for covering non-obvious or indirect benefits (like a benefit to a friend, business associate, or shell company), not just direct financial gain. Their removal could narrow the definition of a conflict.

Removal of draft Subsection(s) 5.3 A-N, replacing them with new Subsection(s) 5.4-5.9

While the edits for subsections 5.4-5.9 are well written, important and acceptable, I'm concerned that most of the original provisions that were deleted—covering things like disclosure of conflicts, recusals, misuse of position, and protection against even the appearance of impropriety—have been removed.

It is important that together these clauses should form a broad framework of ethical protections. Without addressing them all, we risk leaving the Town vulnerable to real or perceived ethical violations. I'd urge the Council to carefully consider the new clauses, and reinstating or restoring any of the protections that seem to be missing in this section.

Comment of Section 6

Section 6.1.B I recommend that no more than one (1) Regular Member be affiliated with any single political party. Additionally, at least three (3) Regular Members and one Alternate Member should be registered as unaffiliated. This structure helps prevent the two major parties from colluding to block ethical complaints when it serves their interests.

Section 6.4.A I suggest that the identity of the person filing a complaint not be made public. While the complainant should not remain anonymous, their name should be kept confidential to protect them from potential retaliation by individuals in positions of authority. At the same time, it is important to ensure that the complaint process is not exploited through frivolous filings, which should neither be tolerated nor encouraged.

I was only able to review about half of the revised draft document. I apologize for not having more feedback to offer at this time, as there are still numerous edits and deletions I was unable to address.

Thank you for your dedication and effort in helping to create the best ethical code possible for the town.



TOWN OF LEDYARD CONNECTICUT

Code of Ethics Acknowledgement Form

I, _____
Print Name of Member, Employee, Vendor or Consultant

Member of : _____
Name of Committee, Commission, Board

Employee of the Town of Ledyard _____
Name of Department

Vendor: _____
Name of Company

Consultant: _____
Name of Company

I Acknowledge that I have received and read the Town of Ledyard's Code of Ethics

Signed: _____ Date: _____
Signature of Member, Employee, Vendor or Consultant

**Please Return Completed Form to
Town of Ledyard Town Clerk's Office
741 Colonel Ledyard Highway, Ledyard, Connecticut 06339**

.....
Town Clerk's Office Use

Received by the Town Clerk' Office: _____ Date: _____
Signature of Town Clerk or Assistant Town Clerk

CHAPTER III THE TOWN COUNCIL

SECTION 9. INVESTIGATION

The Town Council shall have power to investigate all offices and agencies of the Town and for such purposes shall have the power to call witnesses to appear before the Town Council to testify on any matter under investigation. The Chairman, or chairman pro-tempore, upon authorization of the Town Council, shall have the power, for such investigation, to issue subpoenas, and, at his request, any judge of the Superior Court may compel the appearance of witnesses and the production of books, records, and papers.

CHAPTER IX TRANSITION AND MISCELLANEOUS PROVISIONS

SECTION 6. CONFLICTS OF INTEREST

Any elected or appointed officer or any employee of the Town who has a financial interest or personal benefit, direct or indirect, in any contract, transaction, or decision of any board or commission to which the Town is a party, shall disclose publicly that interest to the appropriate board or commission and the Town Council in advance of discussion or action on the matter, which shall record such disclosure upon the official record of its meetings. The Town Council may by ordinance specify what is, or what is not, a conflict of interest for officials and employees of the Town.

Willful violation by any such officer or employee of the provisions of this section shall be grounds for his removal. Violation of this section with the knowledge, express or implied, of any person or corporation participating in such contract, transaction, or decision shall render the same voidable by the Town Council, or by a court of competent jurisdiction.

TOWN OF LEDYARD FRAUD POLICY

1. Purpose:

This fraud policy is established to facilitate the development of controls that will aid in the detection and prevention of fraud against the Town of Ledyard. It is the intent of the Town of Ledyard to promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of controls and conduct of investigations.

2. Scope of Policy:

This policy applies to any irregularity, or suspected irregularity, involving employees as well as volunteers, vendors, consultants, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with the Town of Ledyard. Any required investigative activity will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to the Town of Ledyard.

3. Policy:

Management is responsible for the detection and prevention of fraud, misappropriations, and other irregularities. Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. Each member of the management team will be familiar with the types of improprieties that might occur within his or her area of responsibility, and be alert for any indication of irregularity. Any irregularity that is detected or suspected must be reported immediately to the Mayor, who coordinates all investigations with the Town's legal counsel, and other affected areas, both internal and external.

4. Actions That Constitute Fraud

The terms defalcation, misappropriation, and other fiscal irregularities refer to, but are not limited to:

- Any dishonest or fraudulent act
- Misappropriation of funds, securities, supplies, or other assets
- Impropriety in the handling or reporting of money or financial transactions
- Profiteering as a result of insider knowledge of Town activities
- Disclosing confidential information to outside parties
- Accepting or seeking anything of material value from contractors, vendors, consultants, or person providing services/materials to the Town of Ledyard. Exception: Gifts less than \$25 in value.
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or
- Any similar or related irregularity

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LEDYARD TOWN CLERK

5. Other Irregularities:

Irregularities concerning an employee's moral, ethical, or behavioral conduct should be resolved by departmental management and the Mayor. If there is any question as to whether an action constitutes fraud, contact the Mayor for guidance.

6. Investigation Responsibilities:

The Mayor has the primary responsibility for the investigation of all suspected fraudulent acts as defined in the policy. If the investigation substantiates that fraudulent activities have occurred, the Mayor will issue reports to appropriate designated personnel and to the Town Council. Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with legal counsel and senior management, as will final decisions on disposition of the case.

7. Confidentiality

The Mayor treats all information received confidentially. Any employee who suspects dishonest or fraudulent activity will contact their supervisor immediately, and *should not attempt to personally conduct investigations or interviews/interrogations* related to any suspected fraudulent act (see Reporting Procedure section below). Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect the Town of Ledyard from potential civil liability.

8. Authorization for Suspected Fraud:

The Mayor will have:

- Free and unrestricted access to all Town records and premises, whether owned or rented; and
- The authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of his/her investigation.

9. Reporting Procedures:

Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way. An employee who discovers or suspects fraudulent activity will contact the Mayor immediately. The employee or other complainant may remain anonymous. All inquiries concerning the

activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the Mayor. No information concerning the status of an investigation will be given out. The proper response to any inquiries is: "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific reference. The reporting individual should be informed of the following:

- Do not contact the suspected individual in an effort to determine facts or demand restitution.
- Do not discuss the case, facts, suspicions, or allegations with *anyone* unless specifically asked to do so by legal counsel.

10. Termination:

If an investigation results in a recommendation to terminate an individual, the recommendation will be reviewed for approval by legal counsel before any such action is taken.

11. Administration:

The Mayor is responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed annually and revised as needed.

Adopted by the Ledyard Town Council on May 28, 2014

Linda C Davis
Linda C. Davis, Chairman

CHAPTER 10*

CODES OF ETHICS

PART I*

CODE OF ETHICS FOR PUBLIC OFFICIALS

*Cited. 18 CA 212.

Sec. 1-79. Definitions. The following terms, when used in this part, have the following meanings unless the context otherwise requires:

(1) “Blind trust” means a trust established by a public official or state employee or member of his or her immediate family for the purpose of divestiture of all control and knowledge of assets.

(2) “Business with which he is associated” means any sole proprietorship, partnership, firm, corporation, trust or other entity through which business for profit or not for profit is conducted in which the public official or state employee or member of his or her immediate family is a director, officer, owner, limited or general partner, beneficiary of a trust or holder of stock constituting five per cent or more of the total outstanding stock of any class, provided, a public official or state employee, or member of his or her immediate family, shall not be deemed to be associated with a not for profit entity solely by virtue of the fact that the public official or state employee or member of his or her immediate family is an unpaid director or officer of the not for profit entity. “Officer” refers only to the president, executive or senior vice president or treasurer of such business.

(3) “Candidate for public office” means any individual who has filed a declaration of candidacy or a petition to appear on the ballot for election as a public official, or who has raised or expended money in furtherance of such candidacy, or who has been nominated for appointment to serve as a public official, but does not include a candidate for the office of senator or representative in Congress.

(4) “Board” means the Citizen's Ethics Advisory Board established in section [1-80](#).

(5) “Gift” means anything of value, which is directly and personally received, unless consideration of equal or greater value is given in return. “Gift” does not include:

(A) A political contribution otherwise reported as required by law or a donation or payment as described in subdivision (9) or (10) of subsection (b) of section [9-601a](#);

(B) Services provided by persons volunteering their time, if provided to aid or promote the success or defeat of any political party, any candidate or candidates for public office or the position of convention delegate or town committee member or any referendum question;

(C) A commercially reasonable loan made on terms not more favorable than loans made in the ordinary course of business;

(D) A gift received from (i) an individual's spouse, fiancé or fiancée, (ii) the parent, grandparent, brother or sister of such spouse or such individual, or (iii) the child of such individual or the spouse of such child;

(E) Goods or services (i) that are provided to a state agency or quasi-public agency (I) for use on state or quasi-public agency property, or (II) that support an event or the participation by a public official or state employee at an event, and (ii) that facilitate state or quasi-public agency action or functions. As used in this subparagraph, "state property" means property owned by the state or a quasi-public agency or property leased to a state agency or quasi-public agency;

(F) A certificate, plaque or other ceremonial award costing less than one hundred dollars;

(G) A rebate, discount or promotional item available to the general public;

(H) Printed or recorded informational material germane to state action or functions;

(I) Food or beverage or both, costing less than fifty dollars in the aggregate per recipient in a calendar year, and consumed on an occasion or occasions at which the person paying, directly or indirectly, for the food or beverage, or his representative, is in attendance;

(J) Food or beverage or both, costing less than fifty dollars per person and consumed at a publicly noticed legislative reception to which all members of the General Assembly are invited and which is hosted not more than once in any calendar year by a lobbyist or business organization. For the purposes of such limit, (i) a reception hosted by a lobbyist who is an individual shall be deemed to have also been hosted by the business organization which such lobbyist owns or is employed by, and (ii) a reception hosted by a business organization shall be deemed to have also been hosted by all owners and employees of the business organization who are lobbyists. In making the calculation for the purposes of such fifty-dollar limit, the donor shall divide the amount spent on food and beverage by the number of persons whom the donor reasonably expects to attend the reception;

(K) Food or beverage or both, costing less than fifty dollars per person and consumed at a publicly noticed reception to which all members of the General Assembly from a region of the state are invited and which is hosted not more than once in any calendar year by a lobbyist or business organization. For the purposes of such limit, (i) a reception hosted by a lobbyist who is an individual shall be deemed to have also been hosted by the business organization which such lobbyist owns or is employed by, and (ii) a reception hosted by a business organization shall be deemed to have also been hosted by all owners and employees of the business organization who are lobbyists. In making the calculation for the purposes of such fifty-dollar limit, the donor shall divide the amount spent on food and beverage by the number of persons whom the donor reasonably expects to attend the reception. As used in this subparagraph, “region of the state” means the established geographic service area of the organization hosting the reception;

(L) A gift, including, but not limited to, food or beverage or both, provided by an individual for the celebration of a major life event, provided any such gift provided by an individual who is not a member of the family of the recipient does not exceed one thousand dollars in value;

(M) Gifts costing less than one hundred dollars in the aggregate or food or beverage provided at a hospitality suite at a meeting or conference of an interstate legislative association, by a person who is not a registrant or is not doing business with the state of Connecticut;

(N) Admission to a charitable or civic event, including food and beverage provided at such event, but excluding lodging or travel expenses, at which a public official or state employee participates in his or her official capacity, provided such admission is provided by the primary sponsoring entity;

(O) Anything of value provided by an employer of (i) a public official, (ii) a state employee, or (iii) a spouse of a public official or state employee, to such official, employee or spouse, provided such benefits are customarily and ordinarily provided to others in similar circumstances;

(P) Anything having a value of not more than ten dollars, provided the aggregate value of all things provided by a donor to a recipient under this subdivision in any calendar year does not exceed fifty dollars;

(Q) Training that is provided by a vendor for a product purchased by a state or quasi-public agency that is offered to all customers of such vendor;

(R) Travel expenses, lodging, food, beverage and other benefits customarily provided by a prospective employer, when provided to a student at a public institution of higher

education whose employment is derived from such student's status as a student at such institution, in connection with bona fide employment discussions; or

(S) Expenses of a public official, paid by the party committee of which party such official is a member, for the purpose of accomplishing the lawful purposes of the committee. As used in this subparagraph, “party committee” has the same meaning as provided in subdivision (2) of section [9-601](#) and “lawful purposes of the committee” has the same meaning as provided in subsection (g) of section [9-607](#).

(6) “Immediate family” means any spouse, children or dependent relatives who reside in the individual's household.

(7) “Individual” means a natural person.

(8) “Member of an advisory board” means any individual (A) appointed by a public official as an advisor or consultant or member of a committee, commission or council established to advise, recommend or consult with a public official or branch of government or committee thereof, (B) who receives no public funds other than per diem payments or reimbursement for his or her actual and necessary expenses incurred in the performance of his or her official duties, and (C) who has no authority to expend any public funds or to exercise the power of the state.

(9) “Person” means an individual, sole proprietorship, trust, corporation, limited liability company, union, association, firm, partnership, committee, club or other organization or group of persons.

(10) “Political contribution” has the same meaning as in section [9-601a](#) except that for purposes of this part, the provisions of subsection (b) of said section shall not apply.

(11) “Public official” means any state-wide elected officer, any member or member-elect of the General Assembly, any person appointed to any office of the legislative, judicial or executive branch of state government by the Governor or an appointee of the Governor, with or without the advice and consent of the General Assembly, any public member or representative of the teachers' unions or state employees' unions appointed to the Investment Advisory Council pursuant to subsection (a) of section [3-13b](#), any person appointed or elected by the General Assembly or by any member of either house thereof, any member or director of a quasi-public agency and the spouse of the Governor, but does not include a member of an advisory board, a judge of any court either elected or appointed or a senator or representative in Congress.

(12) “Quasi-public agency” means Connecticut Innovations, Incorporated, the Connecticut Health and Education Facilities Authority, the Connecticut Higher Education Supplemental Loan Authority, the Connecticut Student Loan Foundation, the

Connecticut Housing Finance Authority, the State Housing Authority, the Materials Innovation and Recycling Authority, the Capital Region Development Authority, the Connecticut Lottery Corporation, the Connecticut Airport Authority, the Connecticut Health Insurance Exchange, the Connecticut Green Bank, the Connecticut Port Authority, the Connecticut Municipal Redevelopment Authority, the State Education Resource Center and the Paid Family and Medical Leave Insurance Authority.

(13) “State employee” means any employee in the executive, legislative or judicial branch of state government, whether in the classified or unclassified service and whether full or part-time, and any employee of a quasi-public agency, but does not include a judge of any court, either elected or appointed.

(14) “Trust” means a trust in which any public official or state employee or member of his immediate family has a present or future interest which exceeds ten per cent of the value of the trust or exceeds fifty thousand dollars, whichever is less, but does not include blind trusts.

(15) “Business organization” means a sole proprietorship, corporation, limited liability company, association, firm or partnership, other than a client lobbyist, that is owned by, or employs, one or more individual lobbyists.

(16) “Client lobbyist” means a lobbyist on behalf of whom lobbying takes place and who makes expenditures for lobbying and in furtherance of lobbying.

(17) “Necessary expenses” means a public official's or state employee's expenses for an article, appearance or speech or for participation at an event, in his official capacity, which shall be limited to necessary travel expenses, lodging for the nights before, of and after the appearance, speech or event, meals and any related conference or seminar registration fees.

(18) “Lobbyist” and “registrant” shall be construed as defined in section [1-91](#).

(19) “Legal defense fund” means a fund established for the payment of legal expenses of a public official or state employee incurred as a result of defending himself or herself in an administrative, civil, criminal or constitutional proceeding concerning matters related to the official's or employee's service or employment with the state or a quasi-public agency.

(20) “State agency” means any office, department, board, council, commission, institution, constituent unit of the state system of higher education, technical education and career school or other agency in the executive, legislative or judicial branch of state government.

(21) “Confidential information” means any information in the possession of the state, a state employee or a public official, whatever its form, which (A) is required not to be disclosed to the general public under any provision of the general statutes or federal law; or (B) falls within a category of permissibly nondisclosable information under the Freedom of Information Act, as defined in section [1-200](#), and which the appropriate agency, state employee or public official has decided not to disclose to the general public.

Sec. 1-79a. Calculation of dollar limit on gifts. For purposes of calculating the dollar limits under the exceptions to the term “gift” under sections [1-79](#) and [1-91](#) any expenditure provided by a lobbyist who is an individual shall be deemed to have also been provided by the business organization which he owns or by which he is employed, and any expenditure provided by a business organization shall be deemed to have also been provided by all owners and employees of the business organization who are lobbyists.

Sec. 1-80. Office of State Ethics. Citizen's Ethics Advisory Board. Members; appointment; qualifications; vacancies; compensation; restrictions. Hearings. (a) There shall be established an Office of State Ethics. Said office shall consist of an executive director, general counsel, ethics enforcement officer and such other staff as hired by the executive director. Within the Office of State Ethics, there shall be the Citizen's Ethics Advisory Board that shall consist of nine members, appointed as follows: One member shall be appointed by the speaker of the House of Representatives, one member by the president pro tempore of the Senate, one member by the majority leader of the Senate, one member by the minority leader of the Senate, one member by the majority leader of the House of Representatives, one member by the minority leader of the House of Representatives, and three members by the Governor. Members shall be appointed to serve a four-year term commencing on October first of the year in which the prior four-year term expires. Any member may be reappointed. No more than five members shall be members of the same political party.

(b) All members shall be electors of the state. No member shall be a state employee. No member or employee of said board shall (1) hold or campaign for any public office; (2) have held public office or have been a candidate for public office for a three-year period prior to appointment; (3) hold office in any political party or political committee or be a member of any organization or association organized primarily for the purpose of influencing legislation or decisions of public agencies; or (4) be an individual who is a registrant as defined in subdivision (17) of section [1-91](#). For purposes of this subsection, “public office” does not include the offices of justice of the peace or notary public.

(c) Any vacancy on the board shall be filled by the appointing authority having the power to make the original appointment within thirty days.

(d) The board shall elect a chairperson who shall, except as provided in subsection (b) of section [1-82](#) and subsection (b) of section [1-93](#), preside at meetings of the board and a vice-chairperson to preside in the absence of the chairperson. Six members of the board shall constitute a quorum. Except as provided in subdivision (3) of subsection (a) of section [1-81](#), subsections (a) and (b) of section [1-82](#), subsection (b) of section [1-88](#), subsection (e) of section [1-92](#), subsections (a) and (b) of section [1-93](#) and subsection (b) of section [1-99](#), a majority vote of the members shall be required for action of the board. The chairperson or any three members may call a meeting.

(e) Any matter before the board, except hearings held pursuant to the provisions of subsection (b) of section [1-82](#) or subsection (b) of section [1-93](#), may be assigned by the board to two of its members to conduct an investigation or hearing, as the case may be, to ascertain the facts and report thereon to the board with a recommendation for action. Any hearing held pursuant to this subsection shall be held in accordance with the provisions of chapter 54.

(f) Members of the board shall be compensated at the rate of two hundred dollars per day for each day they attend a meeting or hearing and shall receive reimbursement for their necessary expenses incurred in the discharge of their official duties.

(g) The board shall not be construed to be a board or commission within the meaning of section [4-9a](#).

(h) The members and employees of the Citizen's Ethics Advisory Board and the Office of State Ethics shall adhere to the following code of ethics under which the members and employees shall: (1) Observe high standards of conduct so that the integrity and independence of the Citizen's Ethics Advisory Board and the Office of State Ethics may be preserved; (2) respect and comply with the law and conduct themselves at all times in a manner which promotes public confidence in the integrity and impartiality of the board and the Office of State Ethics; (3) be faithful to the law and maintain professional competence in the law; (4) be unswayed by partisan interests, public clamor or fear of criticism; (5) maintain order and decorum in proceedings of the board and Office of State Ethics; (6) be patient, dignified and courteous to all persons who appear in board or Office of State Ethics proceedings and with other persons with whom the members and employees deal in their official capacities; (7) refrain from making any statement outside of a board or Office of State Ethics proceeding, which would have a likelihood of prejudicing a board or Office of State Ethics proceeding; (8) refrain from making any statement outside of a board or Office of State Ethics proceeding that a reasonable person would expect to be disseminated by means of

public communication if the member or employee should know that such statement would have a likelihood of materially prejudicing or embarrassing a complainant or a respondent; (9) preserve confidences of complainants and respondents; (10) exercise independent professional judgment on behalf of the board and Office of State Ethics; and (11) represent the board and Office of State Ethics competently.

(i) No member or employee of the board or Office of State Ethics may make a contribution, as defined in section [9-601a](#), to any state employee, public official, candidate for state-wide office or candidate for the office of representative or senator in the General Assembly.

(j) Members of the board shall recuse themselves from participating in any proceeding or matter undertaken pursuant to this chapter that involves the person who appointed such member to the board.

(k) No former member of the board may represent any business or person, other than himself or herself, before the board for a period of one year following the end of such former member's service on the board. No business or person that appears before the board shall employ or otherwise engage the services of a former member of the board for a period of one year following the end of such former member's service on the board.

(l) No member of the board may hold any other position in state employment for a period of one year following the end of such member's service on the board, including, but not limited to, service as a member on a state board or commission, service as a judge of the Superior Court or service as a state agency commissioner. The provisions of this subsection shall not be construed to prohibit any former board member from holding a volunteer or unpaid position in state service within one year of the end of his or her service on the board.

(m) Upon request of any aggrieved party, the board may delay the effect of any decision rendered by the board for a period not to exceed seven days following the rendering of such decision.

Secs. 1-80b to 1-80d. State Ethics Commission member serving as Citizen's Ethics Advisory Board member; Citizen's Ethics Advisory Board member appointment by Governor. Appointment of interim executive director. Transfer of State Ethics Commission staff. Sections [1-80b](#) to [1-80d](#), inclusive, are repealed, effective October 1, 2021.

Sec. 1-80e. Designation of judge trial referees. The Chief Court Administrator shall designate ten judge trial referees who shall be available to the Office of State Ethics to: (1) Preside over and rule at any hearing of the Office of State Ethics; and (2) make

findings as to probable cause following any investigation conducted by the ethics enforcement officer of the Office of State Ethics.

(Sec. 1-81. Duties of the board, Office of State Ethics. Employment of executive director, general counsel, ethics enforcement officer. Legal and enforcement divisions of the Office of State Ethics. Regulations. State personnel training in ethics. (a) The board and general counsel and staff of the Office of State Ethics shall:

(1) Compile and maintain an index of all reports, advisory opinions, informal staff letters, memoranda issued in accordance with subsection (b) of section [1-82](#) and statements filed by and with the Office of State Ethics to facilitate public access to such reports and advisory opinions, informal staff letters, memoranda statements as provided by this part;

(2) Preserve advisory opinions and informal staff letters, permanently; preserve memoranda issued in accordance with subsection (b) of section [1-82](#) and statements and reports filed by and with the board for a period of five years from the date of receipt;

(3) Upon the concurring vote of a majority of the board present and voting, issue advisory opinions with regard to the requirements of this part or part IV of this chapter, upon the request of any person subject to the provisions of this part or part IV of this chapter, and publish such advisory opinions in the Connecticut Law Journal. Advisory opinions rendered by the board, until amended or revoked, shall be binding on the board and shall be deemed to be final decisions of the board for purposes of appeal to the superior court, in accordance with the provisions of section [4-175](#) or [4-183](#). Any advisory opinion concerning the person who requested the opinion and who acted in reliance thereon, in good faith, shall be binding upon the board, and it shall be an absolute defense in any criminal action brought under the provisions of this part or part IV of this chapter, that the accused acted in reliance upon such advisory opinion;

(4) Respond to inquiries and provide advice regarding the code of ethics either verbally or through informal letters;

(5) Provide yearly training to all state employees regarding the code of ethics;

(6) Make legislative recommendations to the General Assembly and report annually, not later than February fifteenth, to the Governor summarizing the activities of the Office of State Ethics; and

(7) Meet not less than once per month with the office's executive director and ethics enforcement officer.

(b) The Office of State Ethics may enter into such contractual agreements as may be necessary for the discharge of its duties, within the limits of its appropriated funds and in accordance with established procedures.

(c) The Office of State Ethics shall employ an executive director, general counsel and ethics enforcement officer, each of whom shall be exempt from classified state service. The ethics enforcement officer shall be a member of the bar of this state. The salary for the executive director, general counsel and the ethics enforcement officer shall be determined by the Commissioner of Administrative Services in accordance with accepted personnel practices. No one person may serve in more than one of the positions described in this subsection. The Office of State Ethics may employ necessary staff within available appropriations. Such necessary staff of the Office of State Ethics shall be in classified state service.

(d) The executive director, described in subsection (c) of this section, shall be appointed by the Citizen's Ethics Advisory Board for an open-ended term. Such appointment shall not be made until all the initial board members appointed to terms commencing on October 1, 2005, are appointed by their respective appointing authorities, pursuant to subsection (a) of section [1-80](#). The board shall annually evaluate the performance of the executive director, in writing, and may remove the executive director, in accordance with the provisions of chapter 67.

(e) The general counsel and ethics enforcement officer described in subsection (c) of this section, and other staff of the Office of State Ethics shall be appointed by the executive director of the Office of State Ethics. The executive director shall annually evaluate the performance of the general counsel, ethics enforcement officer and such other staff, in writing, and may remove the general counsel or ethics enforcement officer, in accordance with the provisions of chapter 67, or such other staff, in accordance with any applicable collective bargaining agreement.

(f) There shall be a legal division within the Office of State Ethics. The legal division shall provide the board with legal advice on matters before said board and shall represent the board in all matters in which the board is a party, without the assistance of the Attorney General unless the board requests such assistance. The legal division shall, under the direction of the general counsel, provide information and written and verbal opinions to persons subject to the code and to the general public. The general counsel, described in subsection (c) of this section, shall supervise such division. The investigation or instigation of a complaint may not occur solely because of information received by the legal division.

(g) There shall be an enforcement division within the Office of State Ethics. The enforcement division shall be responsible for investigating complaints brought to or by

the board. The ethics enforcement officer, described in subsection (c) of this section, shall supervise the enforcement division. The ethics enforcement officer may represent the Office of State Ethics before the Superior Court in an appeal of any ruling or finding pursuant to, or any matter arising under, section [1-82](#), [1-93](#), or [1-101nn](#), provided the board is not a party in such appeal. The enforcement division shall employ such attorneys and investigators, as necessary, within available appropriations, and may refer matters to the office of the Chief State's Attorney, as appropriate.

(h) The Citizen's Ethics Advisory Board shall adopt regulations in accordance with chapter 54 to carry out the purposes of this part. Such regulations shall not be deemed to govern the conduct of any judge trial referee in the performance of such judge trial referee's duties pursuant to this chapter.

(i) The general counsel shall, in consultation with the executive director of the Office of State Ethics, oversee yearly training of all state personnel in the code of ethics, provide training on the code of ethics to other individuals or entities subject to the code and shall make recommendations as to public education regarding ethics.

Sec. 1-81a. Recommended appropriations. Allotments. (a) Notwithstanding any provision of the general statutes, the appropriations recommended for the Office of State Ethics shall be the estimates of expenditure requirements transmitted to the Secretary of the Office of Policy and Management by the executive director of the Office of State Ethics and the recommended adjustments and revisions of such estimates shall be the recommended adjustments and revisions, if any, transmitted by said executive director to the Office of Policy and Management.

(b) Notwithstanding any provision of the general statutes, the Governor shall not reduce allotment requisitions or allotments in force concerning the Office of State Ethics.

Sec. 1-81b. Summary of ethics laws re bidders, proposers and state contractors. The Office of State Ethics shall develop a plain language summary of state ethics laws concerning (1) persons, firms and corporations submitting bids or proposals for state contracts, and (2) state contractors. The Office of State Ethics shall publish said summary on the Office of State Ethics' web site.

Sec. 1-81c. Mandatory ethics training for public officials. Frequency. Exception. Not later than December 31, 2010, the Office of State Ethics shall establish and administer a program of mandatory training on the code of ethics for public officials as set forth in chapter 10. Such program shall provide such training to members of the General Assembly upon first election to the General Assembly, and for all members of

the General Assembly every four years beginning in 2011, except that, in the event there is a significant revision of the code of ethics for public officials, as determined by the Joint Committee on Legislative Management, said committee shall request that the Office of State Ethics conduct a training for all members of the General Assembly before the date of the next regularly scheduled training.

Sec. 1-82. Complaints. Procedure. Time limits. Investigation; notice; hearings. Attorneys' fees. Damages for complaints without foundation. (a)(1) Upon the complaint of any person on a form prescribed by the board, signed under penalty of false statement, or upon its own complaint, the ethics enforcement officer of the Office of State Ethics shall investigate any alleged violation of this part, section [1-101bb](#) or section [1-101nn](#). Not later than five days after the receipt or issuance of such complaint, the board shall provide notice of such receipt or issuance and a copy of the complaint by registered or certified mail to any respondent against whom such complaint is filed and shall provide notice of the receipt of such complaint to the complainant. When the ethics enforcement officer of the Office of State Ethics undertakes an evaluation of a possible violation of this part, section [1-101bb](#) or section [1-101nn](#) prior to the filing of a complaint, the subject of the evaluation shall be notified not later than five business days after an Office of State Ethics staff member's first contact with a third party concerning the matter.

(2) In the conduct of its investigation of an alleged violation of this part, section [1-101bb](#) or section [1-101nn](#), the Office of State Ethics shall have the power to hold hearings, administer oaths, examine witnesses and receive oral and documentary evidence. The Office of State Ethics may subpoena witnesses under procedural rules adopted by the Citizen's Ethics Advisory Board as regulations in accordance with the provisions of chapter 54 to compel attendance before the Office of State Ethics and to require the production for examination by the ethics enforcement officer of the Office of State Ethics of any books and papers which the Office of State Ethics deems relevant in any matter under investigation or in question, provided any such subpoena is issued either pursuant to a majority vote of the Citizen's Ethics Advisory Board or pursuant to the signature of the chairperson of such board. The vice-chairperson of such board may sign any such subpoena if the chairperson of such board is unavailable. In the exercise of such powers, the Office of State Ethics may use the services of the state police, who shall provide the same upon the office's request. The Office of State Ethics shall make a record of all proceedings conducted pursuant to this subsection. The ethics enforcement officer of the Office of State Ethics may bring any alleged violation of this part before a judge trial referee assigned by the Chief Court Administrator for such purpose for a probable cause hearing. Such judge trial referee shall be compensated in accordance with the provisions of section [52-434](#) from such funds as may be available to the Office of State Ethics. Any witness summoned before the Office of State Ethics or a judge trial referee pursuant to this subsection shall receive the witness fee paid to

witnesses in the courts of this state. During any investigation conducted pursuant to this subsection or any probable cause hearing conducted pursuant to this subsection, the respondent shall have the right to appear and be heard and to offer any information which may tend to clear the respondent of probable cause to believe the respondent has violated any provision of this part, section [1-101bb](#) or section [1-101nn](#). The respondent shall also have the right to be represented by legal counsel and to examine and cross-examine witnesses. Not later than ten days prior to the commencement of any hearing conducted pursuant to this subsection, the Office of State Ethics shall provide the respondent with a list of its intended witnesses. Any finding of probable cause to believe the respondent is in violation of any provisions of this part shall be made by a judge trial referee not later than thirty days after the ethics enforcement officer brings such alleged violation before such judge trial referee, except that such thirty-day limitation period shall not apply if the judge trial referee determines that good cause exists for extending such limitation period.

(b) If a judge trial referee determines that probable cause exists for the violation of a provision of this part, section [1-101bb](#) or section [1-101nn](#), the board shall initiate hearings to determine whether there has been a violation of this part, section [1-101bb](#) or section [1-101nn](#). Any such hearing shall be initiated by the board not later than thirty days after the finding of probable cause by a judge trial referee and shall be concluded not later than ninety days after its initiation, except that such thirty or ninety-day limitation period shall not apply if the judge trial referee determines that good cause exists for extending such limitation period. A judge trial referee, who has not taken part in the probable cause determination on the matter shall be assigned by the Chief Court Administrator and shall be compensated in accordance with section [52-434](#) out of funds available to the Office of State Ethics. Such judge trial referee shall preside over such hearing and rule on all issues concerning the application of the rules of evidence, which shall be the same as in judicial proceedings. The judge trial referee shall have no vote in any decision of the board. All hearings of the board held pursuant to this subsection shall be open. At such hearing the board shall have the same powers as the Office of State Ethics under subsection (a) of this section and the respondent shall have the right to be represented by legal counsel, to compel attendance of witnesses and the production of books, documents, records and papers and to examine and cross-examine witnesses. Not later than ten days prior to the commencement of any hearing conducted pursuant to this subsection, the Office of State Ethics shall provide the respondent with a list of its intended witnesses. The judge trial referee shall, while engaged in the discharge of the duties as provided in this subsection, have the same authority as is provided in section [51-35](#) over witnesses who refuse to obey a subpoena or to testify with respect to any matter upon which such witness may be lawfully interrogated, and may commit any such witness for contempt for a period no longer than thirty days. The Office of State Ethics shall make a record of all proceedings pursuant to this subsection.

During the course of any such hearing, no ex-parte communication shall occur between the board, or any of its members, and: (1) The judge trial referee, or (2) any staff member of the Enforcement Division of the Office of State Ethics, concerning the complaint or the respondent. The board shall find no person in violation of any provision of this part, section [1-101bb](#) or section [1-101nn](#) except upon the concurring vote of two-thirds of its members present and voting. No member of the board shall vote on the question of whether a violation of any provision of this part has occurred unless such member was physically present for the duration of any hearing held pursuant to this subsection. Not later than forty-five days after the public hearing conducted in accordance with this subsection, the board shall publish its finding and a memorandum of the reasons therefor. Such finding and memorandum shall be deemed to be the final decision of the board on the matter for the purposes of chapter 54. The respondent, if aggrieved by the finding and memorandum, may appeal therefrom to the Superior Court in accordance with the provisions of section [4-183](#).

(c) If a judge trial referee finds, after a hearing pursuant to this section, that there is no probable cause to believe that a public official or state employee has violated a provision of this part, section [1-101bb](#) or section [1-101nn](#), or if the board determines that a public official or state employee has not violated any such provision, or if a court of competent jurisdiction overturns a finding by the board of a violation by such a respondent, the state shall pay the reasonable legal expenses of the respondent as determined by the Attorney General or by the court if appropriate. If any complaint brought under the provisions of this part, section [1-101bb](#) or section [1-101nn](#) is made with the knowledge that it is made without foundation in fact, the respondent shall have a cause of action against the complainant for double the amount of damage caused thereby and, if the respondent prevails in such action, the respondent may be awarded by the court the costs of such action together with reasonable attorneys' fees.

(d) No complaint may be made under this section later than five years after the violation alleged in the complaint has been committed.

(e) No person shall take or threaten to take official action against an individual for such individual's disclosure of information to the board or the general counsel, ethics enforcement officer or staff of the Office of State Ethics under the provisions of this part, section [1-101bb](#) or section [1-101nn](#). After receipt of information from an individual under the provisions of this part, section [1-101bb](#) or section [1-101nn](#), the Office of State Ethics shall not disclose the identity of such individual without such individual's consent unless the Office of State Ethics determines that such disclosure is unavoidable during the course of an investigation. No person shall be subject to civil liability for any good faith disclosure that such person makes to the Office of State Ethics.

Sec. 1-82a. Confidentiality of complaints, evaluations of possible violations and investigations. Publication of findings.

(a) Unless a judge trial referee makes a finding of probable cause, a complaint alleging a violation of this part, section [1-101bb](#) or section [1-101nn](#) shall be confidential except upon the request of the respondent. An evaluation of a possible violation of this part, section [1-101bb](#) or section [1-101nn](#) by the Office of State Ethics prior to the filing of a complaint shall be confidential except upon the request of the subject of the evaluation. If the evaluation is confidential, any information supplied to or received from the Office of State Ethics shall not be disclosed to any third party by a subject of the evaluation, a person contacted for the purpose of obtaining information or by the ethics enforcement officer or staff of the Office of State Ethics. No provision of this subsection shall prevent the Office of State Ethics from reporting the possible commission of a crime to the Chief State's Attorney or other prosecutorial authority.

(b) An investigation conducted prior to a probable cause finding shall be confidential except upon the request of the respondent. If the investigation is confidential, the allegations in the complaint and any information supplied to or received from the Office of State Ethics shall not be disclosed during the investigation to any third party by a complainant, respondent, witness, designated party, or board or staff member of the Office of State Ethics.

(c) Not later than three business days after the termination of the investigation, the Office of State Ethics shall inform the complainant and the respondent of its finding and provide them a summary of its reasons for making that finding. The Office of State Ethics shall publish its finding upon the respondent's request and may also publish a summary of its reasons for making such finding.

(d) If a judge trial referee makes a finding of no probable cause, the complaint and the record of the Office of State Ethics' investigation shall remain confidential, except upon the request of the respondent and except that some or all of the record may be used in subsequent proceedings. No complainant, respondent, witness, designated party, or board or staff member of the Office of State Ethics shall disclose to any third party any information learned from the investigation, including knowledge of the existence of a complaint, which the disclosing party would not otherwise have known. If such a disclosure is made, the judge trial referee may, after consultation with the respondent if the respondent is not the source of the disclosure, publish the judge trial referee's finding and a summary of the judge trial referee's reasons therefor.

(e) The judge trial referee shall make public a finding of probable cause not later than five business days after any such finding. At such time the entire record of the investigation shall become public, except that the Office of State Ethics may postpone examination or release of such public records for a period not to exceed fourteen days

for the purpose of reaching a stipulation agreement pursuant to subsection (c) of section [4-177](#). Any such stipulation agreement or settlement shall be approved by a majority of those members present and voting.

Sec. 1-82b. Continuation of certain probable cause hearings. Section [1-82b](#) is repealed, effective October 1, 2021.

Sec. 1-83. Statements of financial interests. Filing requirements. Ethics statements. Confidentiality. Waiver. (a)(1) All state-wide elected officers, members of the General Assembly, department heads and their deputies, members or directors of each quasi-public agency, members of the Investment Advisory Council and such members of the Executive Department and such employees of quasi-public agencies as the Governor shall require, shall file electronically with the Office of State Ethics using the software created by the office, under penalty of false statement, a statement of financial interests for the preceding calendar year on or before the May first next in any year in which they hold such an office or position. If, in any year, May first falls on a weekend or legal holiday, such statement shall be filed not later than the next business day. Any such individual who leaves his or her office or position shall file electronically a statement of financial interests covering that portion of the year during which such individual held his or her office or position. The Office of State Ethics shall notify such individuals of the requirements of this subsection not later than sixty days after their departure from such office or position. Such individuals shall file such statement electronically not later than sixty days after receipt of the notification.

(2) Each state agency, department, board and commission shall develop and implement, in cooperation with the Office of State Ethics, an ethics statement as it relates to the mission of the agency, department, board or commission. The executive head of each such agency, department, board or commission shall be directly responsible for the development and enforcement of such ethics statement and shall file a copy of such ethics statement with the Office of State Ethics.

(b) (1) The statement of financial interests, except as provided in subdivision (2) of this subsection, shall include the following information for the preceding calendar year in regard to the individual required to file the statement and the individual's spouse and dependent children residing in the individual's household: (A) The names of all businesses with which associated; (B) all sources of income, including the name of each employer, with a description of the type of income received, in excess of one thousand dollars, without specifying amounts of income; (C) the name of securities in excess of five thousand dollars at fair market value owned by such individual, spouse or dependent children or held in the name of a corporation, partnership or trust for the benefit of such individual, spouse or dependent children; (D) the existence of any known blind trust and the names of the trustees; (E) all real property and its location,

whether owned by such individual, spouse or dependent children or held in the name of a corporation, partnership or trust for the benefit of such individual, spouse or dependent children; (F) the names and addresses of creditors to whom the individual, the individual's spouse or dependent children, individually, owed debts of more than ten thousand dollars; (G) any leases or contracts with the state or a quasi-public agency held or entered into by the individual or a business with which he or she was associated; and (H) the name of any of the following that is a partner or owner of, or has a similar business affiliation with, the business included under subparagraph (A) of this subdivision: (i) Any lobbyist, (ii) any person the individual filing the statement knows or has reason to know is doing business with or seeking to do business with the state or is engaged in activities that are directly regulated by the department or agency in which the individual is employed, or (iii) any business with which such lobbyist or person is associated.

(2) In the case of securities in excess of five thousand dollars at fair market value held within (A) a retirement savings plan, as described in Section 401 of the Internal Revenue Code of 1986, or any subsequent corresponding internal revenue code of the United States, as amended from time to time, (B) a payroll deduction individual retirement account plan, as described in Section 408 or 408A of said Internal Revenue Code, (C) a governmental deferred compensation plan, as described in Section 457 of said Internal Revenue Code, or (D) an education savings plan, as described in Section 529 of said Internal Revenue Code, the names of such securities shall not be required to be disclosed in any statement of financial interests and only the name of such retirement savings plan, individual retirement account plan, deferred compensation plan or education savings plan holding such securities shall be required.

(c) The statement of financial interests filed pursuant to this section shall be a matter of public information, except (1) the names of any dependent children residing in the household of the individual filing such statement shall not be subject to disclosure under the Freedom of Information Act, as defined in section [1-200](#), and (2) the list of names, filed in accordance with subparagraph (F) of subdivision (1) of subsection (b) of this section shall be sealed and confidential and for the use of the Office of State Ethics only after a complaint has been filed under section [1-82](#) and such complaint has been determined by a vote of the board to be of sufficient merit and gravity to justify the unsealing of such list or lists and not open to public inspection unless the respondent requests otherwise. If the board reports its findings to the Chief State's Attorney in accordance with subsection (c) of section [1-88](#), the board shall turn over to the Chief State's Attorney such relevant information contained in the statement as may be germane to the specific violation or violations or a prosecutorial official may subpoena such statement in a criminal action. Unless otherwise a matter of public record, the Office of State Ethics shall not disclose to the public any such subpoena which would be exempt from disclosure by the issuing agency.

(d) Any individual who is unable to provide information required under the provisions of subdivision (1) of subsection (b) of this section by reason of impossibility may petition the board for a waiver of the requirements.

Sec. 1-84. (Formerly Sec. 1-66). Prohibited activities. Exception re employment of immediate family at constituent unit. (a) No public official or state employee shall, while serving as such, have any financial interest in, or engage in, any business, employment, transaction or professional activity, which is in substantial conflict with the proper discharge of his duties or employment in the public interest and of his responsibilities as prescribed in the laws of this state, as defined in section [1-85](#).

(b) No public official or state employee shall accept other employment which will either impair his independence of judgment as to his official duties or employment or require him, or induce him, to disclose confidential information acquired by him in the course of and by reason of his official duties.

(c) No public official or state employee shall wilfully and knowingly disclose, for financial gain, to any other person, confidential information acquired by him in the course of and by reason of his official duties or employment and no public official or state employee shall use his public office or position or any confidential information received through his holding such public office or position to obtain financial gain for himself, his spouse, child, child's spouse, parent, brother or sister or a business with which he is associated.

(d) No public official or state employee or employee of such public official or state employee shall agree to accept, or be a member or employee of a partnership, association, professional corporation or sole proprietorship which partnership, association, professional corporation or sole proprietorship agrees to accept any employment, fee or other thing of value, or portion thereof, for appearing, agreeing to appear, or taking any other action on behalf of another person before the Department of Banking, the Office of the Claims Commissioner, the Health Systems Planning Unit of the Office of Health Strategy, the Insurance Department, the Department of Consumer Protection, the Department of Motor Vehicles, the State Insurance and Risk Management Board, the Department of Energy and Environmental Protection, the Public Utilities Regulatory Authority, the Connecticut Siting Council or the Connecticut Real Estate Commission; provided this shall not prohibit any such person from making inquiry for information on behalf of another before any of said commissions or commissioners if no fee or reward is given or promised in consequence thereof. For the purpose of this subsection, partnerships, associations, professional corporations or sole proprietorships refer only to such partnerships, associations, professional corporations or sole proprietorships which have been formed to carry on the business or profession directly relating to the employment, appearing, agreeing to

appear or taking of action provided for in this subsection. Nothing in this subsection shall prohibit any employment, appearing, agreeing to appear or taking action before any municipal board, commission or council. Nothing in this subsection shall be construed as applying (1) to the actions of any teaching or research professional employee of a public institution of higher education if such actions are not in violation of any other provision of this chapter, (2) to the actions of any other professional employee of a public institution of higher education if such actions are not compensated and are not in violation of any other provision of this chapter, (3) to any member of a board or commission who receives no compensation other than per diem payments or reimbursement for actual or necessary expenses, or both, incurred in the performance of the member's duties, or (4) to any member or director of a quasi-public agency. Notwithstanding the provisions of this subsection to the contrary, a legislator, an officer of the General Assembly or part-time legislative employee may be or become a member or employee of a firm, partnership, association or professional corporation which represents clients for compensation before agencies listed in this subsection, provided the legislator, officer of the General Assembly or part-time legislative employee shall take no part in any matter involving the agency listed in this subsection and shall not receive compensation from any such matter. Receipt of a previously established salary, not based on the current or anticipated business of the firm, partnership, association or professional corporation involving the agencies listed in this subsection, shall be permitted.

(e) No legislative commissioner or his partners, employees or associates shall represent any person subject to the provisions of part II concerning the promotion of or opposition to legislation before the General Assembly, or accept any employment which includes an agreement or understanding to influence, or which is inconsistent with, the performance of his official duties.

(f) No person shall offer or give to a public official or state employee or candidate for public office or his spouse, his parent, brother, sister or child or spouse of such child or a business with which he is associated, anything of value, including, but not limited to, a gift, loan, political contribution, reward or promise of future employment based on any understanding that the vote, official action or judgment of the public official, state employee or candidate for public office would be or had been influenced thereby.

(g) No public official or state employee or candidate for public office shall solicit or accept anything of value, including but not limited to, a gift, loan, political contribution, reward or promise of future employment based on any understanding that the vote, official action or judgment of the public official or state employee or candidate for public office would be or had been influenced thereby.

(h) Nothing in subsection (f) or (g) of this section shall be construed (1) to apply to any promise made in violation of subdivision (6) of section [9-622](#), or (2) to permit any activity otherwise prohibited in section [53a-147](#) or [53a-148](#).

(i) (1) No public official or state employee or member of the official or employee's immediate family or a business with which he is associated shall enter into any contract with the state, valued at one hundred dollars or more, other than a contract (A) of employment as a state employee, (B) with the Technical Education and Career System for students enrolled in a school in the system to perform services in conjunction with vocational, technical, technological or postsecondary education and training any such student is receiving at a school in the system, subject to the review process under subdivision (2) of this subsection, (C) with a public institution of higher education to support a collaboration with such institution to develop and commercialize any invention or discovery, or (D) pursuant to a court appointment, unless the contract has been awarded through an open and public process, including prior public offer and subsequent public disclosure of all proposals considered and the contract awarded. In no event shall an executive head of an agency, as defined in section [4-166](#), including a commissioner of a department, or an executive head of a quasi-public agency, as defined in section [1-79](#), or the executive head's immediate family or a business with which he is associated enter into any contract with that agency or quasi-public agency. Nothing in this subsection shall be construed as applying to any public official who is appointed as a member of the executive branch or as a member or director of a quasi-public agency and who receives no compensation other than per diem payments or reimbursement for actual or necessary expenses, or both, incurred in the performance of the public official's duties unless such public official has authority or control over the subject matter of the contract. Any contract made in violation of this subsection shall be voidable by a court of competent jurisdiction if the suit is commenced not later than one hundred eighty days after the making of the contract.

(2) The superintendent of the Technical Education and Career System shall establish an open and transparent process to review any contract entered into under subparagraph (B) of subdivision (1) of this subsection.

(j) No public official, state employee or candidate for public office, or a member of any such person's staff or immediate family shall knowingly accept any gift, as defined in subdivision (5) of section [1-79](#), from a person known to be a registrant or anyone known to be acting on behalf of a registrant.

(k) No public official, spouse of the Governor or state employee shall accept a fee or honorarium for an article, appearance or speech, or for participation at an event, in the public official's, spouse's or state employee's official capacity, provided a public official, Governor's spouse or state employee may receive payment or reimbursement

for necessary expenses for any such activity in his or her official capacity. If a public official, Governor's spouse or state employee receives such a payment or reimbursement for lodging or out-of-state travel, or both, the public official, Governor's spouse or state employee shall, not later than thirty days thereafter, file a report of the payment or reimbursement with the Office of State Ethics, unless the payment or reimbursement is provided by the federal government or another state government. If a public official, Governor's spouse or state employee does not file such report within such period, either intentionally or due to gross negligence on the public official's, Governor's spouse's or state employee's part, the public official, Governor's spouse or state employee shall return the payment or reimbursement. If any failure to file such report is not intentional or due to gross negligence on the part of the public official, Governor's spouse or state employee, the public official, Governor's spouse or state employee shall not be subject to any penalty under this chapter. When a public official, Governor's spouse or state employee attends an event in this state in the public official's, Governor's spouse's or state employee's official capacity and as a principal speaker at such event and receives admission to or food or beverage at such event from the sponsor of the event, such admission or food or beverage shall not be considered a gift and no report shall be required from such public official, spouse or state employee or from the sponsor of the event.

(l) No public official or state employee, or any person acting on behalf of a public official or state employee, shall wilfully and knowingly interfere with, influence, direct or solicit existing or new lobbying contracts, agreements or business relationships for or on behalf of any person.

(m) No public official or state employee shall knowingly accept, directly or indirectly, any gift, as defined in subdivision (5) of section [1-79](#), from any person the public official or state employee knows or has reason to know: (1) Is doing business with or seeking to do business with the department or agency in which the public official or state employee is employed; (2) is engaged in activities which are directly regulated by such department or agency; or (3) is prequalified under section [4a-100](#). No person shall knowingly give, directly or indirectly, any gift or gifts in violation of this provision. For the purposes of this subsection, the exclusion to the term "gift" in subparagraph (L) of subdivision (5) of section [1-79](#) for a gift for the celebration of a major life event shall not apply. Any person prohibited from making a gift under this subsection shall report to the Office of State Ethics any solicitation of a gift from such person by a state employee or public official.

(n) (1) As used in this subsection, (A) "investment services" means investment legal services, investment banking services, investment advisory services, underwriting services, financial advisory services or brokerage firm services, and (B) "principal of an investment services firm" means (i) an individual who is a director of or has an

ownership interest in an investment services firm, except for an individual who owns less than five per cent of the shares of an investment services firm which is a publicly traded corporation, (ii) an individual who is employed by an investment services firm as president, treasurer, or executive or senior vice president, (iii) an employee of such an investment services firm who has managerial or discretionary responsibilities with respect to any investment services, (iv) the spouse or dependent child of an individual described in this subparagraph, or (v) a political committee established by or on behalf of an individual described in this subparagraph.

(2) The State Treasurer shall not pay any compensation, expenses or fees or issue any contract to any firm which provides investment services when (A) a political committee, as defined in section [9-601](#), established by such firm, or (B) a principal of the investment services firm has made a contribution, as defined in section [9-601a](#), to, or solicited contributions on behalf of, any exploratory committee or candidate committee, as defined in section [9-601](#), established by the State Treasurer as a candidate for nomination or election to the office of State Treasurer. The State Treasurer shall not pay any compensation, expenses or fees or issue any contract to such firms or principals during the term of office as State Treasurer, including, for an incumbent State Treasurer seeking reelection, any remainder of the current term of office.

(o) If (1) any person (A) is doing business with or seeking to do business with the department or agency in which a public official or state employee is employed, or (B) is engaged in activities which are directly regulated by such department or agency, and (2) such person or a representative of such person gives to such public official or state employee anything having a value of more than ten dollars, such person or representative shall, not later than ten days thereafter, give such recipient and the executive head of the recipient's department or agency a written report stating the name of the donor, a description of the item or items given, the value of such items and the cumulative value of all items given to such recipient during that calendar year. The provisions of this subsection shall not apply to a political contribution otherwise reported as required by law.

(p) (1) No public official or state employee or member of the immediate family of a public official or state employee shall knowingly accept, directly or indirectly, any gift costing one hundred dollars or more from a public official or state employee who is under the supervision of such public official or state employee.

(2) No public official or state employee or member of the immediate family of a public official or state employee shall knowingly accept, directly or indirectly, any gift costing one hundred dollars or more from a public official or state employee who is a supervisor of such public official or state employee.

(3) No public official or state employee shall knowingly give, directly or indirectly, any gift in violation of subdivision (1) or (2) of this subsection.

(q) No public official or state employee shall intentionally counsel, authorize or otherwise sanction action that violates any provision of this part.

(r) (1) Notwithstanding the provisions of subsections (b) and (c) of this section, a member of the faculty or a member of a faculty bargaining unit of a constituent unit of the state system of higher education may enter into a consulting agreement or engage in a research project with a public or private entity, provided such agreement or project does not conflict with the member's employment with the constituent unit, as determined by policies established by the board of trustees for such constituent unit.

(2) The board of trustees for each constituent unit of the state system of higher education shall establish policies to ensure that any such member who enters such a consulting agreement or engages in such a research project (A) is not inappropriately using university proprietary information in connection with such agreement or project, (B) does not have an interest in such agreement or project that interferes with the proper discharge of his or her employment with the constituent unit, and (C) is not inappropriately using such member's association with the constituent unit in connection with such agreement or project. Such policies shall (i) establish procedures for the disclosure, review and management of conflicts of interest relating to any such agreement or project, (ii) require the approval by the chief academic officer of the constituent unit, or his or her designee, prior to any such member entering into any such agreement or engaging in any such project, and (iii) include procedures that impose sanctions and penalties on any member for failing to comply with the provisions of the policies. Annually, the internal audit office of each constituent unit shall audit the constituent unit's compliance with such policies and report its findings to the committee of the constituent unit established pursuant to subdivision (3) of this subsection. For purposes of this subsection, "consulting" means the provision of services for compensation to a public or private entity by a member of the faculty or member of a faculty bargaining unit of a constituent unit of the state system of higher education: (I) When the request to provide such services is based on such member's expertise in a field or prominence in such field, and (II) while such member is not acting in the capacity of a state employee, and "research" means a systematic investigation, including, but not limited to, research development, testing and evaluation, designed to develop or contribute to general knowledge in the applicable field of study.

(3) There is established a committee for each constituent unit of the state system of higher education to monitor the constituent unit's compliance with the policies and procedures described in subdivision (2) of this subsection governing consulting agreements and research projects with public or private entities by a member of the

faculty or a member of a faculty bargaining unit of such constituent unit. Each committee shall consist of nine members as follows: (A) Three members, appointed jointly by the Governor, the speaker of the House of Representatives, the president pro tempore of the Senate, the majority leader of the House of Representatives, the majority leader of the Senate, the minority leader of the House of Representatives and the minority leader of the Senate, who shall serve as members for each such committee; (B) one member appointed by the chairperson of the constituent unit's board of trustees from the membership of such board; (C) the chief academic officer of the constituent unit, or his or her designee; (D) three members appointed by the chief executive officer of the constituent unit; and (E) one member appointed by the chairperson of the Citizen's Ethics Advisory Board from the membership of such board. Members shall serve for a term of two years. Any vacancies shall be filled by the appointing authority. Each committee shall (i) review the annual reports submitted by the internal audit office for the constituent unit, pursuant to subdivision (2) of this subsection, (ii) make recommendations, annually, to the board of trustees of the constituent unit concerning the policies and procedures of the constituent unit established pursuant to subdivision (2) of this subsection, including any changes to such policies and procedures, and (iii) send a copy of such recommendations, in accordance with section [11-4a](#), to the joint standing committees of the General Assembly having cognizance of matters relating to higher education and government administration.

(4) The provisions of subsections (b) and (c) of this section shall apply to any member of the faculty or member of a faculty bargaining unit of a constituent unit of the state system of higher education who enters such a consulting agreement or engages in such a research project without prior approval, as described in subdivision (2) of this subsection.

(s) Notwithstanding the provisions of this section or any other provision of this part, a state employee who is employed at a constituent unit of the state system of higher education and a member of the immediate family of such state employee may be employed in the same department or division of such constituent unit, provided the constituent unit has determined that procedures have been implemented to ensure that any final decisions impacting the financial interests of either such state employee, including decisions to hire, promote, increase the compensation of or renew the employment of such state employee, are made by another state employee who is not a member of the immediate family of such state employee.

Sec. 1-84a. Disclosure or use of confidential information by former official or employee. No former executive or legislative branch or quasi-public agency public official or state employee shall disclose or use confidential information acquired in the course of and by reason of his official duties, for financial gain for himself or another person.

Sec. 1-84b. Certain activities restricted after leaving public office or employment. (a) No former executive branch or quasi-public agency public official or state employee shall represent anyone other than the state, concerning any particular matter (1) in which he participated personally and substantially while in state service, and (2) in which the state has a substantial interest.

(b) No former executive branch or quasi-public agency public official or state employee shall, for one year after leaving state service, represent anyone, other than the state, for compensation before the department, agency, board, commission, council or office in which he served at the time of his termination of service, concerning any matter in which the state has a substantial interest. The provisions of this subsection shall not apply to an attorney who is a former employee of the Division of Criminal Justice, with respect to any representation in a matter under the jurisdiction of a court.

(c) The provisions of this subsection apply to present or former executive branch public officials or state employees of an agency who hold or formerly held positions which involve significant decision-making or supervisory responsibility. Such positions shall be designated as such by the agency concerned, in consultation with the Office of State Ethics, except that such provisions shall not apply to members or former members of the boards or commissions who serve ex officio, who are required by statute to represent the regulated industry or who are permitted by statute to have a past or present affiliation with the regulated industry. On or before November 1, 2021, and not less than annually thereafter, the head of each agency concerned, or his or her designee, shall submit the designation of all positions in existence on such date that are subject to the provisions of this subsection to the office electronically, in a manner prescribed by the Citizen's Ethics Advisory Board. If an agency creates such a position after its annual submission under this subsection, the head of such agency, or his or her designee, shall submit the designation of the newly created position not later than thirty days after the creation of such position. As used in this subsection, "agency" means the Health Systems Planning Unit of the Office of Health Strategy, the Connecticut Siting Council, the Department of Banking, the Insurance Department, the Department of Emergency Services and Public Protection, the office within the Department of Consumer Protection that carries out the duties and responsibilities of sections [30-2](#) to [30-68m](#), inclusive, the Public Utilities Regulatory Authority, including the Office of Consumer Counsel, and the Department of Consumer Protection and the term "employment" means professional services or other services rendered as an employee or as an independent contractor.

(1) No public official or state employee in an executive branch position designated pursuant to the provisions of this subsection shall negotiate for, seek or accept employment with any business subject to regulation by his agency.

(2) No former public official or state employee who held such a position in the executive branch shall, within one year after leaving an agency, accept employment with a business subject to regulation by that agency.

(3) No business shall employ a present or former public official or state employee in violation of this subsection.

(d) The provisions of subsection (e) of this section apply to (1) present or former Department of Consumer Protection public officials or state employees who hold or formerly held positions which involve significant decision-making or supervisory responsibility and designated as such by the department, in consultation with the Office of State Ethics, and (2) present or former public officials or state employees of other agencies who hold or formerly held positions which involve significant decision-making or supervisory responsibility concerning the regulation or investigation of (A) any business entity (i) engaged in Indian gaming operations in the state, and (ii) in which a federally-recognized Indian tribe in the state owns a controlling interest, or (B) a governmental agency of a federally-recognized Indian tribe engaged in Indian gaming operations in the state, which positions are designated as such by the agency concerned, in consultation with the Office of State Ethics. On or before November 1, 2021, and not less than annually thereafter, the Commissioner of Consumer Protection and the head of each agency concerned, or their designees, shall submit designations of all positions in existence on such date that are subject to the provisions of this subsection to the office electronically, in a manner prescribed by the Citizen's Ethics Advisory Board. If the department or agency concerned creates such a position after its annual submission under this subsection, the Commissioner of Consumer Protection or the head of such agency, as applicable, or their designees, shall submit the designation of the newly created position not later than thirty days after the creation of such position.

(e) (1) No Department of Consumer Protection public official or state employee or other public official or state employee described in subdivision (2) of subsection (d) of this section shall negotiate for, seek or accept employment with (A) a business entity (i) engaged in Indian gaming operations in the state, and (ii) in which a federally-recognized Indian tribe in the state owns a controlling interest, or (B) a governmental agency of a federally-recognized Indian tribe engaged in Indian gaming operations in the state.

(2) No former Department of Consumer Protection public official or state employee or other former public official or state employee described in subdivision (2) of subsection (d) of this section, who held such a position shall, within two years after leaving such agency, accept employment with (A) a business entity (i) engaged in Indian gaming operations in the state, and (ii) in which a federally-recognized Indian

tribe in the state owns a controlling interest, or (B) a governmental agency of a federally-recognized Indian tribe engaged in Indian gaming operations in the state.

(3) As used in this subsection, “employment” means professional services or other services rendered as an employee or as an independent contractor.

(f) No former public official or state employee (1) who participated substantially in the negotiation or award of (A) a state contract valued at an amount of fifty thousand dollars or more, or (B) a written agreement for the approval of a payroll deduction slot described in section [3-123g](#), or (2) who supervised the negotiation or award of such a contract or agreement, shall accept employment with a party to the contract or agreement other than the state for a period of one year after his resignation from his state office or position if his resignation occurs less than one year after the contract or agreement is signed. No party to such a contract or agreement other than the state shall employ any such former public official or state employee in violation of this subsection.

(g) No member or director of a quasi-public agency who participates substantially in the negotiation or award of a contract valued at an amount of fifty thousand dollars or more, or who supervised the negotiation or award of such a contract, shall seek, accept, or hold employment with a party to the contract for a period of one year after the signing of the contract.

(h) The provisions of subsections (a), (b) and (f) of this section shall not apply to any employee of a quasi-public agency who leaves such agency before July 1, 1989. The provisions of subsections (b) and (f) of this section shall not apply to a former state employee of a public institution of higher education whose employment was derived from such employee's status as a student at such institution.

(i) No Treasurer who authorizes, negotiates or renegotiates a contract for investment services valued at an amount of fifty thousand dollars or more shall negotiate for, seek or accept employment with a party to the contract prior to one year after the end of the Treasurer's term of office within which such contract for investment services was authorized, negotiated or renegotiated by such Treasurer.

(j) No former executive, judicial or legislative branch or quasi-public agency official or state employee convicted of any felony involving corrupt practices, abuse of office or breach of the public trust shall seek or accept employment as a lobbyist or act as a registrant pursuant to this chapter.

(k) No former Governor shall accept employment or act as a registrant pursuant to the provisions of this chapter, for one year after leaving state service, on behalf of any business that received a contract with any department or agency of the state during such

Governor's term. No business shall employ a former Governor in violation of this subsection.

Sec. 1-84c. Donation of goods or services to state or quasi-public agencies. Reporting requirement. (a) Nothing in this chapter shall prohibit the donation of goods or services, as described in subparagraph (E) of subdivision (5) of section [1-79](#), to a state agency or quasi-public agency, the donation of the use of facilities to facilitate state agency or quasi-public agency action or functions or the donation of real property to a state agency or quasi-public agency.

(b) If a public official or state employee receives goods or services to support such official's or employee's participation at an event, as described in subparagraph (E) of subdivision (5) of section [1-79](#), and such goods or services (1) include lodging or out-of-state travel, or both, and (2) are not provided by the federal government or another state government, such official or employee shall, not later than thirty days after receipt of such goods or services, file a report with the Office of State Ethics. Such report shall be on an electronic form prescribed by the board and shall certify to the Office of State Ethics, under penalty of false statement, that the goods or services received in support of such official's or employee's participation at an event facilitated state action or functions. If a public official or state employee does not file a report within such thirty-day period, either intentionally or due to gross negligence on the official's or employee's part, the official or employee shall return to the donor the value of the goods or services received. Unless the failure to file such report is intentional or due to gross negligence, the public official or state employee shall not be subject to any penalty under this chapter for such failure.

(Sec. 1-84d. Foundations or alumni associations established for the benefit of a constituent unit of public higher education or technical education and career school. Notwithstanding any provision of the general statutes, for purposes of this chapter, no foundation or alumni association established for the benefit of a constituent unit of public higher education or technical education and career school shall be deemed to be doing business with or seeking to do business with such constituent unit of public higher education or technical education and career school.

Sec. 1-85. (Formerly Sec. 1-68). Interest in conflict with discharge of duties. A public official, including an elected state official, or state employee has an interest which is in substantial conflict with the proper discharge of his duties or employment in the public interest and of his responsibilities as prescribed in the laws of this state, if he has reason to believe or expect that he, his spouse, a dependent child, or a business with which he is associated will derive a direct monetary gain or suffer a direct monetary loss, as the case may be, by reason of his official activity. A public official, including an elected state official, or state employee does not have an interest which is

in substantial conflict with the proper discharge of his duties in the public interest and of his responsibilities as prescribed by the laws of this state, if any benefit or detriment accrues to him, his spouse, a dependent child, or a business with which he, his spouse or such dependent child is associated as a member of a profession, occupation or group to no greater extent than any other member of such profession, occupation or group. A public official, including an elected state official or state employee who has a substantial conflict may not take official action on the matter.

Sec. 1-86. Procedure when discharge of duty affects official's or state employee's financial interests. Lobbyists prohibited from accepting employment with General Assembly and General Assembly members forbidden to be lobbyists. (a) Any public official or state employee, other than an elected state official, who, in the discharge of such official's or employee's official duties, would be required to take an action that would affect a financial interest of such official or employee, such official's or employee's spouse, parent, brother, sister, child or the spouse of a child or a business with which such official or employee is associated, other than an interest of a de minimis nature, an interest that is not distinct from that of a substantial segment of the general public or an interest in substantial conflict with the performance of official duties as defined in section [1-85](#) has a potential conflict of interest. Under such circumstances, such official or employee shall, if such official or employee is a member of a state regulatory agency, either excuse himself or herself from the matter or prepare a written statement signed under penalty of false statement describing the matter requiring action and the nature of the potential conflict and explaining why despite the potential conflict, such official or employee is able to vote and otherwise participate fairly, objectively and in the public interest. Such public official or state employee shall deliver a copy of the statement to the Office of State Ethics and enter a copy of the statement in the journal or minutes of the agency. If such official or employee is not a member of a state regulatory agency, such official or employee shall, in the case of either a substantial or potential conflict, prepare a written statement signed under penalty of false statement describing the matter requiring action and the nature of the conflict and deliver a copy of the statement to such official's or employee's immediate superior, if any, who shall assign the matter to another employee, or if such official or employee has no immediate superior, such official or employee shall take such steps as the Office of State Ethics shall prescribe or advise.

(b) No elected state official shall be affected by subsection (a) of this section.

(c) No person required to register with the Office of State Ethics under section [1-94](#) shall accept employment with the General Assembly or with any member of the General Assembly in connection with legislative action, as defined in section [1-91](#). No member of the General Assembly shall be a lobbyist.

Secs. 1-86a to 1-86c. Reserved for future use.

Sec. 1-86d. Legal defense fund established by or for a public official or state employee. Reports. Contributions. (a) Any public official or state employee who establishes a legal defense fund, or for whom a legal defense fund has been established, shall file a report on said fund with the Office of State Ethics not later than the tenth day of January, April, July and October. Each such report shall include the following information for the preceding calendar quarter: (1) The names of the directors and officers of the fund, (2) the name of the depository institution for the fund, (3) an itemized accounting of each contribution to the fund, including the full name and complete address of each contributor and the amount of the contribution, and (4) an itemized accounting of each expenditure, including the full name and complete address of each payee and the amount and purpose of the expenditure. The public official or state employee shall sign each such report under penalty of false statement. The provisions of this subsection shall not apply to any person who has made a contribution to a legal defense fund before June 3, 2004.

(b) (1) In addition to the prohibitions on gifts under subsections (j) and (m) of section [1-84](#) and subsection (a) of section [1-97](#), no public official or state employee shall accept, directly or indirectly, any contribution to a legal defense fund established by or for the public official or state employee, from (A) a member of the immediate family of any person who is prohibited from giving a gift under subsection (j) or (m) of section [1-84](#) or subsection (a) of section [1-97](#), or (B) a person who is appointed by said public official or state employee to serve on a paid, full-time basis. No person described in subparagraph (A) or (B) of this subdivision shall make a contribution to such a legal defense fund, and no such person or any person prohibited from making a gift under subsection (j) or (m) of section [1-84](#) or subsection (a) of section [1-97](#) shall solicit a contribution for such a legal defense fund.

(2) A public official or state employee may accept a contribution or contributions to a legal defense fund established by or for the public official or state employee from any other person, provided the total amount of such contributions from any such person in any calendar year shall not exceed one thousand dollars. No such person shall make a contribution or contributions to said legal defense fund exceeding one thousand dollars in any calendar year. The provisions of this subdivision shall not apply in 2004, to any person who has made a contribution or contributions to a legal defense fund exceeding one thousand dollars in 2004, before June 3, 2004, provided said legal defense fund shall not accept any additional contributions from such person in 2004, and such person shall not make any additional contributions to said fund in 2004.

(3) Notwithstanding the provisions of subdivision (2) of this subsection, a public official or state employee may accept a contribution or contributions, in any amount, to a legal defense fund established by or for the public official or state employee from a relative of the public official or state employee or a person whose relationship with the public official or state employee is not dependent on the official's or employee's status as a public official or state employee. The factors that the board shall consider in determining whether a person's relationship is so dependent shall include, but not be limited to, whether the person may be able to benefit from the exercise of official authority of the public official or state employee and whether the person made gifts to the public official or state employee before the official or employee began serving in such office or position.

(Sec. 1-86e. Consultants, independent contractors and their employees. Prohibited activities. (a) No person hired by the state as a consultant or independent contractor, and no person employed by such consultant or independent contractor, shall:

(1) Use the authority provided under the contract, or any confidential information acquired in the performance of the contract, to obtain financial gain for the consultant or independent contractor, an employee of the consultant or independent contractor or a member of the immediate family of any such consultant, independent contractor or employee;

(2) Accept another state contract which would impair the independent judgment of the consultant, independent contractor or employee in the performance of the existing contract; or

(3) Accept anything of value based on an understanding that the actions of the consultant, independent contractor or employee on behalf of the state would be influenced.

(b) No person shall give anything of value to a person hired by the state as a consultant or independent contractor or an employee of a consultant or independent contractor based on an understanding that the actions of the consultant, independent contractor or employee on behalf of the state would be influenced.

Sec. 1-87. Aggrieved persons. Appeals. Any person aggrieved by any final decision of the board, made pursuant to this part, may appeal such decision in accordance with the provisions of section [4-175](#) or section [4-183](#).

Sec. 1-88. Authority of board after finding violation. Prohibition against disclosure of information. Enforcement of civil penalties. (a) The board, upon a

finding made pursuant to section [1-82](#) that there has been a violation of any provision of this part, section [1-101bb](#) or section [1-101nn](#), shall have the authority to order the violator to do any or all of the following: (1) Cease and desist the violation of this part, section [1-101bb](#) or section [1-101nn](#); (2) file any report, statement or other information as required by this part, section [1-101bb](#) or section [1-101nn](#); and (3) pay a civil penalty of not more than ten thousand dollars for each violation of this part, section [1-101bb](#) or section [1-101nn](#).

(b) Notwithstanding the provisions of subsection (a) of this section, the board may, after a hearing conducted in accordance with sections [4-176e](#) to [4-184](#), inclusive, upon the concurring vote of two-thirds of its members present and voting, impose a civil penalty not to exceed ten dollars per day upon any individual who fails to file any report, statement or other information as required by this part, section [1-101bb](#) or section [1-101nn](#). Each distinct violation of this subsection shall be a separate offense and in case of a continued violation, each day thereof shall be deemed a separate offense. In no event shall the aggregate penalty imposed for such failure to file exceed ten thousand dollars.

(c) The board may also report its finding to the Chief State's Attorney for any action deemed necessary. The board, upon a finding made pursuant to section [1-82](#) that a member or member-elect of the General Assembly has violated any provision of this part, section [1-101bb](#) or section [1-101nn](#), shall notify the appropriate house of the General Assembly, in writing, of such finding and the basis for such finding.

(d) Any person who knowingly acts in such person's financial interest in violation of section [1-84](#), [1-85](#), [1-86](#), [1-86d](#), [1-86e](#) or [1-101nn](#) or any person who knowingly receives a financial advantage resulting from a violation of any of said sections shall be liable for damages in the amount of such advantage. If the board determines that any person may be so liable, it shall immediately inform the Attorney General of that possibility.

(e) Any employee of the Office of State Ethics or member of the Citizen's Ethics Advisory Board who, in violation of this part or section [1-101nn](#), discloses information filed in accordance with subparagraph (F) of subdivision (1) of subsection (b) of section [1-83](#), shall be dismissed, if an employee, or removed from the board, if a member.

(f) Any civil penalty imposed by the board pursuant to this section may be enforced by the Office of State Ethics as a money judgment in accordance with chapter 906.

Sec. 1-89. Violations; penalties. Disciplinary powers of the legislature, agencies and commissions. Civil action for damages. (a)(1) Any person who intentionally violates any provision of this part, section [1-101bb](#) or section [1-101nn](#) shall, for a first violation, be guilty of a class A misdemeanor, unless subdivision (2) of this subsection is applicable.

(2) If, for a first violation, such person derives a financial benefit of one thousand dollars or more as a result of such violation, such person shall be guilty of a class D felony.

(3) For a second or subsequent violation, such person shall be guilty of a class D felony.

(4) No person may be found guilty of a violation of subsection (f) or (g) of section [1-84](#) and bribery or bribe receiving under section [53a-147](#) or [53a-148](#) upon the same incident, but such person may be charged and prosecuted for all or any of such offenses upon the same information.

(b) The penalties prescribed in this part or section [1-101nn](#) shall not limit the power of either house of the legislature to discipline its own members or impeach a public official, and shall not limit the power of agencies or commissions to discipline their officials or employees.

(c) The Attorney General may bring a civil action against any person who knowingly acts in the person's financial interest in, or knowingly receives a financial advantage resulting from, a violation of section [1-84](#), [1-85](#), [1-86](#), [1-101bb](#) or [1-101nn](#). In any such action, the Attorney General may, in the discretion of the court, recover any financial benefit that accrued to the person as a result of such violation and additional damages in an amount not exceeding twice the amount of the actual damages.

(d) Any fines, penalties or damages paid, collected or recovered under section [1-88](#) or this section for a violation of any provision of this part or section [1-101bb](#) or [1-101nn](#) applying to the office of the Treasurer shall be deposited on a pro rata basis in any trust funds, as defined in section [3-13c](#), affected by such violation.

Sec. 1-89a. Conferences on ethical issues. Section [1-89a](#) is repealed, effective October 1, 2021.

(Sec. 1-90. Commission to review oath of office for members of General Assembly. Section [1-90](#) is repealed.

Roxanne Maher

From: Keva Fothergill <kevafothergill@sbcglobal.net>
Sent: Friday, September 13, 2024 7:28 AM
To: Town Council Group
Subject: Ethics committee

Town Council:

I support the formation of an Ethics Committee

In Ledyard and would gladly sit on said committee, if members are needed. I do not currently participate in any other boards/committees.

Contact information:

Keva Fothergill
16 Osprey drive
Gales Ferry
[8608573565](tel:8608573565)

[Sent from AT&T Yahoo Mail for iPhone](#)

Roxanne Maher

From: Joe Franzone <joefranzone@gmail.com>
Sent: Thursday, September 12, 2024 10:26 PM
To: Town Council Group
Subject: Ethics Committee

We should have one!
Thanks, Joe Franzone
66 Hurlbutt Rd.

--

'Every day's a Holiday!'

Roxanne Maher

From: Alicia <amlyons77@aol.com>
Sent: Thursday, September 12, 2024 9:08 PM
To: Town Council Group
Subject: I support an Ethics Committee

Good evening,

I am a Ledyard resident of 17 years now. As I am reading about the proposed apartment complex in Gales Ferry, a blasting company and other projects being done its past time for Ledyard to have an Ethics Committee to protect our residents, wildlife and businesses.

I fully support our town organizing an ethics committee and hope it happens before these big projects are approved.

Please reply with any questions or concerns.

Thank you,
Alicia Lyons

Roxanne Maher

From: Lynn Wilkinson <lynnwilkinson57@comcast.net>
Sent: Thursday, September 12, 2024 6:04 PM
To: Town Council Group
Subject: Ethics committee

Dear Town Council members

I am would like to respectfully request that an Ethics commission be formed for our town. It seems odd to me that Ledyard is one of very few towns that doesn't have one, and I believe this should be rectified.

Lynn Wilkinson
57 Terry Road
Gales Ferry, CT 06335
Sent from my iPhone

Roxanne Maher

From: Markos Samos <markwsamos@gmail.com>
Sent: Saturday, September 14, 2024 8:28 AM
To: Town Council Group
Subject: Ethics Committe

I wish to request that the Town Council create an ethics committee. I am concerned that without such a committee this town runs the risk of self interested parties making decisions on their behalf and not that of the town's people.

I have been a resident of Gales Gales for 44 years and love this town. I am concerned that given the current political climate some decisions may not be in the best interest of the town.

--

Thank You
Markos Samos
33 Robin Hood Drive
Gales Ferry

Roxanne Maher

From: LYNN WILKINSON <lynnwilkinson57@comcast.net>
Sent: Monday, November 18, 2024 9:19 AM
To: Town Council Group; Fred Allyn, III
Subject: Town Council meeting 11/13/2024 Ethics Commission

11/18/2024
Lynn Wilkinson
57 Terry Road
Gales Ferry, CT 06335

Ledyard Town Council
Mayor Fred Allyn

Dear Town Council and Mr. Allyn,
I have just finished watching the video from the last council meeting, and I have several comments and concerns.

Of the 169 towns in Connecticut, we are in the minority with no ethic commission, or code of ethics for elected officials. I fail to see how correcting this lack is "a solution looking for a problem". The example given of successfully addressing embezzlement is all well and good, but many ethical issues are not nearly so clear cut. Financial gain is not the only measure of ethics violation, and I am disappointed to see an elected official ignore that in his statements.

Furthermore, although I understand a commission to investigate wrongdoing can be called, an *independent* commission would do more for the public trust. This is the very reason so many asked for independent studies to supplement application to P&Z recently. Essentially asking a body to investigate itself (should the need ever arise) would do little to assuage resident's concerns about potential improprieties.

Ledyard is in a period of rapid change, and there are many impactful projects on the table, with presumably more to come. There is a lot of fear and uncertainty, which is not unusual in these circumstances. Adopting a code of ethics and an Ethics Commission, which seems to be fairly standard practice in Connecticut towns, is hardly following your friends off the proverbial bridge; it would improve voter confidence in our elected official's decisions, and lay many concerns about transparency to rest.

I hope that going forward, the council will be open to considering the taxpayer's requests, rather than relying on the old standard of "this is how we've always done it".

Respectfully,
Lynn Wilkinson

Roxanne Maher

From: Deborah K <whistldyxc@gmail.com>
Sent: Saturday, December 7, 2024 11:25 AM
To: Carmen Garcia Irizarry
Cc: Town Council Group
Subject: Ethics progress

Dear Chair and Administration Committee members,

I had meant to get this to you weeks ago, but life here in Gales Ferry has had much going on recently. I have watched the Administrative Committee in action regarding formation of a Code of Ethics and an Ethics Committee. After reviewing again the meetings of Sept. 11th and Nov. 12th, I want to thank those who are putting in the work to get this important task accomplished. I feel Chairperson Garcia-Irizarry and Councilors Brunelle and Buhle expressed a very good understanding of how an Ethics Committee can be helpful on many levels. Unfortunately, I was extremely disappointed to observe that the full Administrative Committee is not on board with having an informative discussion on the topic and, in fact, Councilor Dombrowski stated at the outset (several times - Sept.) he would vote against it, if pursued. He confirmed the same at the subsequent Nov. meeting. As a resident, I would like to see all of our elected officials participate in the process, regardless of personal feelings. I commend and encourage those willing to work, to push forward, and I look forward to reading the final draft proposal. This is something that has been requested several times over previous years and is an important step in guidance and transparency for both residents and those who serve our Town in any capacity.

Thank you for your efforts,

Deborah Edwards
30 Bluff Road West
Gales Ferry, CT

From: Carlo M Porazzi <porazzicm@gmail.com>
Sent: Wednesday, December 11, 2024 12:58 PM
To: Town Council Group
Subject: Ethics Commision

Ledyard Town Council,

As a current resident and taxpayer I am writing to voice my support for the formation of a Ledyard Ethics Commission.

I find it very concerning that Ledyard is one of the few towns that does not have this oversight committee. The objection over forming this committee by at least one standing member of the town council is also concerning. Simply having a code of ethics established with no board to administer is much like the example given of having laws but no police force. In my opinion there have been and are instances of poor judgement by town leaders in local matters and I believe the establishment of this commission will allow for complaints to be lodged, with pertinent facts supporting. I also agree this will go far in increasing trust between residents and Ledyard local government, something I believe is waning currently.

To that matter, while the draft I read is a very good start I would offer some changes if I may:

- Sec 2 - the follow sentence leaves some ambiguity as to what this could allow: "Specific portions of this Ordinance shall not be applicable if they conflict in whole or in part with any labor agreement, employment contract or state statute." It would be beneficial if some high -level examples could be provided
- Sec 4, subsection J & M - I would suggest any former member of town government be prohibited from representing any party seeking business with or in the town, or seeking employment

with that party for a term of three (3) years from their vacancy of their town position

- Any reference or suggestion, explicit or implied, to the mayor in office at the time having any control or oversight in the dealings of the Ethics Committee except for receiving reports of current status and/or findings

Thank you for your consideration,
Carlo Porazzi
30 Chapman Ln
Gales Ferry

To:
 Ledyard Town Council
 Working Group on Creation of an Ethics Committee
 Ledyard, CT

12/11/2024

Dear Members of the Town Council,

As a current resident of the town of Ledyard, I would like to voice my support for the creation of a Code of Ethics and a Ledyard Ethics Committee, as your own investigations have indicated we are one of the very few towns in Connecticut that do not currently have sufficient vehicles to apply such oversight.

I found the discussion so far in the town minutes very enlightening, though it disturbs me to learn that there would be *any* dissenting voice on our town council against establishing a vehicle for oversight, as ethical behavior in government is a cornerstone of maintaining the trust the electorate has in our town officials, both elected, hired and appointed.

I have read the Draft Ordinance for Establishing a Code of Ethics and an Ethics Commission. I must say I largely approve of the language, but call you attention to the following points that perhaps merit discussion:

1. **Section 5.5.a** stipulates "No complaint may be made under the code unless it is filed with the Commission within three (3) years after the violation alleged in the complaint has been committed."
 - o *I pose the question whether 3 years is too short a period, since that does not even equal the 4-year term of office for many positions outlined in the Chapter II of the Town Charter. Perhaps a 4 or even 5 years limitation for making a complaint would be better in a spirit of just accountability?*
2. **Section 5.3 Terms of Appointment** stipulates Members shall be appointed by the Town Council for a period of 3 years. **Section 5.5.c** requires 3-out-of-5 concurring votes to establish *probable cause* during an ethics investigation. Subsequently **Section 5.5.e** further requires a unanimous 5-out-of-5 concurring members to be able to take action upon any violations found.
 - o *Unlike a jury in a criminal trial who are chosen at random from the general public, the Ethics Committee is appointed by the Town Council, which potentially introduces (political or other) influence/bias into its composition. Thus is 5-out-of-5 concurring members too high a bar to expect any findings to ever result in disciplinary action? I am wondering what is the norm for taking disciplinary action in other such ethics bodies (either in government or in business), or if there is perhaps another model to use?*

Thank you for your Consideration,
 Milton Schroeder Jr.
 290 Whalehead Road

Roxanne Maher

From: Chris Jelden <chrisjelden@gmail.com>
Sent: Monday, December 16, 2024 4:10 PM
To: Town Council Group
Cc: April Brunelle; Jessica Buhle; Carmen Garcia Irizarry; Kevin J. Dombrowski; Gary Paul; Tony Saccone; Gary St. Vil; Naomi Rodriguez; Timothy Ryan
Subject: Support for Establishing a Code of Ethics and Ethics Commission

Dear Members of the Ledyard Town Council,

I am writing to express my strong support for the proposed ordinance to establish a Code of Ethics and an Ethics Commission for the Town of Ledyard.

Until very recently I simply assumed Ledyard already had a Code of Ethics in place—it seemed like the kind of fundamental safeguard that any reasonable person would expect. In fact, when I asked around to fellow Ledyard residents, most people either believed we had one or felt we definitely should. Our current situation puts us in a small group of Connecticut towns without this framework, and that's not a distinction we should want to maintain.

Having a Code of Ethics isn't about suggesting that unethical behavior is rampant. It's about being prepared when gray areas arise. Clear guidelines offer those working within the town a reference point for iffy situations, ensuring decisions are made with integrity and transparency. An Ethics Commission would then serve as a resource for officials and employees—someone they can turn to for guidance, rather than having to navigate challenging situations alone.

I understand there may be concerns about the costs associated with implementing these measures. However, the cost of not having a proper ethical framework would be the breakdown of public trust and the difficulty of reacting after a problem emerges. A Code of Ethics and an Ethics Commission help us proactively safeguard our community's interests and maintain the trust of our residents.

Ultimately, no one needs a Code of Ethics until they do. By adopting this ordinance, Ledyard steps confidently toward good governance. It reassures the community that we value honesty, accountability, and responsible leadership.

Thank you for your time and consideration.

Sincerely,
Chris Jelden

Roxanne Maher

From: Ed Murray <murrayed92021@outlook.com>
Sent: Wednesday, January 8, 2025 1:19 PM
To: Roxanne Maher
Subject: Ethics

To: Chair and members of Ledyard Town Council:

I believe it is essential for Ledyard to have a Code of Ethics and an Ethics Commission as a demonstration of our commission to good government. Not having one makes us different but not better.

As to the makeup of the commission, i believe it should be representative of the electorate and should have 2 regular and 1 alternative member who are not affiliated with any party.

Ed Murray
26 Devonshire Dr
Gales Ferry, CT 06335

Roxanne Maher

From: Pamela Ball <pcball@earthlink.net>
Sent: Sunday, February 2, 2025 10:05 PM
To: Roxanne Maher
Subject: Ethics committee ordinance

Dear Council,

Having read the proposed ordinance and letters from town residents in support of the ordinance to create an Ethics Committee (EC), several issues and questions come to mind.

Being subjected to an “ethics” investigation, especially without an attorney, can have serious lifelong negative effects. I know of a situation in another town where a resident volunteering on a town committee made a decision that was correct, proper and in keeping with the duties of the committee but was not popular with the townsfolk. At a town meeting, I witnessed first hand how the town select person simply refused to listen to and consider any comments in support of her and the decision she made. Several of us gave statements that were rudely ignored. There was unflattering newspaper coverage and she was treated poorly by town residents and town authorities. She was subjected to such harsh treatment that she felt forced to - and did - move out of town to escape the hostility. This person was an acquaintance of mine and I know first hand how horrible this was for her.

Once an accusation is made to the EC, since there are no attorneys involved and thus no attorney-client privilege, is it not discoverable? Cannot all of the “confidential” information that is part of any EC investigation, from the filing of the complaint to the final decision, be discovered by a FOIA request? Would an accused have to turn over their personal email, texts or other documents to five members of the EC and could that information be discovered by anyone else via a FOIA request? Would all of their social media posts be subject to scrutiny? All it would take is one person in town with an issue with the accused to use that information to start rumors, post negative things on social media, post content of personal emails, etc. because without attorney-client privilege, isn't the information accessible through a FOIA request? Potential employers could find out if a person was called before the EC and, without attorney-client privilege, wouldn't the town have to reveal that information if the employer filed a FOIA? Even if a person subjected to an accusation is found to be “innocent” there is no way to repair their reputation, their standing in the community, to gain back the hours of time spent in defense, or to be repaid expenses incurred to defend themselves. Once negative comments are out there, they are out there forever.

Will there be any requirements to be an EC committee member other than to be a registered voter in town? How will you determine if a committee member is qualified to sit in judgement of other townspeople? Will they receive any training such as intrinsic bias training? Will Council read the social media posts of potential EC members to see if they have made political, insulting or other disparaging comments against other residents? Who will determine what information should or should not be redacted from subpoenaed personal communications of the accused? Who will do the research to make sure that any documentation that an accuser submits is valid? Who will and how can an EC make sure that any proceedings are free from personal or political bias? If an attorney is not involved, could anyone make a FOIA request of the members of the EC to reveal information from their discussions and any communications on the topic?

Going before the EC has been compared to being judged by a jury of peers but that activity is carried out in a courtroom with a judge, attorneys (*i.e.*, trained professionals) and a jury selected to hear the case at hand; that is not the situation proposed here. Here you would have five untrained individuals who would sit in judgement on a fellow towns person. What if a person on the EC knows the accused or is familiar with the situation? In a jury selection process, that person would be removed; is Council going to vet and seat a new member each time this occurs? If the EC determines that a complaint is not valid, what plans will there be to stop the accuser from making their accusations public in other ways? The accused has no protection or privacy until an attorney is involved so the simple act of filing a complaint puts the accused in a position of needing one. What if they don't have the money to hire a lawyer? You may

argue that a FOIA could be requested for any proceedings under the current policies, but under the current policies situations are handled by professionals, not neighbors, and attorney-client privilege would likely be in place.

What kind of complaints have ECs in other towns received and what kinds of actions have they taken? Did they need an EC to address the issues or would the policies in place have worked just as well? I believe that it would be a good idea to reach out to other towns to see how their EC was used and to talk to the accusers and accused to see how they were affected, especially those who went through the process and were found innocent. I do not know if a formal EC in was in place for the situation I described above. Regardless, it devolved into a situation of neighbor attacking neighbor with awful consequences.

Have there been any "ethical violations" that have been identified that have not been or could not be adequately addressed by policies already in place? I understand that there have been some unpopular goings on in town (proposed blasting, proposed apartment complex) but just because a decision is unpopular does not mean it is a violation of ethics.

Some arguments for the committee included noting that Ledyard was one of the few towns in the state that didn't have an EC. Since we have policies in place, we don't need a committee. Other comments were directed to preparedness; there are policies in place so the town is prepared. And the last argument was that if you haven't done anything wrong, you don't have anything to worry about. All it will take is for someone in town to suspect you of doing wrong, filing a complaint and your life could be changed. Knowing that you haven't done anything wrong isn't going to protect you from an investigation. It's like arguing that you don't care about privacy because you have nothing to hide; do you really want people poking around in your life even if you haven't done anything wrong?

It seems to me that what is really needed is to make everyone aware of the policies already in place to handle complaints in a professional manner with trained personnel rather than asking five townspeople to make a judgement on another. Maybe the existing policies could be updated to include information from the ordinance about the "ethical violations" that would be subject to an investigation and outline the steps to file a complaint under the current system. Such an amendment would address those who say that the current guidelines are too vague.

Is Council going to make a town wide announcement should this committee be established? If so, why not make a town wide announcement to educate folks as to the (updated) policies in place?

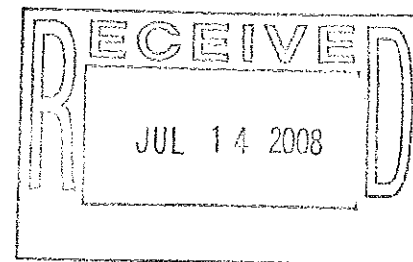
If this committee is put in place, all present and future volunteers should be made aware that anyone in town can file an ethics complaint against them. My friend was simply volunteering to make a good thing happen for the town. If the situation had been handled professionally, perhaps she wouldn't have been harassed so badly as to have to move away. Who would want to be a volunteer in Ledyard knowing that anyone could make a complaint against them? Volunteering should be rewarding, not a risk.

Thank you for reading,

Pam Ball



State of Connecticut
HOUSE OF REPRESENTATIVES
 STATE CAPITOL
 HARTFORD, CONNECTICUT 06106-1591




REPRESENTATIVE TOM REYNOLDS
 FORTY-SECOND ASSEMBLY DISTRICT

47 BITTERSWEET DRIVE
 GALES FERRY, CONNECTICUT 06335
 HOME: (860) 464-0441
 CAPITOL: (860) 240-8585
 TOLL FREE: 1-800-842-8267
 FAX: (860) 240-0206
 E-MAIL: Tom.Reynolds@cga.ct.gov

VICE CHAIRMAN
 PUBLIC SAFETY AND SECURITY COMMITTEE

MEMBER
 APPROPRIATIONS COMMITTEE
 EDUCATION COMMITTEE

MEMORANDUM

DATE: July 9, 2008
TO: Mayor Fred Allyn, Jr.
FROM: Representative Tom Reynolds 
RE: New Ethics Law

You asked me about the new ethics law adopted by the legislature and signed by the Governor this year. Specifically, you were interested in the pension revocation provision. Attached is a summary of the new law.

The law generally permits state courts to revoke or reduce any retirement or other benefit due to state or municipal public officials or employees who commit certain crimes related to their employment. The law requires the Attorney General to apply to the Superior Court for an order to revoke or reduce the benefits of a public official or employee who, on and after the bill's passage, is convicted of or pleads guilty or nolo contendere (no contest) in federal or state court to various crimes.

The effective date of the law is October 1, 2008. Therefore, pension revocation is not an option for towns seeking to apply this new law to pensioners who were convicted of certain crimes before that date.

A retroactive pension revocation provision was in the original bill, but we could not get the votes to pass the bill if the retroactivity language was left in. I regret this, but it's the best we could do this year.

I hope this information is responsive to your inquiry. If you have any questions, please let me know.

Copy: Ledyard Town Council
 Attachment

OLR Bill Analysis

HB 6502

Emergency Certification

AN ACT CONCERNING COMPREHENSIVE ETHICS REFORMS.

SUMMARY:

This bill:

1. generally permits state courts to revoke or reduce any retirement or other benefit due to state or municipal officials or employees who commit certain crimes related to their employment;
2. makes it a class A misdemeanor for public servants to fail to report a bribe;
3. expands illegal campaign finance practices to cover certain solicitations by chiefs of staff;
4. makes several changes to state codes of ethics such as limiting gift exceptions, prohibiting state contractors from hiring certain former public officials and state employees, restricting the Office of State Ethics' (OSE) authority to issue subpoenas, prohibiting *ex parte* communications during OSE hearings on ethics complaints, limiting Citizens' Advisory Board members who can act on ethics complaints, and subjecting the governor's spouse to the code;
5. requires OSE to provide mandatory training to legislators on the Code of Ethics for Public Officials; and
6. requires public agencies to post, on available web sites, meeting dates, times, and minutes required by law to be publicly disclosed.

EFFECTIVE DATE: October 1, 2008

§§ 1-5 — CORRUPT OFFICIALS AND EMPLOYEES

The bill generally permits state courts to revoke or reduce any retirement or other benefit due to state or municipal public officials or employees or quasi-public agency members and directors who commit certain crimes related to their employment.

The bill requires the court to order payment of any benefit or payment that is not revoked or reduced.

Exceptions to Reduction or Revocation

Under the bill:

1. no revocation or reduction may prohibit or limit benefits that are the subject of a qualified domestic relations order (e. g. , child support);
2. no pension may be reduced or revoked if the IRS determines that the action will negatively affect or invalidate the status of the state's or a municipality's government retirement plans under Section 401 (a) of the Internal Revenue Code of 1986; and
3. the pension benefits of a public official or employee who cooperated with the state as a whistleblower before learning of the criminal investigation may not be revoked or reduced if the court determines or the attorney general certifies that the official or employee voluntarily provided information to the attorney general, state auditors, or a law enforcement agency against a person more blameworthy than the official or employee.

Additionally, no pension may be revoked if the court determines that to do so would constitute a unilateral breach of a collective bargaining agreement. Instead the court may issue an order to reduce the pension by an amount necessary to (1) satisfy any fine, restitution, or other monetary order issued by the criminal court and (2) pay the cost of the official's or employee's incarceration.

Crimes Related to Office or Employment

The bill requires the attorney general to apply to the Superior Court for an order to revoke or reduce the benefits of a public official or employee who, on and after the bill's passage, is convicted of or pleads guilty or *nolo contendere* (no contest) in federal or state court to:

1. committing or aiding or abetting the embezzlement of public funds from the state, a municipality, or a quasi-public agency;
2. committing or aiding or abetting any felonious theft from the state, a municipality, or a quasi-public agency;
3. bribery connected to his or her role as a public official or employee; or
4. felonies committed willfully and with intent to defraud to obtain or attempt to obtain an advantage for himself or herself or others through the use or attempted use of his or her office.

The attorney general must notify the prosecutor in these criminal cases of the pension revocation statute and that the pension may be used to pay any fine, restitution, or other monetary order the court issues.

"Public officials" are (1) statewide elected officers, (2) legislators and legislators-elect, (3) judges, (4) gubernatorial appointees, (5) municipal elected and appointed officials, (6) public

members and union representatives on the Investment Advisory Council, (7) quasi-public agency members and directors, and (8) people appointed or elected by the General Assembly or either chamber. The term does not include advisory board members or members of Congress.

"State employees" includes employees of quasi-public agencies.

Sentencing Considerations

When determining whether to revoke or reduce a public official's or employee's benefits or payments, the bill requires the court to consider:

1. the severity of the crime;
2. the amount of money the state, municipality, quasi-public agency, or anyone else lost as a result of the crime;
3. the degree of public trust reposed in the person by virtue of his or her position;
4. if the crime was part of a fraudulent scheme against the state or a municipality, the defendant's role in it; and
5. any other factors the court determines that justice requires.

After determining to reduce pension benefits, the court must consider the needs of an innocent spouse or beneficiary and may order that all or part of the benefits be paid to the spouse or beneficiary.

Pension Contributions

If an official's or employee's pension is revoked, the bill entitles the person to the return of any contributions he or she made to it, without interest. But, the repayment cannot be made until the court determines that the official or employee has fully satisfied any judgment or court-ordered restitution related to the crime against the office. If the court determines that he or she has not, it may deduct the unpaid amount from the individual's pension contributions.

Collective Bargaining Agreements

Beginning October 1, 2008, the bill prohibits collective bargaining agreements from containing any provision that bars the revocation or reduction of a corrupt state or municipal employee's pension.

§§ 6 & 7 — BRIBERY

The bill makes it a class A misdemeanor for public servants to fail to report a bribe (see BACKGROUND). Public servants commit this crime when they do not report to a law

enforcement agency as soon as reasonably practicable that (1) another person has attempted to bribe them by promising, offering, transferring, or agreeing to transfer to them any benefit as consideration for their decision, opinion, recommendation, or vote or (2) they knowingly witnessed someone attempting to bribe another public servant or another public servant committing bribe receiving. By law, a person is guilty of bribe receiving if he or she solicits, accepts, or agrees to accept any benefit for, because of, or inconsideration for his or her decision, opinion, recommendation, or vote.

The bill expands the definition of "public servant" that applies to existing bribery and bribe receiving crimes, as well as this new crime. The bill expands the public servants covered by these crimes to include quasi-public agency officers and employees. Elected and appointed government officers and employees and people performing a government function, including advisors and consultants, are already covered.

§ 12 — CAMPAIGN FINANCE

The bill makes it an illegal campaign practice for chiefs of staff to solicit contributions from certain people on behalf of, or for the benefit of, any state, district, or municipal office candidate. Under the bill, the chief of staff (1) for a legislative caucus cannot solicit an employee of the caucus, (2) for a statewide elected official cannot solicit a member of the official's office, and (3) for the governor or lieutenant governor cannot solicit from any member of the official's office or from any state commissioner or deputy commissioner.

By law, it is an illegal campaign finance practice for, among other things, state department heads and their deputies to solicit political contributions at any time, and for anyone to knowingly and willfully violate a campaign finance law. Campaign finance violators are subject to criminal penalties of up to five years in prison, a \$ 5,000 fine, or both for knowing and willful violations. They are also subject to civil penalties of up to \$ 2,000 per offense.

STATE ETHICS CODE

§§ 16 & 17 — *Ethics Complaint Enforcement*

By law, when an ethics complaint is filed with OSE, the office conducts probable cause investigations, including hearings. If probable cause is found, OSE's Citizens' Advisory Board initiates a hearing to determine whether there has been a violation. A judge trial referee conducts the hearing. Both OSE and its advisory board can subpoena witnesses and records during their respective proceedings.

Subpoenas. The bill restricts OSE's authority to issue subpoenas by requiring it to get (1) approval from a majority of the advisory board members or (2) the chairperson of the board to sign the subpoena. It authorizes the vice chair to sign the subpoena if the chair is unavailable.

Ex Parte Communications. During the hearing on whether a violation has occurred, the bill prohibits ex parte communications about the complaint or respondent between the board or any of its members and the judge trial referee conducting the hearing or a member of OSE's

staff.

Voting on Existence of Violation. By law, the Citizens' Advisory Board, at the conclusion of the hearing, determines whether a violation occurred and, if so, imposes penalties. The bill restricts the board members who can vote on whether a violation occurred to those who were physically present during the entire violation hearing.

The bill makes a technical change by specifying the number of board members, rather than the fraction of the board, necessary to find a violation of the State Code for Lobbyists. The bill requires six members, rather than two-thirds of the board, to find a violation. By law, there are nine board members.

§§ 13 & 14 — Gifts

With several exceptions, the law prohibits public officials, candidates for public office, and state employees from accepting gifts (generally anything of value over \$ 10) from lobbyists. It also prohibits public officials and state employees from accepting gifts from people doing, or seeking to do, business with their agency; people engaged in activities regulated by their agency; or prequalified state contractors. The law also prohibits these people from giving gifts to public officials and employees.

The bill caps at \$ 1,000 the exception for gifts provided at celebrations of major life events by people unrelated to the recipient. Major life events include a ceremony commemorating an individual's induction into religious adulthood such as a confirmation or bar or bat mitzvah, a wedding, a funeral, and the birth or adoption of a child. It does not include any event that occurs on an annual basis such as an anniversary (Conn. State Agency Regulations § 1-92-53).

§ 15 — Employment Restrictions

The bill prohibits a party to a state contract or agreement from employing a former public official or state employee who substantially helped negotiate or award a contract valued at \$ 50,000 or more or an agreement for the approval of a payroll deduction. The prohibition applies to employees or officials who resign within one year after the contract or agreement is signed and ends one year after the resignation. The law already prohibits former officials and employees from accepting the job. The penalty for violations is a fine of up to \$ 10,000. First-time intentional violations are punishable by up to one year in prison, a \$ 2,000, or both. Subsequent intentional violations are punishable by up to five years in prison, a \$ 5,000 fine, or both.

§§ 9 & 10 — Governor's Spouse

The bill makes the governor's spouse subject to the State Ethics Code by extending the definition of "public official" to include him or her. Currently, "public officials" are statewide elected officers, legislators and legislators-elect, gubernatorial appointees, public members and union representatives on the Investment Advisory Council, quasi-public agency members and directors, and people appointed or elected by the General Assembly or any house thereof. The

term does not include judges, advisory board members, or members of Congress.

§ 8 — TRAINING

By December 31, 2010, the bill requires OSE to establish and administer a program for providing mandatory training to legislators on the Code of Ethics for Public Officials. The program must provide for mandatory training of (1) newly elected legislators and (2) all legislators every four years beginning in 2011. However, the Legislative Management Committee must request OSE to train all legislators before the next regularly scheduled training if it determines that there has been a significant revision to the Code of Ethics for Public Officials.

BACKGROUND

Penalties for Class A Misdemeanors

A class A misdemeanor is punishable by up to one year in prison, a \$ 2,000 fine, or both.

STATE OF CONNECTICUT
AGENCY LEGISLATIVE PROPOSAL
2019 SESSION

Document Name 2019 AAC Municipal Ethics	
Agency Office of State Ethics	Agency Priority (See instructions) 1
Contact Person/Unit Carol Carson, Executive Director	Telephone 860-263-2400
Email Address: Carol.Carson@ct.gov	
Title of Proposal AAC Municipal Ethics	Statutory Reference Proposal Type <input checked="checked" type="checkbox"/> New <input type="checkbox"/> Resubmittal
ATTACH COPY OF FULLY DRAFTED BILL (Required for review)	
APPROVAL OF OTHER AFFECTED AGENCY (Attach additional approvals if necessary)	
Agency N/A	Agency Contact (Name and Title) N/A
Attach Summary of Agency Comments	Contact Date N/A
Summary of Proposal (Include background information) <p>To require that all municipalities adopt a municipal code of ethics that has, at a minimum, basic ethics provisions that would apply to municipal officials and employees. Municipalities have an option to draft their own minimum provisions, as described in the proposal, or adopt model minimum provisions included in the proposal.</p> <p>During 2018, the Citizen’s Ethics Advisory Board Subcommittee on Municipal Ethics (“Subcommittee”) held numerous meetings during which it discussed with various stakeholders their views concerning municipal ethics. In addition, the Subcommittee conducted a survey of all Connecticut municipalities regarding their treatment of municipal ethics matters. Based on the these discussions and the results of the survey, the Subcommittee determined that, at this time, the best approach concerning municipal ethics is to require all municipalities in Connecticut to have a Code of Ethics that, at a minimum, has certain basic ethics provisions.</p> <p>The proposed minimum ethics provisions are commonly used in any governmental ethics code. In fact, the results of the municipal ethics survey indicate that a large number of municipalities, both cities and towns, already have these basic provisions in their existing ethics codes. However, there is still a considerable segment of Connecticut municipalities that do not have an ethics code in place.</p>	
Reason for Proposal (Include significant policy and programmatic impacts) <p>Section 1. Requires all municipalities to adopt, by a certain date, a municipal code of ethics that has, at a minimum, basic ethics provisions that would apply to municipal officials and employees. Municipalities have an option to draft their own minimum provisions, as described in subsection (b) of this section, or adopt model minimum provisions provided for in section 2 of this act. The section sets forth certain deadlines for compliance with these requirements.</p>	

Section 2. Provides for the model minimum provisions that a municipality may adopt to be in compliance with the requirements of section 1 of this act.

Section 3. Requires municipalities, by a certain date, to report their compliance with the provisions of this act to the Office of State Ethics and include a copy of their local ethics code with such report. By a specified date, the Office of State Ethics has to inform the Legislature of the municipal compliance with the requirements of this act.

Section 4. Provides for an ethics education instructor who will be employed by the Office of State Ethics to provide ethics trainings to all municipalities on the minimum ethics provisions set forth in this act.

Significant Fiscal Impacts

Municipal: None

Federal: None

State: Funding for one ethics education instructor who will be employed by the Office of State Ethics.

AN ACT CONCERNING MUNICIPAL ETHICS.

Be it enacted by the Senate and House of Representatives in General Assembly convened:

Section 1. (NEW) (*Effective October 1, 2019*) (a) On or before October 1, 2020, each municipality shall adopt a code of ethics that contains, at a minimum, the provisions described in subsection (b) of this section. If a municipality adopted or adopts an ethics code prior to October 1, 2020, that contains the minimum provisions described in subsection (b) of this section, such municipality shall be in compliance with the requirements of this section. If, on or before October 1, 2020, a municipality adopts the model minimum provisions, as contained in section 2 of this act, such municipality shall be in compliance with the requirements of this section.

(b) The following minimum provisions shall be contained in a code of ethics that is adopted by a municipality pursuant to subsection (a) of this section:

- (1) A conflict of interest provision that prohibits a municipal official or employee of the municipality from participating in any matter in which such municipal official or employee, his or her immediate family members, or any businesses with which the official or employee is associated, has a personal or financial interest, other than an interest of a de minimis nature valued less than one hundred dollars, or an interest that is not distinct from that of a substantial segment of the municipality's population, which does not include any group of municipal government employees;
- (2) a disclosure and recusal provision that requires the written disclosure of a conflict of interest by a municipal official or employee of the municipality and the recusal from participating in any decision-making concerning a matter that presents a conflict of interest;
- (3) a gift provision that prohibits a municipal official or employee of the municipality from soliciting or accepting anything of value that could reasonably be expected to influence the actions or judgment of such municipal official or employee;
- (4) a use of property provision that prohibits a municipal official or employee of the municipality from using municipal property in any manner that benefits himself or herself, his or her immediate family members, or any businesses with which the official or employee is associated, to a degree that is greater than a member of the general public when such property is made available to the general public;

(5) a use of office or position provision that prohibits a municipal official or employee of the municipality from using his or her office or position and any confidential information acquired by a municipal official or employee of the municipality through his or her office or position to further such official's or employee's own personal or financial interests, or interests of his or her immediate family members, or any businesses with which the official or employee is associated;

(6) a nepotism provision that prohibits a municipal official or employee of the municipality from appointing or hiring, or participating in influencing appointment or hiring of an immediate family member for any type of employment with the municipality, including by contract, unless the contract is competitively bid. The provision shall prohibit a municipal official or employee of the municipality from serving in a direct supervisory capacity over an immediate family member, or exercising authority or make recommendations with regard to personnel actions involving such family member;

(7) a contracting provision that prohibits a municipal official or employee of the municipality, his or her immediate family members, or any businesses with which the official or employee is associated, from entering into any contract with the municipality in which such municipal official or municipal employee holds a municipal office or position, valued at five hundred dollars or more, other than a contract of employment as a municipal employee, or pursuant to a court appointment, unless the contract has been awarded through an open and public process;

(8) a representation of private interests provision, other than self-representation or representation of an immediate family member, that prohibits a municipal official or employee of the municipality from representing anyone in any matter before any municipal board, commission, council or department; and

(9) post-employment provisions that prohibit former municipal official or employee of the municipality from (A) representing anyone for compensation before any municipal board, commission, council, committee or department in which he or she was formerly employed at any time within a period of one year after termination of his or her service with the municipality; (B) representing anyone other than the municipality, concerning any particular matter which the official or employee participated personally and substantially while in municipal service or employment, and in which the municipality has a substantial interest; (C) accepting employment with a party to the contract valued at an amount of twenty-five thousand dollars or more, other than the municipality, for a period of one year after his or her resignation from municipal office or position if the former official or employee participated substantially in the negotiation or award of such contract and his or her

resignation occurs less than one year after the contract is signed; and (D) disclosing or using confidential information acquired in the course of and by reason of his or her official duties, for anyone's financial gain or benefit.

Sec. 2. (NEW) (*Effective October 1, 2019*) Any municipality that adopts a code of ethics that contains the model minimum provisions shall be in compliance with the requirements of section 1 of this act. The following provisions shall constitute the model minimum provisions:

Definitions:

(1) "Business with which the person is associated" means any sole proprietorship, partnership, firm, corporation, trust or other entity through which business for profit or not for profit is conducted in which the municipal official or employee of the municipality or member of his or her immediate family is a director, officer, owner, limited or general partner, beneficiary of a trust or holder of stock constituting five per cent or more of the total outstanding stock of any class, provided, the municipal official or employee of the municipality, or member of his or her immediate family, shall not be deemed to be associated with a not for profit entity solely by virtue of the fact that the municipal official or employee of the municipality or member of his or her immediate family is an unpaid director or officer of the not for profit entity. "Officer" refers only to the president, executive or senior vice president or treasurer of such business, and to any person who exercises exclusive control over such business.

(2) "Confidential information" means any information in the possession of a municipality, a municipal employee, or a municipal official, whatever its form, which (1) is mandatorily non-disclosable to the general public under a municipal regulation, ordinance, policy or provision, or state or federal statute or regulation, or non-disclosable pursuant to municipal contract or order of any court of competent jurisdiction; or (2) falls within a category of permissibly non-disclosable information under the Freedom of Information Act, Chapter 3 of the Connecticut General Statutes, and which the appropriate municipal board, commission, council or department or individual has decided not to disclose to the general public.

(3) "Financial interest" means any interest with a monetary value of one hundred dollars or more or that generates a financial gain or loss of one hundred dollars or more per person in a calendar year.

(4) "Gift" means anything of value, which is directly and personally received, unless consideration of equal or greater value is given in return. "Gift" does not include:

(A) A political contribution otherwise reported as required by law or a donation or payment as described in subdivision (9) or (10) of subsection (b) of section 9-601a of the general statutes;

(B) Services provided by persons volunteering their time, if provided to aid or promote the success or defeat of any political party, any candidate or candidates for public office or the position of convention delegate or town committee member or any referendum question;

(C) A commercially reasonable loan made on terms not more favorable than loans made in the ordinary course of business;

(D) A gift received from (i) an individual's spouse, fiancé or fiancée, (ii) the parent, grandparent, brother or sister of such spouse or such individual, or (iii) the child of such individual or the spouse of such child;

(E) Goods or services that are provided to the municipality and facilitate governmental action or functions;

(F) A certificate, plaque or other ceremonial award costing less than one hundred dollars;

(G) A rebate, discount or promotional item available to the general public;

(H) Printed or recorded informational material germane to governmental actions or functions;

(I) A meal provided at an event or the registration or entrance fee to attend such an event, in which the municipal official or employee of the municipality participates in his or her official capacity;

(J) A meal provided in the home by an individual who resides in the municipality;

(K) A gift, including, but not limited to, food or beverage, or both, provided by an individual for the celebration of a major life event such as the birth or adoption of a child, a wedding, a confirmation or a bar or bat mitzvah, a funeral, or retirement from municipal employment or service, provided any such gift provided by an individual who is not a member of the family of the recipient shall not exceed five hundred dollars. As used in this subparagraph, "major life event" shall not include any event that occurs on an annual basis such as an anniversary except personal gifts of up to twenty-five dollars per occasion, aggregating no more than fifty dollars per recipient in a calendar year, shall be permitted to a minor incident to a birthday or other traditional gift-giving occasion such as Christmas or Chanukah;

(L) Anything of value provided by an employer of (i) a municipal official, (ii) a municipal employee, or (iii) a spouse of a municipal official or municipal employee, to such official, employee or spouse, provided such benefits are customarily and ordinarily provided to others in similar circumstances;

(M) Anything having a value of not more than ten dollars, provided the aggregate value of all things provided by a donor to a recipient under this subparagraph in any calendar year shall not exceed fifty dollars; or

(5) "Immediate family" means any spouse, child or dependent relative who resides in the individual's household.

(6) "Individual" means a natural person.

(7) "Person" means an individual, sole proprietorship, trust, corporation, limited liability company, union, association, firm, partnership, committee, club or other organization or group of persons.

(8) "Personal interest" means an interest in any action taken by the municipality in which an individual will derive a nonfinancial benefit or detriment but which will result in the expenditure of municipal funds.

(9) "Municipal employee" means a person employed, whether part time or full time, by a municipality or a political subdivision thereof.

(10) "Municipal official" means an elected or appointed official, whether paid or unpaid or part time or full time, of a municipality or political subdivision thereof, including candidates for the office and includes a district officer elected pursuant to section 7-327 of the general statutes.

Minimum Provisions:

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

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

(C) Notwithstanding the prohibition in subparagraph (A) of this subdivision, a municipal official or municipal employee may vote or otherwise participate in a matter that involves a determination of general

policy if the official's or employee's interest in the matter is shared with a substantial segment of the population of the municipality and is not limited any group of municipal government employees.

(2) (A) No municipal official or municipal employee shall solicit or accept any gift from any person who, to his or her knowledge, has personal or financial interest in any pending matter within such official's or employee's official responsibility, or could reasonably be expected to influence the actions or judgment of such municipal official or employee.

(B) If a prohibited gift is offered to a municipal official or municipal employee, he or she shall refuse it, return it, or pay the donor the market value of the gift. Alternatively, such prohibited gift may be considered a gift to the municipality provided it remains in the municipality's possession permanently.

(3) No municipal official or municipal employee shall request or permit the use of municipally-owned vehicles, equipment, facilities, materials or property for personal convenience or profit, or that of his or her immediate family members, or any businesses with which the person is associated, except when such are available to the public generally or are provided as municipal policy for the use of such municipal official or municipal employee in the conduct of official business.

(4) No municipal official or municipal employee shall use his or her position or office and any confidential information acquired by a municipal official or municipal employee through his or her office or position to further such official's or employee's personal or financial interests, or interests of his or her spouse, child, child's spouse, parent, grandparent, brother or sister or a business with which the person is associated.

(5) No municipal official or municipal employee may appoint or hire, or participate in influencing the appointment or hiring of his or her spouse, child, child's spouse, parent, grandparent, brother or sister or a business with which the person is associated for any type of employment with the municipality, including by contract, unless the contract is competitively bid. No municipal official or municipal employee may directly supervise his or her family member or any business with which the person is associated. No municipal official or municipal employee may exercise authority or make recommendations with regard to personnel actions involving such family member or any business with which the person is associated.

(6) No municipal official or municipal employee, or a member of his or her immediate family, or a business with which the person is associated shall enter into a contract with the municipality valued at five hundred dollars

or more, other than a contract of employment as a municipal employee, or pursuant to a court appointment, unless the contract has been awarded through a process of public notice and competitive bidding.

(7) No municipal official or municipal employee shall represent anyone, other than the municipality, concerning any matter before any board, commission, council, committee or department of the municipality.

(8) Nothing herein shall prohibit or restrict a municipal official or municipal employee from appearing before any board, commission, council, committee or department of the municipality on his or her own behalf, or on behalf of a member of his or her immediate family, or from being a party in any action, proceeding or litigation brought by or against such municipal official or municipal employee to which the municipality is a party.

(9) No former municipal official or municipal employee shall represent anyone for compensation before any municipal board, commission, council, committee or department in which he or she was formerly employed at any time within a period of one year after termination of his or her service with the municipality.

(10) No former municipal official or municipal employee shall represent anyone other than the municipality concerning any particular matter in which he or she participated personally and substantially while in municipal service.

(11) No former municipal official or municipal employee shall disclose or use confidential information acquired in the course of and by reason of his or her official duties, for financial gain for himself or herself or others.

(12) No former municipal official or municipal employee who participated substantially in the negotiation or award of a municipal contract obliging the municipality to pay an amount of twenty-five thousand dollars or more, or who supervised the negotiation or award of such contract shall seek or accept employment with a party to the contract other than the municipality for a period of one year after his or her resignation from municipal office or position if his or her resignation occurs less than one year after the contract is signed.

Sec. 3. (NEW) (*Effective October 1, 2019*) (a) Not later than January 15, 2021, each municipality shall submit a notice to the Office of State Ethics stating whether the municipality has complied with the requirements of section 1 of this act. Such notice shall include a copy of such municipality's code of ethical conduct that includes the minimum provisions described in subsection (b) of section 1 of this act.

(b) Not later than January 1, 2022, the Office of State Ethics shall submit a report, in accordance with the provisions of section 11-4a of the general statutes, to the joint standing committee of the General Assembly having cognizance of matters relating to ethics. Such report shall indicate the status of the compliance of each municipality with the requirement of section 1 of this act.

Sec. 4. (NEW) (*Effective October 1, 2019*) Not later than October 1, 2020, the Office of State Ethics shall employ an ethics education instructor, who shall be in classified state service, to conduct municipal ethics education program, at least annually, for municipal officials and employees for the purpose of educating such officials or employees as to the requirements of the minimum provisions described in subsection (b) of section 1 of this act. The Office of State Ethics shall be appropriated sufficient funds to support the municipal ethics education program described in this section.

Roxanne Maher

From: Rep. France, Mike <Mike.France@cga.ct.gov>
Sent: Monday, March 04, 2019 9:31 PM
To: Fred Allyn, III; Linda C. Davis; Robert Congdon (Preston First Selectman); Mayor Ron McDaniel; Tom McNally (Montville TC)
Cc: Michael Sinko (Preston BoS); Lynwood Crary (Preston BoS); Roxanne Maher; zRepresentative Mike France
Subject: FW: Municipal Ethics Legislative Proposal
Attachments: ACC Municipal Ethics - Minimum Provisions (2019).docx

Municipal Leaders,

Attached is a recommendation approved by the Citizen's Ethics Advisory Board, which was received today from the Office of State Ethics for consideration before the GAE Committee. It provides a requirement for each municipality to adopt a code of ethics by October 1, 2020 that complies with the minimum provisions described therein. As stated below, the GAE Committee raised a placeholder concept bill on February 15, 2019 that could be updated with the attached proposed language. Please provide any feedback on this proposal.

Regards,
Mike France
State Representative, 42nd Assembly District
Ledyard, Preston, Montville
District: (860) 464-9229
Capitol: (860) 842-1423
Web: www.RepFrance.com

From: Gagnon, Hailey
Sent: Monday, March 04, 2019 4:25 PM
To: Rep. France, Mike
Subject: FW: Municipal Ethics Legislative Proposal

From: Lewandowski, Peter [mailto:Peter.Lewandowski@ct.gov]
Sent: Monday, March 04, 2019 4:20 PM
To: Sen. Flexer, Mae; Rep. Fox, Dan; Sen. Sampson, Rob; zRepresentative Mike France
Cc: Rogers, Nick; Carson, Carol; Nicolescu, Nancy
Subject: Municipal Ethics Legislative Proposal

Dear Co-Chairs and Ranking Members:

Attached is a legislative proposal from the Office of State Ethics concerning municipal ethics. On February 15, 2019, the GAE Committee voted to raise a concept with respect to municipal ethics (Agenda item, V.27). The attached proposed language was approved by the Citizen's Ethics Advisory Board at its February 28, 2019 meeting.

The proposal requires that all municipalities adopt a municipal code of ethics that has, at a minimum, basic ethics provisions that would apply to municipal officials and employees. Municipalities have an

option to draft their own minimum provisions, as described in the proposal, or adopt model minimum provisions included in the proposal.

During 2018, the Citizen's Ethics Advisory Board Subcommittee on Municipal Ethics ("Subcommittee") held numerous meetings during which it discussed with various stakeholders their views concerning municipal ethics. In addition, the Subcommittee conducted a survey of all Connecticut municipalities regarding their treatment of municipal ethics matters. Based on the these discussions and the results of the survey, the Subcommittee determined that, at this time, the best approach concerning municipal ethics is to require all municipalities in Connecticut to have a Code of Ethics that, at a minimum, has certain basic ethics provisions.

The proposed minimum provisions are commonly used in any governmental ethics code. In fact, the results of the municipal ethics survey indicate that a large number of municipalities in Connecticut, both cities and towns, already have these basic provisions in their existing ethics codes. However, there is still a considerable segment of Connecticut municipalities that do not have an ethics code in place.

The Office of State Ethics hopes that members of the GAE Committee will support this proposal. A copy of the proposal was forwarded to Shannon McCarthy at the Legislative Commissioners' Office.

Please let me know if you have any questions or concerns.

Sincerely,

Peter J. Lewandowski
Associate General Counsel
Office of State Ethics

18-20 Trinity Street | Hartford, CT 06106-1660
Tel: 860.263.2392 | Fax: 860.263.2402 | E-mail: peter.lewandowski@ct.gov

Roxanne Maher

From: Roxanne Maher
Sent: Monday, February 3, 2025 6:24 AM
To: Town Council Group
Cc: Roxanne Maher
Subject: FW: Ethics committee ordinance

Tracking:	Recipient	Read
	Town Council Group	
	Roxanne Maher	
	Timothy Ryan	Read: 2/3/2025 9:46 AM
	Jessica Buhle	Read: 2/3/2025 10:30 AM
	William Barnes	Read: 2/3/2025 10:37 AM
	Naomi Rodriguez	Read: 2/3/2025 10:38 AM
	Carmen Garcia Irizarry	Read: 2/3/2025 11:00 AM
	April Brunelle	Read: 2/3/2025 11:49 AM

From: Pamela Ball <pcball@earthlink.net>
Sent: Sunday, February 2, 2025 10:05 PM
To: Roxanne Maher <council@ledyardct.org>
Subject: Ethics committee ordinance

Dear Council,

Having read the proposed ordinance and letters from town residents in support of the ordinance to create an Ethics Committee (EC), several issues and questions come to mind.

Being subjected to an “ethics” investigation, especially without an attorney, can have serious lifelong negative effects. I know of a situation in another town where a resident volunteering on a town committee made a decision that was correct, proper and in keeping with the duties of the committee but was not popular with the townsfolk. At a town meeting, I witnessed first hand how the town select person simply refused to listen to and consider any comments in support of her and the decision she made. Several of us gave statements that were rudely ignored. There was unflattering newspaper coverage and she was treated poorly by town residents and town authorities. She was subjected to such harsh treatment that she felt forced to - and did - move out of town to escape the hostility. This person was an acquaintance of mine and I know first hand how horrible this was for her.

Once an accusation is made to the EC, since there are no attorneys involved and thus no attorney-client privilege, is it not discoverable? Cannot all of the “confidential” information that is part of any EC investigation, from the filing of the complaint to the final decision, be discovered by a FOIA request? Would an accused have to turn over their personal email, texts or other documents to five members of the EC and could that information be discovered by anyone else via a FOIA request? Would all of their social media posts be subject to scrutiny? All it would take is one person in town with an issue with the accused to use that information to start rumors, post negative things on social media, post content of personal emails, etc. because without attorney-client privilege, isn’t the information is accessible through a FOIA request? Potential employers could find out if a person was called before the EC and, without attorney-client privilege, wouldn’t the town have to reveal that information if the employer filed a FOIA? Even if a person subjected to

an accusation is found to be “innocent” there is no way to repair their reputation, their standing in the community, to gain back the hours of time spent in defense, or to be repaid expenses incurred to defend themselves. Once negative comments are out there, they are out there forever.

Will there be any requirements to be an EC committee member other than to be a registered voter in town? How will you determine if a committee member is qualified to sit in judgement of other townspeople? Will they receive any training such as intrinsic bias training? Will Council read the social media posts of potential EC members to see if they have made political, insulting or other disparaging comments against other residents? Who will determine what information should or should not be redacted from subpoenaed personal communications of the accused? Who will do the research to make sure that any documentation that an accuser submits is valid? Who will and how can an EC make sure that any proceedings are free from personal or political bias? If an attorney is not involved, could anyone make a FOIA request of the members of the EC to reveal information from their discussions and any communications on the topic?

Going before the EC has been compared to being judged by a jury of peers but that activity is carried out in a courtroom with a judge, attorneys (*i.e.*, trained professionals) and a jury selected to hear the case at hand; that is not the situation proposed here. Here you would have five untrained individuals who would sit in judgement on a fellow townspeople. What if a person on the EC knows the accused or is familiar with the situation? In a jury selection process, that person would be removed; is Council going to vet and seat a new member each time this occurs? If the EC determines that a complaint is not valid, what plans will there be to stop the accuser from making their accusations public in other ways? The accused has no protection or privacy until an attorney is involved so the simple act of filing a complaint puts the accused in a position of needing one. What if they don't have the money to hire a lawyer? You may argue that a FOIA could be requested for any proceedings under the current policies, but under the current policies situations are handled by professionals, not neighbors, and attorney-client privilege would likely be in place.

What kind of complaints have ECs in other towns received and what kinds of actions have they taken? Did they need an EC to address the issues or would the policies in place have worked just as well? I believe that it would be a good idea to reach out to other towns to see how their EC was used and to talk to the accusers and accused to see how they were affected, especially those who went through the process and were found innocent. I do not know if a formal EC in was in place for the situation I described above. Regardless, it devolved into a situation of neighbor attacking neighbor with awful consequences.

Have there been any “ethical violations” that have been identified that have not been or could not be adequately addressed by policies already in place? I understand that there have been some unpopular goings on in town (proposed blasting, proposed apartment complex) but just because a decision is unpopular does not mean it is a violation of ethics.

Some arguments for the committee included noting that Ledyard was one of the few towns in the state that didn't have an EC. Since we have policies in place, we don't need a committee. Other comments were directed to preparedness; there are policies in place so the town is prepared. And the last argument was that if you haven't done anything wrong, you don't have anything to worry about. All it will take is for someone in town to suspect you of doing wrong, filing a complaint and your life could be changed. Knowing that you haven't done anything wrong isn't going to protect you from an investigation. It's like arguing that you don't care about privacy because you have nothing to hide; do you really want people poking around in your life even if you haven't done anything wrong?

It seems to me that what is really needed is to make everyone aware of the policies already in place to handle complaints in a professional manner with trained personnel rather than asking five townspeople to make a judgement on another. Maybe the existing policies could be updated to include information from the ordinance about the “ethical violations” that would be subject to an investigation and outline the steps to file a complaint under the current system. Such an amendment would address those who say that the current guidelines are too vague.

Is Council going to make a town wide announcement should this committee be established? If so, why not make a town wide announcement to educate folks as to the (updated) policies in place?

If this committee is put in place, all present and future volunteers should be made aware that anyone in town can file an ethics complaint against them. My friend was simply volunteering to make a good thing happen for the town. If the situation had been handled professionally, perhaps she wouldn't have been harassed so badly as to have to move away. Who would want to be a volunteer in Ledyard knowing that anyone could make a complaint against them? Volunteering should be rewarding, not a risk.

Thank you for reading,

Pam Ball

Roxanne Maher

From: barbarakil@sbcglobal.net
Sent: Monday, February 10, 2025 9:44 PM
To: Roxanne Maher
Subject: Ethics Committee

As a resident of Ledyard (50 Seabury Avenue) I would like to express my strong disapproval of the proposed Ethics Commission, as written.

I am also a member of the Ledyard Republican Town Committee, at our Monthly Meeting tonight we voted unanimously against the Proposed Ethics Commission as written.

These issues should not be voted on by a handful of people when the majority of the residents of Ledyard have no idea what is being proposed

Barbara Kil

Roxanne Maher

From: Sharon Pealer <pealerl@att.net>
Sent: Monday, February 10, 2025 10:18 PM
To: Roxanne Maher
Subject: Code of Ethics

The Ledyard Republican Town Committee opposes the code of ethics ordinance as written.

Sharon Pealer; Chair Ledyard RTC



Virus-free. www.avg.com

Roxanne Maher

From: Sharon Pealer <pealerl@att.net>
Sent: Monday, February 10, 2025 11:08 PM
To: Roxanne Maher
Subject: Ethics ordinance

I am writing to express my opposition to the proposed Ethics ordinance being presented to the administration committee of the Ledyard Town Council on Wednesday February 12 in the year 2025. I have read through the entire proposed ordinance and as written it does not serve the town or her residents well. This ordinance as proposed allows for persons with an axe to grind to use the commission to attack someone and the only chance for relief is at the extreme end of the proposed procedures where a full vote of the five commission members is required to find someone guilty. In the meantime the accused must suffer through a several months long process, the expenses and stresses all of it. In the punitive discussion portion of this ordinance it looks to be a political tool which is not something that is in the better interests of any residents of the town. This town has had to deal with uncomfortable issues in the past and has managed to resolve these issues without making political attacks. I should think that mature adults would be able to resolve issues by talking and actively listening to the parties involved, and I would hope that this would include those elected representatives now serving the towns residents.

Sharon Pealer

Roxanne Maher

From: William D. Saums <bsaums@centechsolutions.com>
Sent: Monday, February 10, 2025 5:40 PM
To: Roxanne Maher
Subject: Ethics commission

Dear Councilors:

As you know, I served on the Town Council for many years, and I've learned that the Admin Commission is once again considering forming an ethics commission.

Speaking as a citizen with experience, I do not support the formation of an ethics commission. Such a commission will waste commissioners' and Town employees' time, it could result in unnecessary legal fees for the Town, and it would duplicate controls already in place: laws, ordinances, regulations, and the Town employee code of conduct.

If Town employees break the law, they should be prosecuted. If the existing laws don't work, fix them; but don't introduce an uncontrollable element like this into our system of government.

Here is an excerpt from just one study on the effectiveness ethics commissions:

"Even so, the raw correlations and point estimates that we present indicate that state ethics commissions have only very weak, and possibly perverse, effects on public corruption. Consequently, while we cannot rule out some small beneficial impact of state ethics commissions, our results do imply that this outcome is no more likely than a harmful effect of similar or larger magnitude. As such, it is reasonable to conclude that there is no support for claims that state ethics commissions, including bipartisan and nonpartisan commissions, serve to reduce political corruption."

Source:

https://capi.law.columbia.edu/sites/default/files/content/practitioner_toolkits/do_state_ethics_commissions_reduce_political_corruption_an_exploratory_investiga.pdf

In the event this proposal makes it onto the Town Council agenda, please read this statement into the minutes of the Town Council meeting.

Thank you.

Sincerely,

-Bill Saums
(O) 1-860-572-7181
(M) 1-401-225-5362

Roxanne Maher

From: Mike Cherry <mj_cherry@hotmail.com>
Sent: Wednesday, February 12, 2025 10:25 AM
To: Roxanne Maher
Subject: Comments on Code of Ethics and Ethics Commission Draft of 09/09/2024

I am ambivalent as to creating an ethics commission in Ledyard.
That being said I do have a few comments on the proposed draft:

- Section 4 Paragraph 2.A. third paragraph refers to subsection 3(a) – I don't see a paragraph 3(a) in the document
- Section 4.2.I seems to contradict CGS 8-11 with regards to Land Use Commissions dealing with Zoning. There are similar CGS sections dealing with planning and wetlands

Paragraph 4.1 seems limited to interests and transactions that would limit independent judgement in performance of Official Duties and seems too vague to be effective.

Reading other comments for this proposal leads me to believe many of those supporting creation of a commission do not realize the scope in paragraph 4.2 seems limited to financial misuse and gain.

Mike Cherry
5 Whippoorwill Dr
Gales Ferry, CT 06335
(860) 460-3546
mj.cherry@comcast.net

Roxanne Maher

From: Roxanne Maher
Sent: Wednesday, February 12, 2025 8:48 AM
To: Town Council Group
Subject: FW: Regarding the Proposed Code of Ethics

From: Daniel Pealer <danieljpealer@gmail.com>
Sent: Tuesday, February 11, 2025 9:40 PM
To: Roxanne Maher <council@ledyardct.org>
Subject: Regarding the Proposed Code of Ethics

Dear Members of the Town Council,

I am writing to express my concerns regarding the proposal to establish a code of ethics and committee and to urge the council not to adopt this measure. While the intention behind promoting ethical standards and accountability is commendable, I believe that creating such a committee could lead to significant legal and practical challenges for the town as I detail below.

Legal Implications: The introduction of a code of ethics could lead to increased litigation if breaches of the code result in legal challenges or disputes. This could place a financial and administrative burden on the town, diverting resources from other important areas.

Focusing on potential legal issues, it is important to consider the potential for conflicts of interest and bias within an ethics committee. Members of such a committee are often personally selected from within the community, which can lead to partiality and favoritism. In the Supreme Court case, *Caperton v. A.T. Massey Coal Co.* (2009), the Court ruled that due process requires recusal when there is a serious risk of actual bias or conflicts of interest. Establishing an ethics committee could create a similar risk, where personal relationships and affiliations influence the decision-making process, undermining the committee's credibility and impartiality. Any committee established to enforce a code of ethics must not just actually be fair and impartial it must also appear to be fair and impartial.

Further the proposed code of ethics focuses on the lack of a clause prohibiting retroactive application. Without such a clause prohibiting the application of this code to conduct that occurred prior to the adoption of such a code there is the risk of a person facing punishment Ex Post Facto. The punishment can be any of the following: "an order to cease and desist the violation, to pay a civil penalty of up to the maximum allowed per state law per violation, censure, reprimand, suspension without pay, termination of employment and/or removal from appointed office. Additionally, the commission may refer violators to the proper authorities for further civil or criminal" (Page 10 of the draft ordinance)

Article I, Section 10, Clause 1 of the U.S. Constitution, One of the two Ex Post Facto Clauses, prohibits states (and by extension, municipalities) from enacting laws that apply retroactively, thus criminalizing conduct that was legal when originally performed. This clause ensures that individuals have fair notice of the laws and consequences that govern their actions. If a town were to create a code of ethics and apply

it retroactively, it would violate this constitutional prohibition by potentially punishing individuals for actions that were not considered unethical at the time they were committed. By preventing such retroactive application, the clause safeguards individuals against unjust legal changes that could undermine the principles of fairness and due process in the legal system.

Of critical note, while there are some exceptions to the Ex Post Facto Clauses they apply those apply when the law is non-punitive, which the proposed ordinance is not. (see *Smith v. Doe* (2003), *Stogner v. California* (2003), *Lynce v. Mathis* (1997) and *Miller v. Florida* (1987))

In conclusion, while I am sure that supporters of this proposal believe that it is going to produce a brighter future, the gleam of those intentions can blind us to the perils of the dark path they may lead us on. Therefore, it is crucial to thoroughly evaluate the possible drawbacks and challenges that come with adopting a new code of ethics. I strongly encourage the town council to consider alternative strategies that already exist to deal with these concerns.

Thank you for your attention to this matter. I look forward to the council's thoughtful deliberation on this important issue.

Sincerely,
Daniel Pealer

Roxanne Maher

From: Wendy Hellekson <whelleks@icloud.com>
Sent: Wednesday, February 12, 2025 7:14 AM
To: Town Council Group
Subject: Ethics Commission

Dear Councilors,

I am writing in support of an ethics commission for the Town of Ledyard. A strong and balanced government requires that there be oversight to the members of that government. I mean that from all sides, and all parties. This is not a partisan issue. Government should work for the people and not for personal gains, financial or otherwise .

I realize that this is coming from the Chair of the DTC, but I personally feel an ethics commission is important and would be advocating for it if I was not DTC Chair.

Wendy Hellekson
DTC Chair and Citizen of Ledyard

Roxanne Maher

From: Edmund Lamb <edmundlamb@sbcglobal.net>
Sent: Wednesday, February 12, 2025 11:42 AM
To: Roxanne Maher
Subject: Two Proposed Town Ordinances: Fly Additional Flags @ Town Hall & Form Ethics Committee

I am very OPPOSED to both proposed ordinances which are totally unnecessary and will certainly lead to issues later on.

The flags, signs, banners etc. that already exist on RT 117 near & adjacent to the town hall, are very distractive to drivers.

As you well know, there is a great deal of foot traffic across RT117, much of it NOT in the crosswalks.. I for one, don't feel safe driving if distracted by more roadside clutter.

The "ethics committee" is clearly a duplication of existing policies, is not necessary, and surely will lead to more legal & government turmoil and also added costs.

Sincerely; Ed Lamb

47 Lambtown Rd

Roxanne Maher

From: Angela Cassidy <acassidy1122@yahoo.com>
Sent: Tuesday, February 11, 2025 9:19 PM
To: Roxanne Maher; Town Council Group
Subject: Ledyard Ethics Committee/Code of Ethics

February 11, 2025

Administrative Commission Chair

cc: Ledyard Town Council

Ledyard, Ct

Subject: Urgent Need for an Ethics Commission and a Code of Ethics

Dear Commissioners,

I am writing to urge action on the establishment of an Ethics Commission and a comprehensive Code of Ethics for Ledyard. Despite many previous letters and discussions on this matter over the past several months, there has been little progress, and the absence of clear ethical guidelines and accountability measures remains a serious issue.

The lack of consequences for unethical behavior allows misconduct to go unchecked. Without an enforceable Code of Ethics and a dedicated Ethics Commission, there is no formal mechanism to address conflicts of interest, abuses of power, or breaches of public trust. This gap undermines transparency, weakens public confidence,

The delay in addressing this issue is concerning. Ethical governance should be welcomed and a fundamental requirement. Other municipalities and organizations have long recognized the need for such a commission and code.

Sincerely,

Angela Cassidy

62 Hurlbutt Rd

Gales Ferry, Ct 06335

860-271-1749

From: Daniel Pealer <danieljpealer@gmail.com>
Sent: Tuesday, February 11, 2025 9:40 PM
To: Roxanne Maher
Subject: Regarding the Proposed Code of Ethics

Dear Members of the Town Council,

I am writing to express my concerns regarding the proposal to establish a code of ethics and committee and to urge the council not to adopt this measure. While the intention behind promoting ethical standards and accountability is commendable, I believe that creating such a committee could lead to significant legal and practical challenges for the town as I detail below.

Legal Implications: The introduction of a code of ethics could lead to increased litigation if breaches of the code result in legal challenges or disputes. This could place a financial and administrative burden on the town, diverting resources from other important areas.

Focusing on potential legal issues, it is important to consider the potential for conflicts of interest and bias within an ethics committee. Members of such a committee are often personally selected from within the community, which can lead to partiality and favoritism. In the Supreme Court case, *Caperton v. A.T. Massey Coal Co.* (2009), the Court ruled that due process requires recusal when there is a serious risk of actual bias or conflicts of interest. Establishing an ethics committee could create a similar risk, where personal relationships and affiliations influence the decision-making process, undermining the committee's credibility and impartiality. Any committee established to enforce a code of ethics must not just actually be fair and impartial it must also appear to be fair and impartial.

Further the proposed code of ethics focuses on the lack of a clause prohibiting retroactive application. Without such a clause prohibiting the application of this code to conduct that occurred prior to the adoption of such a code there is the risk of a person facing punishment Ex Post Facto. The punishment can be any of the following: “an order to cease and desist the violation, to pay a civil penalty of up to the maximum allowed per state law per violation, censure, reprimand, suspension without pay, termination of employment and/or removal from appointed office. Additionally, the commission may refer violators to the proper authorities for further civil or criminal” (Page 10 of the draft ordinance)

Article I, Section 10, Clause 1 of the U.S. Constitution, One of the two Ex Post Facto Clauses, prohibits states (and by extension, municipalities) from enacting laws that apply retroactively, thus criminalizing conduct that was legal when originally performed. This clause ensures that individuals have fair notice of the laws and consequences that govern their actions. If a town were to create a code of ethics and apply it retroactively, it would violate this constitutional prohibition by potentially punishing individuals for actions that were not considered unethical at the time they were committed. By preventing such retroactive application, the clause safeguards individuals against unjust legal changes that could undermine the principles of fairness and due process in the legal system.

Of critical note, while there are some exceptions to the Ex Post Facto Clauses they apply those apply when the law is non-punitive, which the proposed ordinance is not. (see *Smith v. Doe* (2003), *Stogner v. California* (2003), *Lynce v. Mathis* (1997) and *Miller v. Florida* (1987))

In conclusion, while I am sure that supporters of this proposal believe that it is going to produce a brighter future, the gleam of those intentions can blind us to the perils of the dark path they may lead us on. Therefore, it is crucial to thoroughly evaluate the possible drawbacks and challenges that come with adopting a new code of ethics. I strongly encourage the town council to consider alternative strategies that already exist to deal with these concerns.

Thank you for your attention to this matter. I look forward to the council's thoughtful deliberation on this important issue.

Sincerely,
Daniel Pealer

Roxanne Maher

From: Jacob Hurt <jacob.d.hurt2@gmail.com>
Sent: Tuesday, February 11, 2025 6:23 PM
To: Town Council Group
Subject: Ethics Commission - I Support!

Councilors,

I spoke with a couple of you recently about the idea of an Ethics Commission. I strongly support it, and look forward to its formation. I would like to try and be a member!

Ethics Commissions are functioning well in several towns throughout the state, providing a clear path for concerned citizens to report and substantiate potential conflicts of interest. Government officials should not be using public office to privately benefit themselves, nor should unsubstantiated gossip and rumors about such conduct go unchecked. Such conduct, or even the appearance of that conduct, undermines public trust and could open the town and taxpayers to unintended liabilities.

Ethics Commissions provide a standard for elevating and investigating claims. With one in place, there is a way to investigate worthy claims, dismiss unsubstantiated ones, and uphold the public's trust that public servants are not misusing their office or its resources.

Thank you for your consideration.

Jacob Hurt
6 Nugget Hill Drive

Roxanne Maher

From: Alyssa Siegel-Miles <alyssajsiegel@gmail.com>
Sent: Tuesday, February 11, 2025 9:55 PM
To: Town Council Group; Roxanne Maher
Subject: Support for Ledyard Ethics Commission

Dear Ledyard Town Council,

Thank you for all the hard work you have been doing for our town. I am grateful for your work on crafting a responsible budget, plus your great work on the Finance and Admin Committees, and the Community Relations Committee for Diversity, Equity, and Inclusion, among many other things.

I am writing to support the development of a Ledyard Ethics Commission. Ledyard needs a commission that is empowered to investigate allegations of unethical conduct, corrupting influence, illegal activities, or other behavior that would reflect adversely on our town. Citizens must have a mechanism to be aware of who is trying to influence officials and to address real or perceived conflicts of interest.

I expect that people who work or are elected to serve in Ledyard are accountable for their actions. An ethics commission would be a critical step forward for enabling our town to shed light on financial and other conflicts of interest among public officials or town employees. A strong, independent ethics agency is essential to maintaining a government that is representative, responsive, and accountable.

An ethics commission must be built on the principles of independence, accountability, and transparency. A well-designed ethics commission will help the public trust that our government officials have integrity, as well as enable accountability for violations of the public trust.

Quite a few other CT towns and cities have Ethics Commissions. We need one in Ledyard as well.

Thank you for your time and attention.

Sincerely,
Alyssa Siegel-Miles
712 Colonel Ledyard Hwy.

From: Alexa Shelton <alexa.shelton@gmail.com>
Sent: Tuesday, March 11, 2025 7:23 AM
To: Roxanne Maher; Town Council Group
Subject: Support for an Ethics Commission and Appreciation for Black History Month Initiatives

Dear Members of the Ledyard Town Council,

I am writing to express my strong support for the establishment of an Ethics Commission in Ledyard and to extend my appreciation for the town's efforts in recognizing Black History Month through events and the essay contest. As a longtime resident of Gales Ferry, a mother, and an active member of our community, I believe that both initiatives reflect our town's commitment to integrity, inclusivity, and progress.

The creation of an Ethics Commission is a necessary step to ensure transparency, accountability, and fairness in our local government. Trust in our town's leadership is foundational to a thriving community, and having an independent body to oversee ethical concerns will only strengthen that trust. Establishing clear ethical guidelines and providing a system for addressing concerns in a fair, impartial manner benefits all residents, regardless of political affiliation. Our town's decisions impact our children, our neighborhoods, and our collective future—ensuring those decisions are made with integrity should be a priority for us all.

Additionally, I want to commend the Council and those involved in organizing Black History Month events and the essay contest. As a mother, I believe it is vital that my children, and all children in Ledyard, grow up in a community that values diversity, acknowledges history, and fosters a spirit of learning and understanding. These programs not only honor the contributions of Black Americans but

also encourage meaningful discussions and personal reflection that help bridge divides and create a more unified community.

I urge the Council to continue supporting initiatives that promote ethical governance and inclusivity. Ledyard is a wonderful place to live, and by committing to these values, we can ensure it remains a welcoming, fair, and forward-thinking community for all.

Thank you for your time and for your dedication to making Ledyard the best it can be.

Sincerely,

Alexa Shelton

Gales Ferry resident

Roxanne Maher

From: Anne Roberts-Pierson <ar-pierson@att.net>
Sent: Tuesday, April 1, 2025 3:07 PM
To: Town Council Group
Subject: Creation of Ethics Commission

Dear Chairman and Administration Committee members,
As a current Ledyard resident and taxpayer, I would like to voice my support for creation of an Ethics Commission for Ledyard. Ethical behavior is the cornerstone of maintaining trust and transparency between the electorate and town officials.

I realize that within the past decade efforts began but went nowhere in this endeavor. More recently, I brought up, in person, the request for the creation of an Ethics Commission in May 2024. Others did the same and I was glad to see a Draft proposal come forth in September 2024. Thank You for this.

Alas, informative discussions on this topic of an Ethics Commission for Ledyard seem to have come to a halt of late. This is disappointing to be sure as I see that within the growing pile of correspondence you are receiving on this topic, there are even two (2) individuals who are anxious to serve on the Ethics Commission !

In trying to educate myself on this topic, I believe the CT State Office of Ethics even provides training for municipal ethics commissions.

Perhaps a way to move this process along might be to collaborate with other nearby towns who have taken the leap already and created an Ethics Commission. Their guidance could prove helpful and useful. Maybe you might think about an outreach to them. Holding a public forum on this topic could also prove useful and informative.

The devil is always in the details (draft proposals always require fine-tuning) but achieving critical mass with strong momentum in the first place will surely help move the process forward.

Thanks for listening. Thank you for your service.

Yours sincerely,
Anne Roberts-Pierson
4 Anderson Drive
Gales Ferry, CT 06335

Roxanne Maher

From: Lou Consolini <louconsolini@gmail.com>
Sent: Monday, April 7, 2025 10:15 AM
To: Roxanne Maher
Subject: Ethics board or committee

Sent from my iPhone I'm writing to say that I'm in favor of forming an ethics committee in our town.
Louis Consolini 168R Iron St.

From: Mary B. Larson
Sent: April 8 2025
To: Members of the Administration Committee and the Town Council
Subject: Ethics Commission

First of all, thank you for your dedication, your talents and your time devoted to our town. It cannot be easy! We are a small town, with growing pains and challenging issues that our forebears could not have imagined. I am writing to voice my opinion that it is time that we join the majority of towns and cities in the state who have formally addressed the difficult questions of ethics in today's world.

I have been a resident of town since 1969, raised a family here, and ministered 20 years in two different churches in town. I have always been an unaffiliated voter, because I vote by character and not by party. Obviously, though, ethics are a primary concern in my life. My concern is that I am seeing the town I love being torn apart by contentious issues and proposals, and that trust in public officials is being eroded by rumors and ethical concerns.

I know there is a proposal which you are considering to create a code of ethics, along with an ethics commission to oversee it, whose time, I believe, has come. We need an independent, neutral body of residents who would have the responsibility to advise public officials with ethical questions, evaluate questions and concerns, and render decisions. They must be trained for this responsibility, not be employees of the town or members of any commission or board in the town, and not motivated by political agendas.

The town, as any organization, must have clear standards of ethical conduct. Public trust depends upon avoiding even appearances of impropriety. The State of Connecticut had a recommendation that municipalities adopt a code addressing several important issues: conflict of interest, disclosure and recusal, gifts, use of property and information, mis-use of office or position, nepotism, and contracting, including hiring and firing.

I have read concerns that adopting a code will create threats of retroactive complaints, or incur legal expenses for the town. The longer we wait, however, the greater the difficulty. The draft of the code needs some tweaks before being adopted, yes; but unaddressed issues could create even worse legal expenses in years to come. It never works to think problems will disappear if we ignore them!

Rev. Dr. Mary Brown Larson (Mobby)
53 Harvard Terrace, Gales Ferry

Roxanne Maher

From: miltnal@aol.com
Sent: Monday, April 7, 2025 9:19 AM
To: Roxanne Maher
Subject: Ethics committee

290 Whalehead Rd
Gales aFerry Ct 06335..

Attention to the Administration Committee for the formation of an Ethics Committee.
To Whom It May Concern.

As citizens of Ledyard since 1972, we are very concerned with the apparent reluctance of some in our town to establish an Ethics Committee. Although this matter has been proposed and discussed for sometime, there has been no result. Ledyard is known as a community which works to provide and protect the needs and desires of its citizens. As issues become more complicated it is important that we safeguard our standards and goals. An ethics committee is vital in that regard.

Thank you for your time and effort serving Ledyard/Gales Ferry
Alice and Milton D Schroeder sr.



Gales Ferry District
18 Hurlbutt Road / P.O. Box 181
Gales Ferry, Ct. 06835-1825
GalesFerryDistrict@gmail.com



April 9, 2025

Ledyard Town Council

Ledyard, CT

Cc: Administrative Committee, Economic Development, Mayor Allyn

Dear Councilors,

I am writing on behalf of the residents of Gales Ferry to express our concerns regarding representation and ethical governance in our town. Perhaps the most important issue pending, some would say languishing, before the Council is that relating to the establishment of a Code of Ethics that expands on Chapter IX, Section 6, *Conflicts of Interest*, of the Town Charter (revised November 2018, effective December 3, 2018). Not only does the Town Charter not address ethics, provide a code of ethics, or process for addressing potential ethical lapses by town officials, commissioners, and councilors, there is no separate ordinance that does. It is most important that this gap in our governance structure be remedied as soon as practicable.

Concerns have been raised by constituents of the Gales Ferry District that reinforce the need for a clear and enforceable ethical framework for our town. Some of these actions included the firing of a town official without any rationale provided. If this was the result of a potential ethics concern, having a written Code of Ethics would have allowed the violation to be made clear. Further, the existence of an Ethics Commission would have permitted an objective investigation ensuring the appropriate level of transparency and accountability in such a critical personnel action.

Other concerns have also been raised. For example, the appointment of persons who receive compensation from companies or organizations that would be perceived to have clear interests in the decisions before various town commissions to which they are appointed. Another is the perception that municipal infrastructure investments have been prioritized to benefit only a specific few individuals or families. Discussion of such issues require transparency, accountability, and authenticity. Otherwise, they create ethical dilemmas that happen all too often.

It has now been over ten months since the council was approached regarding the creation of a town ethics code and commission. In that time, many issues have surfaced. This topic has been on the Town Council and Administrative Committee agendas for months and there has been no shortage of discussion in the community. Below we share several strong examples of ethics codes and commission structures from other towns.

At this point, we respectfully ask: Where does this stand?

We urge the Administrative Committee to bring this matter back to the table for discussion, completion, and adoption. Ensuring fair representation is essential to maintaining trust and equity in how we govern.

Towns across Connecticut have already taken action to ensure transparency, accountability, and public trust in their governance. These include:

- Norwich, CT: Ethics Commission consists of five members and two alternates none of whom may *not* be officers, officials, or employees of the City. The Code of Ethics is in Chapter 2, Article IV of the Norwich Code of Ordinances.
- Burlington, CT: Ethics Commission investigates allegations of unethical conduct or illegal activity that reflects poorly on the town.
- East Hampton, CT: Ethics Commission acts as an independent body to hear and investigate complaints under a local Code of Ethics and Conduct.
- Glastonbury, CT: Ethics Commission interprets and enforces a local ethics code for officials, consultants, employees, and residents.
- Somers, CT: Ethics Commission reviews and investigates potential ethics violations from public officials and contractors.
- Windham, CT: Ethics Commission upholds the town's ethics code and promotes government accountability.

These towns provide clear, accessible guidance for public servants and the community alike. Ledyard should be no different.

Thank you for your time and attention to these pressing matters. We look forward to your response.



Lee Ann Berry,
President, Gales Ferry District

Roxanne Maher

From: Kathrine Kohrs <kathrine.kohrs@gmail.com>
Sent: Tuesday, April 8, 2025 3:01 PM
To: BOE@ledyard.net; boemembers@ledyard.net
Cc: Town Council Group; Jay Hartling; Roxanne Maher
Subject: Support DEI in our schools

Dear Board of Education Members,

Thank you for your continued dedication to our schools, our students, and the thoughtful work you do on behalf of the community—especially in navigating the complexities of the school budget.

I'm writing to express my deep concern regarding the recent directive from the current federal administration concerning Diversity, Equity, and Inclusion (DEI) in our schools.

While you await formal guidance from the Connecticut Department of Education, I urge the board to refrain from taking any premature action to remove DEI language or initiatives from school policies. These values are essential to creating a safe and supportive environment for all students. Please stand firm and do not act out of fear or pressure from federal agencies that are overreaching their authority.

New York's public schools have already indicated they will not comply with the directive. I sincerely hope that Connecticut will also demonstrate the same resolve and commitment to our students.

Now more than ever, we must be vocal and unwavering in our support for all students—especially those who are most vulnerable and currently being targeted by these harmful political efforts. Just as we do not tolerate bullying within our school communities, we should not tolerate bullying from the highest levels of government.

Thank you for your time and for standing up for what's right.

Sincerely,

Kate Kohrs

Gales Ferry

Roxanne Maher

From: Mike Christie-Fogg <fogg.mike@gmail.com>
Sent: Tuesday, April 8, 2025 1:01 PM
To: BOE@ledyard.net; boemembers@ledyard.net; jhartling@ledyard.net; Roxanne Maher;
Town Council Group
Subject: Please protect all students

Hello,

Thank you again for all your hard work on the BOE budget and all the work you do for our schools and students.

I am writing because I am very concerned about the latest federal directive from the current administration regarding DEI in our schools.

While you await direction from the state Department of Education, I urge you not to take any action that would remove any "DEI" initiatives or wording from our school policies. Please hold out for as long as possible and do not take action prematurely out of fear. I encourage you to fight back against federal agency demands to censor anything it deems diversity, equity and inclusion, which they do not have authority to make.

NY public schools have told the federal administration that they won't comply with the DEI order. I hope that Connecticut stands strong and does the same.

We must loudly and publicly protect and support ALL students in our school, especially those that are currently being targeted by the malicious whims of the federal administration. We don't tolerate bullying in our schools and we shouldn't tolerate or give in to bullying from our president either!

--

Michael Fogg
Furniture~Sculpture~Faux Bois
351 Shewville Rd. Ledyard CT 06339
860.287.5087
www.foggfauxbois.com
[Instagram](#)

Roxanne Maher

From: Carlo M Porazzi <porazzicm@gmail.com>
Sent: Tuesday, April 8, 2025 2:00 PM
To: Town Council Group; Fred Allyn, III; Roxanne Maher; April Brunelle; Jessica Buhle; Kevin J. Dombrowski
Subject: Town Ethics Commission

Ledyard Town Council Administrative Team and others,

I write once again to request that the administrative committee push forward with a clear and transparent set of ethics guidelines and subsequently, a commission to apply those overarching guidelines to the code of conduct by the town government representatives. I understand the town has a working draft. As mentioned many times previous, Ledyard is one of a few towns in the state that still does not have an ethics commission. There have been discussions at the town council meetings about more reach and transparency to the residents and taxpayers in regards to the actions of our local government, yet this major step in that direction still seems elusive. It would be unfortunate for a few at the local government level to hamper the wishes of the community when the benefit would speak volumes about our town government respecting the will of the people. And being respected in return. I understand that our current charter empowers the Town Council to handle complaints of this type currently, but I know that any complaint deemed "too sensitive or controversial" by some will be summarily dismissed. Conversely, an Ethics Commission will have more autonomy, or should have. In regards to finding suitable local volunteers to sit on this panel, I don't think that will be an issue at all. I submit the following for your review (thanks to AI):

In government, ethics refers to **the application of moral principles to the actions and decisions of public officials, ensuring fairness, transparency, and accountability, and prioritizing the public interest over personal gain.** [1, 2, 3, 4]

Here's a more detailed breakdown: [1, 3]

- Public Interest vs. Personal Gain: Government ethics emphasizes serving the public good and avoiding actions that could be seen as benefiting personal interests or those of a select few. [1, 3]
- Integrity and Honesty: Ethical behavior in government requires honesty, integrity, and adherence to high standards of conduct. [3, 5]
- Accountability: Public officials are accountable to the public for their decisions and actions, and ethical conduct ensures that they are held responsible for their actions. [3, 5]
- Fairness and Impartiality: Ethical government ensures that decisions are made fairly and impartially, without bias or discrimination. [1, 3, 5]
- Transparency: Ethical government promotes transparency in decision-making and operations, allowing the public to understand how decisions are being made and held accountable. [1, 2, 3]
- Conflict of Interest: Government ethics addresses conflicts of interest, where a public official's personal interests could potentially influence their official duties. [1, 6]
- Ethical Codes and Standards: Many governments have established codes of conduct and ethical standards for public officials, outlining expected behavior and potential consequences for violations. [4, 5]
- Importance of Ethics: Ethical behavior in government is crucial for maintaining public trust, ensuring effective governance, and upholding the principles of democracy. [1, 3, 4]
- Ethical Governance: Ethical governance means governance based on a certain value premise, which is also "good". For example, probity, integrity, compassion, empathy, responsibility, social justice etc. without which ethical issues can't be upheld. [7]
- Political Ethics: Political ethics, also known as political morality or public ethics, refers to the practice of aligning political actions with moral and ethical principles to ensure fair governance. [8]

[1] <https://www.scu.edu/government-ethics/resources/what-is-government-ethics/>

- [2] https://en.wikipedia.org/wiki/Public_sector_ethics
[3] <https://www.govpilot.com/blog/guide-to-local-government-ethics-what-makes-an-ethical-government>
[4] <https://www.aspanet.org/ASPA/ASPA/Code-of-Ethics/Code-of-Ethics.aspx>
[5] <https://manifold.open.umn.edu/read/chapter-8-ethics-and-accountability-in-public-administration>
[6] <https://www.cityofdenton.com/DocumentCenter/View/884/Local-Government-Ethics-in-a-Nutshell-PDF>
[7] <https://www.drishtiias.com/daily-updates/daily-news-analysis/ethical-mode-of-governance-for-india>
[8] <https://www.vaia.com/en-us/explanations/anthropology/political-anthropology/political-ethics/>
[-] <https://www.vaia.com/en-us/explanations/anthropology/political-anthropology/political-ethics/>
[-] <https://www.scribd.com/document/657640415/Ethics-Vision-VAM-Merged>
[-] <https://www.drishtiias.com/daily-updates/daily-news-analysis/ethical-mode-of-governance-for-india>

Finally, below is a copy of my previous email to the town council on this matter and the ethics draft at hand.

12/11/2024

Ledyard Town Council,

As a current resident and taxpayer I am writing to voice my support for the formation of a Ledyard Ethics Commission. I find it very concerning that Ledyard is one of the few towns that does not have this oversight committee. The objection over forming this committee by at least one standing member of the town council is also concerning. Simply having a code of ethics established with no board to administer is much like the example given of having laws but no police force. In my opinion there have been and are instances of poor judgement by town leaders in local matters and I believe the establishment of this commission will allow for complaints to be lodged, with pertinent facts supporting. I also agree this will go far in increasing trust between residents and Ledyard local government, something I believe is waning currently. To that matter, while the draft I read is a very good start I would offer some changes if I may:

- Sec 2 - the following sentence leaves some ambiguity as to what this could allow: "Specific portions of this Ordinance shall not be applicable if they conflict in whole or in part with any labor agreement, employment contract or state statute." It would be beneficial if some high -level examples could be provided
- Sec 4, subsection J & M - I would suggest any former member of town government be prohibited from representing any party seeking business with or in the town, or seeking employment with that party for a term of three (3) years from their vacancy of their town position
- Any reference or suggestion, explicit or implied, to the mayor in office at the time having any control or oversight in the dealings of the Ethics Committee except for receiving reports of current status and/or findings

Thank you for your consideration,
Carlo Porazzi
30 Chapman Ln
Gales Ferry

Roxanne Maher

From: Jennifer Zeronson <jengetter@yahoo.com>
Sent: Tuesday, April 8, 2025 1:56 PM
To: Town Council Group; Roxanne Maher
Cc: Jennifer Zeronson
Subject: Support for Ethics Commission

Dear Town Council,

Thank you for all you are doing to lead our town.

I am writing today in strong support of an Ethics Commission / Code of Ethics in the Town of Ledyard. My understanding is that we are one of the few towns in the state that does not have one. Accordingly, examples are readily available and should provide a strong framework for our own.

This issue has been sporadically included on Council agendas for almost a year now. It is time for the Council to decisively act.

Jennifer Zeronson

18 Bluff Road West

Roxanne Maher

From: nelatwood@aol.com
Sent: Tuesday, April 8, 2025 1:33 PM
To: Town Council Group
Cc: Fred Allyn, III; Roxanne Maher; April Brunelle; Jessica Buhle; Kevin J. Dombrowski; Gales Ferry District
Subject: Ethics

Councilors:

I write in support of the recent letter submitted to you from Lee Ann Berry, President of the Gales Ferry District regarding an Ethics Code/Commission/Committee.

I urge you, for the protection of citizens and dedicated public servants of the Town of Ledyard, to address this matter as a priority and implement a Code of Ethics ASAP beginning with this week's meeting.

My question is: Why would anyone NOT want to have a Code of Ethics in place? It helps everyone to clearly define boundaries and ensure business is conducted fairly. Thank you for your consideration of this matter and for all your work.

Respectfully,
Ellen Atwood
8 Harvard Ter

Roxanne Maher

From: Joe Franzone <joefranzone@gmail.com>
Sent: Tuesday, April 8, 2025 6:11 PM
To: Town Council Group
Subject: Ethics

We should have an ethics committee.

It's common sense!

Please get on this and be suspicious of any who oppose it!

Thanks for all your time and efforts! Much appreciated!

Joe Franzone, 66 Hurlbutt Rd., 860-303-1387

--

'Every day's a Holiday!'



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2586

Agenda Date: 10/8/2025

Agenda #:

AGENDA REQUEST
GENERAL DISCUSSION ITEM

Subject:

MOTION to endorse the Community Relations Committee for Diversity, Equity & Inclusion's message to be distributed in the form of a Digital and possibly a Printed Flyer "*We Encourage all Ledyard Residents to Listen, Collaborate, and Find Common Ground. Progress comes from Teamwork*"

Background:

(type text here)

Department Comment/Recommendation:

(type text here)

Ledyard Community Relations Committee for DEI

**WE ENCOURAGE ALL LEDYARD RESIDENTS TO LISTEN,
COLLABORATE, AND FIND COMMON GROUND.**



PROGRESS COMES FROM TEAMWORK



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2449

Agenda Date: 9/24/2025

Agenda #:

POLICY-PROCEDURE

Motion/Request:

MOTION to set a Public Hearing (Hybrid Format - Video Conference and In-Person) Public Hearing date to be held on October 22, 2025 at 5:00 p.m. 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 And Ethics Commission*” ..

Background:

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.

Legal Notice :

Proposed Ordinance: