



TOWN OF LEDYARD CONNECTICUT

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

Administration Committee

~ AGENDA ~

Chairman Gary St. Vil

Regular Meeting

Wednesday, September 10, 2025

5:30 PM

Town Hall Annex- Hybrid Format

In -Person: Council Chambers, Town Hall Annex Building

Remote Participation: Information Noted Below:

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

<https://us06web.zoom.us/j/86519026631?pwd=6bU6XH8NZzYbYOkmR2JX1fa8dhcGKz.1>
Or by Audio Only: Telephone: +1 646 558 8656; Meeting ID: 865 1902 6631; Passcode: 901865

- I. CALL TO ORDER
- II. ROLL CALL
- III. RESIDENTS & PROPERTY OWNERS COMMENTS
- IV. PRESENTATIONS / INFORMATIONAL ITEMS
- V. APPROVAL OF MINUTES

MOTION to approve the Administration Committee Meeting Minutes of August 6, 2025

Attachments: [ADMIN-2025-08-06](#)

VI. OLD BUSINESS

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

Attachments: [DRAFT CODE OF ETHICS AND ETHICS COMMISSION-JESSICA-2025-09-08](#)
[AN ORDINANCE ESTABLISHING A TOWN OF LEDYARD CODE OF ETHICS AND ETHICS-ATTORNE RED LINE DRAFT](#)
[Town Attorneys-Ethics Ordinance-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 Commission email-2025-08-21](#)
[Schroeder ltr-Proposed Ordinance Creating a Code of Ethics & Ethics Commission-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- Franzoni 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 Commission - Wilkinson-email-2024-11-18](#)
[Ethics Commission-Edwards email-2024-12-07](#)
[Ethics Commission-Porazzi-email-2024-12-11](#)
[Ethics Commission-Schroeder ltr-2024-12-11](#)
[Jelden-Ethics Commission-email-2024-12-16](#)
[Murray - Ethics Commission-email-2025-1-08](#)
[Ethics Commission Ordinance-Ball email-2025-02-02](#)
[House of Representatives HB 6502 Ethics Reform 2008-07-09.pdf](#)
[ACC Municipal Ethics - Minimum Provisions \(2019\).docx](#)
[Representative France-Code of Ethics E-mail 2019-03-04.pdf](#)
[Ethics Commission-Ball-email-2025-02-02](#)
[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 Commissionemail-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 Commission-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 Commission-ltr -2025-04-08- Page 1-](#)
[Berry-Ethics Commission-ltr -2025-04-08- Page 2-](#)
[Khors-Ethics Commission-ltr -2025-04-08](#)
[Christy-Fogg-DEI-In Schools-email-2025-04-08](#)
[Porazzi-Ethics Commission-ltr -2025-04-08](#)
[Zeronsa-Ethics Commission-ltr -2025-04-08](#)
[Atwood-Ethics Commission-email-2025-04-08](#)
[Franzone-Ethics Commission-ltr -2025-04-08](#)

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

VII. NEW BUSINESS

1. MOTION to set a Public Hearing (Hybrid Format - Video Conference and In-Person) Public Hearing date to be held on October 8, 2025 at 6:15 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” .

2. MOTION to approve the proposed revisions to the Library Administrative Assistant & Head of Technical Services job description as presented in the draft dated September 2025.

Attachments: [Administrative Assistant and Tech Services DRAFT 2025.docx](#)

3. MOTION to approve the proposed revisions to the Library Technician I – Youth Services job description as presented in the draft dated September 2025.

Attachments: [Library Technician I - Youth Services DRAFT.docx](#)

4. 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](#)

5. 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](#)

6. 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](#)

7. Any New Business proper to come before the Committee

IV ADJOURNMENT

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



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2374

Agenda Date: 9/10/2025

Agenda #:

MINUTES

Minutes:

MOTION to approve the Administration Committee Meeting Minutes of August 6, 2025



TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL
HYBRID FORMAT

741 Colonel Ledyard Highway
Ledyard, CT 06339
860 464-3203
<http://www.ledyardct.org>
Roxanne M. Maher
Administrative Assistant

MINUTES
ADMINISTRATION COMMITTEE
SPECIAL MEETING

Wednesday, August 6, 2025

6:00 PM

Town Hall Annex Building

DRAFT

- I. CALL TO ORDER – The Meeting was called to order by Councilor Buhle at 6:00 p.m. at the Council Chambers Town Hall Annex Building.

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

II. ROLL CALL-

Attendee Name	Title	Status	Location	Arrived	Departed
Jessica Buhle	Committee Chairman	Present	In-Person	5:30 pm	6:20 pm
April Brunelle	Town Councilor	Present	In-Person	5:30 pm	6:20 pm
Kevin Dombrowski	Town Councilor	Present	In-Person	5:30 pm	6:20pm
Carmen Garcia-Irizarry	Town Councilor	Present	In-Person	5:30 pm	6:20 pm
Fred Allyn, III	Mayor	Present	In-Person	5:30 pm	6:20 pm
Christine Dias	Human Resources Director	Present	Remote	5:30 pm	6:20 pm
Kristen Chapman	Mayor's Executive Assistant	Present	Remote	5:30 pm	6:20 pm
M. Dave Schroder, Jr	Resident	Present	In-Person	5:30 pm	6:20 pm
Edwin Murray	Resident	Present	In-Person	5:30 pm	6:20 pm
Eleanor Murray	Resident	Present	Remote	5:30 pm	6:20 pm
Deborah Edwards	Resident	Present	Remote	5:30 p,	6:20 pm
Roxanne Maher	Administrative Assistant	Present	In-Person	5:30 pm	6:20 pm

III. CITIZENS' COMMENTS

Mr. Milton Dave Schroeder, Jr., 290 Whalehead Road, Gales Ferry, stated before he begins his comments that he wanted to be clear that his comments were not intended as a personal critique of the Town Attorney, noting that he appreciated the time and expertise he has contributed in editing the draft *Ordinance Creating a Code of Ethics and Establishing an Ethics Commission*. He stated the Town Attorney's insights are clearly thoughtful, grounded in legal reasoning, noting he recognized that he was speaking without the benefit of having heard the Town Attorney's full explanation for the revisions that have been made.

Mr. Schroeder went on to state in the interest of keeping this discussion focused on the content rather than individuals, that he would refer to the proposed revisions simply as "*the attorney edits*" or "*the edits.*"

Mr. Schroeder continued by stating as someone who was not legally trained, that he understands that some of these edits may be intended to streamline the language, removing redundant definitions or simplifying structure. He noted where that was the case, that he fully supported those changes. Clarity and simplicity serve everyone. However, he noted that there were other edits that he found more difficult to understand, and, in some cases, entire sections of the draft have been eliminated. He stated that he worried that these edits may substantially alter the intent or effectiveness of the Ethics Code itself.

Mr. Schroeder questioned whether the State provided a model template or example language to help municipalities establish effective codes of ethics and ethics commissions? He stated 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?*" He also questioned whether it was really this challenging to arrive at a workable Ethics Code with clear enforcement mechanisms, and he questioned whether they have even managed to do that? He stated 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.

Mr. Schroeder stated given the time and energy invested in this process, one would hope this Committee has produced a document that not only reflected the best practices, but sets a high standard. Otherwise, he stated that they risk ending up with a code that appears substantial but ultimately lacks the scope, authority, and the enforceability needed to be truly effective; and if was not effective, that perhaps the town would have been better served with the model template(s) and generic language.

Mr. Schroeder stated that he had about 1 ½ pages of comments regarding specific sections of the draft Ordinance. Councilor Buhle thanked Mr. Schroeder for his comments noting that the Town Council had a Special Meeting scheduled for 6:30 p.m. this evening. Therefore, she asked in the interest of time, that Mr. Schroeder leave his 1 ½ pages of comments regarding specific sections of the draft Ordinance with her this evening for the Administration Committee to review as part of their deliberation. She stated the Mr. Schroeder's comments would be attached to the meeting portal.

Mr. Edwin Murray, 26 Devonshire Drive, Gales Ferry, stated after reviewing the seventeen pages of the draft *Ordinance Creating a Code of Ethics and Establishing an Ethics Commission* he realized that the Town Attorney made the document more concise. He stated that the proposed Ordinance provides a framework that the town can work from. He stated the draft *Ordinance Creating a Code of Ethics and Establishing an Ethics Commission*, as edited by the Town Attorney, should be voted on and approved.

Mr. Murray continued by noting the draft *Ordinance Creating a Code of Ethics and Establishing an Ethics Commission* included all the town officials and employees, however, it does not include the management staff of the schools. He stated that he thought the draft Ordinance worked for the town and provided them with the opportunity for the town to move forward with the proposal.

Ms. Deborah Edwards, 30 Bluff Road - West, Gales Ferry, stated that she echoed Mr. Schroeder's comments this evening. She stated that she believed the Town Attorney's comments regarding the draft *Ordinance Creating a Code of Ethics and Establishing an Ethics Commission* helped to clarify the document and made it more concise. However, she stated the Town Attorney's rewrite of the document left out some things that she thought were important; and were things that they were all looking to include in the proposed Ordinance. She noted that Councilor Buhle mentioned that she had a telephone conversation with the Town Attorney regarding the proposal; and that she looked forward to Councilor Buhle relaying the reason for the Town Attorney's edits page-by-page and hearing the Administration Committee's discussion regarding the Town Attorney's edits. She stated until all this was accomplished she would urge the Administration Committee not to move forward with the draft *Ordinance Creating a Code of Ethics and Establishing an Ethics Commission*.

Ms. Edwards requested clarification on the process for the Town Council to adopt an Ordinance, noting that it was her understanding that after the Administration Committee forwards a proposed Ordinance to the Town Council that a Public Hearing would be held before the Town Council would vote on the proposed *Ordinance Creating a Code of Ethics and Establishing an Ethics Commission*. Councilor Buhle stated that Ms. Edwards's understanding was correct, in that a Public Hearing would be held prior to the Town Council's deliberation and vote on the proposed *Ordinance Creating a Code of Ethics and Establishing an Ethics Commission*.

Councilor Buhle thanked the residents for their comments.

III. PRESENTATIONS/INFORMATIONAL ITEMS - None.

IV. REVIEW AND APPROVAL OF PRIOR MEETING MINUTES

MOTION to approve the Regular Meeting Minutes of July 9, 2025
Moved by Councilor Dombrowski, seconded by Councilor Brunelle

VOTE: 3- 0 Approved and so declared

V. OLD BUSINESS

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

Councilor Buhle stated after the Administration Committee's June 11, 2025 meeting the draft "*Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*" was sent to Town Attorney Matt Ritter for his review. She stated that she and

Attorney Ritter spoke by telephone on June 26, 2025 for thirty minutes about the draft Ordinance. She stated there were about seven changes that were discussed to provide clarity, such as increasing the gift amount from \$25.00 to \$100.00. She stated there were also some sections of the draft Ordinance that were removed that Attorney Ritter asked her about, noting that during their conversations they had agreed to keep, however, she stated that some of those sections were removed in the draft Ordinance that Attorney Ritter sent back, even though Attorney Ritter agreed that they were legal and permissible.

Councilor Buhle continued by stating that Councilor Garcia-Irizarry put in a lot of work and effort to draft the proposed “*Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*” noting that the removed sections were being used in other towns Ethics Ordinances. She also noted that prior to submitting the draft Ordinance to Attorney Ritter that both she and Councilor Dombrowski provided some changes to the original framework that Councilor Garcia-Irizarry drafted. She stated that she felt that the Administration Committee had a strong working document, noting that she expected Attorney Ritter to make some changes. However, she stated the draft Ordinance Attorney Ritter returned to the Administration Committee did not fall in-line with her expectations of what she thought was going to get back.

Councilor Buhle noted that she has emailed Attorney Ritter stating that she had some concerns regarding the edited document she received from him because it did not match up with their telephone conversation they had regarding the draft “*Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*”. She stated that she strongly wanted to make sure they accomplish the goal to establish a Code of Ethics and Ethics Commission to protect the town in the future and to make sure they establish something that protected them going forward. She stated that she did not want “*perfect*” to get in the way of “*good*”; but that she did not want to adopt something that was not what the residents were looking for, noting that the Administration Committee agreed that they had a good starting draft Ordinance, and that she expected to receive some changes back from the Attorney Ritter.

Councilor Buhle stated that the Administration Committee would not be acting on the draft “*Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*” provided by Attorney Ritter this evening because she wanted the Committee to take some time to review Attorney Ritter’s recommendations to decide which recommendations they wanted to abide by and which sections they would like to see in the final draft.

Councilor Dombrowski stated that he agreed with Councilor Buhle’s recommendation to take some time to review Attorney Ritter’s recommendations, noting that 50% of the document was deleted; and the remaining 50% was reworded.

Councilor Dombrowski noted the document Mr. Schroeder provided to the Administration Committee this evening. He specifically addressed Mr. Schroeder’s comment regarding the following:

“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.”

Councilor Dombrowski explained the Connecticut General Statutes that enables Municipalities to establish an Ethics Commission only allowed Ethics Commissions to address financial matters, noting that an Ethics Commission cannot look at anything else. He stated someone cannot file an Ethics Complaint because they disagreed with a Town Official's decision on something. He stated that he wanted to provide this clarification because he was not sure what residents were expecting the Ethics Commission to look at. He stated the State Statute was specific **to personal financial gains while they were representing the town such as: embezzlement from the town, working on contracts that were self-imposed where they were the recipient of; and they was the person approving the contracts.**

Councilor Buhle stated that the Administration Committee would continue their work to draft an Ordinance that would protect the town and its residents; and would also fall in line with Connecticut General State Statutes.

Councilor Brunelle stated that it would be wise to sit back and take in Attorney Ritter's suggestions and weigh them against whether it was what the Administration Committee wanted versus whether it was fluff or really necessary. She stated that she would like more time to go through Attorney Ritter's recommendation.

Councilor Buhle suggested the Administration Committee review and compare the draft Ordinance they forward to Attorney Ritter to the mark-up draft they received back from Attorney Ritter. She asked that the Committee forward their comments and recommendations to the Administrative Assistant Roxanne Maher to compile for a discussion at a Special Meeting specially dedicated to work on the *Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*”.

RESULT: CONTINUED

Next Meeting:09/10/2025 5:00 p.m.

VII. NEW BUSINESS

1. MOTION to recommend the Town Council reappoint the following members the Agricultural Commission for a three (3) year term ending September 24, 2028:

- Ms. Allyson Angelini (U) 193 Iron Street, Ledyard (Regular Member)
- Ms. Katie Yuhase(U) 34 Meetinghouse Lane, Gales, Ferry (Regular Member)
- Mr. Steve Martic (R) 59R-2 Long Pond South, Ledyard (Alternate Member)

Moved by Councilor Brunelle, seconded by Councilor Dombrowski
Discussion: None.

VOTE: 3 – 0 Approved and so declared

RESULT: 3– 0 APPROVED TO RECOMMEND

MOVER: April Brunelle, Committee Member

SECONDER: Kevin Dombrowski, Committee Member

AYES: April Brunelle, Jessica Buhle, Kevin Dombrowski

2. MOTION to recommend the Town Council appoint Ms. Jennifer Bingham (D) 26 West Drive, Gales Ferry, as an Alternate Member to the Board of Assessment Appeals to complete a four (4) year term ending August 26, 2028 to fill a vacancy left by Mr. Nelson.

Moved by Councilor Dombrowski, seconded by Councilor Brunelle
Discussion: None

VOTE: 3 – 0 Approved and so declared

RESULT: 3– 0 APPROVED TO RECOMMEND

MOVER: Kevin Dombrowski, Committee Member

SECONDER: April Brunelle, Committee Member

AYES: April Brunelle, Jessica Buhle, Kevin Dombrowski

3. MOTION to recommend the Town Council appoint Mr. Greg Lockhart (D) 30 Tanger Lane, Gales Ferry, to the Planning & Zoning Commission, as an Alternate Member to complete a three (3) year term ending December 31, 2025 to fill a vacancy left by Mr. Harwood.

Moved by Councilor Brunelle, seconded by Councilor Dombrowski

Discussion: None.

VOTE: 3 – 0 Approved and so declared

RESULT: 3– 0 APPROVED TO RECOMMEND

MOVER: April Brunelle, Committee Member

SECONDER: Kevin Dombrowski, Committee Member

AYES: April Brunelle, Jessica Buhle, Kevin Dombrowski

4. Any other New Business proper to come before the Committee – None.

VIII. ADJOURNMENT

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

VOTE: 3 - 0 Approved and so declared, the meeting was adjourned at 6:20 p.m.

Respectfully submitted,

Jessica Buhle
Committee Chairman
Administration Committee



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 24-0481

Agenda Date: 9/10/2025

Agenda #: 1.

ORDINANCE

Motion/Request:

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

Background:

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 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

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 signed signs 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 Communion, 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 Financiala 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(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.~~

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

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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www.shipmangoodwin.com

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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

- i. 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.
- ii. If the complaint is not in the proper form and/or the Ethics Commission determines that the allegations, even if true, would not constitute a violation of this Code then the Ethics Commission shall dismiss the complaint and duly notify the complainant in writing, with a copy to the Town Council and Mayor, of said fact and the reasons thereof; by registered or certified mail not later than ten (10) business days after said decision. Allegations applicable to other administrative, or judicial authority will be referred to the proper authority.
- iii. If the Ethics Commission determines that the complaint is in proper form and the allegations, if true would, constitute a violation of this Code then the Ethics Commission shall, not later than ten (10) business days after said determination, provide a copy of the complaint 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.

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 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 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?

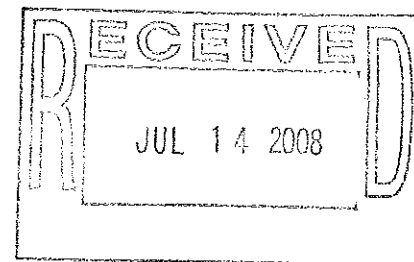
If this committee is put in place, all present and future volunteers should be made aware that anyone in town can file an ethics complaint against them. My friend was simply volunteering to make a good thing happen for the town. If the situation had been handled professionally, perhaps she wouldn't have 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 ☒ New ☐ 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) 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. 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 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.	
Reason for Proposal (Include significant policy and programmatic impacts) 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.	

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 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

Roxanne Maher

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 #: 25-2449

Agenda Date: 9/10/2025

Agenda #: 1.

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 8, 2025 at 6:15 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* .

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.

Department Comment/Recommendation:

(type text here)

Mayor Comment/Recommendation:

(type text here)

Body:

(type text here)



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2453

Agenda Date: 9/10/2025

Agenda #: 2.

JOB DESCRIPTION

Motion/Request:

MOTION to approve the proposed revisions to the Library Administrative Assistant & Head of Technical Services job description as presented in the draft dated September 2025.

Background:

A vacancy in the Library Technician II - Youth Services position allowed for a realignment of duties. This updated position would consolidate administrative assistant functions and technical services, which use more of the same skill set than technical services and youth services. The position is currently staffed and this will result in an upgrade for the current employee. The employee is currently pursuing an advanced degree in Library Sciences.

Department Comment/Recommendation:

Human Resources Comment/Recommendation:

The Director of Human Resources recommends the changes to the job description as presented.

Financial Information:

(type text here)

Mayor Comment/Recommendation:

(type text here)

TOWN OF LEDYARD
ADMINISTRATIVE ASSISTANT & HEAD OF TECHNICAL SERVICES
LIBRARY

NATURE OF WORK:

This position provides administrative support to ensure efficient operation of the Library and provides technical service functions for the Library professional staff: manages the daily business affairs of the library; serves as Director's Admin Assistant; maintains library records; creates statistical, financial, and other reports; performs secretarial duties for Department Heads and other library staff; compiles informational materials; and generates reports for Library Commission.

SUPERVISION RECEIVED:

The Administrative Assistant is supervised by the Library Director.

SUPERVISION EXERCISED:

The Administrative Assistant supervises Library staff and volunteers who assist with technical services (e.g., processing of materials for circulation).

ESSENTIAL JOB FUNCTIONS:

- Maintain records of all financial transactions including preparing invoices for payment, recording payments, balancing accounts, and banking
- Compile data and prepare financial and statistical reports for Director
- Understand and oversee the proper operation of library equipment
- Assist with staff training, preventive maintenance, troubleshooting, and arrange for repairs as needed for said equipment
- Assist the Director with grant applications, including product and pricing research.
- Assist the Director and Public Works with building maintenance issues that arise
- Work with outside I.T. vendors to coordinate computer equipment/software updates and other issues
- Handle routine correspondence for the Director and other staff as needed
- Catalog, classify, and process materials
- Maintain records of all donations including memorial and gift book donations
- Maintain office and building supply inventory, place orders as needed, and verify receipt
- Anticipate supply needs, research vendors for the best price, and keep up with the bid/contract pricing lists from various sources
- Maintain Safety Data Sheet (SDS) notebook as required by OSHA and train staff on its use
- Distribute daily mail
- Assist with circulation duties as needed, including checking items out to patrons, discharging returned materials, entering patron data, collecting fines, and clearing patron records
- Work in other library departments when assigned

ADDITIONAL DUTIES:

- Recruit, train, and supervise library employees and volunteers who assist in technical services
- Run errands for the library
- Organize supplies, other library items, and storage areas for all staff
- Collaborate with staff on projects as needed
- Attend continuing education workshops and conferences as needed
- Perform a variety of library clerical tasks as assigned

- Other duties as required

******The duties listed above are intended only as illustrative of the various types of work that may be performed. The omission of specific statements of duties does not exclude them from the position if the work is similar, related, or a logical assignment to the position.******

QUALIFICATIONS PROFILE:

Knowledge, Skills, and Ability:

- Knowledge of and skills in utilizing computers and general office machines
- Knowledge of modern office practices and procedures
- Knowledge of library policies, procedures, and administrative practices
- Detail-oriented with good problem solving skills
- Excellent organizational, planning, and time management skills
- Proficiency in MS Office
- Ability to establish and maintain effective working relationships with vendors and co-workers

Education, Experience, and Training:

Bachelor's degree preferred and two years of experience in a clerical position or the equivalent in practical experience. Library experience preferred.

Physical Demands:

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodation may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee is frequently required to talk; sit; bend or twist; stoop or crouch; use hands, fingers, wrists, or perform repetitive motions; handle/feel objects or controls; and reach with hands and arms. The employee must occasionally walk, climb stairs to various levels, and lift and/or move up to 25 pounds. The employee must maintain continuous visual acuity including close vision, the ability to focus, and hand-eye coordination. The employee must maintain normal auditory ability and the ability to communicate conversationally and by phone.

The employee must be free from mental and physical disorders which would interfere with performance of duties as described and have the ability to maintain composure with the public and coworkers in everyday stressful and emergency situations.

*******This job description does not constitute an employment agreement or contract between the employer and the employee and is subject to change by the employer as the needs of the employer and job requirements change.*******

Adopted at Ledyard Town Council meeting on

DRAFT 9/2025

_____, Chairman



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2452

Agenda Date: 9/10/2025

Agenda #: 3.

JOB DESCRIPTION

Motion/Request:

MOTION to approve the proposed revisions to the Library Technician I - Youth Services job description as presented in the draft dated September 2025.

Background:

The employee who was in the existing position “Library Technician II - Youth Services” submitted notice and the Library Director asked that we realign this position and the Administrative Assistant position. Both positions are in the Town Hall and Public Library Employees union. Once the position is approved by Town Council, we will advertise to fill the vacancy.

Department Comment/Recommendation:

Human Resources Comment/Recommendation:

The Director of Human Resources recommends the approval of the job description as presented.

Financial Information:

(type text here)

Mayor Comment/Recommendation:

(type text here)

TOWN OF LEDYARD

Library Technician I – Youth Services

GENERAL STATEMENT OF DUTIES:

The Library Technician I – Youth Services works in conjunction with the Assistant Librarian I – Youth Services to assist in providing services and programs to children from birth to age 18. .

SUPERVISION RECEIVED:

The Library Technician I – Youth Services is supervised by the Assistant Librarian I – Youth Services and/or the Library Director.

SUPERVISION EXERCISED:

The Library Technician I – Youth Services supervises the staff and the volunteers in the Assistant Librarian's absence.

ESSENTIAL JOB FUNCTIONS:

- Provide reference and reader advisory services to children, teens, parents, caregivers, teachers, and adults in person and over the phone
- Assist patrons in the children's room in locating materials, using the online catalog, accessing library databases, and using library mobile applications
- Plan and perform story times and other programs as assigned
- Assist in preparing materials and activities for programs along with bibliographies, fliers, displays, and publicity for youth services
- Understand and able to perform all jobs related to circulation including checking out books to patrons, discharging returned materials, entering patron data into the computer, collecting fines, clearing patron records, placing holds, and renewing items
- Operate equipment as needed
- Interpret library rules and policies
- Work with staff and volunteers to shelve, shelf read, and shift in the children's room as needed

ADDITIONAL DUTIES:

- Attend continuing education workshops and conferences as needed
- May be assigned Sunday work responsibilities
- Perform other duties as required

******The duties listed above are intended only as illustrative of the various types of work that may be performed. The omission of specific statements of duties does not exclude them from the position if the work is similar, related, or a logical assignment to the position. ******

QUALIFICATIONS PROFILE:

Knowledge, Skills, and Ability:

- Knowledge of the principles and practices of public library functions

- Knowledge of youth literature
- Knowledge of the use of computers in libraries
- Knowledge of the bibliographic standards of cataloging
- At ease working with youth
- Ability to relate in a friendly and open manner with youth and caregivers
- Ability to establish and maintain effective working relationships with coworkers

Education and Experience:

Bachelor's degree preferred along with a minimum of one year library experience and the ability to work with youth

Physical Demands:

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodation may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee is frequently required to talk; sit; bend or twist; stoop or crouch; use hands, fingers, wrists, or perform repetitive motions; handle/feel objects or controls; and reach with hands and arms. The employee must occasionally walk, climb stairs to various levels, and lift and/or move up to 25 pounds. The employee must maintain continuous visual acuity including close vision, the ability to focus, and hand-eye coordination. The employee must maintain normal auditory ability and the ability to communicate conversationally and by phone.

The employee must be free from mental and physical disorders which would interfere with performance of duties as described and have the ability to maintain composure with the public and coworkers in everyday stressful and emergency situations.

******This job description does not constitute an employment agreement or contract between the employer and the employee and is subject to change by the employer as the needs of the employer and job requirements change. ******

Adopted at Ledyard Town Council Meeting on _____.

Chair



TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 25-2433

Agenda Date: 9/10/2025

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 have 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	☒ 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:

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 #: 25-2457

Agenda Date: 9/10/2025

Agenda #: 5.

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
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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
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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	
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Mr. Justin DeBrodt 5 Erins Way Ledyard, CT 06339	U	10/31/2025	Y N	☐ Y ☐ N	☐ Excellent ☐ Good ☐ Fair ☐ 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

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 #: 25-2434

Agenda Date: 9/10/2025

Agenda #: 6.

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:

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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	☒ Y ☐ N	Y N	☒ Excellent ☐ Good ☐ Fair ☐ Poor
Mr. Ellin M. Grenger 15 Bittersweet Drive Gales Ferry, CT 06335	D	11/7/2025	☒ Y ☐ N	Y N	☒ Excellent ☐ Good ☐ Fair ☐ Poor
Ms. Barbara Candler 3 Goulart Road Ledyard, CT 06339	D	11/7/2025	Y ☒ N	Y N	☒ Excellent ☐ Good ☐ Fair ☐ Poor
Cynthia Wright 6 Laurel Leaf Drive Gales Ferry, CT 06335	D	11/7/2025	☒ Y ☐ N	Y N	☒ Excellent ☐ Good ☐ Fair ☐ Poor
Ms. Elizabeth Rumery 2 Bluff Road Gales Ferry, CT 06339	D	11/7/2025	☒ Y ☐ N	Y N	☒ Excellent ☐ Good ☐ Fair ☐ 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

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Ledyard, CT 06339-1551
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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	☒	11/7/2025	Y N	Y N	☐ Excellent ☐ Good ☐ Fair ☐ Poor
Mr. Ellin M. Grenger 15 Bittersweet Drive Gales Ferry, CT 06335	D	11/7/2025	Y N	☒ Y N	☐ Excellent ☒ Good ☐ Fair ☐ Poor
Ms. Barbara Candler 3 Goulart Road Ledyard, CT 06339	D	11/7/2025	Y N	☒ Y N	☐ Excellent ☒ Good ☐ Fair ☐ Poor
Cynthia Wright 6 Laurel Leaf Drive Gales Ferry, CT 06335	D	11/7/2025	Y N	☒ Y N	☐ Excellent ☒ Good ☐ Fair ☐ Poor
Ms. Elizabeth Rumery 2 Bluff Road Gales Ferry, CT 06339	D	11/7/2025	Y N	☒ Y N	☐ Excellent ☒ Good ☐ Fair ☐ 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