



**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  
REGULAR MEETING

Wednesday, September 10, 2025

5:30 PM

Town Hall Annex Building

**DRAFT**

- I. CALL TO ORDER – The Meeting was called to order by Councilor Buhle at 5:30 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	6:25 pm
April Brunelle	Town Councilor	Present	In-Person	5:30 pm	6:25 pm
Kevin Dombrowski	Town Councilor	Present	In-Person	5:30 pm	6:25 pm
Gary St. Vil	Town Council Chairman	Present	Remote	5:30 pm	6:25 pm
Carmen Garcia-Irizarry	Town Councilor	Present	In-Person	5:30 pm	6:25 pm
Bill Barnes	Town Councilor	Present	In-Person	5:30 pm	6:25 pm
Tim Ryan	Town Councilor	Present	Remote	5:30 pm	6:25 pm
Fred Allyn, III	Mayor	Present	In-Person	5:30 pm	6:25 pm
Christine Dias	Human Resources Director	Present	In-Person	5:30 pm	6:25 pm
Patricia Riley	Town Clerk	Present	In-Person	5:30 pm	6:25 pm
M. Dave Schroder, Jr	Resident	Present	In-Person	5:30 pm	6:25 pm
Joanne Kelley	Resident	Present	In-Person	5:30 pm	6:25 pm
Eric Treaster	Resident	Present	Remote	5:30 pm	6:25 pm
Whit Irwin	Resident	Present	In-Person	5:30 pm	6:25 pm
Deborah Edwards	Resident	Present	Remote	5:30 pm	6:25 pm
Sharon Pealer	Resident	Present	In-Person	5:30 pm	6:25 pm
Jay Pealer	Resident	Present	In-Person	5:30 pm	6:25 pm
Dan Pealer	Resident	Present	In-Person	5:30 pm	6:25 pm
Jeff Eilenberger	Resident	Present	In-Person	5:30 pm	6:25 pm
Anne Roberts-Pierson	Resident	Present	In-Person	5:30 pm	6:25 pm
Steve Munger	Resident	Present	In-Person	5:30 pm	6:25 pm
Angela Cassidy	Resident	Present	In-Person	5:30 pm	6:25 pm
Wendy Hellekson	Resident	Present	Remote	5:30 pm	6:25 pm
Alyssa Siegel-Miles	Resident	Present	Remote	5:30 pm	6:25 pm
Roxanne Maher	Administrative Assistant	Present	In-Person	5:30 pm	6:25 pm

### III. CITIZENS' COMMENTS

**Mr. Whit Irwin**, 2 Winfield Way, Ledyard, noted tonight's Administration Committee Agenda included a motion to create an Ethics Commission for the Town of Ledyard. He stated that he was present this evening to expressed his opposition to the draft Ordinance. He stated that he opposed this idea as much as he opposed flying Third Party Flags that this Town Council considered within the last year. He stated creating an Ethics Commission was a horrible idea stating that they were bloating the government even more, commenting that thanks to this Town Council his taxes were even more this year than they were. He stated in reading the proposed "*Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*" dated September 8, 2025 that they were creating more paperwork and requirements, noting that it was a burdensome processes, and more work for the town, pointing out that this Town Council already cut some of the staff's pay. He stated when a proposal to Establish an Ethics Commission was previously brought before the Town Council it was resoundly rejected, and therefore, they should not consider it again. He stated while he was serving on the Town Council there was at least one occasion, when it was brought up by one person, who was no longer here. He went on to state that it was also mentioned that there was a lot of hard work that went into it drafting the proposed Ordinance. However, he stated that he would stipulate that a lot of hard work does not make it a good idea. He stated a lot of hard work that went into bombing World Trade Center in 2001, noting that the 24<sup>th</sup> Anniversary was tomorrow. He stated that he would think that most people would not think that was a good idea either. He stated that he wanted to be On the Record that *Establishing an Ethics Commission for the Town of Ledyard* was a horrible idea and that it they should Vote it down; commenting that it was making more Big Government. Mr. Irwin stated that during the last 20-years that Ledyard had two cases. Therefore, he stated *Establishing a Code of Ethics and Ethics Commission* was a solution looking for a problem. Thank you.

**Mr. Jeff Eilenberger**, 2 Village Drive, Ledyard, stated that he echoed Mr. Irwin's comments. He stated he did not know if anybody here remembered Hugh Hefner, and the Spruce Goose which was a massive, wooden flying boat that flew only once in 1947 and was now on display at the Evergreen Aviation & Space Museum, in Minnville, Oregon. He stated a lot of work went into Spruce Goose, noting that he thought the Spruce Goose had a total flight of about 15 seconds, noting that Howard Hughes was the wrong guy. He stated that he reviewed the proposed "*Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*" dated September 8, 2025; and that what he sees was that they would be creating a lot of attorney fees. He noted an Ethics Complaint in Montville that occurred in 2011 in which they spent \$18,000 on two Ethics Cases. He stated that Ledyard does not have that kind of money to spend, noting that some say that would never happen. He stated that he was totally against Establishing an Ethics Commission stating that it was not wanted or needed. Thank you.

**Mr. Steve Munger**, 12 Nutmeg Drive, Ledyard, thanked their elected officials for their dedication, even though most of the time he thought they were going in the wrong direction, noting that he understands that serving their community takes some of their personal time away from your family, and therefore, he always respected them. He stated although he did not do a lot of research on the proposed “*Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*” dated September 8, 2025; that he would support the comments made by the previous two speakers. He stated the Town already have documents in place that allows the Town Council to pursue the same exact thing they were trying to accomplish with the establishing of an Ethics Commission that was going to cost the town money. Therefore, he questioned the reason they do not just follow the procedures and policies already in place and save the town some money. He stated that this Town Council should stop dividing the community on every stupid thing that comes up. He concluded his comments by stating “*Be careful what you wish for*”. Thank you.

**Mr. Milton Dave Schroeder, Jr.**, 290 Whalehead Road, Gales Ferry, stated that he was going to take a bit longer than the allotted three-minute limit, noting that Angela Cassidy and Leanne Berry have conceded their three-minutes to him, if they were allowed to do so, noting that he would keep his comments to under nine-minutes.

Councilor Buhle asked the Mr. Schroeder keep his comments as short as possible, especially if he was going to read exactly what he already submitted in writing this evening, noting that his written communication as part of the public record. Mr. Schroeder stated that he would not be reading the written comments he submitted to the Town Council prior to tonight’s meeting.

Mr. Schroeder thanked the Administration Committee for the opportunity to speak. He stated that tonight he wanted to focus on Exhibit 5, “*SCHROEDER — Proposed Changes CoE 9\_10\_2025*.” He stated because the Committee had the text already in front of them, that he would not read his Exhibit 5 and instead he would explain why his proposed changes were necessary — and why the draft Ordinance dated September 8, 2025 was not ready for adoption.

Mr. Schroeder proceeded by noting the following:

- Section 3. Applicability — covering town attorneys. As written, the Code does not clearly apply to town attorneys. Yet they play a central role in advising and shaping decisions. Because they serve as contractors, not employees, they fall through the cracks unless we make this explicit. That loophole undermines accountability at the very core of government. A simple phrase fixes this: include town attorneys as covered contractors. Norwich does this; Ledyard should too.
- Section 4. Definitions — clarity around “contractor.” Right now, “contractor” is undefined. That leaves open the question of who the Code actually covers. Norwich solved this years ago by writing a clear, comprehensive definition into its ordinance. Ledyard should borrow that language. Without it, we are left with ambiguity and loopholes that will be exploited.

- Section 5. Conflict of Interest — consistency. The draft mentions officers and employees, but not contractors. That omission means attorneys and other contract staff would not be bound by conflict-of-interest rules. It's a glaring oversight. This isn't a minor drafting detail. It's the difference between a Code that actually applies across the board and one that leaves powerful actors untouched.
- Section 7.1. Membership — protecting independence. Section 7.1 allows each political party to hold two seats on a five-member Commission. At first glance that seems fair. But combine it with the four-vote requirement for probable cause, and suddenly each party has a built-in veto. That structure guarantees deadlock in any politically sensitive case. Two votes alone can kill an investigation before it starts. Ask yourself: how does the public trust a Commission that can't even begin an investigation because of partisan vetoes? They won't. And perception matters just as much as outcome. There are better models. One option is limiting each party to one seat, requiring the majority of Commissioners to be independents or unaffiliated. Another option is Norwich's approach: five Page 1 of 3 regular members, four alternates, no special partisan entitlements. That has worked there for decades.
- Section 7.3. Authority and Duties — the heart of the Commission. Section 7.3 is framed so narrowly it reads as though the Commission has no real role. It lists consulting the Town Attorney, requesting advisory opinions — but nowhere does it clearly say the Commission can receive, investigate, and adjudicate complaints. That omission creates a structural problem: what is this Commission even for, if not to investigate? The ordinance must say it, clearly and explicitly. And one more point: the draft states the Commission can only consult with an attorney if authorized by the Town Council. That undermines independence. An Ethics Commission must be free to seek outside counsel without political permission. Otherwise, you've hobbled it at the start.
- Section 7.4. Filing of Complaints. The language in 7.4 could be misread to carve out complaints that involve management of town employees. Yes, employment issues should remain with management — but when violations of the public trust are alleged, the Ethics Commission must have authority to investigate. A clarifying clause makes that distinction cleanly.
- Section 7.5. Probable Cause — the danger of requiring four votes. Section 7.5 requires four votes to find probable cause. That is too high. Why? Because combined with the partisan membership rules, it gives each party veto power. It effectively creates two tiers of accountability: some people can never be investigated, no matter the evidence. Worse, it risks flipping the burden of proof. If only four votes are required both to establish probable cause and to find a violation, then respondents are essentially guilty until proven innocent. That is not how justice works. A simple majority is the fair and workable standard. Anything else erodes legitimacy.
- Section 7.7. Final Decisions — aligning with the Charter.

Councilor Dombrowski stated that Mr. Schroeder's time was up.

Mr. Schroeder stated he was almost done with his comments and proceed noting the following:

- Finally, Section 7.7 should be corrected to align with the Town Charter. The Ethics Commission should make findings and recommendations; discipline or removal rests with the Council or the Mayor. That division of authority is already written into the Charter. The ordinance must reflect it. Closing. At its core, an ethics code is about protecting public trust. People need to know their government operates impartially, that public office isn't being used for personal gain, and that Page 2 of 3 the rules apply equally to everyone — attorneys, employees, contractors, and elected officials alike. This draft does not achieve that. It is too narrow, too politicized, and too weak. Other towns have functioning Codes of Ethics that have stood for decades. We should use those models instead of adopting a flawed ordinance that will fail the first time it is tested. Commissioners — you've had over a year to refine this draft. It is still not there. If these deficiencies are not addressed, the Town Council should reject it outright and demand a workable code. The people of Ledyard deserve a Commission that is independent, fair, and strong enough to hold everyone accountable. Mr. Schroeder stated that anything less was unacceptable.

**Ms. Joanne Kelley**, 12 Thames View Pentway, Ledyard, stated that she did not plan to speak this evening. However, she stated in listening to residents' comments that she did not understand how anybody could be against having Code of Ethics or an Ethics Commission. She noted as a Realtor for thirty-years that they work in a field where they operate under a very rigorous code of ethics; and she noted that nobody has anything to fear from it. She stated when a complaint was made against somebody, and they were in-fact found guilty of violating the code of ethics that 90% of the time it was a simple misunderstanding of what the rules were that established the Code of Ethics. She stated having a Code of Ethics would just give everybody a framework under which they all understand that they were going to work under. She stated in a small town like Ledyard that it was almost impossible for town government to do business where there were not going to be some elements of Conflicts of Interest where people's interests overlap. She stated having a Code of Ethics was mainly about transparency and letting the residents know when there were conflicts of interest.

Ms. Kelley went on to note that recently the Planning & Zoning Commission held a Public Hearing regarding the Cashman's Application for a development at the former Dow Chemical/Styrenics Site in Gales Ferry. She stated a member of the Planning & Zoning Commission had a direct Conflict of Interest because he had a job in which he was paid to promote the interests of the Applicant. She stated eventually the Commission Member recused himself, but that it took a little bit of an effort, noting that she believed the Attorney had to recuse themselves as well, because there was another Attorney within his Law Firm that also represented the Applicant. Therefore, she stated that having a Code of Ethics and Ethics Commission would help with these types of things, noting as she previously said that most of the time when there was a violation, even when there

was a guilty finding it was just a question of education, stating that it may only require a letter of admonition. She stated that she thought that people were envisioning that this was going to be like people would be drawn and quartered if they make a mistake. However, she stated that was not the purpose at all, noting that it was about the Establishing a Code of Ethics as a framework rather than the enforcement, although they would have to have enforcement. Therefore, she stated that she just did not understand how anybody could be against this proposal, noting that she was a volunteer; she sits on the professional standards committee, she sits on the hearing panels for the Board of Realtors, and it's all volunteer, and there was no money involved, stating that nobody gets paid for that. Thank you.

***Mayor Fred Allyn, III***, 362 Colonel Ledyard Highway, stated that he wanted to point out the following:

- The Connecticut General Statutes identifies the Code of Ethics, issues.
- The Town Charter Chapter III; Section 9 (page 11) – The power of investigation is vested with the Town Council.- Mayor Allyn questioned the reason the Town Council would want to relegate that authorization to another group of volunteers.
- Town Council has a Fraud Policy that covers a lot. Mayor Allyn noted on two occasions the Town Council Investigated Tax Collector Yvonne Bell and Water Pollution Control Authority Executive Assistant Cindy Cross who both embezzled money. He stated in both cases the Town Council followed the process, and both employees were prosecuted, served time, and the Town was made whole.
- Town Employee Handbook covers the following:
  - ✓ Conflict of Interest (page 20)
  - ✓ Outside employment (page 21)
  - ✓ Nepotism (page 20)
  - ✓ Appendix 8 covers the use of town vehicles.

Mayor Allyn continued by addressing the proposed “*Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*” dated September 8, 2025; specifically Section 7; Subsection 8 “Penalties for Violations of the Code of Ethics” in which they list the following Penalties:

- ✓ Suspension without pay.
- ✓ Demotion
- ✓ Termination of employment
- ✓ And/or removal from elected or appointed office;

Mayor Allyn stated that all of these Penalties directly go to against the town's collective bargaining agreements, stating that the Town would lose all of these cases every time; as well as lose tens of thousands of dollars. He also stated that they cannot remove of an elected official, explaining that there is no recall in the State of Connecticut. Therefore, he stated the proposed “*Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*” dated September 8, 2025 was riddled with issues.

Mayor Allyn went on to state that he did not understand why the Administration Committee had the Town Attorney review the draft Ordnance and provide his legal recommendations to only to go back and make changes to the draft he provided. He stated the Town spent \$4,000 for the legal review; and it seemed like they were back to the drawing board. He stated in looking at the proposed Ordnance that 99% of what the Administration Committee was trying to cover already existed in the documents he mentioned this evening. He stated that he did not know who has looked at the Employee Handbook, stating that many of these things were covered, noting that the Employee Handbook was on the town's website. Thank you.

**Ms. Patricia Riley**, Ledyard Town Clerk, stated that she was present this evening to address some of the issues she had with the proposed "*Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*" dated September 8, 2025 because of the Town Clerk's involvement in the process regarding the filing of Ethics Complaints and other associated work. She stated that no one from the Administration Committee contacted her to discuss all of the Town Clerk's responsibilities provided in the proposed Ordinance.

Ms. Riley continued by addressing the following concerns:

- Freedom of Information Act (FOIA) concerns
  - ✓ Ordinance stated that Ethic Issues were not a matter of public record – Ms. Riley stated that the proposed Ordinance names the Town Clerk as the person to receive the Ethics Complaints. She would have liked to have the opportunity to research this with FOIA, the State of Connecticut and other towns if the Town Clerks were doing this work.
  - ✓ Ethic Commission Member emails – Ms. Riley questioned whether the volunteers who were serving on the Ethics Commission would be specifically told that they could only use a town email account, noting that some people may use their personal email address. She questioned what would happen to the paperwork if they resign off from the Ethics Commission or their term ended.
  - ✓ Storing of the Ethic Complaints and Associated Documentation – Ms. Riley questioned where she was supposed to store these records in her office so that they were away from other staff, including the Assistant Town Clerk, if she, as the Town Clerk, was the only one authorized to receive these documents.
  - ✓ Five-day turnaround time provided in the proposed Ordinance – Ms. Riley questioned what would happen if she was on vacation for a week and they have a weekend involved. Her five-days to provide the notification would be up. Then someone could file an Ethics Complaint on her because she did not meet the required timeline. She stated that she was not comfortable with being in that position, because the Assistant Town Clerk could not take the paperwork. She stated that it did not seem reasonable that the Assistant Town Clerk could not receive the documentation. However, she stated if the Assistant Town Clerk could take in the documentation that she would be privy to the information as well, and then where was the confidential level here.
  - ✓ Records Retention Laws – Ms. Riley noted that the State Library has specific record retention schedules.

- ✓ What if someone files an Ethics Commission complaint on a member of the Ethics Commission,. She questioned whether there was a process for that. there was not a process for how to handle that.
- ✓ Section 6 “*Disclosure of Interests Required*” stated that all Town Council Members, Counselors, Board of Education Members, and the Mayor shall file each year before or on January 1st a form to be prepared by the by the Town Attorney, a statement under oath containing all of their financial interests, etc. Ms. Riley questioned who was going to give that oath. Would it be a Conflict of Interest for her to administer the Oath, if all of this was going through the Town Clerk’s Office. She stated that this was something the Administration Committee may want to think about, noting that perhaps the Forms should be Notarized elsewhere before the Form is submitted to the Town Clerk’s Office.
- ✓ Workflow – Ms. Riley stated that no one really understands the workflow. She stated the Town Clerk’s Office was a two- person office. She stated that she worked almost every single night. Therefore, she stated to have all of this work fall under my office, without the Assistant Town Clerk involved it was not realistic or reasonable.

Ms. Riley stated the proposed “*Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*” dated September 8, 2025 seemed like a lot of unnecessary work when the Town Charter stated that all the Town employees were under the Mayor; and the Board of Education employees and Superintendent were under Board of Education, and the elected officials are under the Town Council. She stated that it would only make sense for Ethics Complaints to go to the proper Department or or Officials, and not through the Town Clerk’s Office to to create that.

Ms. Riley stated questioned whether the Administration Committee looked at Code of Ethics in other towns such as Montville. She stated that these were just some things that she thought the Administration Committee should look at before they decided to move forward with the proposal as presented in the draft dated September 8, 2025. Thank you.

**Ms. Wendy Hellekson**, 14 L Lakeside Drive, Ledyard, stated that she was not planning on speaking tonight, but in hearing all these comments and concerns that she wanted to say that as a governing body that it was extremely important to have an Ethics Commission. She noted that the United States Supreme Court has no ethics over it right now, and they were catching a lot of heat, and there were a lot of conflicts of interest, and there was no redress for it, noting that was problematic. She stated that she was a teacher and that she they had extremely strong ethics they needed to follow. She also noted that she knew that Real Estate Agents have strong ethics, stating that both of her parents worked in jobs where they had to follow ethics things. She stated that she was extremely concerned that people in town would not have want to have an Ethics Board to oversee and to make sure that everybody was doing the right thing, regardless of party, regardless of who you are. She stated that it was extremely important to make sure that things are running smoothly and correctly. Thank you.

**Mr. Tim Ryan**, 62 Inchcliffe Drive, Gales Ferry, Town Councilor, attending remotely via Zoom, stated like many others this evening that he was not planning on speak on the proposed “*Ordinance Establishing a Code of Ethics and Ethics Commission for the Town*

*of Ledyard*" dated September 8, 2025. However, he stated that he would echo a lot of the concerns that have been voiced already. He stated in reviewing the proposal that it smacks of a solution looking for a problem. He noted as the Mayor had stated, the town already have a number of documents, policies and procedures that handle Ethics Concerns, the chief among them were: Connecticut General Statutes; Town Charter; Employee Handbook, and their Fraud Policy. He stated that Ledyard has not had any issues that these documents were not able to address. He stated with that being said, that he did not want people to think that he was not concerned about having ethics. However, he was merely saying that the Town of Ledyard already had policies, procedures, and processes in place to address those concerns. He stated if they were going to be forming an Ethics Commission that it would require town resources and recurring expenses in the town's annual budget. He stated aside from fact that he did not feel that an Ethics Commission was a necessary activity; that it seemed unwise for the Administration Committee to disregard any comments or edits the Town Attorney provided in his red line edited draft Ordinance. He stated the Town Attorney's job was to protect the town from liability; stating that was what the Town Attorney gets paid to do. He stated that he also had concerns that the Town Clerk was not involved in process to draft the proposed Ordinance, especially because of the required involvement of the Town Clerk's Office. He stated this was major misstep and needed to be corrected before anything happens. Thank you.

**Ms. Deborah Edwards**, 30 Bluff Road - West, Gales Ferry, attending remotely via Zoom, stated that she was in-favor of moving forward with the proposed "*Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*" dated September 8, 2025. She stated during the past year that she has spoken a couple of times on this subject. She stated although many of the issues were covered, that not everything was addressed in the proposed Ordinance. She noted as Ms. Kelley mentioned earlier this evening, that there have been things going on in meetings for a year and a half. She stated that they have been being told that there have never been any problems; and now they were hearing well okay, there have been problems in past years; but they were addressed. She stated without the proper Guidelines and a Procedure to follow that many people would not know where to go first. She stated that she thought having a Code of Ethics and Ethics Commission would be helpful for anybody taking on an elected or an employee role, or even as a volunteer to know that they have something to look at to know what is expected of them and what they should steer clear from, noting that it would be like a handbook for the protection of all. She stated that everybody has some kind of personal story they can relay noting that she has been reading and hearing some of them. However, she stated if the town had a Code of Ethics; Ethics Commission and Complaint Forms that they could look up on the town website that it would help somebody if they really have a complaint, noting that she was not talking about neighborhood gossip or confrontations because somebody did not get their way. She stated that having a Code of Ethics and an Ethics Commission was not going to create more confrontation. Thank you.

**Ms. Angela Cassidy**, 62 Hurlbut Drive, Gales Ferry, stated that they were not trying to reinvent the wheel, noting that all the towns around Ledyard have Ethics Commissions commenting that it was not abnormal. She stated that Ledyard does have some issues

with how the Code of Ethics was written; or how the Commission it would be operating. However, she stated that this should be a group effort to come together and create a system that worked for the town. She stated that this should not be a partisan issue; this should be something that everybody wanted to protect, their Town Councilors protect their government, and most of all to protect their citizens. That's all.

Councilor Buhle thanked all the residents for their comments.

III. PRESENTATIONS/INFORMATIONAL ITEMS - None.

IV. REVIEW AND APPROVAL OF PRIOR MEETING MINUTES

MOTION to approve the Special Meeting Minutes of August 6 2025

Moved by Councilor Dombrowski, seconded by Councilor Brunelle

VOTE: 3– 0 Approved and so declared

Councilor Buhle stated without objection and in the interest of managing their time that she would like to change the order of tonight's business to address New Business before getting into Old Business and their discussion regarding the *proposed “An Ordinance Establishing a Town of Ledyard Code Of Ethics”*. The Administration Committee agreed to address New Business before Old Business this evening.

VII. NEW BUSINESS

1. MOTION to recommend the Town Council approve the proposed revisions to the Library Technician I – Youth Services job description, as presented in the draft dated September 2025.

Moved by Councilor Dombrowski, seconded by Councilor Brunelle

Discussion: Director of Human Resources Christine Dias explained that they were making some updates to a couple of the Library job descriptions. She stated that they currently have a vacancy for the former position, which was titled “*Library Technician II Youth Services*”. She stated that they were moving the Technical Services aspects from this Library Youth Services position to the Administrative Assistant Position, which was the next item on tonight's agenda (Item #2), because those skill sets go better together. She concluded by stating that the updates to both of the Library job descriptions on tonight's Agenda was to just realign them with the appropriate skill sets.

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

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

Moved by Councilor Dombrowski, seconded by Councilor Buhle  
Discussion: See discussion above (Item #1).

VOTE: 3 – 0 Approved and so declared

<b>RESULT:</b>	<b>3– 0 APPROVED TO RECOMMEND</b>
<b>MOVER:</b>	Kevin Dombrowski, Committee Member
<b>SECONDER:</b>	Jessica Buhle, Committee Member
<b>AYES:</b>	April Brunelle, Jessica Buhle, Kevin Dombrowski

3. MOTION to recommend the Town Council 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

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

VOTE: 3 – 0 Approved and so declared

<b>RESULT:</b>	<b>3– 0 APPROVED TO RECOMMEND</b>
<b>MOVER:</b>	April Brunelle, Committee Member
<b>SECONDER:</b>	Kevin Dombrowski, Committee Member
<b>AYES:</b>	April Brunelle, Jessica Buhle, Kevin Dombrowski

4. MOTION to recommend the Town Council 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 Thomposn.

Moved by Councilor Dombrowski, seconded by Councilor Brunelle  
Discussion: It was noted that Mr. Thompson was currently serving as an Alternate Member on the Inland Wetland & Water Courses Commission. With Ms. Lynmarie Thomposn's vacancy IWWC Chairman DeBrodt requested that Mr. Thompson be appointed as a Regular Member.

VOTE: 3 – 0 Approved and so declared

<b>RESULT:</b>	<b>3– 0 APPROVED TO RECOMMEND</b>
<b>MOVER:</b>	Kevin Dombrowski, Committee Member
<b>SECONDER:</b>	April Brunelle, Committee Member
<b>AYES:</b>	April Brunelle, Jessica Buhle, Kevin Dombrowski

5. MOTION to recommend the Town Council 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

Moved by Councilor Brunelle, seconded by Councilor Dombrowski

Discussion: It was noted that Ms. Barbara Candler's term was also due to expire on November 7, 2025. However, Library Commission Chairman Bolduc noted in the reappointment request form that Ms. Candler was not interested in continuing to serve on the Library Commission once her term ended this year.

VOTE: 3 – 0 Approved and so declared

<b>RESULT:</b>	<b>3– 0 APPROVED TO RECOMMEND</b>
<b>MOVED:</b>	April Brunelle, Committee Member
<b>SECONDER:</b>	Kevin Dombrowski, Committee Member
<b>AYES:</b>	April Brunelle, Jessica Buhle, Kevin Dombrowski

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

V. OLD BUSINESS

1. Continued discussion and possible action to create an Ethics Commission for the Town of Ledyard.
- MOTION to recommend the Town Council adopt a proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” as presented in the draft dated September **8-10**, 2025.

DRAFT: 09/**8-10**/2025

Ordinance # \_\_\_\_\_

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 1<sup>st</sup> 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

Moved by Councilor Buhle, seconded by Councilor Brunelle

Discussion: Councilor Buhle stated at the Administration Committee's August 6, 2025 meeting that she asked the Administration Committee to review Attorney Matt Ritter's July 14, 2025 recommended changes to the proposed draft "*Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*" and to provide suggestions for discussion at tonight's meeting. She stated that she has provided an updated draft dated September 8, 2025 for tonight's review and discussion, noting that where possible she adopted all of the Town Attorneys changes noting that about 80% of the Attorney Ritter's proposed changes were included in the September 8, 2025 draft, because they made sense and it was worded better. She stated that Attorney Ritter put a lot of work into the draft, and therefore, she stated that she kept a large chunk of it.

Councilor Buhle went on to state that right now she had Code of Ethics from seven towns on her computer. She stated the proposed *Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*" provided in the September 8, 2025 draft was an amalgamation of the following towns Glastonbury, Stonington, Norwich, New London, Seymour, Griswold, and Essex. She stated that Councilor Garcia-Irizarry had started drafting the proposed Ethics Ordinance and that she provided an exceptional framework, noting that this Administration Committee continued to work on the proposed Ordinance, stating that they worked harder to make sure that they were creating

something that was not something that was written by Artificial Intelligence (AI). She stated that the proposed “*Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” was not written by their imaginations. She stated it was written using chunks from other towns Ethics Ordinances to come up with the draft Ordinance.

Councilor Buhle continued by addressing the following:

- Section 6 “*Disclosure of Interest Required*”

“*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:.....*”(see above)

Councilor Buhle stated during her telephone conversation with Attorney Ritter that although he stated that he would recommend removing Section 6; that it was not illegal. She stated that Attorney Ritter questioned whether she really wanted to require all town officials or town employees who had a private financial interest to be required to disclose in writing the nature and extent of such interest, noting that Attorney Ritter stated that they were going to have people that do not want to run for office. She stated that her response to Attorney Ritter was that she liked the provision and that she had no problem with telling anyone about what businesses or property she owned; or if she was a major shareholder of something; and that she was not afraid of disclosing that. She noted that Attorney Ritter responded to her comments by stating; “*Okay, you can do and it's not illegal legal. But you're probably going to dissuade people from participating in government*”; and that she responded stating” Councilor Buhle stated this proposed Ordinance would only apply to elected officials, excluding the Justices of the Peace. However, she stated when she received Attorney Ritter’s July 14, 2025 red line edited draft Ordinance that he had struck the provisions of Section 6 “*Disclosure of Interest Required*”. She stated because she thought it was important she added the text back into the proposed Ordinance.

- Section 8 *Penalties for Violations of the Code of Ethics (f)*

Termination of employment ***and/or removal from elected or appointed office;***

Councilor Buhle noted Mayor Allyn’s comment that they could not ***terminate and/or remove people from elected or appointed office***. She stated that she realizes that Mayor Allyn was correct. She stated that if the Code of Ethics was violated that it could lead to any or a combination of the penalties listed. She stated that it was not to say that every violation leads to that penalty, and that it was not to say that was what that penalty was for a Union employee, or a town employee with that situation. She stated the language ***Termination of employment*** was included in Attorney Ritter red line draft; but that he did strike the following language ***and/or removal from elected or appointed office***. Therefore, she was fine with removing this language from the draft Ordinance.

Councilor Buhle stated so this was where they were at, noting that she was extremely concerned that they were going to let perfect get in the way of good; and that if they do not pass an Ethics Ordinance that in two-years from now they were going to wish that they had. She stated that she did not write the proposed “so that we could specifically attack one person in town or go after an opponent, or something like that. She stated that was designed to protect the town in the future, noting that the proposed Ordinance does fall in line with the Town Charter, pointing out that Chapter IX, Section 6 Stated “*The Town Council may buy ordinance, specify what is or what is not, a conflict of interest for officials and employees of the town*”.

Councilor Buhle stated based on questions she has received during the past two-weeks she prepared a “*Frequently Asked Questions and Answers Sheet for “An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission”*”. She stated because of the number of residents that spoke this evening and because they were under a time constraints, noting that the Town Council had a Special Meeting scheduled for 6:30 p.m. following this meeting, that she would not review them, but that they would be attached to the minutes of this meeting.

**Frequently Asked Questions “An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission” Q&A**  
as written by Jessica Buhle

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

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

A: The Town Charter has provisions which cover Investigation and Conflicts of Interest. The Charter does not outline specifically what constitutes a Conflict of Interest, and also requires the Town Council to vote to perform an Investigation. I personally feel that the Council would struggle to remain impartial against other councilors or Town officials there may be speculation against. Creating a Code of Ethics outlines what constitutes a Conflict of Interest in participation in the town, and creates a nonpartisan Commission which can respond to any filed complaints. Per Chapter 9, Section 6 of the Town Charter, “The Town Council may by ordinance specify what is, or what is not, a conflict of interest for officials and employees of the Town.” This ordinance falls in line with that language.

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

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

believe the current system has more potential to be politically weaponized, as current investigation requirements require a majority of the Council, a partisan group.

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

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

***Q: Will this cost us any money?***

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

***Q: Who does this Ordinance apply to?***

A: As it is written, this Ordinance applies to all Town officials, elected or appointed, including all members of committees, commissions, and boards, and all Town employees, including Board of Education members and employees. Some provisions, such as the disclosure statement in Section 6, only apply to Town Councilors, Board of Education members, and the Mayor.

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

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

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

A: We have low crime rates in Ledyard, but we have an excellent police department to respond when we need them. I've never had a fire in my home (and fingers crossed I don't in the future), but I want Ledyard to have a great fire department. Most in this town believe we have an ethical town government, but I want to make sure we have an

ordinance in place to protect us from future unscrupulous behavior and to set the standard for what our town considers financial benefit and conflict of interest. Also, the last I knew, Ledyard was one of twenty-four towns in Connecticut without an Ethics ordinance or Code of Ethics. I do not see harm in establishing a Code of Ethics to protect our town as many of our neighboring towns have done

Councilor Brunelle stated that she wanted to recognize and thank everyone who has submitted written comments since the Administration Committee began discussing draft a *Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission* as follows: Dave Schroeder, Jr., Pamela Ball, Keva Fothergill, Joe Franzone; /KUXU Lyons, Markos Samos, Deborah Edwards, Carlo Porazzi, Chris Jelden, Ed Murray, Barbara Kil, Sharon Pealer, Dan Pealer, Bill Saums, Mike Cherry, Wendy Hellekson, Angeal Cassidy; Jacob Hurt, Allyssa Siegel-Miles; Alexa Shelton; Anne Roberts-Pierson, Lou Consolini, Mary Larson, Jennifer Zeronsa, and Ellen Atwood

Councilor Brunelle stated because they needed to cut things short this evening that she wanted to clarify one misstatement regarding the cutting of pay that was made this evening during Residents Comments. She stated we did not cut pay, we cut raises, she stated that can nobody's pay was cut.

Councilor Brunelle continued by addressing the proposed “*Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” responding to the following questions and comments:

- ***The cost of legal fees to support the Commission*** - Councilor Brunelle stated that she would rather spend money to stop unethical behavior than save money and let unethical behavior continue.
- ***Why were we doing this*** - Councilor Brunelle stated that they have heard tons and tons of reasons of why noting that she believed this question was kind of naive and kind of shows that you are not paying attention to all people that have spoken and have said why this was important. Just like it was important to know why people think it was not important. She stated for her it was important because of what she has heard.
- ***It was unwise to ignore the attorney*** - Councilor Brunelle stated that she agreed that it was unwise to ignore the attorney, noting that he worked really hard on this. I don't want to ignore him. I want to use his expertise and his work to better favor the town.
- ***We should be looking into the employee handbook*** -Councilor Brunelle stated that elected officials, town commissioners, committee people don't go to the employee handbook.

Councilor Buhle stated that she personally feels that this is needed. She has worked in quality assurance for over seven- years; and she was a Realtor that has a strong code of ethics. All the jobs she has ever had had a Code of Ethics, noting that it was important, it protects everybody. She stated one of the major facts she wanted to point out that a lot of people are misunderstanding, was that it has to be monetary gain. It was not just because you I don't like that; or you look that funny. It has to be proven that it was a monetary gain.

Councilor Dombrowski stated that the proposed “*Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” presented in the September 8, 2025 draft was not done, and that he did not know when it would be ready. He stated that he did not see Councilor Buhle’s September 8, 2025 until Monday, when it was emailed to the members of the Administration Committee, noting that he has had little time to look it over; and he apologized that he did not provide any comments because of time constraints due to work commitments. He expressed concern that the Town Attorney’s red line edits and recommendations were ignored and that language was put back in without understanding why the Town Attorney recommended the language be removed. He stated the draft Ordinance was not ready, and that he would not support it as written.

Councilor Buhle questioned whether Councilor Dombrowski had any proposed changes to the draft “*Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”. Councilor Dombrowski stated to begin with, that he does not support establishing an Ethics Commission. He stated to address comments made about the importance of having ethics, that he worked for General Dynamics-Electric Boat, noting that they have strict ethics because with the work that they do people’s lives were at risk with what they build. He stated that he has to be 100% ethical with everything he does, noting this included every decision he makes, and anything he signs off on every day at his work. Therefore, he stated that it was not that he did not think ethics was important, because he does. However, he stated the proposed draft Ordinance was not the worded the right way. Councilor Buhle questioned whether Councilor Dombrowski could specify. Councilor Dombrowski stated the draft Ordinance was not right, it was completely wrong; the whole thing was wrong. He stated that Councilors have been working on the draft Ordinance for months; and that he has been looking at it, and that he has been disagreeing with it the entire time. He stated that he has told the Committee this right from the beginning, because the town already has processes in-place that supports what they need in this town, whether they were an elected official, employee, or volunteer; and it has proved to work on two occasions where the town did have an ethics issue. He went on to note that some then sit here and say, we don’t have a process in place when the town does have a processes in place. He stated in the words of Admiral Rickover “*This is not completed. Staff work.....And Good Enough is not Good Enough to move forward with this.*”

Councilor Buhle stated that she understands, but that she just does not think that way, noting that she thinks in other ways. She stated to be very clear that she planned to move “*Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”. Forward to the Town Council tonight because she was very confident and feels very comfortable with the draft that was submitted. She stated before she moves forward with the Motion that she wanted to read one more of her comments because this was something that the Town Charter does not cover.

Councilor Buhle proceeded to state that her biggest concern with relying on the Town Charter was that she personally felt that the Town Council would struggle to remain impartial against other councilors or town officials, when there may be a *Conflict of Interest*. She stated creating a Code of Ethics, would outline what constituted a Conflict

of Interest and would create a nonpartisan commission which could respond to any filed complaints. She stated that the composition of the Ethics Commission does not require that there are two Democrats or two Republicans on the Commission, , just that there may not be, or than two. Therefore, she stated that the Commission could have five unaffiliated commissioners, noting that it did not matter, but there could not be three of any one party. She stated having read through dozens of other town's Ethics Commissions, that the intention was to create a Commission that does not get politicized or weaponized or misused, or meets frivolously. She stated that she did not see that happening, noting that 130 towns in Connecticut have Ethics Ordinances and that she was not reading about them every day going bankrupt because of complaints. Therefore, she stated that she did not foresee there being a major problem.

Mayor Allyn addressed the composition for the Ethics Commission noting that they could not have five unaffiliated and one democrat or one republican explaining that would violate Connecticut State Statute 9-167a "*Minority Representation*".

- MOTION to amend the proposed draft "*Ordinance Establishing a Code of Ethics and Ethics Commission for the Town of Ledyard*"  
to strike the following language from Section 8 (f) ~~and/or removal from elected or appointed office~~.

Moved by Councilor Buhle, seconded by Councilor Brunelle

VOTE: 3- 0 Approve the Amendment

VOTE on Main Motion as amended (new draft dated September 10, 2025)  
MOTION to recommend the Town Council adopt a proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" as presented in the draft dated September **8-10**, 2025.

VOTE: **2 – 1 Approved and so declared**

<b>RESULT:</b>	<b>2 – 1 APPROVED TO RECOMMEND</b>
<b>MOVER:</b>	Jessica Buhle, Committee Member
<b>SECONDER:</b>	April Brunelle, Committee Member
<b>AYES:</b>	April Brunelle, Jessica Buhle
<b>NAYES</b>	Kevin Dombrowski

7. MOTION to recommend the Town Council 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.~~ **September 24, 2025 at 5:00 p.m.** to be held in Council Chambers, Town Hall Annex, 741 Colonel Ledyard Highway, Ledyard, Connecticut, to receive comments and recommendations regarding a proposed "*An Ordinance Establishing a Town of Ledyard Code Of Ethics*" .

Moved by Councilor Buhle, seconded by Councilor Brunelle

Discussion: The Administration Committee agreed to change the date of the Public Hearing from ~~October 8, 2025~~ at 6:15 p.m. to **September 24, 2025 at 5:00 p.m.** as a "friendly amendment"

In accordance with the Town Charter; Section 5

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

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

**VOTE: 2 – 1 Approved and so declared**

<b>RESULT:</b>	<b>2– 1 APPROVED TO RECOMMEND</b>
<b>MOVER:</b>	Jessica Buhle Committee Member
<b>SECONDER:</b>	April Brunelle, Committee Member
<b>AYES:</b>	April Brunelle, Jessica Buhle
<b>NAYES:</b>	Kevin Dombrowski

3. Any other Old Business proper to come before the Committee – None.

**VIII. ADJOURNMENT**

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

**VOTE: 3 - 0 Approved and so declared, the meeting was adjourned at 6:25 p.m.**

Respectfully submitted,

Jessica Buhle  
Committee Chairman  
Administration Committee