TOWN OF LEDYARD
CONNECTICUT

Town Council

~ AGENDA ~

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

Chairman Gary St. Vil

Regular Meeting

Wednesday, October 22, 2025 **7:00 PM** **Town Hall Council Chambers**

In-Person: Council Chambers Town Hall Annex
Remote: Information noted below:

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

https://us06web.zoom.us/j/85483208527?pwd=MsEzpZ1b92YPNb9pBb1WXWrPtEZj1b.1
Audio Only: Telephone: +1 646 558 8656; Meeting ID: 854 8320 8527; Passcode: 152951

I. CALL TO ORDER

II. PLEDGE OF ALLEGIANCE

III. ROLL CALL

IV. PRESENTATIONS

- Students Celebrate 250 "I Voted" Sticker Contest

Attachments: Perfect-Grade -3-#7
Haggan-Grade -2-#6
Amelia-Grade -3-#8

- Proclamation

V. RESIDENT & PROPERTY OWNERS (COMMENTS LIMITED TO THREE (3) MINUTES

VI. COMMITTEE COMMISSION AND BOARD REPORTS

VII. COMMENTS OF TOWN COUNCILORS

VIII. REVIEW AND APPROVAL OF MINUTES

MOTION to approve Regular Town Council Minutes of October 8, 2025

Attachments: TC-MIN-2025-10-08

IX. COMMUNICATIONS

Communications List - October 22, 2025

Attachments: Communications List-2025-10-22
Chappelle-Primary Care for All-emila-2025-10-11
Harwood-Conservation Commission Support Transfer of 13 Applewood & 19 Avery Hill Road Extention to Avalonia Land Conservancy-2025-10-15
Mayor Correspondence Re_Disapproval of Ordinance #100_021 10.16.2025
Ord #100_021 An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission Mayor Disapproval 10.16.2025
ACTION LTR-TOWN COUNCIL MTG-2025-10-08
Exhibit 1_Comments to Ordinance_MRitter_10.15.2025
Exhibit 2 Parks & Recreation Director Ordinance Comments 10.14.2025
Exhibit 3_JBuhle Correspondence 10.9.2025
APPOINT LTR-BOLDUC-LIBRARY COMMISSION-2025-10-09
APPOINT LTR-DEBRODT-INLAND WETLAND & WATER COURSES-2025-10-09
APPOINT LTR-GRENGER-LIBRARY COMMISSION-2025-10-09
APPOINT LTR-MARELLI-INLAND WETLAND & WATER COURSES-2025-10-09
APPOINT LTR-RUMMERY-LIBRARY COMMISSION-2025-10-09
APPOINT LTR-THOMPSON-INLAND WETLAND & WATER COURSES-2025-10-09
APPOINT LTR-WRIGHT-LIBRARY COMMISSION-2025-10-09
Admin Asst Memo to Mayor Transmitting Ordinance Establishing a Code of Ethics & Ethics Commission-2025-10-14
MEMO TRANSMITTING MAYOR LTR VETO-ORDINANCE ESTABLISHING ETHICS COMMISISON-2025-10-16

X. REFERALS

XI. COUNCIL SUB COMMITTEE, LIAISON REPORTS

1. Administration Committee Report Fiscal Year 2025/2026

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

3. Finance Committee Report Fiscal Year 2025/2026

4. LUPPW Committee Report Fiscal Year 2025/2026

5. Liaison Reports

XII. REPORT OF THE MAYOR

Mayor Report Fiscal Year 2025/2025

XIII. OLD BUSINESS

XIV. NEW BUSINESS

Administration Committee

1. MOTION to recommend the Town Council appoint Mr. Nathaniel Woody (U) 770 Long Cove Road, Gales Ferry as a Regular Member, to Planning & Zoning Commission for a three (3) term ending October 31, 2028 filling a vacancy left by Mr. Craig.

   Attachments: Planning & Zoning Request-Woody Appointment as Regular Memaber-email-2025-10-07
   Planning & Zoning Reappointment Recommendationsltr-2025-8-26
   PLANNING & ZONING-2025-06-24

2. MOTION to appoint Ms. Gillian Thorne (R) 3 Adios Lane, Ledyard, to the Library Commission to complete a two (2) year term ending November 7, 2027 filling a vacancy left by Ms. Candler.

   Attachments: RTC-Appointment Application-Thorne- Library Commission-2024-09-12
   Re-Appointment Recommendations -Library Commission-2025-09-02
   LIBRARY COMMISSION-2025-10-02
   Thorne-Thank you for Appointment Application-Library-2024-12-12

3. MOTION to appoint the following members to the Sustainable CT Ad Hoc Committee for a two (2) year term ending December 15, 2027 in accordance with the structure provided in Res#004-20/25/Jan 25 "Town of Ledyard Resolution Supporting Their Continued Participation In The Sustainable CT Municipal Certification Program And Establishing A Sustainable CT Ad Hoc Committee:

   · Mr. Michael Dreimiller (D) 37 Norman Drive, Gales Ferry (Economic Development Commission)
   · Mr. Nathaniel Woody (U) 770 Long Cove Road, Gales Ferry (Planning & Zoning Commission
   · Ms. Beth Ribe (U) 129 Rose Hill Road, Ledyard (Community -at-Large)
   · Councilor Carmen Garcia-Irizarry (D) 58 Eagle Ridge Drive, Gales Ferry Land Use/Planning/Public Works Committee Member

   Attachments: SUSTAINABLE CT-MEMBERS-EMAIL-2025-09-15
   Sustainable CT Ad Hoc Committee- Memo- Request Noninations-2027-10

Finance Committee

4. MOTION to authorize the submission of a grant request to the State of Connecticut for the removal of foam and cleaning of the foam system for Gales Ferry Engine 21.

5. MOTION to amend the Fiscal Year 2025/2026 Standing Bid Waiver List to include the following:
   · Freightliner/Alliance in East Hartford.

Attachments: WPCA-Standing Bid Waiver Addtion-Groton Utilities-email-2025-09-24-Lynch
Gales Ferry Fire-Standing Bid Waiver-Additon-Frieghtliner-Alliance-East Hartford-emil-2025-10-02
Standing Bid Waivers FY 25-26.pdf

6. MOTION to appropriate $8,000 to Account #20810201-50000-24207 (Cemetery Committee - Grant Expense) to recognize the grant awarded by the State of Connecticut Office of Policy and Management entitled "Neglected Cemetery Account Grant Program".

Attachments: Neglected Cemetery-2025-02-12
Neglected Cemetery Account Grant Program Application 2025 Ledyard-Plan
Neglected Cemetery Account Grant Program Guidelines 2025
Neglected Cemetery Acct. Grant Program Award.pdf

Land Use/Planning/Public Works Committee

7. MOTION to recommend the Town of Ledyard transfer town-owned property located at 19 Avery Hill Road Extension, Ledyard Connecticut (Parcel ID: 50/130/19), known as the "Kettle Hole" property to Avalonia Land Conservancy for no consideration to be combined with other lands of the DDJJM, LLC., at 173 Stoddards Wharf Road and 175 Stoddards Wharf Road to be transferred to Avalonia Land Conservancy, to remain open to the public for passive recreation and to be protected in perpetuity under the Conservancy care with the following conditions:

1) Avalonia Land Conservancy will pay for all conveyances and fees regarding the transfer of the property.

2) In the event Avalonia Land Conservancy determines they no longer wish to own or no longer can own the so-called "Kettle Hole" property, Avalonia Land Conservancy will first offer the property back to the Town of Ledyard as the last owner of record. Such conveyance will be at no cost to the Town, other than customary recording and legal fees. The Town shall have 120 days to accept or reject re-acquisition. The Town shall notify Avalonia Land Conservancy in writing of its intent to accept or reject. Should the Town choose not to accept the property back, Avalonia Land Conservancy will then have the right to convey the parcel to a third party of their choice.

Attachments: CGS8-24Referral -19Avery Hill Rd Ext
TransAvaloniaLandConserv-WAttachments-2025-09-10
PLANNING & zONING -8-24Referral- 19Avery HillRdExt.
LandTransferToAvalonia NODTC-2025-09-15
PLANNING & ZONING -EMAIL-2025-09-16-TRANSFER PROPERIES -NO CONSIDERATION
Avalonia Land Conservancy ltr-Requeest Transfer- Open Space Parcels-13 Applewood Dirve - 129 Avery Hill Road Ext-2025-10-07
Harwood-Conservation Commission Support Transfer of 13 Applewood & 19 Avery Hill Road Extention to Avalonia Land Conservancy-2025-10-15

8. MOTION to recommend the Town of Ledyard transfer town-owned property located at 13 Applewood Drive (parcel ID: 99-530-13) to Avalonia Land Conservancy for no consideration, to be combined with the Avalonia Land Conservancy "Pike Marshall Preserve to remain open to the public for passive recreation and to be protected in perpetuity under the Conservancy care with the following conditions:

1). The 10-foot wide access to the property shall be clearly marked in the field by a Land Surveyor engaged by Avalonia Land Conservancy.

2) Appropriate signage identifying the open space parcel shall be installed by Avalonia Land Conservancy.

3) Avalonia Land Conservancy will pay for all conveyances and fees regarding the transfer of the property.

4) In the event Avalonia Land Conservancy determines they no longer wish to own or no longer can own 13 Applewood Drive property (parcel ID:99-530-13), Avalonia Land Conservancy will first offer the property back to the Town of Ledyard as the last owner of record. Such conveyance will be at no cost to the Town, other than customary recording and legal fees. The Town shall have 120 days to accept or reject re-acquisition. The Town shall notify Avalonia Land Conservancy in writing of its intent to accept or reject. Should the Town choose not to accept the property back, Avalonia Land Conservancy will then have the right to convey the parcel to a third party of their choice.

Attachments: CGS8-24Referral 13Applewood Drive TransAvalonia Land Conserv WAttachments-2025-09-08
PLANNING & ZONING 8-24Referral 13 Applewood Dr LandTransferToAvalonia NODTC-2025-09-15
PLANNING & ZONING -EMAIL-2025-09-16-TRANSFER PROPERIES -NO CONSIDERATION
Avalonia Land Conservancy ltr-Requeest Transfer- Open Space Parcels-13 Applewood Dirve - 129 Avery Hill Road Ext-2025-10-07
Harwood-Conservation Commission Support Transfer of 13 Applewood & 19 Avery Hill Road Extention to Avalonia Land Conservancy-2025-10-15

9. MOTION to schedule a Hybird (in-Person and Video Conference) Public Hearing date for November 12, 2025 at 6:15 p.m., in accordance with CGS 07-163e, to receive comment and recommendation on the following:

(1) The transfer town-owned property located at 19 Avery Hill Road Extension, Ledyard Connecticut (Parcel ID:50/130/19), known as the "Kettle Hole" property to Avalonia Land Conservancy for no consideration, to be combined with other lands of the DDJJM, LLC., at 173 Stoddards Wharf Road and 175 Stoddards Wharf Road to be transferred to Avalonia Land Conservancy, to remain open to the public for passive recreation and to be protected in perpetuity under the Conservancy care with the following conditions:

1). Avalonia Land Conservancy will pay for all conveyances and fees regarding the

transfer of the property.

2). In the event Avalonia Land Conservancy determines they no longer wish to own or no longer can own the so-called "Kettle Hole" property, Avalonia Land Conservancy will first offer the property back to the Town of Ledyard as the last owner of record. Such conveyance will be at no cost to the Town, other than customary recording and legal fees. The Town shall have 120 days to accept or reject re-acquisition. The Town shall notify Avalonia Land Conservancy in writing of its intent to accept or reject. Should the Town choose not to accept the property back, Avalonia Land Conservancy will then have the right to convey the parcel to a third party of their choice.

(2) The transfer town-owned property located at 13 Applewood Drive(parcel ID:99-530-13) to Avalonia Land Conservancy for no consideration, to be combined with the Avalonia Land Conservancy "Pike Marshall Preserve to remain open to the public for passive recreation and to be protected in perpetuity under the Conservancy care with the following conditions:

1). The 10-foot wide access to the property shall be clearly marked in the filed by a Land Surveyor engaged by Avalonia Land Conservancy.

2). Appropriate signage identifying the open space parcel shall be installed by Avalonia Land Conservancy.

3). Avalonia Land Conservancy will pay for all conveyances and fees regarding the transfer of the property.

4). In the event Avalonia Land Conservancy determines they no longer wish to own or no longer can own 13 Applewood Drive property (parcel ID:99-530-13), Avalonia Land Conservancy will first offer the property back to the Town of Ledyard as the last owner of record. Such conveyance will be at no cost to the Town, other than customary recording and legal fees. The Town shall have 120 days to accept or reject acquisition. The Town shall notify Avalonia Land Conservancy in writing of its intent to accept or reject. Should the Town choose not to accept the property back, Avalonia Land Conservancy will then have the right to convey the parcel to a third party of their choice.

.

Attachments: CGS-7-163e- Sale of Town Property- Public Hearing
CGS8-24Referral -19Avery Hill Rd Ext
TransAvaloniaLandConserv-WAttachments-2025-09-10
PLANNING & ZONING -8-24Referral- 19Avery HillRdExt.
LandTransferToAvalonia NODTC-2025-09-15
CGS8-24Referral 13Applewood Drive TransAvalonia Land Conserv
WAttachments-2025-09-08
PLANNING & ZONING 8-24-Referral 13 Applewood Dr
LandTransferToAvalonia NODTC-2025-09-15
PLANNING & ZONING -EMAIL-2025-09-16-TRANSFER
PROPERIES -NO CONSIDERATION
Avalonia Land Conservancy ltr-Requeest Transfer- Open Space Parcels-13
Applewood Dirve - 129 Avery Hill Road Ext-2025-10-07
Harwood-Conservation Commission Support Transfer of 13 Applewood
& 19 Avery Hill Road Extention to Avalonia Land
Conservancy-2025-10-15

10. MOTION to schedule a Hybird Format (In-Person & Video Conference) Special Town Meeting date for November 12, 2025 at 6:30 p.m. to be held in the Council Chambers, 741 Colonel Ledyard Highway, to consider, discuss and vote upon the following:

(1) "Shall the Town of Ledyard transfer town-owned property located at 19 Avery Hill Road Extension, Ledyard Connecticut (Parcel ID:50/130/19), known as the "Kettle Hole" property to Avalonia Land Conservancy for no consideration, to be combined with other lands of the DDJJM, LLC., at 173 Stoddards Wharf Road and 175 Stoddards Wharf Road to be transferred to Avalonia Land Conservancy, to remain open to the public for passive recreation and to be protected in perpetuity under the Conservancy care with the following conditions:

1). Avalonia Land Conservancy will pay for all conveyances and fees regarding the transfer of the property.

2). In the event Avalonia Land Conservancy determines they no longer wish to own or no longer can own the so-called "Kettle Hole" property, Avalonia Land Conservancy will first offer the property back to the Town of Ledyard as the last owner of record. Such conveyance will be at no cost to the Town, other than customary recording and legal fees. The Town shall have 120 days to accept or reject re-acquisition. The Town shall notify Avalonia Land Conservancy in writing of its intent to accept or reject. Should the Town choose not to accept the property back, Avalonia Land Conservancy will then have the right to convey the parcel to a third party of their choice?".

(2) "Shall the Town of Ledyard transfer town-owned property located at 13 Applewood Drive(parcel ID:99-530-13) to Avalonia Land Conservancy for no consideration, to be combined with the Avalonia Land Conservancy "Pike Marshall Preserve to remain open to the public for passive recreation and to be protected in perpetuity under the Conservancy care with the following conditions:

1). The 10-foot wide access to the property shall be clearly marked in the field by a Land Surveyor engaged by Avalonia Land Conservancy.

2). Appropriate signage identifying the open space parcel shall be installed by Avalonia Land Conservancy.

3). Avalonia Land Conservancy will pay for all conveyances and fees regarding the transfer of the property.

4). In the event Avalonia Land Conservancy determines they no longer wish to own or no longer can own 13 Applewood Drive property (parcel ID:99-530-13), Avalonia Land Conservancy will first offer the property back to the Town of Ledyard as the last owner of record. Such conveyance will be at no cost to the Town, other than customary recording and legal fees. The Town shall have 120 days to accept or reject re-acquisition. The Town shall notify Avalonia Land Conservancy in writing of its intent to accept or reject. Should the Town choose not to accept the property back, Avalonia Land Conservancy will then have the right to convey the parcel to a third party of their choice?"..

Attachments: CGS8-24Referral -19Avery Hill Rd Ext TransAvaloniaLandConserv-WAttachments-2025-09-10
PLANNING & zONING -8-24Referral- 19Avery HillRdExt. LandTransferToAvalonia NODTC-2025-09-15
CGS8-24Referral 13Applewood Drive TransAvalonia Land Conserv WAttachments-2025-09-08
PLANNING & ZONING 8-24Referral 13 Applewood Dr LandTransferToAvalonia NODTC-2025-09-15
PLANNING & ZONING -EMAIL-2025-09-16-TRANSFER PROPERIES -NO CONSIDERATION
Avalonia Land Conservancy ltr-Requeest Transfer- Open Space Parcels-13 Applewood Dirve - 129 Avery Hill Road Ext-2025-10-07
Harwood-Conservation Commission Support Transfer of 13 Applewood & 19 Avery Hill Road Extention to Avalonia Land Conservancy-2025-10-15

11. MOTION to extend Archery Hunting on Certain Town Owned Lands and Certain Open Space Properties for one-year in accordance with provisions in Ordinance#100-018 (rev. 1) "An Ordinance Providing Archery Hunting on Certain Town Owned Lands and Certain Open Space Properties"

In addition, amend Ordinance #100-018 "Appendix A - Town of Ledyard Hunting Rules and Regulations" to paragraph (5) as follows:

5) Hunting shall be limited to the following Town of Ledyard owned properties and open space properties not owned by the Town of Ledyard, as recorded on the Deed of the Land Records or with written consent of the property owner.

a) Clark Farm (1025 Colonel Ledyard Highway) (Town Owned Property)
b) Founders Preserve Parcel (REMOVE 332 - CHANGE TO 334 Colonel Ledyard Highway
(Avalonia Land Conservancy)
.

Attachments: ORD-#100-018 (REV 1)-ARCHERY HUNTING TOWN OWNED PROPERTY-2021-04-28.docx
ORD-#100-018-APPENDIX - ARCHERY HUNTING TOWN OWNED PROPERTY-DRAFT-2025-10-01

General Business

12. MOTION to override the Mayor's disapproval/veto dated October 16, 2025 and approved the "An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission" as approved by the Town Council at their October 8, 2025 meeting.

Attachments:
MEMO TRANSMITTING MAYOR LTR VETO-ORDINANCE ESTABLISHING ETHICS COMMISISON-2025-10-16
Exhibit 1_Comments to Ordinance_MRitter_10.15.2025
Exhibit 2 Parks & Recreation Director Ordinance Comments 10.14.2025
Exhibit 3_JBuhle Correspondence 10.9.2025
TC-MIN-2025-09-24-PUBLIC HEAIRNG
DRAFT CODE OF ETHICS AND ETHICS COMMISSION-ADMIN MTG-2025-09-10
AN ORDINANCE ESTABLISHING A TOWN OF LEDYARD CODE OF ETHICS AND ETHICS-ATTORNE RED LINE DRAFT
AN ORDINANCE ESTABLISHING A TOWN OF LEDYARD CODE OF ETHICS AND ETHICS-RITTER-22434477-v2
Ethics Ordinance - FAQ- J-Buhle-2025-09-10
DRAFT CODE OF ETHICS AND ETHICS COMMISSION-JESSICA-2025-09-08
Town Attroney-Ethics Odinance-email-2025-07-24
DRAFT_AN ORDINANCE ESTABLISHING A TOWN OF LEDYARD CODE OF ETHICS AND ETHICS COMMISSIONDRAFT-2025-06-11-CLEAN COPY
SCHROEDER - Proposed Changes CoE 9_10_2025
Ball-Ethics Commisson email-2025-08-21
Schroder ltr-Proposed Ordinance Creating a Code of Ethics & Ethics Commisison-Attorney Comments-2025-08-06
Acknowledgement Form-Code of Ethics-DRAFT.docx
Town Charter-Investigation-Conflict of Interest
Fraud Policy - Adopted-2014-05-28
CGS - CHAPTER 10-ETHICS PUBLIC EMPLOYEES.docx
Ethics Commission- Fothergill-dmail-2024-09-13
Ethics Commission- Franzone emaill-2024-09-13
Ethics Commission- Lyons-emaill-2024-09-13
Ethics Commission- Wilkinson-emaill-2024-09-13
Ethics Commission-Samos-email-2024-09-24
Ethics Commisison - Wilkinson-email-2024-11-18
Ethics Commission-Edwards email-2024-12-07
EThis Commission-Porazzi-email-2024-12-11
Ethics Commisison-Schroeder ltr-2024-12-11
Jelden-Ethics Commission-email-2024-12-16
Murray - Ethics Commission-email-2025-1-08
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 Commisison-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 Commissioneemail-2025-02-12
Lamb Third Party Flags-Ethics Commission--email- 2025-02-12
Cassidy -email-2025-02-11-Ethics Commission
D-Pealer Ethics Commission email-2025-02-11
Hurt-Ethics Commission- email-2025-02-11
Siegel-Miles-Ethics Commission--email-2025-02-11
Shelton email-Ethics Commission-2025-03-11
Roberts-Pierson-Ethics Commision-email-2025-04-01
Consolini -ETHICS COMMISSION-EMAIL-2025-04-07
Larson-Ethics Commission-2025-04-08
Schroeder -ETHICS COMMISSION-EMAIL-2025-04-07
Berry-Ethics Commisstion-ltr -2025-04-08- Page 1-
Berry-Ethics Commisstion-ltr -2025-04-08- Page 2-
Khors-Ethics Commisstion-ltr -2025-04-08
Christy-Fogg-DEI-In Schools-email-2025-04-08
Porazzi-Ethics Commisstion-ltr -2025-04-08
Zeronsa-Ethics Commisstion-ltr -2025-04-08
Atwood-Ethics Commission-email-2025-04-08
Franzone-Ethics Commisstion-ltr -2025-04-08

XV. ADJOURNMENT

DISCLAIMER:

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

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

File #: 25-2686 **Agenda Date:** 10/22/2025 **Agenda #:**

REPORT

Staff/Committee Report:

- Students Celebrate 250 "*I Voted*" Sticker Contest

Ledyard Celebrates America 250
VOTING STICKER CONTEST

The Town of Ledyard will be holding a year of special events commemorating the 250th Anniversary of the signing of the Declaration of Independence. The "Ledyard Celebrates America 250 Planning Committee" is hosting a Voting Sticker Contest. If you would like to enter, please design a voting sticker in the space below and return it to your teacher by September 5, 2025. Three sticker designs will be chosen by the Town Council on Wednesday, September 10, 2025.

Name Audrey Perfect !!

Teacher Ms. Bridger Grade 3



7

Ledyard Celebrates America 250
VOTING STICKER CONTEST

The Town of Ledyard will be holding a year of special events commemorating the 250th Anniversary of the signing of the Declaration of Independence. The "Ledyard Celebrates America 250 Planning Committee" is hosting a Voting Sticker Contest. If you would like to enter, please design a voting sticker in the space below and return it to your teacher by September 5, 2025. Three sticker designs will be chosen by the Town Council on Wednesday, September 10, 2025.

Name James Haggan

Teacher Mrs. Mason Grade 2



6

Ledyard Celebrates America 250
VOTING STICKER CONTEST

The Town of Ledyard will be holding a year of special events commemorating the 250th Anniversary of the signing of the Declaration of Independence. The "Ledyard Celebrates America 250 Planning Committee" is hosting a Voting Sticker Contest. If you would like to enter, please design a voting sticker in the space below and return it to your teacher by September 5, 2025. Three sticker designs will be chosen by the Town Council on Wednesday, September 10, 2025.

Name Amelia

Teacher ms.bridger Grade 3ed



8

File #: 25-2687 **Agenda Date:** 10/22/2025 **Agenda #:**

REPORT

Staff/Committee Report:

- Proclamation

File #: 25-2684 **Agenda Date:** 10/22/2025 **Agenda #:**

MINUTES

Minutes:
MOTION to approve Regular Town Council Minutes of October 8, 2025

TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

Chairman Gary St. Vil

MINUTES
LEDYARD TOWN COUNCIL – REGULAR MEETING
WEDNESDAY, OCTOBER 8, 2025; 7:00 PM
HYBRID FORMAT
VIDEO CONFERENCE VIA ZOOM

DRAFT

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

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

II. PLEDGE OF ALLEGIANCE

III. ROLL CALL –

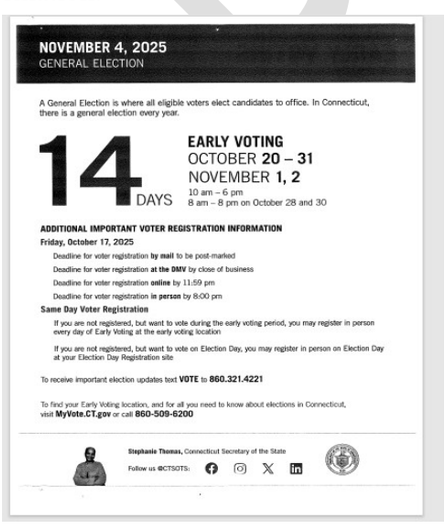
Attendee Name	Title	Status	Location
William Barnes	Town Councilor	Present	In-Person
April Brunelle	Town Councilor	Present	In-Person
Jessica Buhle	Town Councilor	Present	In-Person
Carmen Garcia-Irizarry	Town Councilor	Present	In-Person
Kevin Dombrowski	Town Councilor	Present	In-Person
Adrienne Parad	Town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

IV. INFORMATIONAL ITEMS/PRESENTATIONS

- Registrars of Voters – Early Voting

Chairman St. Vil stated at the Town Council's September 29, 2025 meeting they authorized the Mayor to accept the Connecticut Secretary of the State Early Voting Grant in the amount of $10,026.07. He stated that because there were questions regarding the Early Voting Laws the Town Council invited the Registrars to attend tonight's meeting to provide some information and to bring more awareness to the guidelines. He welcomed Registrar Diana Mann to come up to the Podium to talk about this important subject.

Registrar Diana Mann stated that she and Deputy Registrar Patricia Carman Frost were present this evening to provide an overview of the Early Election Laws and the Secretary of the State's Early Voting Grant in the amount of $10,026.07. Ms. Frost passed out the following handouts regarding the upcoming November 4, 2025 Election and Early Voting Information:


NOVEMBER 4, 2025
GENERAL ELECTION

A General Election is where all eligible voters elect candidates to office. In Connecticut, there is a general election every year.

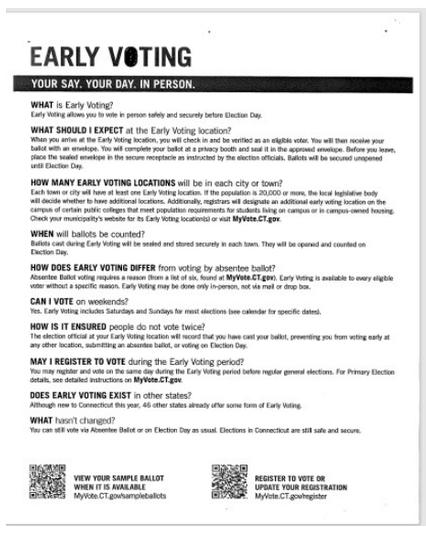
14 DAYS
EARLY VOTING
OCTOBER 20 – 31
NOVEMBER 1, 2
10 am – 6 pm
8 am – 8 pm on October 28 and 30

ADDITIONAL IMPORTANT VOTER REGISTRATION INFORMATION
Friday, October 17, 2025
Deadline for voter registration by mail to be post-marked
Deadline for voter registration at the DMV by close of business
Deadline for voter registration online by 11:59 pm
Deadline for voter registration in person by 8:00 pm
Same Day Voter Registration
If you are not registered, but want to vote during the early voting period, you may register in person every day of Early Voting at the early voting location
If you are not registered, but want to vote on Election Day, you may register in person on Election Day at your Election Day Registration site

To receive important election updates text VOTE to 860.321.4221

To find your Early Voting location, and for all you need to know about elections in Connecticut, visit MyVote.CT.gov or call 860-509-6200

Stephanie Thomas, Connecticut Secretary of the State
Follow us @CTSOTS:


EARLY VOTING
YOUR SAY. YOUR DAY. IN PERSON.

WHAT is Early Voting?
Early Voting allows you to vote in person safely and securely before Election Day.

WHAT SHOULD I EXPECT at the Early Voting location?
When you arrive at the Early Voting location, you will check in and be verified as an eligible voter. You will then receive your ballot with an envelope. You will complete your ballot at a privacy booth and seal it in the approved envelope. Before you leave, place the sealed envelope in the secure receptacle as instructed by the election officials. Ballots will be secured unopened until Election Day.

HOW MANY EARLY VOTING LOCATIONS will be in each city or town?
Each town or city will have at least one Early Voting location. If the population is 20,000 or more, the local legislative body will decide whether to have additional locations. Additionally, registrars will designate an additional early voting location on the campus of certain public colleges that meet population requirements for students living on campus or in campus-owned housing. Check your municipality's website for its Early Voting location(s) or visit MyVote.CT.gov.

WHEN will ballots be counted?
Ballots cast during Early Voting will be sealed and stored securely in each town. They will be opened and counted on Election Day.

HOW DOES EARLY VOTING DIFFER from voting by absentee ballot?
Absentee Ballot voting requires a reason (from a list of six, found at MyVote.CT.gov). Early Voting is available to every eligible voter without a specific reason. Early Voting may be done only in-person, not via mail or drop box.

CAN I VOTE on weekends?
Yes. Early Voting includes Saturdays and Sundays for most elections (see calendar for specific dates).

HOW IS IT ENSURED people do not vote twice?
The election official at your Early Voting location will record that you have cast your ballot, preventing you from voting early at any other location, submitting an absentee ballot, or voting on Election Day.

MAY I REGISTER TO VOTE during the Early Voting period?
You may register and vote on the same day during the Early Voting period before regular general elections. For Primary Election details, see detailed instructions on MyVote.CT.gov.

DOES EARLY VOTING EXIST in other states?
Although new to Connecticut this year, 46 other states already offer some form of Early Voting.

WHAT hasn't changed?
You can still vote via Absentee Ballot or on Election Day as usual. Elections in Connecticut are still safe and secure.

VIEW YOUR SAMPLE BALLOT WHEN IT IS AVAILABLE
MyVote.CT.gov/sampleballots

REGISTER TO VOTE OR UPDATE YOUR REGISTRATION
MyVote.CT.gov/register

Mrs. Mann explained in a letter dated September 19, 2025 the Town received notification that pursuant to Public Act 25-168, the Connecticut Secretary of the State would again provide grant funding to each municipality this year in the amount of at least $5,000; for costs related to conducting early voting. She stated based on the Secretary of State's formula Ledyard was scheduled to receive $10.026.07; and that the grant funding would be distributed starting in September 2025 contingent on municipalities detailing their intended use of the funds.

Mrs. Mann continued by explaining that the Connecticut Early Voting Laws were initially passed by Public Act 23-5 in 2023, noting that these Early Voting Law would apply to elections and primaries that occur on or after January 1, 2024. She also explained that the in accordance with Public Act 23-5 every municipality had to create at least one early voting location and had the option to establish more, noting that Ledyard's Early Voting Location was in the Lower Level of the Town Hall.

Early Voting provisions were as follows:

- General Elections: 14 days of early voting
- Primaries: seven days ahead
- Special Elections: four days

Mrs. Mann stated for the November 4, 2025 General Election Early Voting would begin on October 20, 2025 and would run for fourteen days ending on November 2, 2025. The hours would be from 10:00 a.m. – 6:00 p.m. every day including the weekends. She stated on the last Tuesday, and Thursday, the hours would be from 8:00 a.m. – 8:00 p.m.

Mrs. Mann stated that Municipalities were surprised that the Secretary of State Office was providing grant funding this year. She stated the Registrars Office planned to use the grant funding for the following:

- Printing of Ballots
- Tabulators – Mrs. Mann stated for the July 8, 2025 Referendum regarding the one Question pertaining to Juliet W. Long School Heating Ventilation and Air Conditioning System (HVAC) Project the cost was $700 for the thumb sticks. Therefore, she stated that they did not know what the cost was going to be for twelve candidates that were on the November 4, 2025 Ballot.

  Deputy Registrar Patricia Carman Frost addressed the Registrar's budget noting that the estimate was based on minimum cost for the eleven tabulator machines. She stated the machines would not work without the executable file they receive from ES&S and that each voting machine had to have its own file. She stated the Programing piece cost was over $7,000. She stated this cost did not include the cost for each line on the Ballot. She stated last year they only had one machine, and the cost was over $5,000. She stated because the Secretary of State was not allowing Municipalities to use the voting machines for Early Voting that all those ballots would need to be counted by hand. However, she stated for Election Day (November 4, 2025) that they would have all eleven voting machines available. Mrs. Mann added that the Same Day Registration Ballots would need to go through one voting machine tabulator; and Absentee Ballots would need to go through one voting machine tabulator; and then they would have voting machine tabulators for the three Voting Districts. Ms. Frost stated that they would also have to have a back-up Voting Machine tabulator for each District.

  Ms. Smith stated because the Early Voting would be carrying into Election Day that some of the Grant Funding would be used for the work that has to be done on Election Day. She stated because ES&S would not provide a cost estimate that they were not sure what their total costs were going to be for Early Voting and Election Day, noting that the $10,026.07 grant funding could be fully expended just for the cost of the tabulators.

  Councilor Barnes questioned whether the town's MIS Department could do the work that ES&S does for the Elections. Ms. Smith stated that the town's MIS Department could not do this election work. Mrs. Mann stated that they had to use ES&S because the information goes to the Secretary of State's Office. Councilor Barnes questioned whether there were other vendors the Town could use. Ms. Smith explained per the Secretary of State's Office ES&S was the only vendor they could use. Councilor Barnes stated that he

did not mind being required to do something, however, he stated it was problematic. because ES&S could not give the town a quote.

Councilor Dombrowski stated that he agreed with Councilor Barnes' comment that ES&S not being able to provide the town a quote was problematic. However, he stated the Municipalities were locked-in.

Councilor Ryan requested clarification, noting that ES&S was the only vendor that Municipalities could use in the State. Mrs. Mann and Ms. Smith replied stating that was correct. Mayor Allyn, III, explained that the State makes the deal and then tells the Municipalities what they have to do.

Councilor Buhle stated that she understands that in Election Security that the State wanted to make sure all citizens had a safe and secure way to vote. However, she stated that it was a problem when a vendor/organization had no incentive to provide a competitive rate. She stated realistically it does not cost ES&S that much to program a thumb drive.

Councilor Dombrowski stated that the frustration was not that the State has told Municipalities that they had to use a particular vendor to support the election. He stated the frustration was that they were less than a month away from the election, they know what the Ballot was going to contain, however, the vendor that was supplying the secure software to support the tabulators could not tell them the cost.

Councilor Ryan questioned whether the Registrars have experienced this in the past with ES&S not being able to provide cost estimates for their services. Mrs. Mann stated that they have; and she noted for the Fiscal Year 2025/2026 Budget Referendum that she was shocked when they received the ES&S $700 Invoice for a simple "*Yes or No*" Question. Therefore, she stated every time they had the Referendum the cost was $700 resulting in a total cost of $2,100 for the three Referendums (May 20, 2025; June 10, 2025 & July 8, 2025 (JWL School HVAC Project).

Chairman St. Vil questioned whether ES&S costs were fairly consistent from year to year; or whether they were surprised each year when they receive ES&S Invoice. Mrs. Mann stated that the costs were not consistent from year to year, and that they were surprised.

Councilor Dombrowski stated for this year they were using a new tabulator. Mrs. Mann stated Councilor Dombrowski was correct, noting that they used the new tabulators for the Fiscal Year 2025/2026 Budget Referendum; and that the November 4, 2025 Election would be the first time they were using the new tabulators for a General Election. She stated for the Budget Referendum they only used two tabulators one at voting location and one tabulator as the backup. However, she stated for the November 4, 2025 General Election that they would be using all eleven tabulators because of the three Voting Districts, Early Voting Ballots, Absentee Ballots, Same Day Registration, plus backup tabulators. Councilor Dombrowski stated that he did not think the $10,026.07 Secretary of State's Grant Funding would cover all these costs.

Chairman St. Vil questioned whether the Registrars included enough funding in their General Government Budget for these costs. Ms. Mann stated in preparing their Department's Fiscal Year 2025/2026 Budget they included funding to support the workers at the Polling Locations, and $10,000 to support the tabulators for the November 4, 2025 Election, which included the maintenance fee. She stated because their old tabulators cost $2,500 that she included $3,800 for the new tabulators based on the information that was provided. However, she stated that this was based on the November 4, 2025 General Election, explaining that they did not plan on the cost to run the three Referendums that were held for the Fiscal Year Budget (2 Referendums) and Juliet W. Long Heating Ventilation & Air Conditioning (HVAC) Project (2 Referendums).

Councilor Buhle stated the permitted use of the $10,026.07 Secretary of State's Grant Funding was for costs directly tied to Early Voting; examples include but were not limited to: labor costs, printing costs, location, equipment and supplies. Therefore, she questioned whether the Registrars were planning to use the Secretary of State's Grant Funding to pay for the labor to staff the Early Voting and then move budgeted labor costs to pay for the tabulators, noting that the tabulators at Districts 1, 2, & 3 were not related to Early Voting;

stating that she believed these would be Same Day Voting Expenses. She stated the labor costs for Early Voting, would be their Early Voting Costs. She stated because money was fungible, that they could move the money that was allocated in the General Government budget for labor costs money over to pay for the tabulators; and then use the Grant Funding to pay for the labor costs.

Mrs. Mann stated that Finance Director Matthew Bonin stated that they could not use the $10,026.07 Secretary of State's Grant Funding to pay for labor costs, because those costs were already budgeted for.

Councilor Buhle stated that she had concerns that the Secretary of State was going to say that paying for the tabulators for Districts 1, 2 & 3; or the tabulators for Same Day Registration were not related to Early Voting expenses; and that she wanted to be sure that the use of the Grant Funding was not conflicting with the way the State anticipated the funds to be used.

Ms. Smith responded stating that she did not think Councilor Buhle was understanding how this all worked. She explained that Same Day Registration would be occurring during Early Voting; however, this would be done manually. She stated when they get to Election Day that all of the Ballots have to go through the tabulators (Absentee Ballots, Same Day Registration Ballots, etc.) at the Central Location, which was District 1; just like every other election. Therefore, she stated that it was all part of Early Voting.

Councilor Buhle stated that she was appreciative of Early Voting noting that her husband would have been disenfranchised during the last election, if not for Early Voting.

Chairman St. Vil thanked Mrs. Mann and Ms. Smith for attending tonight's meeting and for the information regarding Early Voting and the upcoming November 4, 2025 General Election.

V. RESIDENTS AND PROPERTY OWNERS – None.

VI. COMMITTEE COMMISSION AND BOARD REPORTS – None.

VII. COMMENTS OF TOWN COUNCILORS

Councilor Barnes stated October was National Cybersecurity Awareness Month. He stated that this was important to him in his day job; and it was important to him in the role he serves on the Town Council. He encouraged the town to continue to consider the deployment of the multi-factor authentication capability within the Microsoft Cloud for access to Teams. He stated that the multi-factor authentication was the single most important thing the town could do to avoid the possible compromise of a town member's email box; and whatever information may be disclosed. He stated that he appreciated these efforts were continuing and that hopefully they could see that activated within the next few months.

Councilor Brunelle reminded everybody that as the weather started to turn and storms start coming in, that it was a great time to make sure they were signed up for "*Notify Me*" to receive notifications. She stated for those who were not already signed up that they could visit the town's website at: www.ledyardct.org to sign up to receive email and/or text messages. She stated that it was a good way to know about road closures or other problems they should be aware of.

Councilor Ryan stated that he had comments related to a specific agenda item this evening. Therefore, he would reserve his comments for later this evening.

Councilor Saccone stated the heating season was upon them and that he wanted to remind residents if they were heating their homes with wood, pellets, or coal this season to be careful. He stated the Fire Departments would be responding to numerous house calls because residents think the ashes from their wood stoves were extinguished when they dump them into a plastic container and putting them on the side of the house, and then they end up burning the house down. He stated ashes and charcoal can take up to 72-hours to cool off. He stated if residents take their ashes outside that they take them away from the house and soak them in water. He asked residents to please be careful this winter season.

Councilor Dombrowski stated in keeping with the comments regarding Fall weather that the leaves were beginning to fall from the trees. He urged motorists to drive with caution noting that wet leaves make the roads slippery. He went on to state that the deer were now active, noting that they are out at dusk and dawn. He stated every year Ledyard has a number of deer/vehicle strikes and he asked that they be mindful of the deer when driving in the area. He also asked that motorist obey the Stop Signs, noting that they were not optional and did not mean Yield. He stated although he has not seen this in Ledyard that he has seen in other town's that Red Lights mean to "*Curtsey and Go*". He stated that it was concerning when he sees someone pull up to a Red Light and then go straight through the traffic light. He stated a Red Traffic Light means "*Stop*".

Councilor Buhle stated October was Pregnancy and Infant Loss Awareness Month. She expressed her empathy to all those in their community who has experienced pregnancy and infant loss. She stated that she knows how isolating and heartbreaking the experience was and she was sending love to those in their community who were or have gone through the experience.

Chairman St. Vil stated this past weekend he was out and about town talking with residents and he noted that spoke with Mr. Bruce Garstka who was the Chairman of the Agricultural Commission. He noted that Mr. Garstka brought to his attention an email the Town Council received regarding the Clark Farm Lease. He explained that the Agricultural Lease for a portion of the Clark Farm Property would terminate in March, 2026 and to ensure that the property would not go fallow that the Agriculatuaral Commission was requesting a process to vet a new lessee for the property. He stated in talking with Mayor Allyn, III, that this matter should be addressed by the Land Use/Planning/Public Works Committee. Councilor Garcia-Irizarry, LUPPW Committee Chairman, stated that the Committee met with Mr. Garstka at their October 6, 2025 meeting and discussed his request.

VIII. REVIEW AND APPROVAL OF PRIOR MEETING MINUTES

MOTION to approve the following:

- Special Town Council Meeting of September 10, 2025 (Executive Session)
- Regular Meeting Minutes of September 10, 2025
- Public Hearing Minutes of September 24, 2025

Moved by Councilor Dombrowski, seconded by Councilor Garcia-Irizarry

VOTE: **7 – 0 - 1 Approved and so declared** (Brunelle abstained)

IX. COMMUNICATIONS

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

X. COUNCIL SUB COMMITTEE, LIAISON REPORTS

Administration Committee

Councilor Buhle stated the Administration Committee met earlier this evening and forwarded a few appointments to the Town Council for consideration at their October 22, 2025 meeting.

Community Relations Committee for Diversity Equity & Inclusion

Councilor Brunelle stated the Community Relations Committee for Diversity, Equity & Inclusion met on September 17, 2025; and also held a Special Meeting on September 29, 2025 to discuss putting together a little message to the town to encourage listening, working together and collaborating. She stated the overall environment in the State was a little elevated and hot. Therefore, the Community Relations Committee for Diversity, Equity & Inclusion wanted to make sure they were aware of; and that they were helping to make it a little more tolerable in their town. She noted that the Committee had an item on tonight's agenda regarding their proposal that she would further discuss later this evening.

Finance Committee
Councilor Saccone stated although the Finance Committee has not met since the last the Town Council meeting they have one item on the Consent Calendar this evening regarding tax refunds.

Land Use/Planning/Public Works Committee
Councilor Garcia-Irizarry stated the LUPPW Committee met on October 6, 2025 and discussed the following: (1) Status of work to designate the Spicer Homestead Ruins, located within the Clark Farm property, as a Registered Historical Site – Councilor Garcia-Irizarry noted that the Historic District Commission Members Mrs. Karen Parkinson and Mr. Doug Kelley attended the meeting and explained that they were continuing their work on the initiative; and would most likely not be ready to present a Report to the LUPPW Committee until December or January. She noted that the LUPPW Committee agreed to keep the Spicer Homestead Ruins on their Agenda; (2) Agricultural Leases of Town-Owned Land – Councilor Garcia-Irizarry stated that Agricultural Commission Chairman Bruce Garstka attended the meeting to discuss his Memo dated August 27, 2025 regarding the Commission's interest to create a List of Criteria for the Leasing of Town-Own Land such as Clark Farm and former Norwich State Hospital Property to encourage the properties be used for Agricultural purposes and to prevent them from going fallow. She stated the LUPPW Committee authorized the Agricultural Commission to develop a List of Criteria for the leasing of Town-Owned Land that would encourage agricultural use; and they asked Mr. Garstka to come back to the LUPPW Committee once they have developed the List; (3) Transfer of Town-Owned Open Space Land to Avalonia Land Conservancy – Councilor Garica-Irizary stated that Avalonia Land Conservancy President Dennis Main, Conservation Commission Chairman Michael Marelli, and Land Use Director/Town Planner Elizabeth Burdick attended the meeting to provide some background regarding the transfer of the following Town-Owned properties to Avalonia Land Conservancy: (a) 19 Avery Hill Road Extension, Ledyard, known as the "Kettle Hole" property; and (b) 13 Applewood Drive, Ledyard. She explained that the Conservation Commission was in-favor of transferring these properties to Avalonia Land Conservancy and that the Planning & Zoning Commission conducted an 8-24 Review and has provided a "Favorable Recommendation" with some conditions. She stated the town owned properties would be combined with other Avalonia Land Conservancy properties to remain open to the public for passive recreation and to be protected in perpetuity. She noted the LUPPW Committee asked Avalonia Land Conservancy President Dennis Main to provide a letter to the town requesting the transfer of the properties to their Organization prior to presenting the request to the townspeople. In addition, the LUPPW Committee forwarded recommendations for the Town Council to schedule a Public Hearing in accordance with CGS 707-163e and a Special Town Meeting in accordance with Town Charter, Chapter VII; Section 9 to be held on November 12, 2025. Councilor Dombrowski noted that setting the Public Hearing and Special Town Meeting would be on the Town Council's October 22, 2025 Agenda.

Permanent Municipal Building Committee
Councilor Brunelle stated the PMBC met on Monday, October 6, 2025 and they basically discussed an installation at the Ledyard Central Office, and the Solar Array Installation at the Juliet W. Long School which has been completed. Eversource had to reschedule turning the solar array on, noting that a date has not yet been provided. The Gales Ferry School was in a holding pattern and they were waiting for more information regarding the Roof Installation.

Public Safety-Emergency Services
Councilor Saccone stated on September 25, 2025 their Police and Firefighters conducted a water rescue after a vehicle went into the Thames River near the Yale Boat Lauch in the Gales Ferry Village. He stated on September 10, 2025 the Town Council recognized Chief Dispatcher Paul Smith, and he stated the September 25, 2025 incident tied into the importance of their Emergency Dispatchers being the ultimate First Responders. He stated the Caller, who was probably disturbed, told the Dispatcher what he was going to do; and immediately crews were dispatched to the location, however, he stated when they arrived it was too late as the vehicle was already 90% under the water. He stated one of their Police Officers and Gales Ferry Firefighters jumped into the water and broke through the windows and got the individual out, noting that they were alive today. He stated he wanted to bring to light all that their First Responders do for their community.

Board of Education
Councilor Garcia-Irizarry stated although the Board of Education met last night she was not able to attend the meeting.

Library Commission
Councilor Garcia-Irizarry stated the Library Commission met on September 17 and September 22, 2025. However, she stated because she was in Puerto Rico that she was not able to attend.

Economic Development Commission
Councilor Buhle stated she was not able to attend the EDC's October 7, 2025 meeting.

XI. MAYOR'S REPORT

Mayor Allyn, III, reported on the following: (1) Deer Strikes – Mayor Allyn stated to date this season Ledyard has had 39 Deer Strikes. He stated a few years ago they had 126 Deer Strikes, which was extremely high. He stated as Councilor Dombrowski mentioned earlier this evening that he hoped that motorist would pay attention to their peripheral vision, noting that often the Deer will be standing on the side of the road and will suddenly decide to enter the road; (2) Gales Ferry School Roof Project – Mayor Allyn stated that Town would be entering into Mediation with the Roofing Contractor, which would be scheduled for December, 2025 or January 2026. He stated that he would keep the Town Council apprised of the situation; (3) Library Director has resigned her position – Mayor Allyn stated the position was posted on Monday (October 6, 2025) and to date the town has received two applications; (4) Southeastern Connecticut Council of Governments Local Transportation Capital Improvement Program (LoTCIP Grant – Mayor Allyn stated yesterday he met with Southeastern Connecticut Council of Governments to discuss a new LoTCIP Grant Application to seek funding for a bridge located on Lantern Hill Road that was not rated high. He stated they would be meeting with an Engineering Firm and SCCOG to review the Plan to see if they were confident the Project would be eligible for the LoTCIP Grant Program. He stated if they find that the Project was eligible for the LoTCIP Funding that it would save the Town about $1.2 million; (5) Economic Development Commission October 6, 2025 Meeting – Mayor Allyn stated at the EDC Meeting they discussed a Small Town Economic Assistance Program Grant (STEAP) for the construction of sidewalks in Gales Ferry. He stated the STEAP Grants usually come out in late February, and that they would have to have their engineering and design work completed. He also explained that because Route 12 was a State Road that they would have to obtain Encroachment Permits from the State Department of Transportation (DOT). He stated if the town was going to seek to do some development in Gales Ferry, that would be similar to what was done in Ledyard Center, that they would need to start allocating funds to conduct the design and engineering work and then look for a LoTCIP Grant, noting that he did not think that the STEAP Grants would provide enough funding for the project; (6) Elks Police Appreciation Dinner – October 10, 2025– Mayor Allyn stated that he would be attending the Dinner on Friday evening, noting that two Award Recipients would be from the Ledyard Police Department. He stated that he would report back on who the two recipients were at the October 22, 2025 Town Council Meeting.

Questions to the Mayor

Councilor Garcia-Irizarry addressed Food Waste Composting, and she questioned the status of Southeastern Connecticut Regional Resource Recycling Authority (SCRRRA) Organic Composting Facility. Mayor Allyn stated that SCRRRA has picked up where Blue Earth Composting left off. He stated that SCRRRA was still waiting to receive their Permit from the State for their Organic Waste Composting Facility. He stated once SCRRRA obtains their State Permit that it would be a huge catalyst for the whole area.

Councilor Saccone noted the weight load for the Bridge on Lantern Hill Road, and he noted that the Gales Ferry Ladder Truck weighed 42-tons. He stated if the Bridge could not support the weight that the ladder truck and tanker trucks would have to be diverted, which would result in a significant time delays in responding to fires in that area. Therefore, he stated that including this in the Local Transportation Capital Improvement Program (LoTCIP) Grant Application may be an

important factor to note. Mayor Allyn thanked Councilor Saccone for mentioning the weight of the fire apparatus stating that the Lantern Hill Road Bridge Design Rating would need to be 50-tons. He stated the other Lantern Hill Road Bridge was currently out of service, therefore, he stated the Desing Rating for the two bridges on that road would need to match.

Councilor Barnes questioned whether the Lantern Hill Road Bridge being out of service would affect the homeowners and fire insurance for the adjacent property owners. Mayor Alllyn stated the adjacent communities were aware that the bridge was out of service. He stated the Lantern Hill Road Bridge was shared between Ledyard and Stonington, noting the other side of the bridge was in Stonington. Councilor Barnes stated with the bridge being out of service that it would affect Mutal Aide in responding to fires. Mayor Allyn stated that Councilor Barnes was correct, explaining that it would be a problem, because Ledyard's Mutual Aide comes from the Olde Mystic Fire Department on that end of Lantern Hill Road, stating with the Bridge being out of service the Olde Mystic Fire Department currently cannot get up that way. Therefore, he stated that they would have to look for alternatives, noting that the Mashantucket Pequot Fire Department would probably be a good alternative because they would come in from this side of the Lantern Hill Road Bridge.

Chairman St. Vil questioned the reason some of the Stop Signs that were on the galvanized posts in the Highlands area were taken out and sandwich board stop signs were currently in place. Mayor Allyn stated that he was not aware of the Stop Sign situation in the Highlands and that he would look into the matter and get back to Chairman St. Vil.

XII. OLD BUSINESS – None.

XIII. NEW BUSINESS

CONSENT CALENDAR

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

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

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

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

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

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

Moved by Councilor Dombrowski, seconded by Councilor Garica-Irizarry

VOTE: 8 – 0 Approved and so declared

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

Administration Committee

4. 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.
Moved by Councilor Buhle, seconded by Councilor Brunelle
Discussion: None.

VOTE: 8 – 0 Approved and so declared

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

Community Relations Committee for Diversity, Equity & Inclusion

5. MOTION to endorse the Community Relations Committee for Diversity, Equity & Inclusion's message to be distributed in the form of a Digital and possibly a Printed Flyer "*We Encourage all Ledyard Residents to Listen, Collaborate, and Find Common Ground. Progress comes from Teamwork*"; as presented in the draft dated September 29, 2025.
Moved by Councilor Brunelle, seconded by Councilor Buhle
Discussion: Councilor Brunelle stated that this was basically the *Elephant in the Room* noting that tensions in the country have gotten a little heated. She stated that they like to think of their Town as our home, our neighbors, our friends, and our family. So the Community Relations Committee for Diversity, Equity, & Inclusion felt that it was important to put forth a message to remind everybody that we are all here together and that progress does come from teamwork. She stated that it was a good message to put out there digitally and in a flyer form. She stated it was just a little thing and something nice noting that to encouragement was always good, rather than negativity.

Councilor Buhle stated that she pictures the Flyer with inspirational photos, stating that she wanted the background to be really pretty pictures of Ledyard with a great positive message. She stated before tonight's meetings that she and Councilor Dombrowski were discussing the many things where we were all very similar and alike; and the many shared experiences. She stated that recently things have been so divisive that it was nice to have situations where the y could recognize that they have common ground.

Councilor Barnes stated during the Community Relations Committee for Diversity, Equity,& Inclusion's meeting that they talked about one of the ways the town has come together in an incredible way was the Farmers Market. He stated that they talked about a photo of the Farmers Market being the center of the flyer; and he questioned whether Councilor Brunelle was able to obtain authorization to use a Farmers Market photograph.

Councilor Brunelle stated the Farmers Market did not want to associate themselves with DEI (Diversity, Equity, & Inclusion) for fear of retaliation and angering people, which was the whole point of the message, which she found very disappointing, but that was their right. Therefore, she stated that she did not want to use a picture they were not comfortable with.

Councilor Barnes stated the message was provided by Councilor Parad and the idea was that it would not just be a sheet with words, but that it would also include a photograph. He stated if they had a photograph they could use that he thought that it would make the flyer more impactful. He stated there were things that happen every day in town that show teamwork, collaboration and community. He stated that this message would ring more true if these things were expressed on whatever they produced.

Chairman St. Vil stated that he agreed with the sentiment of the message, noting before tonight's meeting they were having a discussion around life. He stated that sometimes they forget that they were not just Councilors working together, but that they were coworkers, they

were neighbors, they were friends. He stated to reinforce that sentiment whether it was in written form or digitally that it was one of those things that it could not hurt especially in the divisive climate they were in today.

VOTE: **6 – 2 Approved and so declared** (Dombrowski, Ryan not in favor)

RESULT:	APPROVED 6 – 2
MOVER:	April Brunelle, Town Councilor.
SECONDER:	Jessica Buhle, Town Councilor
AYES:	Barnes, Brunelle, Buhle, Dombrowski, Garcia-Irizarry, Saccone, St. Vil
NAYES:	Dombrowski, Ryan
EXCUSED:	Parad

General Items

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

MOTION to adopt a proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" as presented in the draft dated ~~September 10,~~ ***October 8, .***2025.
Moved by Councilor Buhle, seconded by Councilor Brunelle
Discussion: Councilor Buhle stated that she would like to Amend the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission"*.

Councilor Ryan questioned whether the proposed amendments that Councilor Buhle was presenting this evening were attached to the Agenda Packet. Councilor Buhle stated that they were not; and that she would send them to him.

Councilor Dombrowski stated that he would not be ready to vote on the proposed amendments without seeing them. Councilor Ryan stated that they could not engineer these changes at a Town Council meeting.

Chairman St. Vil stated that the proposed amendments were not engineering, noting that they were clarifications to the existing Ordinance. He stated if Councilors did not feel comfortable voting that they could "*Abstain"*, noting that they could not stop the vote. Councilor Dombrowski stated that he could vote "*No"* explaining that the issue he had was that they were making changes to a proposed Ordinance that was being discussed for the first time by the Town Council; without providing any documentation prior to tonight's meeting. Chairman St. Vil stated the proposed clarifications were fairly benign to the original intent of the Ordinance. He stated that he respected Councilor Dombrowski's opinion; and he asked Councilor Buhle to proceed.

❖ MOTION to amend the "*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission"* as presented in the draft dated September 10, 2025 as follows:

- ***Section 4, paragraph 3b,*** remove the phrase "~~spouse or minor child~~" and replace it with "***or immediate family of***".
- ***Section 4, paragraph*** 8, Town Employee definition will be modified to add the phrase, ***"including outsourced administrative or executive professionals, including but not limited to consultants and the Town Attorney***"
- ***Section 5, paragraph 3,*** add the phrase, "***unless the contract or purchase order is awarded through the traditional bid or quote process and conflict is disclosed.***"
- ***Section 5, paragraph 4,*** add the following sentence, "***This provision does not apply to Town employees or Board of Education employees providing recreational services including but not limited to classes, coaching, camp counseling through Ledyard Parks and Recreation or Ledyard Board of Education".***
- ***Section 7, paragraph 1b6***, add the phrase "***unless disclosed to the Ethics Commission.***"

Moved by Councilor Buhle, seconded by Councilor Brunelle

Discussion: Chairman St. Vil that he expected that there would be some significant discussion this evening. Therefore, he proposed that they start with an orderly fashion beginning with Councilor Barnes so that everyone had a chance to present their initial opinion on the matter; and then he would open the floor discussion for debate.

Councilor Buhle stated that she had a draft with the proposed changes and marked-up that she would send to Administrative Assistant Roxanne Maher.

Councilor Barnes stated that he wanted to be clear, noting that in terms of having a Code of Ethics that he thought that there was unanimous support by all Town Councilor Members that it was something they need. He stated that he did not want anyone to see a vote whether it was from him or another member of the Town Council and think that they were against the need for a Code of Ethics. He stated that they absolutely needed it and that they should have had one sometime ago; and that whatever happens that they would have a Code of Ethics in the future.

Councilor Barnes continued by addressing the proposed "*An Ordinance Establishing a Code of Ethics and Ethics Commission"* in its entirety noting that he had three areas of concern; and one concern that may make it possible not to proceed. He stated that some of Councilor Buhle's proposed amendments addressed some of his concerns; however, he stated that he wanted to share what his concerns were before this evening. He stated by not seeing the proposed edits that it was not possible for him to know that all of his concerns were raised:

- ***Public Hearing – September 24, 2025*** – Councilor Barnes stated from the Public Hearing there were a number of town officials that did not have a chance to review the proposed Ordinance or participate in the discussion. He stated based on Councilor Buhle's edits that it sounded like for at least the Parks, Recreation & Senior Citizens they captured some of that.

  Councilor Barnes questioned whether Councilor Buhle followed up with all of the town officials that expressed concerns at the September 24, 2025 Public Hearing.

  Councilor Buhle stated that she followed up with:

  - Parks & Recreation Director Scott Johnson, Jr.
  - Town Clerk Particia Riley – Councilor Buhle stated that she had a meeting on the calendar with Town Clerk Patricia Riley; however, she stated Ms. Riley was not available that day and they had to reschedule.
  - Director of Human Resources Christine Dias – Councilor Buhle stated that she did not follow-up with Ms. Dias. However, she stated that she thought the process made sense; and it was her opinion that for any Ethics Complaints involving town employees that they be handled by the Human Resources Department.

  Councilor Barnes stated that his concern was that they incorporate the feedback from each of the town officials. He thanked Councilor Buhle for one of the edits she suggested, noting that it at least covered the Parks & Recreation. He stated that he believed there was a need to make sure all town officials, at least from the Director level, had a chance to review the suggested edits and to provide comments. However, he stated that they have not had that opportunity.

  Councilor Barnes continued to note his concerns as follows:

- ***Exemptions for Certain Situations*** - Councilor Barnes stated it sounded like Councilor Buhle captured the exemptions for the Parks & Recreation Activity Leagues with her proposed edits this evening.

- ***Residents Feedback*** – Councilor Barnes noted all the detailed feedback from the residents, stating that nearly all of the residents who were in-favor and opposed to the proposed Ordinance commented that the proposed document needed substantial updates. He stated that Mr. Schroeder may have provided the best example; and that he thought that Councilor Buhle may have captured many of those.

- ***Town Charter*** - Councilor Barnes stated that his biggest concern regarding the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* as written, was that it was inconsistent with the Town Charter. He stated the Town Charter empowers the Town Council for all Investigation Matters. He stated if the proposed Ordinance was to provide a recommendation for the Town Council for further investigation; that they need to say that. However, he stated as the proposed Ordinance was currently written the Ethics Commission was the Investigative Authority; and he stated that could not be established in an Ordinance because it was inconsistent with the Town Charter at this time.

  Councilor Brunelle asked whether Councilor Buhle's proposed changes could be printed and passed out, so that everyone would have the chance to see them, noting that she did not have her laptop this evening.

  Councilor Brunelle commented on the following:

- ***Proposed Changes were Not Substantial*** – Councilor Brunelle stated that she agreed that the proposed changes were for clarification to make the intent clear, stating that they were not substantial changes.

- ***Existing Documentation and Procedures*** - Councilor Brunelle stated that they received comments that they have things in place and they did not need the proposed Ordinance, because they handled situations in the past without having this. She stated the two situations that occurred in the past were Legal Matters. She stated that they were Illegal Embezzlements; and that was not ethics. She stated if someone was embezzling money that they would not go to the Ethics Commission, noting that they would call the police. Therefore, she stated that those two circumstances do not really apply, because if it was a Legal Issue you would obviously follow the legal course.

- ***Ethics Committee*** – Councilor Brunelle stated that she agreed with Councilors Barnes that they needed to have an Ethics Committee.

  Councilor Barnes corrected Councilor Brunelle stating that he wanted to be clear, that what he said was that they needed a Code of Ethics. Councilor Brunelle stated that was fine.

  Councilor Brunelle stated that she believed they needed to have an Ethics Committee; an this has been being worked on for a very long time, months, and months, and months.

- ***Town Official Comments*** – Councilor Brunelle stated as far as town officials reviewing and providing comments that she had a question for the Mayor. She stated that the Mayor knew that they were working on this for months, and months, and months. She questioned whether the Mayor ever contacted the town officials and let them know that this was happening so that they had a chance see the reviews and comments, because they have been in the minutes and things like that.

  Mayor Allyn, III, stated that the Department Heads were made aware of the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" the day following the draft that was introduced on September 8, 2025; which was when they finally had a working draft. Councilor Brunelle stated the Mayor did not let them know ahead of time. Mayor Allyn stated prior to the September 8, 2025 draft that there had been several iterations, therefore, he stated it would not have been helpful for the Department Heads to review the many different changing drafts as the document was being developed. Councilor Brunelle stated that their comments could have helped mold it in the future. She stated that she would have taken it upon herself to let them know ahead of time, so that their comments could have come in ahead of time before the irritations, so that it would have been more cohesive with their comments a head of time. Mayor Allyn stated that it would have been equally important for this group to reach out to those employees and communicate with them, noting that has been a huge problem. Councilor Brunelle stated that was the Mayor's role, noting that they were underneath him. Councilor Barnes stated that he did not think Councilor Brunelle's comment were appropriate. Councilor Brunelle stated that she thought it was appropriate because he was putting blame on us, when she did not think it was our responsibility for that as a Committee, as they were making up a draft, stating that they cannot contact everybody in town. Mayor Allyn stated the Administration Committee worked on the draft for 22-months.

  Councilor Brunelle went on to state the reason she abstained from approving the Minutes this evening was because the Minutes were not accurate. The Minutes did not capture her sentiments and there were a lot of typos in the Minutes; and she did not want to make a fuss, and that was why she abstained. Councilor Barnes stated that Councilor Brunelle should have voted "*No"*. Councilor Brunelle stated it was her choice to abstain, so that it was on the record; because she thought that some of the stuff that was printed in the Minutes misinterpreted what she said; and her intention.

Councilor Brunelle stated for example one of them was that she addressed the "*Question why some people were saying that she did not understand why some people could be against such a thing*" and she stated "*That was a naïve question because there has been tons of reasons why people have said they have been against it; and that I understand and I listen to them; and at the same token you cannot sit there and say I don't understand why anyone would be for it, because there has been a lot of comments and statements why they were for it. So you have to look at both sides, you have to see the Pro's and Con's and you have to say what is the best route for the town"* . So that was the reason she abstained because she did not feel that it correctly portrayed what she said at the meeting and there was no video; so she could not go back to verify. So with that being said, she felt that this was very important; she believed they have been working on it for a very long time; and she believed that it should be pushed forward.

****POST MEETING NOTE**: The following Minutes were listed for approval this evening:

- Special Town Council Meeting Minutes - September 10, 2025 Executive Session – No dialogue was recorded;
- Regular Town Council Meeting Minutes - September 10, 2025 – only discussion regarding the proposed Ethics Ordinance was to set a Public Hearing Date;
- Public Hearing Minutes - September 24, 2025 Councilor Brunelle was not present

Councilor Ryan stated that he thought Councilor Brunlle's comments toward the Mayor were accusatory and rude. Councilor Brunelle stated that she was sure he did. But he that Councilor Ryan has said a lot of rude things to her in the past and written, so its *Touche'*. Councilor Ryan stated that he was referring to the comments Councilor Brunelle said to the Mayor. She stated that it was also rude when everybody was saying that they did it wrong; it was the same thing back.

Council Ryan stated that he did not support the proposed Ordinance under Agenda Item #6 for the following reasons:

- The draft that was before Town Council includes additional language that has not been reviewed by the Town Attorney; due to the sensitive nature of this proposed Ordinance, the Town Attorney should review the final draft and provide their opinion to the Town Council to consider.

- The current draft ignores previous recommendations made by the Town Attorney, an individual who was paid to protect the town from liability.

- The development of this draft proposal did not involve the Town Clerk, although he understands that Councilor Buhle did try to schedule meetings; as well as the Human Resources Director and other stakeholders, noting that he understood that Councilor Buhle was able to talk with the Parks and Recreation Director Scott Johnson, Jr., and yet the proposed Ordinance invokes additional responsibility on the Town Clerk's Office not accounted for currently, in terms of resources. Additionally, at a prior Administration Committee meeting (September 8, 2025), the Town Clerk also outlined some execution concerns. The Town Clerk should be given the opportunity to review the document and provide input on impacts to their department for the Town Council to consider.

- As noted by the Mayor and the town's Human Resources Director, the proposed draft was in conflict with the town's collective bargaining agreements.

- This proposed draft was in conflict with the Town Charter; and that he would expand on this later in his comments.

Councilor Ryan stated that based on just the above reasons, that this draft was not ready for Town Council consideration, and it feels like it is being rushed over the finish line for reasons that he could not comprehend. He noted a comment was made at a prior Administrative Committee meeting regarding a concern about *"perfect getting in the way of good*". He stated that was a phrase that should be used with caution, and while he would agree with that sentiment in certain circumstances, an Ordinance that opens the town up to additional legal liability and has the potential to personally and professionally affect individuals was not one of those circumstances.

Councilor Ryan went on to state, Additionally, what has not been made clear to him was what problem this was addressing. He stated that they were potentially exposing the town to significant additional expenses – at least $20,000 in additional annual legal expenses according to the town attorney – and for what purpose. He stated there were multitudes of existing documents that ensure ethical conduct by employees was enforced, including:

- CT General Statute 7-148h – Outlines ethical conduct rules for officials and the ability for a municipality to bestow the power to investigate allegations to a body.
- Chapter III, Section 9 of the Town Charter – Provides the Town Council with the power of investigation, and therefore, invokes the powers/provisions inherent in CGS 7-148. He noted that this power cannot be explicitly delegated; and, per Section 4 of the Town Charter, the Town Council cannot create an ordinance that was inconsistent with the provisions of the Town Charter. As such, there was an inherent disconnect between the Town Charter and the proposed Ordinance.
- Town of Ledyard Fraud Policy – Outlines multiple examples that constitute employee fraud.
- Town of Ledyard Employee Handbook – Outlines detailed examples of behavior considered unethical, including nepotism and multiple examples of conflicts of interests.

Councilor Ryan stated that given the aforementioned, that he questioned why the town needed anything else – especially something potentially contradictory to existing town documents as noted above – to handle the exceedingly rare instances the town has had regarding ethical misconduct by employees. Rare instances, that he would note, have been successfully handled using existing policies and procedures.

Councilor Ryan went on to state that what was especially worrisome was what this proposed Ordinance implied - that the Town Council does not have the capacity to use the powers bestowed to them by the Town Charter to objectively act in the best interests of the town. He stated that he would remind everyone that they were elected to do just that - put the town first, ahead of any personal, partisan or special interests.

Councilor Ryan stated that he wanted to clarify that he was not debating the need to enforce ethical behavior, noting that he was simply pointing out that they have procedures and policies currently in place that are time tested and proven to work.

Councilor Ryan stated that if there was an interest in creating a Code of Ethics, or updating an existing document, to act as a comprehensive ethics reference, and would perhaps expand on some of the definitions already provided, that he would support that effort, provided all the necessary stakeholders were involved in developing it from the beginning, which has not been the case with what was before them, as they have seen. He stated to be clear, that would be absent the establishment of an Ethics Commission, for reasons he stated previously.

Councilor Ryan stated in the end, if the Town Council was going to pass an Ordinance with the power to change people's lives and obligate additional town resources and taxpayer money, that it needed to perfect – not just "*good enough*". He stated the proposed Ordinance, which was in conflict with their Town Charter, should go back to Committee for additional work.

Councilor Saccone provided the following comments:

- ***Town Charter*** – Councilor Saccone questioned when the Town Attorney reviewed the proposed "*An Ordinance Establishing a Code of Ethics and Ethics Commission"* whether he found any conflict with the Town Charter.

Councilor Buhle stated the draft Ordinance that Town Attorney Matt Ritter returned to her also included an Ethics Commission investigation. She stated that she would imagine that their Town Attorney, that was representing them, would not provide language that was in conflict with the Town Charter, or that he would not provide them with a draft Ordinance that does not comply with the Town Charter. Councilor Saccone noted that he would agree with Councilor Buhle's comment.

- ***Need for an Ethics Commission***- Councilor Saccone stated he has lived in town 37 years and that he has seen illegal things happen in town and the people were punished for what they did. He stated the proposed Ordinance would not have stopped those people from stealing town funds. However, he stated that the proposed Ordinance brings to light that their elected officials and their employees are ethical.

- ***Draft Ordinance*** – Councilor Saccone stated that he supported the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"*. He stated that he reviewed Ethics Ordinances from three other towns noting that he did not like some of the things that were in the Town of Waterford's Ethics Ordinance as it delt with how their Representative Town Meeting (RTM) people could do things. However, he stated that he agreed with the rest of Waterford's Ordinance, noting that it brougth to light what their needs would be as a town as well. He stated that he has read over the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* numerous times.

- ***Good Enough versus Perfect*** – Councilor Saccone stated that the United States Government had laws that go on the books that were never perfect. He commented that he was not saying the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* needed a correction. However, he stated should they find years down the road that there were things they needed to add or subtract to enhance any law or regulations, that they could do that, noting that they see it happen every day in the laws that were written across the country.

  Councilor Saccone stated that he was in-favor of the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* and that he would vote "*Yes"*.

  Councilor Dombrowski stated that some of the things they talked about tonight regarding an Ethics Commission he brought up when they first began discussing the subject such as:

- ***Conflict with Town Charter*** – Councilor Dombrowski stated during their early discussions regarding establishing an Ethics Commission that he said that he thought they needed to have a Charter Revision first.

- ***Code of Ethics – Ethics Commission*** – Councilor Dombrowski stated the Code of Ethics and Ethics Commission needed to be separate; for the same reasons others have presented this evening. He stated that they could take the Code of Ethics out of the proposed Ordinance and adopt it as a Policy Document, explaining that could be done without a Public Hearing.

  Councilor Dombrowski stated could a Code of Ethics and Ethics Commission be put together in one document "*Yes*". Should they be in one document "*No"*.

- ***Substantive Changes***- Councilor Dombrowski stated although some have said the proposed changes Councilor Buhle presented were to provide clarification; and they were not substantive, that he thought some of them could be substantive enough, to require a new Public Hearing.

- ***Attorney Legal Review*** – Councilor Dombrowski stated the draft Ordinance dated September 10, 2025 that was presented at the September 24, 2025 Public Hearing; and the proposed changes presented this evening have not gone back to the Town Attorney for a legal review; after the Administration Committee added some portions back into the proposed Ordinance that were specifically struck out by the Town Attorney. He stated that he thought they were putting themselves in a position for liabilities because they added language in without getting the appropriate level of legal review.

  Councilor Dombrowski stated that he did not think the draft "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* was ready; noting that he has been saying this right along.

  Councilor Buhle provide the following comments:

- ***Changes from Town Attorney Draft dated 7/14/2025*** - Councilor Buhle stated that she wanted to be clear that the only significant change to the Town Attorney's July 14, 2025 draft Ordinance and the draft that was before them this evening, was to Section 6 with regard to ***Disclosure for Public Officials and those Working in the Town***. She stated as she has said in

all of her previous comments that the bulk of the telephone conversation that she and the Town Attorney had regarding the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* was regarding Section 6. She stated that the Town Attorney advised her multiple times that it was admissible and legal and they could keep it. She stated that she responded to the Town Attorney stating "*Yes that was an important part of the draft Ordinance to her and that she wanted to keep it; and that she wanted that in there*". She stated the Town Attorney said "*You can have that…. That was fine";* and then the Town Attorney returned the draft Ordinance without it; and with no explanation as to why it was removed. She stated that was extremely frustrating to her; because being told "*Yes, it was legal and admissible*" , noting that the Town Attorney said "*It may deter people from running from office; and it was going to deter your volunteers".* Councilor Buhle stated that she said "*It was only going to apply to elected officials"* and that the Town Attorney said "*Oh, okay, you can have that "; a*nd she said "*Okay"*.

Councilor Buhle stated that was the only portion of that she would say was relevant. She stated the Town Attorney's reassurance it was legal and acceptable; but the Town Attorney removed it.

Councilor Dombrowski stated that unfortunately for the public record the only draft he had before him this evening was the Town Attorney's redline draft Ordinance; and not the conversation between Councilor Buhle the Town Attorney. Councilor Buhle stated that she understands; and that she learned that she would not have telephone conversations with attorneys.

Chairman St. Vil questioned whether Councilor Dombrowski was doubting Councilor Buhle's statements or her interpretation of her conversation with the Town Attorney. Councilor Dombrowski stated that he did not have anything to back-it up; stating that he was not doubting the conversation Councilor Buhle had with the Town Attorney; and he was not doubting what she believed; or what she was saying was not correct. However, he stated the problem was that the interpretation the Town Attorney provided back to Councilor Buhle struck that language out.

Councilor Ryan questioned whether the draft Ordinance that Councilor Buhle was referring to was reviewed by the Town Attorney. Councilor Buhle responded stating "*No".* Councilor Barnes questioned whether a review by the Town Attorney was possible and he questioned the reason they would not do that. Councilor Buhle that she did not feel that any of the changes were so substantial that they changed the document. Councilor Ryan questioned whether the version of the Ordinance that Councilor Buhle was making amendments to this evening had been sent to the Town Attorney for his review, noting that there has been plenty of time to pass that version through the Town Attorney. Councilor Buhle replied stating "*That it has not*"; noting that the Town Attorney took almost 4-weeks to return the previous draft. Councilor Ryan stated had they given the Town Attorney the updated version then, that they could have come back and had a Special Meeting to talk about this after they gave it another legal review; especially for an ordinance, noting that it was law. Councilor Buhle stated that she understood; and that she did not think that any of the changes from the Town Attorney's advisory draft were substantial enough to warrant another legal review at this time. Councilor Ryan stated that he did not understand the reason they would not let the Town Attorney make that determination; noting that was what an Attorney does. Councilor Buhle stated sure. Councilor Ryan stated that Councilor Buhle was not an Attorney. Councilor Buhle stated that she was not; and she stated that every change that was made to the Attorney's advisory draft Ordinance was verified through the Connecticut General Statues; and they were in several other towns' ordinances. Therefore, she stated that she was not concerned, noting that furthermore; there was a Severability provision in there, so if something was not valid that it did not invalidate the entire draft. She stated that she did not think that they have presented an illegal draft with unenforceable expectations.

Councilor Barnes stated that they have expressed concerns that the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" may be inconsistent with the Town Charter. He stated that he did not refute that the prior comments did not include that. However, he stated given the concern that was first shared by the Mayor that they ought to ask the Town Attorney, given the totality of all the revisions, whether this draft was proper. He also stated that they owed an ask as to whether it was inconsistent with the Town Charter as they interpret it to be a concern. Councilor Buhle stated that she thought Councilor Barnes had a fair question. But as she mentioned, and she was going to blunt, if everybody wanted to say they have already spent $4,000 on the Attorney Review, why would the Attorney return a draft that was inconsistent with the Town Charter; and if he did why they would pay $4,000 for an Attorney to review something and give them back something that was inconsistent with their Town Charter. Councilor Barnes noted that the Town Attorney removed language; Councilor Buhle interjected stating that the Town Attorney did

not remove the Investigation portion. Councilor Barnes stated that he was not an Attorney, and therefore, he could not see why at this point, when they were about to put an Ordinance in-place, they would not ask the Town Attorney the following questions: (1) What he thought of the final revision; and (2) Whether it was inconsistent with the Town Charter; as they identified a concern. He stated maybe it was not inconsistent with the Town Charter, noting that maybe there was a legal premise in Connecticut General Statues that would supersede that, stating that it would be great to know. However, he stated that they owe it to themselves, and to the citizens to conduct their due diligence, and not to go into this without that awareness. He stated that it was not that the work was not valid, it was just not complete.

Councilor Ryan stated that he would be blunt, noting as Councilor Brunelle stated, the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Ordinance"* had been worked on for two-years. However, he stated that it felt like it was being rushed to get over the finish line, noting that the timing was conspicuous. He stated that he disagreed with the comments that they could put the Ordinance in-place and then they could massage it, noting that he was not trying to misinterpret the words. However, he stated that if they put something in-place that it would have the power, and that they were seeing what was happening in Waterford; where people were getting negative publicity. He stated that he could go on-line and get all the complaints that have been lobbed at the Waterford RTM Officials. He stated if they were going to people on notice that they owed it to their town employees and elected officials that were going to be subject to the proposed Ordinance and to do their due diligence to make sure they had something that was as close to perfect as possible, noting that it worried him.

Councilor Ryan stated that he wanted to be clear that he does support a Code of Ethics. He stated a Code of Ethics was a great thing; noting that they could aggregate and make a comprehensive reference, or do a policy, noting he was fine with that; and he would support that 100%. However, he stated as he has discussed with Councilor Buhle, that he was worried about the Ethics Commission part, because of the way the proposed draft Ordinance was written; and because they did not involve the right stakeholders, within the town, to develop the draft right from the beginning; and that the process still has not involved them, especially the ones that it was going to directly affect, which was also worrisome. He stated that the proposal needed to go back to the Committee to be reworked and to take the time to address all of the input they have gotten multiple times now from Town Department Heads that were going to be directly affected by this proposed Ordinance who were at the September 24, 2025 Public Hearing and at the Administration Committee meeting.

Councilor Buhle state that she wanted to make the following clarifying statements:

- ***Ethics Commission itself as a process conflicting with the Town Charter*** - Councilor Buhle stated that she had a concern that if they take the proposed "*An Ordinance Establishing a Code of Ethics and Ethics Commission"* to the Town Attorney and he says "*Oh, Yea, that conflicts with your Town Charter*" that she would quite frankly be upset, because he returned a draft Ordinance that conflicted with their Town Charter. She stated the entire Hearing portion of the proposed draft Ordinance was written by the Town Attorney. She stated that the Town Attorney struck their entire Hearing Section and added a new Hearing Section. She stated this Ethics Commission was essentially *advisory* to the Town Council. She stated that it takes the Investigation Vote out of the public eye. She stated that hypothetically it would allow Councilor Ryan to say "*I think Councilor Buhle was participating in unethical behavior"* and to file an Ethics Complaint that would remain confidential until Probable Cause was determined. Councilor Ryan asked whether Councilor Buhle has seen what was happening in Waterford. Councilor Buhle replied, "*Yes, they had to change their ordinance, so that if someone divulged confidential information that it was a problem*". Councilor Ryan asked whether Councilor Buhle realized that he could go on-line, right now, and see the full text of Waterford's Complaints from the Waterford website. Councilor Buhle questioned whether they found Probable Cause yet. Councilor Dombrowski stated that they have not even had the hearing yet. Councilor Ryan stated that Waterford's Ethics Commission did, but that the RTM did not; which would be the corollary. Councilor Buhle stated that when the Complaint goes to the Ethics Commission it was entirely confidential, unless you also go to facebook and say "*I filed an ethics complaint against Jessica Buhle*"; explaining that nobody would know about that until the Ethics Commission confidently determines Probable Cause. Councilor Dombrowski and Councilor Ryan both stated that it did not happen that way in Waterford. Councilor Buhle stated that was the requirement of the proposed draft "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"*. She stated the proposed draft Ordinance was written to protect those who may be falsely accused; and that four out of the five votes were required for a Probable Cause vote. She stated that it had to be substantial to move the Complaint; and it also required four out of five votes for a Final Hearing vote at which time it would come to the Town Council with a Memorandum

and the Town Council would determine the consequence. Therefore, she stated that the Town Council was not going to vote to enforce a penalty that would break a labor law, that breaks an agreement, or that violated the laws, because the Ethics Commission does not determine the penalty associated with the violation. Councilor Ryan stated the Town Council should not have to make that decision, noting that they should not have anything in-place that could put them in a position, where they were violating a Collective Bargaining Agreement; or anything like that. Councilor Buhle stated that they should be able to terminate employees who were unethical, but not subject to a Bargaining Agreement. Councilor Ryan stated that they were now using a Commission that had the power to change people's lives. Councilor Buhle stated that the Town Council was making that choice, not the Ethics Commission. Councilor Ryan stated that the Ethics Commission was providing an Advisory Opinion to the Town Council. Councilor Buhle stated "*Yes"* the Ethics Commission was providing an Advisory Opinion about the Investigation. Councilor Ryan asked whether Councilor Bule thought that the Town Council would go against the Ethics Commission's Advisory Opinion. Councilor Buhle stated that she did not think the Town Council would choose consequences that would put the town in legal jeopardy; stating that she thought that this was the primary focus. She stated that it would require a Super Majority of the Ethics Commission after the Investigation and Hearing. Councilor Ryan stated that he thought that they were getting into the weeds of the operations of the Ethics Commission. Chairman St. Vil stated that he thought getting into the weeds was good. Councilor Ryan stated getting back to one of his original statements this evening, which was that they should not be engineering the proposed Ordinance at a full Town Council meeting.

Chairman St. Vil stated that he did not think that they were engineering the proposed draft "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* noting that the draft was done. He stated that the draft Ordinance has been available for everyone to read; and for the folks that have read the proposal that theywould be aware of what Councilor Buhle was saying this evening. Councilor Ryan stated that they have not had the draft Councilor Buhle was presenting this evening to read. Chairman St. Vil stated the final draft Ordinance was published on September 10, 2025; which was about a month ago. Councilor Barnes stated the draft with the amendments Councilor Buhle presented this evening have not been made available for folks to read. Chairman St. Vil stated the proposed amendments to the draft Ordinance do nothing but provide clarification, noting what they were talking about were substantive things that were embedded within the proposed Ordinance. Councilor Ryan stated the final version dated September 10, 2025; as Chairman St. Vil said, has not gone through a final Town Attorney's review. Chairman St. Vil stated that the proposed Ordinance has had a final Attorney review. Councilor Ryan stated it has not had a final legal review, stating that it has not been through the Human Resources Director for review; and it has not been through the Town Clerk for review. Chairman St. Vil stated the reviews/comments were not provided to Councilor Buhle when they were in subcommittee; although there was ample opportunity to do so, for two-years. He stated that he found a letter dated 2007 from Mayor Fred Allyn, Jr., in which he said they needed to take a look at having an Ordinance and a Commission. However, he stated that he would not focus on that; and instead focus on their most recent effort that began in July, 2024, stating that there was ample opportunity. He stated that he would leave his comments with that; noting at the September 24, 2025 Public Hearing the full staff came and provided comments publicly, for which he offered his fellow Councilors the opportunity to provide proposed Amendments that incorporated the feedback from either the residents or from the department heads, which they could discuss this evening. He stated the only Amendments he was hearing were from author of the document, which was Councilor Buhle. He stated if he was not going to change Councilor Ryan's mind that it was not beneficial to go in circles. He stated if they had something to discuss with Councilor Bule, please debate it, but let's not go in circles or make statements that were unsubstantiated; or were actually opinions. Councilor Ryan stated the statement Chairman St. Vil made about the Mayor Allyn, Jr., should be struck from the record. Chairman St. Vil stated that it should not be struck from the record, because he could produce the record. Councilor Barnes provided clarification noting the letter Chairman St. Vil was referring to was from Mayor Allyn, Jr. from 2007. Councilor Ryan stated that the letter was not from anybody in the room this evening; and it was not from anybody currently employed by the town.

Councilor Ryan stated what he was trying to get across this evening was that certain members of the Town Council were rushing to approve the proposed Ordinance. Chairman St. Vil stated that Councilor Ryan's comment was an unsubstantiated statement. Councilor Brunelle stated that she would say the opposite, that you guys were stalling. Councilor Ryan stated that they were not stalling, that they actually wanted the proposed draft Ordinance to be reviewed by the people it should be reviewed by. He questioned whether Councilor Brunelle had an idea of what the proposal was going to cost the Town Clerk. Councilor Brunelle questioned whether Councilor Ryan knew how much it was going to cost to have another review by the Town Attorney, when it has already had a review. Councilor Ryan questioned whether Councilor Brunelle could answer a question without asking another question. Councilor Brunelle stated that she could, but that Councilor Ryan just did it too.

Councilor Ryan stated that they do not know the full impact of what this proposed draft Ordinance was going to do. He stated that they have not had final reviews on this, and they have had ample time to have final reviews. He stated the timing was conspicuous for trying to push this across the line, three quarters baked, noting that the proposed Ordinance was not ready to be passed. He stated that he wanted to clarify, stating that he was not saying that they were going to kill it; that he was saying that it should go back to Committee to be reworked, to have the right stakeholders involved, and to have a final legal review; and then bring it back to the Town Council. He stated that they should take away all of the reason that this should not be passed. Chairman St. Vil stated people that have something to fear would always have a reason. Councilor Ryan stated now Chairman St. Vil was making unsubstantiated statements.

Councilor Buhle stated that she was going to repeat her earlier comment, noting that this was her strongest statement and what she feels was absolutely the most important thing. She stated they went through several meetings over, and over, and that she, Councilor Dombrowski, and Councilor Brunelle all submitted their own drafts to Administrative Assistant Roxanne Maher, who worked tirelessly to compile the things that they focused on into one draft to send the Town Attorney. She stated that she would be frank, that every single town that has an Ethics Commission or Ordinance, had significant Town Clerk involvement, noting that was a part of their job. Councilor Ryan thanked Councilor Buhle stated that she just proved his point. Councilor Buhle stated that she was not dismissing that; and that was the reason that she tried to meet with the Town Clerk. Councilor Ryan questioned when Councilor Buhle asked the Town Clerk to meet. Councilor Buhle stated that she sent the Town Clerk an email the night of the Public Hearing (September 29, 2025); and they set a meeting date for October 7, 2025; and on October 6, 2025 the Town Clerk rescheduled the meeting. Councilor Buhle stated that she respected boundaries and that she understood that the Town Clerk had things going on and that was fine; and they rescheduled a date to meet. Councilor Ryan stated that Councilor Buhle was still proving his point that the proposed Ordinance was not reviewed by the right people. Councilor Buhle stated that what she was telling them was that the Town Clerk's input was important, but that her duties and job of the proposed Ordinance would not be eliminated no matter how many times she asked the Town Clerk for her opinion, noting that had to be a part of the Town Clerk's job. Councilor Ryan stated that they did not have the person whose job was going to be the most directly affected involved in the development of this document during the last two-years. Councilor Buhle these items were on the Agenda for a year; and she knew that Mayor Allyn knew the proposed Ordinance was going to the Town Attorney. She that she could not tell town employees what to do; as she had been asked not to, when she asked for the Town Charter to be updated on the website. She stated that she was not going to step in and overstep, she was not the liaison between the town employees, stating that was not her job.

Chairman St. Vil stated let's have a meaningful discussion. He stated that Councilor Ryan was making his point clear, that there was inadequate review of the proposed Ordinance, unless he had a different point. He stated in summary that was the point that Councilor Ryan was trying to make; and that Councilor Buhle was trying to refute that. Councilor Ryan stated that was not his point. He stated that he already made his points; and that he did not want Chairman St. Vil to paraphrase what his points were. Chairman St. Vil stated that he wanted to make sure that his fellow Councilors have the opportunity to express their thoughts. He asked that if he summarized Councilor Ryan comments incorrectly that would ask Councilor Ryan to correct him. He asked whether Councilor Buhle had anything to add. Councilor Buhle responded that she had nothing to add, but that Councilor Garcia-Irizarry has not spoken yet.

Councilor Garcia-Irizarry commented on the following:

- ***Town Charter – Power of Investigation***- Councilor Garcia-Irizarry noted as an example that if there was a Planning & Zoning Commission violation; or Inland Wetlands and Water Courses Commission violation that those investigation would be done by Planning & Zoning Commission or the Inland Wetlands and Water Courses Commission. However, stated if the Town Council was the only one that was allowed to do an investigation, why these violations were being delegated to those Commissioners.

  Councilor Dombrowski addressed Councilor Garcia-Irizarry's examples of the Planning & Zoning investigations for a violation; and the Inland Wetland and Watercourses investigations for violations, and he explained that because they were land use matters that the State Statute strips that authority from the Town Council. He noted that State Statutes specifically state that once the Town Council established an Independent Zoning or Planning Commission that the Town Council could have zero input or influence on those matters.

  Councilor Garcia-Irizarry stated that basically then they were in violation of the Town Charter. Councilor Dombrowski stated that it was not a violation of the Town Charter, explaining that they have to considered Connecticut State Statue Section 128 "*Municipal Powers Act"* which was calls out the specific sections for the duties of the Town Council and local Town Government; versus Section 8 of the General Statutes which talks about what

Land Use Matters were. He stated that those powers were initiated by different sections of the State Statutes.

Councilor Garcia-Irizary stated that the Town Charter does not specifically say what kinds of investigations the Town Council was allowed to do, and what kind they were not allowed to do. Councilor Dombrowski stated that it does specify that the *Municipal Powers Act was* what grants the Town Council its authority.

- ***Past Fraud Matters***- Councilor Garcia-Irizarry questioned who did the past investigations. Mayor Allyn stated that the Town Attorney and Forensic Auditor conducted the investigations. Councilor Dombrowski stated that they were hired by the Town Council.

  Councilor Garcia-Irizarry stated for the past issues, that the Town Council asked somebody outside of them to do the investigation; and to then report back to them. She state that it would be the same as the Ethics Commission doing the investigation, and then reporting to the Town Council. She stated that they do that for many things. She stated that there were a lot of different investigations going on here in the town, that were not done by the Town Council, for obvious reasons, noting that does not seem to conflict with the Town Charter.

- ***Costs for Ethics Commission*** - Councilor Garcia-Irizarry stated that she wanted to address the concerns that many people had regarding the cost of having an Ethics Commission. She stated that she did go to the budget of the Preston and Norwich to see what they were spending for their Ethics Commission. She stated this year Preston allocated about $600 for the Ethics Commission; and Norwich allocated $500 in their budget for the Ethics Commission.

  Councilor Ryan questioned whether those town's budgets were for the Ethics Commission's operation of the Commission; or for the pursuit of the legal issues. He stated those budget amounts sounded to him like the costs for printing paper and other operational costs.

  Councilor Barnes stated that he wanted to refer back to something that happened in the past. He stated when they cherry pick and look at a budget line item, that sometimes they draw inaccurate conclusions. He noted that during the Fiscal Year 2025/2026 Budget process in looking at certain employees in other towns budgets and making a judgement to only find out later that town's budget for that particular role was actually also added with another line item. He stated that he was not suggesting that the research was not valid, but that simply looking at the budget and seeing a line item does not assure them that the cost of that was solely in that line item. He stated that information could only come from a conversation with the Finance Department from that town to confirm that there were not other costs that they would not have otherwise seen, that were associated with that activity.

  Councilor Dombrowski stated that some towns, including Ledyard, sometimes have a line item in the budget that has a token amount to hold the line item, so that funding could be transferred in from other places to pay for those expenses, if needed. He stated without looking at their overall Legal Budget that they have spent in previous years on Ethics, that they could not just look at the line item to figure out what those costs were.

  Councilor Garcia-Irizarry stated her point was that for every Commission and Committee they have in this town, that a certain amount of money has been assigned to each one of them; and if they had a legal issue that they would have to use the Town Attorney. She stated basically the Ethics Commission would look for an Advisory Opinion from the Town Attorney. She stated it was not like the Ethics Commission would have to do everything every step of the way, with the Town Attorney holding their hand. She stated the Ethics Commission would have a procedure to follow and once they get into a certain position, if they need it, that they ask for the Legal Advisory Opinion. She stated they were not obligated to ask the Town Attorney for an Advisory Opinion, if they do not need it. She stated that there could be legal costs, and she noted as an example that the town was going to have pay a bunch of money to the Lawyers because the company was not doing their job; noting that they could not have predicted that. She stated her point was that they could have a year with no Ethics Complaints and have no legal fees; and maybe the next year they have some legal fees. She stated the Town Attorney did not have to hold the Ethics Commissions hand every step of the way until the end. She stated that it would only be at a certain step when the Ethics Commission asked for the Legal Advisory Opinion. She stated that she understood that people have a concern about the legal costs, noting that it was a valid concern, but that she was really not concerned. She stated that she trusted their employees, she trusted their town officials, and she did not foresee a big amount of Complaints coming into the Ethics Commission because she trusted that everyone was ethical. But as Councilor Buhle has said in the past "*Just because we do not need something right now does not mean that it was not useful. The best time to have it was when they do not need it; and it was better to have something and not need it; than to need something and not have it."* Councilor Garcia-Irizarry went on to state that she was not concerned about going through a lot of costs. She stated that everyone here was very dedicated and that was the same with their employees, so she was not worried.

Councilor Buhle stated that this was the last time she was going to say this. To settle the Town Charter portion of this document that they either have to accept that the Town Attorney sent them a document that was in conflict with their Town Charter; and if the Town Attorney sent them a draft Ordinance that was in conflict with their Town Charter that she would question why they sent it for an Attorney review. She stated in the draft Ordinance that the Town Attorney proposed the entire portion for the Commission, the Hearing, the Investigation, all of it was the Attorney's words. She stated if the draft the Town Attorney sent them was not in conflict with the Town Charter, then it was not in conflict with the Town Charter; and she was not concerned about it.

Councilor Barnes stated after two years of work and the discussion regarding "*What was an Investigation"* noting that Councilor Garcia-Irizarry made some good points, in that there were some things that they may do that were considered an investigation that were consistent with the Town Charter. He stated why they would not use this opportunity to say "*Town Attorney, thank you for all the work to date. We are pleased to share our final version. We would ask for your concurrence on it; and we would ask to clarify questions we have around the Town Charter, and whether Section 9 was in conflict with this."* Councilor Barnes stated that it was a simple ask, it was a final review; and they would get statement to put on the record as a legal opinion to that point. He stated outside of that they were basing it on conjecture. He stated that they had many engineers and professionals in other areas amongst them, noting that none of them were attorneys. He stated even if he was an attorney that in his role on the Town Council, he would have to report himself to the Ethics Commission, because he could not make a judgement given the seat he was in. He stated why after two-years they would not ask the Town Attorney was ridiculous to him. He stated that they could schedule a Special Town Council meeting the very next day to vote, however, he stated that they should not take a vote without having feedback from the Town Attorney on the final draft of the Ordinance and regarding the question whether it was inconsistent with the Town Charter.

Councilor Ryan stated he listened to Councilor Garcia-Irizarry comments and that he agreed with her in that he hoped that there was never a need to address any ethics issues within the town. He stated with that being said, that perhaps they could look at Councilor Garcia-Irrizary's statement in a different way. He stated if she implicitly trusted the town employees, and she believed they were going to do the right thing then what the Town currently had in-place seemed to be working. He stated to be clear that with the proposed Ordinance that they were opening a door for additional attorney fees that they cannot predict. He stated he understood that for Land Use issues they have had to approve additional funds that they could not have predicted; which was the reason they have a token amount in the budget line, noting that every year he asks why they cannot predict these costs better. He stated Councilor Garcia-Irizarry may be right, that one year the legal fees for the Ethics Commission may be zero; but that the next year the legal fees may blow them out of the water, noting that they may even need to do some level of assessment or budget transfer. He stated that it would depend on what happens and what their funds would cover. He stated that this was a concern for him because they do not know; and they were creating another avenue for another unknown in their budget.

Councilor Ryan concluded his comments by stating the vote that was being taken tonight was on a proposed Ordinance that has not had a final review by the Town Attorney, had not had a final review by the Human Resources Director, and had not had a final review by the Town Clerk, but has had the benefit of being reviewed by the Parks & Recreation Director; and that he thought that Councilor Buhle addressed his concerns. Councilor Buhle stated that she did. Councilor Ryan stated that it was still troublesome to him that the other individuals that would be directly affected by this proposed Ordinance have not been considered. He stated to Councilor Barnes point, that the Town Attorney has not had a chance to do a final review, and to answer the questions that have been brought up.

Councilor Dombrowski stated that he wanted to close with a final comment, noting that they have had some strong disagreement and healthy dialogue this evening. He thanked everyone who worked hard on the proposed "*An Ordinance Establishing a Town of Ledyard Code of*

Ethics and Ethics Commission". He stated whether he agreed with the proposal or not, that it was immaterial, noting the hard work that the Administration Committee did to put the proposal forward, and the work that the full Town Council has done in reviewing, commenting, and for the thought behind their discussion. Therefore, he stated that he wanted to thank everyone.

Councilor Garica-Irizarry stated that they could have the Town Attorney look at the proposed Ordinance and give him a deadline to return his comments back to the Town Council by a certain date.

Chairman St. Vil stated that Councilor Buhle laid out the process that was used, which included the support of the members of the Administration Committee and others to develop the proposed draft Ordinance, which was inclusive of a substantial legal review; noting that the end the product, was presented before the Town Council this evening. He stated as Councilor Buhle has stated, that it has been piece meal, noting a portion was documented via email stating this what they concurred with, and a portion was verbal – "*You can have this if you want it*". He stated nonetheless, the aggregate has been reviewed, not together, but that the aggregate has been reviewed.

Chairman St. Vil continued by outlining the process for the town to adopt an Ordinance as follows:

- If the Town Council chooses to vote on the Ordinance, and the proposed Ordinance fails it ends - Chairman St. Vil stated that he would call for a vote this evening.

- If the Town Council approved the proposed Ordinance, the document has to be certified within seven (7) days; and presented to the Mayor.

- If the Mayor was concerned with the Town Council's due diligence; and a legal review, the Mayor could have a legal review done. Chairman St. Vil stated the legal review does not have to be done by the Town Council, noting that he was confident with the draft Ordinance, and that it did not need that extra layer. He stated when he votes that he would be voting with a good conscious that their legal aspects were covered, not only by the written verbiage of the Town Charter, but by the verbiage within the document. He stated that he thought that the question of a legal review was being framed as if it was not done, and it has been done, or it could never be. He stated that was not a true statement. He stated the Mayor could do a legal review; and if the Mayor was not confident with the proposed Ordinance that he does not have to certify the document. If the Mayor does not certify the Ordinance it would come back to the Town Council.

- The Town Council would get to vote on the Ordinance again, should they vote on it this evening and it passes.

Chairman St. Vil stated that they have to reflect on the process that was followed that was comprised of work beginning in July, 2024 through today. Not only that process, but the process their predecessors started back in 2007; where someone said "*I think this is a good idea, lets take a look at it*"; and the input they have received and the due diligence that has been done.

Councilor Bule stated that she had one last comment, noting that her thought regarding an additional legal review was requested, that all they were striking were specific things that were in conflict with State Statute and the Town Charter, that was it.

Chairman St. Vil stated that this was where collectively they have to debate, and they have to be fair. He questioned whether Councilor Buhle was saying that the competing opinion was whether there were further changes that should happen now. Councilor Buhle stated that she was saying that she believed everything that was in this draft Ordinance was legal and meets the legal requirements. She stated that there were changes to condense; and that she did not think that changes should be proposed for the sake of condensation; whereas the legal review from the Town Attorney should be "*Does this pass the legal test – Yes or No"*. She stated if the answer was "*Yes*" there should be no question or worry.

Chairman St. Vil stated he was not asking for a legal review; and he was not sending the proposed Ordinance back to the Administration Committee for a legal review. He stated what he was saying was that the Mayor has the right to ask for a legal review. He stated the Mayor

would do as he sees fit, which was under his purview. He stated he was checking with Councilor Buhle, as the author of the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"*, to confirm that she did not have any concerns. Councilor Buhle stated that she did not have any concerns regarding the proposed Ordinance.

Chairman St. Vil stated that he appreciated everyone's comments, he appreciated the debate, and he appreciated the discussion. He stated most of all that he appreciated the input from their residents and from their department heads that they heard at their last meeting, both those who were in the room; and the ones who were not in the room. He stated the ones who were not in the room were just as opinionated. He stated that some of the comments he heard was the frustration with what was going on in the Federal Government and the stalemates that were happening; and the lack of progress that was happening. He stated that there was a perception that Municipal Governance was in a similar stalemate where they cannot make progress and they cannot make decisions; and they cannot improve their community.

Chairman St. Vil stated it was his opinion that the only thing the proposed Ordinance does was ensure folks conduct themselves in an ethical way; and it uses the right embedded in the Town Charter to have a standalone Commission on an investigatory basis to determine what was potentially ethical or was potentially not ethical. He stated that it would take a super majority by the Ethics Commission for anyone's lives to be impacted. He stated that it was either you were for it; or you were not it.

Chairman St. Vil called for a Vote on the Amendments as presented earlier this evening, noted again below:

❖ MOTION to amend the "*An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission"* as follows:

- ***Section 4, paragraph 3b,*** remove the phrase "~~spouse or minor child~~" and replace it with "***or immediate family of***".

- ***Section 4, paragraph*** 8, Town Employee definition will be modified to add the phrase, ***"including outsourced administrative or executive professionals, including but not limited to consultants and the Town Attorney***"

- ***Section 5, paragraph 3,*** add the phrase, "***unless the contract or purchase order is awarded through the traditional bid or quote process and conflict is disclosed.***"

- ***Section 5, paragraph 4,*** add the following sentence, "***This provision does not apply to Town employees or Board of Education employees providing recreational services including but not limited to classes, coaching, camp counseling through Ledyard Parks and Recreation or Ledyard Board of Education".***

- ***Section 7, paragraph 1b6***, add the phrase "***unless disclosed to the Ethics Commission.***"

Moved by Councilor Buhle, seconded by Councilor Brunelle
Discussion: (see above)

VOTE: **5 – 3 Approved and so declared** (Barnes, Dombrowski, Ryan not in favor)

RESULT:	AMENDMENTAPPROVED 5 - 3
MOVER:	Jessica Buhle, Town Councilor.
SECONDER:	April Brunelle, Town Councilor
AYES:	Brunelle, Buhle, Garcia-Irizarry, Saccone, St. Vil
NAYES:	Barnes, Dombrowski, Ryan
EXCUSED:	Parad

Chairman St. Vil called for a Vote on the
Main Motion as amended this evening as noted below:

MOTION to adopt a proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" as presented in the draft dated ~~September 10,~~ ***October 8, .***2025.
Moved by Councilor Buhle, seconded by Councilor Brunelle
Discussion: Councilor Barnes thanked Chairman St. Vil for providing the process assuming the proposed Ordinance passed this evening; and he questioned whether there was a certain timeline for the Mayor's review. Chairman St. Vil noted that the Town Charter; Chapter III; Section 12, provided the process noting the following:

- 7- Days for the Town Council to certify the Ordinance and forward to the Mayor.
- 5-Days for the Mayor to Approve or Disapprove the Ordinance.

If the Mayor does not sign or veto's the Ordinance:

- 14-Days after the Mayor veto's the Ordinance the Town Council can approve the Ordinance by a super majority (6 Affirmative votes).

Chairman St. Vil stated that the Town Charter does not state calendar days or business days.

Mayor Allyn, III, stated that he would be seeking a legal review of the "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" as presented in the draft dated October 8, 2025. Therefore, he asked that he be provided with the a red line document identifying all additions and deletions that were made to the Town Attorney's July 14, 2025 red lined draft; including the amendments that were voted on tonight; noting that would make it easier for the Town Attorney to review.

Councilor Ryan stated that he takes issue with Chairman St. Vil's comment that *"You are either for it; or your not for it"*. He stated that it was not whether they were for it; or not for it, explaining that there were concerns about the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" that have not been addressed. He stated he wanted to be clear, that although he was not going to speak for anybody, that he would like to think that everybody on this Town Council had a preference to enforce ethical behavior. He stated it was his opinion that there was no room for unethical behavior in any role in life. He stated it was just about the way they were going about putting the proposed Ordinance in-place. He stated in this case there were specific concerns that he outlined; and they have not been addressed. He stated referencing what others have said; that they have had years to address those concerns; and years to involve the right stakeholders from the very beginning. He stated that apparently there was due diligence done to identify what other municipalities have done with regard to the effects of having an Ethics Commission; and who it involved in terms of department heads; and it was known that their department heads were not involved even after the due diligence was done. He stated it did not seem like it was a big ask to make sure the department heads who have not been met with have the benefit to work with the Administration Committee to come up with a final draft; and that final draft be reviewed by the Town Attorney, prior to the Ordinance going to the Mayor. He stated at this point it felt like it was a throw over the wall, and let the Mayor handle it.

Chairman St. Vil stated that it was tough to lead, and it was tough to get involved with something that you may not be cognizant of; but your aware of. He stated by process Councilor Ryan's concerns have been addressed and adjudicated, however, not in his favor. He stated because Councilor Ryan's concerns were not addressed to his satisfaction, that Councilor Ryan was assuming that they have not been addressed, noting that if it was not an accurate statement. He stated that this was the same thing that was going on in the Federal Government. He stated what was going on in the Federal Government was; "*If you do not agree with me then I am not moving forward"*. He stated "*Let's move forward"*. Councilor Ryan stated those were inaccurate statements. He stated that his concerns have not been addressed in a factual manner, period-full stop.

Councilor Buhle stated the job of the Town Clerk as listed in the proposed Ordinance was the job of the Town Clerk listed in every other town's ordinance. Councilor Ryan questioned why Councilor Buhle did not involve the Town Clerk when they started drafting the document. Councilor Buhle stated that involving the Town Clerk would not have changed the proposed Ordinance. Councilor Ryan questioned whether Councilor Buhle thought that if the Town Clerk had known that the proposed Ordinance was coming that she would have wanted to account for that in her budget. Councilor Brunelle questioned whether that was their responsibility. Councilor Dombrowski stated that it was the Administration Committee's was to involve all stakeholders. He stated, we as the Administration Committee, failed to get all of the stakeholders, as far as Human Resources, Town Clerk, and Parks & Recreation, involved in the discussion early on in the process. Chairman St. Vil stated that he did not think Councilor Dombrowki's statement was accurate, because those individuals presented at the September 24, 2025 Public Hearing, and provided their input, which was addressed. Councilor Ryan stated that their input was not addressed.

Councilor Buhle stated that she could not change the procedural portions of the proposed Ordinance that included the Town Clerk because the Town Clerk was the body that gives an Oath in their town. She went on to note that the Town Clerk's primary concern was what happens in her absence when she may be on vacation, or she was not available to accept an Ethics Complaint. Councilor Buhle stated she discussed this with the Town Attorney and that in the absence of the Town Clerk that the Assistant Clerk was the Acting Town Clerk the same way that she would sign a marriage license or another document. She noted that she and the Town Clerk discussed that in person either after the Administration Committee's September 10, 2025; meeting or after the September 24, 2025 Public Hearing at which the Town Clerk spoke, noting that this addressed the Town Clerk's biggest concern, which were about not being available. Councilor Buhle stated that the Town Clerk stated that one of her primary concerns was not being able to take time off; or not being available to accept an Ethics Complaint being a problem. Therefore, she stated that portion of it was addressed. She went on to state that the Town Clerk suggested changing the document from being submitted "*Under Oath*" to a "*Notary".* Councilor Buhle stated let's be honest, signing something with a *Notary*, was just saying *I'm the one who signed it*, it was not signing it Under Oath; and they did not have the same meaning. She stated an Oath was more important for the situation that it was, and which applied to 19 people in the town. She stated that she did not think that this was a significant burden, in the same way the Town Council gets *Sworn -In Under Oath* when they were elected, and things like that. She stated that she was telling them that the Town Clerk's concerns have been addressed in-part. Councilor Buhle stated that there were parts of it that she could not quickly delegate to another person or completely change. She stated the documentation that includes the Town Clerk, as the Body, was the language from the Town Attorney, which tells her that the Town Clerk was the appropriate person to handle the Ethics Complaints; and the duties and processes. She stated that she understands the Town Clerk's concern, however, those would still be the Town Clerk's job regardless. Councilor Ryan noted that they knew all along that the Town Clerk was going to have additional responsibilities if the proposed Ordinance passed. Therefore, he questioned the reason the Town Clerk was not involved from the very beginning, so that they could have built this into their budget cycle, and understood what the resources were going to be.

Chairman St. Vil stated that everyone had valid comments, and he suggested they have an *After Action Review.* He stated regardless of what happens with the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* this evening – Pass or Fail; that the Administration Committee review of the Town Councilors comments to find out what they could do better going forward for the next ordinance, or the next procedural review.

Councilor Buhle stated that she still planned to meet with the Town Clerk, however, she stated at the end of the day, she has addressed as many of the issues as she possibly could, without changing the entire document, as the Town Attorney presented it in the portions of the proposed Ordinance that included the Town Clerk. She stated while the Town Clerk's input was extremely valid, and she should have been brought in, that continuing to discuss this does not change the meat of the document. She stated hypothetically, if the Town Council does not vote tonight, and she meets with the Town Clerk tomorrow, that it would not change anything in the proposed Ordinance, because these were the requirements of what they would have to do. Councilor Ryan questioned whether Councilor Buhle thought that they owned the Town Clerk and the Director of Human Resources an opportunity to have a final review of the proposed Ordinance. Councilor Buhle stated that the final consequence was the only portion of anything that had the potential to run into grievances, or labor contracts; noting that those choices would be made by the Town Council; at which point the Town Council would not make that choice without the Director of Human Resources. She stated those opinions were valid, but they do not change the proposed Ordinance.

Councilor Barnes stated given the discussion this evening that he was certain that the Mayor had some concerns, and he had the right to do. However, he stated by not giving the Mayor a fully vetted proposal, that the Town Council was transferring that stakeholder management/staff action, all the things that the Administration Committee could have or should have done, to the Mayor; and they were giving him a five (5) day period to return it.

Councilor Barnes went on to state if the Town Council were to approve the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" this evening, the process as he understands it would be as follows:

- Ordnance would go to the Mayor.
- The Mayor would quickly assessable his Team and the Town Attorney to review the Ordinance.
- If everything was fine, the Mayor would approve the Ordinance.
- If the Mayor had concerns that he would veto the Ordinance.
- The Ordinance would come back to the Town Council.

Councilor Barnes stated he hoped that Chairman St. Vil could scheduled a date that everybody could be there, because it would be a war and see who votes. He stated based on what has been expressed in the comments that they would need a full Town Council for the Ordinance to pass. He stated if they only have eight members of the Town Council, like this evening, the Ordinance would fail 5 - 3. He stated the Town Council was transferring to the Mayor responsibilities that they should have done themselves.

VOTE: **5 – 3 Approved and so declared** (Barnes, Dombrowski, Ryan not in favor)

RESULT:	APPROVED 5 - 3
MOVER:	Jessica Buhle, Town Councilor.
SECONDER:	April Brunelle, Town Councilor
AYES:	Brunelle, Buhle, Garcia-Irizarry, Saccone, St. Vil
NAYES:	Barnes, Dombrowski, Ryan
EXCUSED:	Parad

Chairman St. Vil noted that Iten #7 was not necessary this evening.

7. No Action on the
Discussion and possible action on the
MOTION to set a Public Hearing (Hybrid Format - Video Conference and In-Person) Public Hearing date to be held on October 22, 2025 at 5:00 p.m. to be held in Council Chambers, Town Hall Annex, 741 Colonel Ledyard Highway, Ledyard, Connecticut, to receive comments and recommendations regarding a *proposed An Ordinance Establishing a Town of Ledyard Code Of Ethics And Ethics Commission"* .

RESULT: NO ACTION

8. MOTION to grant a bid waiver to P & H Construction & Septic Services LLC, of Uncasville, Connecticut, in the amount of $29,700 due to receiving fewer than the required three bids in response to Bid #072-PI-35 (Septic System 70 Christy Hill Road) in accordance with Ordinance #200-001 (rev 1) "*An Ordinance for Purchasing"*
Moved by Councilor Buhle, seconded by Councilor Saccone
Discussion: Mayor Allyn, III explained that the Town has been involved in the Small Cities Program Income Housing Rehabilitation Loan Program for over a decade. He noted that the Housing Rehabilitation Loan Program was a Revolving Loan Program that was funded by the State and partially funded by American Rescue Plan Act (ARPA) Funds. He stated the program provides no interest loans to residents who qualified for certain/serious home repairs such as the replacement of a furnace, new roof, septic system, etc. He stated the Housing Rehabilitation Loan Program was not for people to beautify their homes or put granite countertops in their kitchen. He stated as Homeowners pay their loans back the town could then loan the money to another qualifying family.

Mayor Allyn went on to explain that the Septic System at 70 Christy Hill Road, Gales Ferry, failed and needed to be replaced; and he noted that the homeowner/applicant has qualified for the Housing Rehabilitation Loan Program. He stated because the Housing Rehabilitation Loan Program Funding was being used the town was required to follow its's purchasing procedures as provided in Ordinance #200-001 (rev. 1) "*An Ordinance for Purchasing*; which required the solicitation of bids for the work. He stated because of the location was a challenging site in terms of the where the septic system was, noting that that they have to pump it up hill; stating that may

have been a reason only one Bid was received. He stated that he checked with the local septic system installers, and they were aware of the Request for Proposals. He stated that because only one bid was received, a Bid Waiver has been requested.

Councilor Barnes questioned whether 70 Christy Hill Road was a town-owned property. Mayor Allyn stated it was a privately owned property; and he explained that the Housing Rehabilitation Loan Program was a Zero Interest Loan Program for privately owned homes, that met the required income guidelines, and had a need for a critical improvement. He stated the Loan was required to be paid back to the town if the property owner refinances the home, sells or transfers the home.

Councilor Garcia-Irizarry stated last year there was a couple who appealed to the Finance Committee because they had previously qualified and received funding from Housing Rehabilitation Loan Program; and they were refinancing their home; so they were looking to defer paying back the Housing Rehabilitation Loan.

Mayor Allyn stated that Councilor Garcia-Irizarry was correct, noting in 2017 a couple received about $32,820.40+ funding from the Housing Rehabilitation Revolving Loan Program to make improvements at their home on Highlands Drive. He stated because they were refinancing their home that they were seeking a "*Subordinate Agreement*" to defer the paying back the 0% interest Housing Rehabilitation Loan to the town. However, he stated because they were refinancing their home, which was one of the terms for the Loan to be repaid to the town, at their January 17, 2024 meeting Finance Committee denied the request. He stated the Loan was paid back to the town which then provided funding that the town could loan to another qualifying family.

VOTE: **8 – 0 Approved and so declared**

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

XV. ADJOURNMENT

Councilor Buhle, moved to adjourn, seconded by Councilor Dombrowski.

VOTE: **8 - 0 Approved and so declared.** The meeting adjourned at 9:05 p.m.

_____

Transcribed by Roxanne M. Maher
Administrative Assistant to the Town Council

I, Gary St. Vil , Chairman of the Ledyard Town Council, hereby certify that the above and foregoing is a true and correct copy of the minutes of the Regular Town Council Meeting held on October 8, 2025.

_____

Gary St. Vil, Chairman

File #: 25-2685 **Agenda Date:** 10/22/2025 **Agenda #:**

AGENDA ITEM
CORRESPONDENCE

Subject:
Communications List - October 22, 2025

Correspondence List:
(type text here)

COMMUNICATIONS LISTING FOR OCTOBER 22, 2025

INCOMING CORRESPONDENCE

1. Avalonia Land Conservancy ltr re: Request transfer of town-owned property 13 Applewood Drive & 19 Avery Hill Road Extension to Avalonia Land Conservancy
2. Mr. Chappell email dated 10/11/2025 re: Primary Healthcare for All
3. Mr. Harwood email & ltr(s) dated 10/15/2025 re: Conservation Commission support transfer of town-owned property 13 Applewood Drive & 19 Avery Hill Road Extension to Avalonia Land Conservancy
4. Mayor ltr dated 10/16/2025 re: Disapprove/Veto Ordinance #100-021 "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* approved by the Town Council at their 10/8/2025 meeting & Exhibits

OUT GOING CORRESPONDENCE

1. Admin Asst ltr to Mayor dated 10/9/2025 re: Action ltr. Town Council Regular Meeting of October 8, 2025
2. Admin Asst Memo to Mayor dated 10/14/ 2025 re: Transmit certified/signed Ordinance #100-021 "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* approved by the Town Council at their 10/8/2025 meeting
3. Admin Asst Memo to Town Council dated 10/16/ 2025 re: Transmit Mayor's letter dated 10/16/2025 Disapproving/Vetoing Ordinance #100-021 "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* approved by the Town Council at their 10/8/2025 meeting
4. LTC ltr dated 10/8/2025 to Bolduc re: Reappointment to Library Commission
5. LTC ltr dated 10/8/2025 to Grenger re: Reappointment to Library Commission
6. LTC ltr dated 10/8/2025 to Rumery re: Reappointment to Library Commission
7. LTC ltr dated 10/8/2025 to Wright re: Reappointment to Library Commission
8. LTC ltr dated 10/8/2025 to DeBrodt re: Reappointment to Inland Wetland & Water Courses Commission
9. LTC ltr dated 10/8/2025 to Marelli re: Reappointment to Inland Wetland & Water Courses Commission
10. LTC ltr dated 10/8/2025 to Thompson re: Appointment to Inland Wetland & Water Courses Commission as Regular Member

NOTICE OF AGENDAS

1. America 250 Committee Agenda 10/14/2025
2. Agricultural Commission Agenda 10/14/2025
3. Retirement Board Agenda 10/21/2025
4. Parks, Recreation & Senior Citizens Agenda 10/21/2025
5. Zoning Board of Appeals10/15/2025 Cancelled
6. Historic District Commission Agenda 10/20/2025
7. Library Commission Agenda 10/20/2025
8. Finance Cmt Agenda 10/15/2025
9. Community Relations Cmt for DEI Agenda 10/15/2025
10. LUPPW Cmt Agenda10/6/2025
11. Town Council Agenda 10/22/2025

MINUTES

1. America 250 Committee Minutes 9/9/2025
2. Agricultural Commission Minutes 9/16/2025
3. Retirement Board Minutes 9/16/2025
4. Parks, Recreation & Senior Citizens Minutes 9/16/2025
5. Historic District Commission Minute s 9/15/2025
6. Library Commission Minutes 9/15/2025
7. Finance Cmt Minutes 9/17/2025
8. Community Relations Cmt for DEI Minutes 9/17/2025
9. Town Council Minutes 10/8/2025

REFERRALS

Community Relations Committee

1. Mr. Chappell email dated 10/11/2025 re: Primary Healthcare for All

Land Use/Planning/Public Works Committee

1. Avalonia Land Conservancy ltr re: Request transfer of town-owned property 13 Applewood Drive & 19 Avery Hill Road Extension to Avalonia Land Conservancy
2. Mr. Harwood email & ltr(s) dated 10/15/2025 re: Conservation Commission support transfer of town-owned property 13 Applewood Drive & 19 Avery Hill Road Extension to Avalonia Land Conservancy

Roxanne Maher

From: Drue Chappelle <patellakinesis@yahoo.com>
Sent: Saturday, October 11, 2025 7:43 PM
To: Town Council Group
Subject: Letter in favor of the Primary Care for All proposal

Dear Members of Ledyard Town Council,

While I could not attend the last town council meeting, I did have the opportunity to watch online including Dr. Fine's presentation on Primary Care for all. As a member of this community, I would highly encourage you to approve measures to ensure that all Ledyard residents not only have access to primary care but are actively utilizing it.

First a little about me: I have spent 15 years working in prehospital care as a paramedic working with American Ambulance (now Hartford Healthcare), following that I spend 3 more years working in the emergency departments of Backus Hospital and Plainfield Emergency Care Center including during the height of the covid pandemic. For the last 6 years, I have been the primary care giver for both of my elderly in-laws (76 female, 80 male), both of whom have numerous comorbidities which make the management of their healthcare, as well as their quality of life, difficult.

I cannot express the impact of primary health care on the overall well-being of patients. Conservatively, I would estimate nearly three quarters of all EMS calls could either be handled effectively by a primary care provider OR would have been prevented by preventative medicine through primary care. The CDC determined that approximately 60% of emergency room visits were for patients with at least one chronic condition. The number of patients I have seen with COPD or CHF (both chronic respiratory diseases) patients who have been brought in for worsening shortness of breath due to poor management of their condition alone is an enormous tax on the system. And it's an expensive one: nebulizer treatments, chest x-rays, steroids, CPAP or BiPAP, and/or intubation and lengthy critical care unit in-patient stays. All of this is preventable with effective management of these conditions and that begins with primary care. And before you write this off as a single example that doesn't apply to the majority of our town; consider diabetes, epilepsy and other neurological disorders, fall prevention, or the magnitude of seasonal flu. All of these are mitigated or outright managed by primary care and they are done so without huge emergency room costs, expensive interventions, costly ambulance bills, and lengthy hospital stays.

In Ledyard, we pay for the healthcare costs for our town employees and sub-contract our emergency medical services with Hartford Healthcare. With a program such as Primary Care for all, we can maintain a healthier community and potentially reduce the costs of two large portions of our town's budget. I strongly urge you to implement such a program. With my own experience, I would even be willing to volunteer my own time to coordinate efforts to achieve such a goal.

Drue Chappelle

14 Sherwood Trace

Gales Ferry, CT 06335

Roxanne Maher

From: H James Harwood <h.james.harwood@gmail.com>
Sent: Wednesday, October 15, 2025 10:41 AM
To: Roxanne Maher
Subject: Support letters for transfer of Kettle Hole and 13 Applewood Drive to Avalonia
Attachments: support letter for transfer of Kettle Hole to Avalonia 10-14-25.pdf; support letter for transfer of open space at 13 Applewood Drive to Avalonia 10-14-25 - Copy.pdf

Hey Roxanne,

At the meeting on September 11th, Planning and Zoning approved motions to issue FAVORABLE REPORTS to the Town Council for the transfer of the Kettle Hole at 19 Avery Road Ext and for the transfer of the town-owned open space property at 13 Applewood Drive to Avalonia. At that time, the Planning and Zoning Commission discussed having the Conservation Commission send letters of support for the transfers to the Town Council.

At our regular meeting last night, the Conservation Commission approved drafts of two letters, one for the Kettle Hole property and one for the 13 Applewood Drive open space property, attesting and reaffirming our support for the transfer of these two properties to Avalonia. PDFs of the two letters are attached.

Let me know if submitting these as PDFs is satisfactory or if you need us to submit hard copies of the letters.

Thanks Roxanne !

Cheers,

Jim

TO: Ledyard Town Council

FROM: Ledyard Conservation Commission

October 14th, 2025

This letter, dated October 14th 2025, serves to attest and reaffirm the support of the Conservation Commission for the transfer of Town-Owned Property at 19 Avery Hill Road Ext. known as the "Kettle Hole" property to Avalonia Land Conservancy to be combined with Other Lands of DDJJM LLC at 173 Stoddards Wharf Road & 75 Stoddards Wharf Road to be transferred to Avalonia, for which a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 was approved and submitted to the Ledyard Town Council by the Ledyard Planning and Zoning Commission at their regular meeting of September 11th, 2025.

Sincerely,

Ledyard Conservation Commission

TO: Ledyard Town Council

FROM: Ledyard Conservation Commission

October 14th, 2025

This letter, dated October 14th 2025, serves to attest and reaffirm the support of the Conservation Commission for the transfer of Town-Owned Open Space Property at 13 Applewood Drive to Avalonia Land Conservancy to be combined with its existing Pike Marshall Preserve, for which a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 was approved and submitted to the Ledyard Town Council by the Ledyard Planning and Zoning Commission at their regular meeting of September 11th, 2025.

Sincerely,

Ledyard Conservation Commission

TOWN OF LEDYARD
CONNECTICUT
OFFICE OF THE MAYOR

Fred B. Allyn III
Mayor

Kristen Chapman
Executive Assistant to the Mayor

741 Colonel Ledyard Highway
Ledyard, CT 06339-1551
(860) 464-3222
FAX (860) 464-8455

October 16, 2025

Ledyard Town Council
C/O Chairman Gary St. Vil
741 Colonel Ledyard Hwy.
Ledyard, CT 06339

RE: Disapproval of Ordinance #100-021

Chairman St. Vil,

I return to you the attached Ordinance #100-021 which is disapproved. Also attached are 2+ pages of comments from the Town Attorney, indicating issues with the document as well as 2 pages of comments from Parks and Rec Director Scott Johnson Jr. My concern is and continues to be a lack of a proper ordinance that reasonably addresses concerns raised in prior meetings, reduces liability exposure to the Town, does not adversely impact Parks and Rec programming for our residents and does not become a political weapon- as demonstrated in Montville and Waterford most recently. The Town Attorney has stated "he cannot defend this ordinance". Of grave concern is another attachment, which is Councilor Buhles reply email to me on Thursday, October 9th at 11:30AM. (You are provided both my email to her and her response to me). The one line response "I am working on it now and anticipate having it to you shortly" flies right in the face of governmental transparency as the Town Council voted on this ordinance the previous night (without the benefit of any Councilor having a copy of the ordinance they were voting on, other than Ms. Buhle). This email does not suggest, it says that she is ***working on an ordinance that was passed the night before.*** No ordinance should be edited in any way after approval- it should be exactly as was voted on the previous night. An ordinance that goes to Public Hearing is meant to be the final draft- it should not be amended post- Public Hearing. Lastly, I want to add further context to a memo you read at the October 8, 2025 meeting authored by Fred Allyn Jr, then Mayor. In said memo, it suggested the town create an ethics commission. What was omitted from the 10/8 meeting is that as part of the forensic audit- completed as a result of the embezzlement by a Town Employee, a decision was made to implement a Fraud Policy, require two sign-off's on checks of a certain dollar threshold, the

tax refund policy and the vehicle use policy. Since that time nearly two decades ago, the implemented policies continue to protect the Town and taxpayers.

As I previously stated in my letter to the Town Council on 9/24/25:

- The Town Charter grants the Town Council the power to investigate.
- The Fraud Policy outlines no less than eight different situations that constitute fraud.
- The Employee Handbook covers Nepotism, Conflict of Interest, Outside Employment and the Vehicle Use Policy.

Lastly, *there is no budget for this new commission or its attorneys.* Please note, the Authority/Duty of the new commission, upon receipt of a complaint is "To consult with The Town Attorney or another attorney" and "To request that the Town Attorney provide advisory opinions". These consultations, investigations and advisory opinions cost money. The Town Attorney has suggested a minimum of $20,000 for such a commission- though it can go markedly higher based on the allegations, if the result is appealed to Superior Court, etc. Also know, the Town is required to provide legal counsel to the accused. Our insurance carrier, CIRMA includes stated deductibles between $1,000 and $10,000 per occurrence.

In closing, please know I do fully support a proper "Code of Ethics" and updating to our Fraud Policy and Conflict of Interest statement, if warranted.

Thank you,

Fred B. Allyn III

Mayor

AN ORDINANCE ESTABLISHING A TOWN OF LEDYARD CODE OF ETHICS AND ETHICS COMMISSION

Be it ordained by the Town Council of the Town of Ledyard:

Section 1. Authority

In accordance with Chapter III of the Town Charter, there is hereby established a Town of Ledyard Code of Ethics and Ethics Commission.

Section 2. Declaration of Policy and Purpose

The trust of the public is essential for government to function effectively. The proper operation of the Town government requires that Town officials, 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. 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.
An honorary degree.

i. Costs associated with attending a conference or business meeting and/or the registration or entrance fee to attend such conference or business meeting in which the Town official or Town employee participates in his or her official capacity.

j. Any gift provided to a Town Official or Town Employee or to an immediate family member of a Town Official or Town Employee for the celebration of a major life event provided any such gift provided to an individual does not exceed one thousand dollars ($1,000.00) in value. A major life event shall include, but not be limited to, a ceremony commemorating an individual's induction into religious adulthood such as a confirmation or bar mitzvah; a wedding; a funeral; the birth or adoption of a child; and retirement from public service or Town employment.

5. *"Immediate family"* means spouse, fiancé, child, parent, grandchild, brother, sister, grandparent, niece, nephew, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, 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, including outsourced administrative or executive professionals, including but not limited to consultants and the Town Attorney.

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, unless the contract or purchase order is awarded through the traditional bid or quote process and conflict is disclosed.

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. This provision does not apply to Town employees or Board of Education employees providing recreational including but not limited to classes, coaching, or camp counseling through Ledyard Parks and Recreation or Ledyard Board of Education.

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

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 unless disclosed to the Ethics Commission.

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.

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

5. Evaluation and Acknowledgement

   a. Within sixty (60) business days of the receipt of a complaint, the Ethics Commission shall review and determine whether there is probable cause that a violation of the Code of Ethics has occurred. A finding of probable cause means that based on a review of the available information the Ethics Commission determines that reasonable grounds exist to believe that the respondent engaged in prohibited conduct by the Code of Ethics. If the Ethics Commission does not make a finding of probable cause, the complaint shall be dismissed and a copy of its decision shall be mailed to both the complainant and the respondent. Unless the Ethics Commission makes a finding of probable cause, a complaint alleging a violation of this Code of Ethics shall be confidential except upon the request of the respondent.

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

6. Hearings

   If the Ethics Commission decides that probable cause of a violation of the Code of Ethics exists, it will conduct a public hearing to determine whether or not a violation occurred in accordance with Uniform Administrative Procedure Act ("UAPA") (See Chapter 54 of the Connecticut General Statutes). At the hearing, the respondent will have the right to be represented by legal counsel, to present evidence and witnesses, and compel attendance of witnesses and the production of books, documents, records, and papers, and to examine and cross-examine witnesses, and inspect and copy relevant and material records, papers, and documents not in such person's possession. Hearings are not governed by the legal rules of evidence, and any information relevant to the matter may be considered. The Ethics Commission will respect the rules of privilege recognized by the law. Not later than ten (10) days before the start of the hearing, the Ethics Commission will provide the respondent with a list of its intended witnesses. The Ethics Commission will make a record of the proceedings.

7. Final Decisions

   a. Decisions by the Ethics Commission that a person is in violation of the Code of Ethics must result from the concurring vote of four (4) of its members.

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

c. Such finding and memorandum will be deemed to be final decision of the commission for the purposes of the UAPA. The respondent may appeal to the superior court in accordance with the provision of Section 4-183 of the Connecticut General Statutes.

d. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) days after its decision. It will also advise the respondent of his or her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

8. Penalties for Violations of the Code of Ethics

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

a. Order to cease and desist the violation;

b. Pay a civil penalty of up to the maximum amount permitted by State law;

c. Censure;

d. Suspension without pay;

e. Demotion;

f. Termination of employment;

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

Section 8. Severability

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

Adopted by the Ledyard Town Council on: October 8, 2025

Signed/Certified on: 10 · 14 · 2025

Gary St. Vil, Chairman

Approve/Disapprove on: 10/16/25

Fred B. Allyn, III, Mayor

Published on:

Patricia A. Riley, Town Clerk

Effective Date:

****

History: Based on the public's interest to establish standards of ethical conduct for all town

TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

Chairman Gary St. Vil

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

October 9, 2025

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

Dear Mayor Allyn:

At its Regular Meeting held on October 8, 2025 the Town Council took the following actions:

- Approved the following Amendments to the proposed *"An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* dated September 10, 2025 as follows:

  - ✓ ***Section 4, paragraph 3b,*** remove the phrase "~~spouse or minor child~~" and replace it with "***or immediate family of***".

  - ✓ ***Section 4, paragraph*** 8, Town Employee definition will be modified to add the phrase, ***"including outsourced administrative or executive professionals, including but not limited to consultants and the Town Attorney"***

  - ✓ ***Section 5, paragraph 3,*** add the phrase, "***unless the contract or purchase order is awarded through the traditional bid or quote process and conflict is disclosed.***"

  - ✓ ***Section 5, paragraph 4,*** add the following sentence, "***This provision does not apply to Town employees or Board of Education employees providing recreational services including but not limited to classes, coaching, camp counseling through Ledyard Parks and Recreation or Ledyard Board of Education".***

  - ✓ ***Section 7, paragraph 1b6***, add the phrase "***unless disclosed to the Ethics Commission.***"

- Adopted a proposed *"An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* dated October 8, 2025.

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

- Granted a bid waiver to P & H Construction & Septic Services LLC, of Uncasville, Connecticut, in the amount of $29,700 due to receiving fewer than the required three bids in response to Bid #072-PI-35 (Septic System 70 Christy Hill Road) in accordance with Ordinance #200-001 (rev 1) "*An Ordinance for Purchasing".*

- Reappointed 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

- Reappointed 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

- Appointed 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.

- Approved the following two tax refunds in the combined total amount of $6,393.90 each exceeding $2,400.00 in accordance with tax collector departmental procedures:

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

The Town Council did not act on the following:

- Discussion and possible action on the
  MOTION to set a Public Hearing (Hybrid Format - Video Conference and In-Person) Public Hearing date to be held on October 22, 2025 at 5:00 p.m. to be held in Council Chambers, Town Hall Annex, 741 Colonel Ledyard Highway, Ledyard, Connecticut, to receive comments and recommendations regarding a *proposed An Ordinance Establishing a Town of Ledyard Code Of Ethics And Ethics Commission"* .

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

Respectfully submitted,

Roxanne M. Maher

Roxanne M. Maher
Administrative Assistant
to the Ledyard Town Council

cc: Director of Finance-
Treasurer
Department Heads
Land Use Director Elizabeth Burdick
Water Pollution Control Authority

6X.1

Fred Allyn, III

From: Ritter, Matthew D. <MRitter@goodwin.com>
Sent: Wednesday, October 15, 2025 1:33 PM
To: Fred Allyn, III; Kristen Chapman
Subject: Comments to Ordinance

Mayor – I hope you can kindly share my comments with the Town Council. I would note that some of my previously suggested edits have been made.

However, I did flag many of the same sections discussed below in my prior draft and I did not review any subsequent drafts after my initial review. In addition, this ordinance appears to be a blend of several other municipal ordinances. In some cases, as I will note below, there are capitalized terms or key terms that are not defined or the ordinance contains redundant sections. I would suggest the Town start over with an ordinance from a single Town and add in provisions to that ordinance. I believe that will lead to a more streamlined review process and avoid inconsistencies within the ordinance.

Comments Below:

1. Definition of a "Financial Interest" – in the new subsection (b) it says "pecuniary or material benefit." A pecuniary benefit is defined in subsection (a) above as anything worth more than $100. I would add a definition to clarify what a "material benefit" is for a Town official or Town employee.

2. I would recommend merging subsections (b) and (c) under the new definition of financial interest because there is little difference between the two definitions. Both provisions are aimed at preventing a Town official or employee from obtaining a financial gain or loss due to official Town action.

However, subsection (c) does not have the same carve out that appears in subsection (b) – "except for such contracts or 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."

I also want to clarify the following fact pattern: a BOE secretary has a husband who is an electrician. Can the electrician bid on a Town contract under the new definitions? Is this a "contract or 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?"

3. Under the language in subsection (c), if a Town Council member owns $200 worth of stock in a company and that company wants to move to Town, is it a violation of this provision for that member of the Town Council to vote on an agreement with the company to relocate to Ledyard? What if the stock is held in a trust or 401k? Same outcome?

Subection (c) also says that a Town employee has a financial interest if they are an "employee" of a business or professional enterprise that may "directly or indirectly" receive a financial gain or loss as a result of a Town action. These types of sections usually run to the owner (or other high ranking officials) of the company and not regular employees. For example, what if a member of the Planning & Zoning Commission works at CVS as a cash clerk in New London. Are they prohibited from voting on a CVS zoning application in Ledyard?

EX. 1

4. Typo in this sentence: "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"… it should say "or" not "of."

5. New definition of immediate family – "anyone living in the same household." Does this include someone who may rent a room and is not related to the owner? What about two roommates who are not related and move in together?

6. Town employee definition has been expanded to include the "town attorney' and "outsourced administrative or executive professionals."

A. Whose responsibility is it to alert every outsourced administrative or executive professionals that they are subject to the Town's Code of Ethics and that they are held to the same standard as Town employees? Will these provisions be part of standard Town contracts?

B. Who is an "outsourced administrative or executive professional?" I would make this a defined term if it is to remain in the ordinance.

C. Under the current draft, if the Town hires an "executive professional", certain provisions of Section 5 apply to the spouse or the child, for example, of that executive professional. Section 5, subsection 6. now provides that the spouse of an executive professional cannot receive a gift from another Town contractor (and in this example neither the executive professional or the Town contractor work for the Town or the BOE). I think the Town will find it difficult, if not legally impossible, to regulate non-Town employees to this extent.

7. Section 5 – I deleted this provision in my original comments because it is a subjective standard as opposed to an objective standard. I think the Ethics Commission and lawyers will have a hard time agreeing on what is "incompatible with the proper discharge" of a person's "independent judgment or action in the performance of that person or person's duties."

8. Section 5, subsection (4) typo: "This provision does not apply to Town employees or Board of Education employees providing recreational including but not limited to classes, coaching, or camp counseling through Ledyard Parks and Recreation or Ledyard Board of Education."

Should it say "recreational services"?

9. Section 5, subsection 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.

What does "may be awarded" mean? I would clarify that it means someone who has bid on a contract or has been awarded a contract.

10. Section 5, Subsection 7. – I would recommend deleting subjective standards. What constitutes private employment that "could tend to impair independence of judgment or action by the Town official or Town employee"?

11. Section 5 – Subsection 8. – what does this mean- "A Town official or a Town employee, not otherwise restrained by the Code"?

Ex. 1

In addition, that same section cites to "Agencies" which is capitalized and not defined elsewhere in the Ordinance.

12. Section 5 – Subsection 12 – what is "personal gain?" It is not defined in the ordinance.

13. Section 5 – Subsection 15 – I am not sure whether the Town can prohibit former employees from working in a job for 1 year after leaving Town service. I am OK with the language as it applies to former Town officials but Town employees may have a claim as to the legality of this provision.

EX.2

Sections 1&2:

- Both sections mention establishing a "Code of Ethics" and "standards of ethical conduct" (section 2). Where is the Code of Ethics or standards of ethical conduct?

Section 3:

- "Shall apply to all" groups town, BOE employees and officials together. In a small town essentially every PR&SC instructor falls into one of those 4 categories. Note: Program Instructors are paid as 1099 contractors for classes, Town/ BOE employees are W-2 creating the "conflict of interest". Same applies to volunteer officials.

Section 4:

- 3.(a) "is not common to the other citizens of the town" Does this sufficiently cover instructors?
- 4.(d) "*or fiancé*" Not needed, fiancé is already defined as "Immediate family" in Sec. 5
- 5. "*anyone living in the same household*" This means we can't hire roommates, further restricting ability to hire camp staff.
- 8. Classifying contractors as "town employees" has major concerns
    - Contracts are already executed and this would require amendments.
    - Possible conflicts with Fed/ State grants.

Code of Ethics?:

- Where is the Code of Ethics- should be after definitions? A Code of Ethics is referenced multiple times, but one is not included in this ordinance. If a Code of Ethics from another source is used (ex. charter, employe handbook) it should be referenced.

Section 5:

- 3. "Unless the contract or purchase order is awarded through the traditional bid or quote process and conflict is disclosed." Instructors don't go through the traditional bid or quote process. The conflict is disclosed to HR.
- 3. Concerns with P&R maintenance contractors due to newly added language. This will not allow us to use our maintenance contractors for things that are not included in the initial contract. Example M&M Hydroseeding recommends after soil testing that we apply lime to a field. We would currently set up a PO for the lime, and he applies it at the same time as an application covered under the contract so there are no added labor costs.
- 3. Provision from Section 5-4 should be included in 5-3 with correct department name.

- 4. Provision is in wrong section, and the department name is incorrect, should read Parks, Recreation, and Senior Citizens Department. Provision should be kept in this section but worded to allow the Mayor, volunteer board/ commission members, and BOE members to teach. Also, wording is wrong as it states "...employees providing recreational including..."

General Concerns/Result:

- Conflicts with Fed/ State grants that have required ethic/ equal right codes. There are also VERY specific reporting and investigation procedures, who has the authority to conduct that investigation, appeal processes, and timelines for all of the above.
- Loss of $30,690.00 in program fees, almost $7,000.00 in revenue.
- Eliminate more than 15 programs enjoyed by more than 500 residents annually.
- Loss of revenue will result in increased budgetary needs to subsidize Senior Center programs and an increase in camp fees.
- This ordinance eliminates all our inclusive programing. This is a possible Federal ADA violation.
- Reduces our ability to hire summer camp staff because we can't hire roommates or family within the same department. We already have measures in place to hire a siblings/ roommate. We allow it but they work at different camp sites so there are no conflicts or sibling rivalries.
- We would no longer be able to use P&R Assistant Courtney for shirt orders. We do get quotes for substantial orders but some of the companies won't quote an order for 2-3 shirts.

EX. 3

Fred Allyn, III

From: Jessica Buhle
Sent: Thursday, October 9, 2025 11:30 AM
To: Fred Allyn, III
Subject: Re: Redline copy of proposed ordinance

Importance: High

Good morning,

I am working on it now and anticipate having it to you shortly.

Thank you.

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

> On Oct 9, 2025, at 11:29 AM, Fred Allyn, III <mayor@ledyardct.org> wrote:
>
> Good morning,
>
> Following up on when I can anticipate receiving the electronic copy of the redline draft of the Town Attorney draft, showing all deletions, additions, edits. Councilor Buhle stated last night that she would send the newly revised copy this morning. The window of time for review is narrow and I will not permit the Town to be exposed to additional liability of not having a final review of an ordinance that has inherent liability risks anyway.
>
> Best,
>
> Fred
>
> Fred B. Allyn III
> <image001.png>
> Mayor, Town of Ledyard, CT
> 741 Colonel Ledyard Hwy.
> Ledyard, CT 06339
> Tel (860) 464-3221
> www.ledyardct.org
>
> NOTICE* Effective June 11, 2018
> Town Hall hours are 7:30AM-4:45PM Mon-Thurs
> ***CLOSED FRIDAYS***

TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

Chairman Gary St. Vil

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

October 9, 2025

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

Dear Mr. Bolduc:

CONGRATULATIONS! The Town Council, at its meeting on October 8, 2025 reappointed you as a member of the Library Commission, to complete a two (2) year term ending November 7, 2027.

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

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

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

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

Sincerely,

Gary St. Vil
Chairman

cc: Town Clerk
Library Commission

GS/rm

TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

Chairman Gary St. Vil

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

October 9, 2025

Mr. Justin DeBrodt
5 Erins Way
Ledyard, Connecticut 06339

Dear Mr. DeBrodt:

CONGRATULATIONS! The Town Council, at its meeting on October 8 2025 reappointed you as a regular member of the Inland Wetland And Water Courses Commission, to complete a two (2) year term ending October 31, 2027.

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

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

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

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

Sincerely,

Gary St. Vil
Chairman

cc: Town Clerk
Inland Wetland And WaterCourses Commission

GS/rm

TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

Chairman Gary St. Vil

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

October 9, 2025

Ms. Ellin M. Grenger
15 Bittersweet Drive
Gales Ferry, Connecticut 06335

Dear Ms. Grenger:

CONGRATULATIONS! The Town Council, at its meeting on October 8, 2025 reappointed you as a member of the Library Commission, to complete a two (2) year term ending November 7, 2027.

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

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

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

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

Sincerely,

Gary St. Vil
Chairman

cc: Town Clerk
Library Commission

GS/rm

TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

Chairman Gary St. Vil

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

October 9, 2025

Mr. Michael Marelli
4 Lee Brook Road
Ledyard, Connecticut 06339

Dear Mr. Marelli:

CONGRATULATIONS! The Town Council, at its meeting on October 8 2025 reappointed you as a regular member of the Inland Wetland And Water Courses Commission, to complete a two (2) year term ending October 31, 2027.

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

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

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

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

Sincerely,

Gary St. Vil
Chairman

cc: Town Clerk
Inland Wetland And WaterCourses Commission

GS/rm

TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

Chairman Gary St. Vil

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

October 9 2025

Ms. Elizabeth Rumery
22 Blufff Road
Gales Ferry, Connecticut o6335

Dear Ms. Rumery:

CONGRATULATIONS! The Town Council, at its meeting on October 8, 2025 reappointed you as a member of the Library Commission, to complete a two (2) year term ending November 7, 2027.

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

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

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

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

Sincerely,

Gary St. Vil
Chairman

cc: Town Clerk
Library Commission

GS/rm

TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

Chairman Gary St. Vil

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

October 9, 2025

Mr. James Thompson
6 Pennywise Lane
Ledyard, Connecticut 06339

Dear Mr. Thompson:

CONGRATULATIONS! The Town Council, at its meeting on October 8, 2025 appointed you as a regular member of the Inland Wetland And Water Courses Commission, to complete a two (2) year term ending October 31, 2026, filling a vacancy left by Ms. Lynmaire Thompson.

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

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

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

Thank you for your willingness serve the Town of Ledyard.

Sincerely,

Gary St. Vil
Chairman

cc: Town Clerk
Inland Wetland And WaterCourses Commission

GS/rm

TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

Chairman Gary St. Vil

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

October 9, 2025

Ms. Cynthia Wright
6 Laurel Leaf Drive
Gales Ferry, CT 06335, Connecticut

Dear Ms. Wright:

CONGRATULATIONS! The Town Council, at its meeting on October 8, 2025 reappointed you as a member of the Library Commission, to complete a two (2) year term ending November 7, 2027.

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

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

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

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

Sincerely,

Gary St. Vil
Chairman

cc: Town Clerk
Library Commission

GS/rm

TOWN OF LEDYARD
CONNECTICUT

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

Chairman Gary St. Vil

MEMORANDUM

DATE: October 14, 2025
TO: Mayor Fred Allyn, Jr.
FROM: Roxanne M. Maher, Administrative Assistant RM
To the Ledyard Town Council

Subject: *"Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission for the Town of Ledyard"*

At its meeting held on October 8, 2025 the Town Council approved the proposed "*Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission for the Town of Ledyard*" as amended a the meeting.

In accordance Chapter III; Section 12 "*Approval of Ordinances*" please find attached the certified Ordinance.

Kindly return to the Town Council Office within five days upon your signature so that it can be properly filed.

Thank you.

cc:
Town Council

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, or immediate family 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.
An honorary degree.

i. Costs associated with attending a conference or business meeting and/or the registration or entrance fee to attend such conference or business meeting in which the Town official or Town employee participates in his or her official capacity.

j. Any gift provided to a Town Official or Town Employee or to an immediate family member of a Town Official or Town Employee for the celebration of a major life event provided any such gift provided to an individual does not exceed one thousand dollars ($1,000.00) in value. A major life event shall include, but not be limited to, a ceremony commemorating an individual's induction into religious adulthood such as a confirmation or bar mitzvah; a wedding; a funeral; the birth or adoption of a child; and retirement from public service or Town employment.

5. *"Immediate family"* means spouse, fiancé, child, parent, grandchild, brother, sister, grandparent, niece, nephew, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, 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, including outsourced administrative or executive professionals, including but not limited to consultants and the Town Attorney.

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, unless the contract or purchase order is awarded through the traditional bid or quote process and conflict is disclosed.

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. This provision does not apply to Town employees or Board of Education employees providing recreational including but not limited to classes, coaching, or camp counseling through Ledyard Parks and Recreation or Ledyard Board of Education.

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 unless disclosed to the Ethics Commission.

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

2. Terms of Appointment

a. Members shall be appointed by the Town Council for a term of three (3) years and shall serve until their successor has qualified or is removed by the Town Council.

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

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

d. Any vacancy on the Ethics Commission, other than by expiration of term, shall be filled for the unexpired portion of the term by the Town Council.

e. The Town Council may remove members for cause and fill the vacancy in accordance with the Town Charter. Cause for removal shall include, but is not limited to, an unexcused absence from three (3) consecutive meetings. It shall be the responsibility of the Chairman of the Ethics Commission to notify the Town Council when a member has not properly performed his or her duties.

f. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary.

3. Authority/Duties

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

a. To consult with the Town Attorney or another attorney hired by the Ethics Commission if so authorized by the Town Council.

b. To request that the Town Attorney provide advisory opinions.

4. Filing of Complaints

A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission and signed under penalty of false statement. The form shall be delivered to the Town Clerk who shall transmit a copy of the complaint to the Chairperson of the Ethics Commission and the respondent within five (5) days of receipt of the complaint. The Ethics Commission shall also notify the respondent that it will conduct a probable cause determination and invite the respondent to provide any information the respondent deems relevant to the Ethics Commission's determination of probable cause.

No complaint may be made under the Code of Ethics unless it is filed with the Ethics Commission within three (3) years after the violation alleged in the complaint has been committed.

The Complaint shall include:

a. Name of the person accused (respondent)

b. Name of the person filing the complaint.

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

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

5. Evaluation and Acknowledgement

a. Within sixty (60) business days of the receipt of a complaint, the Ethics Commission shall review and determine whether there is probable cause that a violation of the Code of Ethics has occurred. A finding of probable cause means that based on a review of the available information the Ethics Commission determines that reasonable grounds exist to believe that the respondent engaged in prohibited conduct by the Code of Ethics. If the Ethics Commission does not make a finding of probable cause, the complaint shall be dismissed and a copy of its decision shall be mailed to both the complainant and the respondent. Unless the Ethics Commission makes a finding of probable cause, a complaint alleging a violation of this Code of Ethics shall be confidential except upon the request of the respondent.

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

6. Hearings

If the Ethics Commission decides that probable cause of a violation of the Code of Ethics exists, it will conduct a public hearing to determine whether or not a violation occurred in accordance with Uniform Administrative Procedure Act ("UAPA") (See Chapter 54 of the Connecticut General Statutes). At the hearing, the respondent will have the right to be represented by legal counsel, to present evidence and witnesses, and compel attendance of witnesses and the production of books, documents, records, and papers, and to examine and cross-examine witnesses, and inspect and copy relevant and material records, papers, and documents not in such person's possession. Hearings are not governed by the legal rules of evidence, and any information relevant to the matter may be considered. The Ethics Commission will respect the rules of privilege recognized by the law. Not later than ten (10) days before the start of the hearing, the Ethics Commission will provide the respondent with a list of its intended witnesses. The Ethics Commission will make a record of the proceedings.

7. Final Decisions

a. Decisions by the Ethics Commission that a person is in violation of the Code of Ethics must result from the concurring vote of four (4) of its members.

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

c. Such finding and memorandum will be deemed to be final decision of the commission for the purposes of the UAPA. The respondent may appeal to the superior court in accordance with the provision of Section 4-183 of the Connecticut General Statutes.

d. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) days after its decision. It will also advise the respondent of his or her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

8. Penalties for Violations of the Code of Ethics

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

a. Order to cease and desist the violation;

b. Pay a civil penalty of up to the maximum amount permitted by State law;

c. Censure;

d. Suspension without pay;

e. Demotion;

f. Termination of employment;

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

Section 8. Severability

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

Adopted by the Ledyard Town Council on: October 8, 2025

Signed/Certified on: 10·14·2025

Gary St. Vil, Chairman

Approve/Disapprove on: _____

_____
Fred B. Allyn, III, Mayor

Published on:

_____
Patricia A. Riley, Town Clerk

Effective Date:

****

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

TOWN OF LEDYARD
CONNECTICUT

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

Chairman Gary St. Vil

MEMORANDUM

DATE: October 16, 2025
TO: Ledyard Town Council
FROM: Roxanne M. Maher, Administrative Assistant RM
To the Ledyard Town Council

Subject: *"Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission for the Town of Ledyard"*

In accordance with the Town Charter, I am transmitting *"Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission for the Town of Ledyard* which the Mayor stated his disapproval in his letter dated October 16, 2025 listing his reasons for not approving the proposed Ordinance.

Chapter III, Section12 of the Town Charter states the following:

Every ordinance, except an emergency ordinance or an ordinance relating to the Town Council or its procedures, shall, before it becomes effective, be certified to the Mayor for his approval within seven (7) days of the final passage by the Town Council. The Mayor shall sign the proposed ordinance, if he approves it, whereupon, subject to the provisions of Section 5 of this Chapter, it shall become effective. If he disapproves a proposed ordinance, he shall, within five (5) days of its receipt by him, return it to the clerk of the Town Council with a statement of the reasons for his disapproval, which statement shall be transmitted by said clerk to the Town Council at its next meeting.

If the Town Council shall pass the proposed ordinance by an affirmative vote of at least six (6) members within fourteen (14) days after such ordinance has been returned with the Mayor's disapproval, it shall become effective without his approval subject to said Section 5. *If the Mayor does not return the proposed ordinance within the time required, it shall become effective without his approval subject to said Section 5.*

Should you have any questions, please feel free to contact me.

Thank you.

TOWN OF LEDYARD
CONNECTICUT
OFFICE OF THE MAYOR

Fred B. Allyn III
Mayor

Kristen Chapman
Executive Assistant to the Mayor

741 Colonel Ledyard Highway
Ledyard, CT 06339-1551
(860) 464-3222
FAX (860) 464-8455

October 16, 2025

Ledyard Town Council
C/O Chairman Gary St. Vil
741 Colonel Ledyard Hwy.
Ledyard, CT 06339

RE: Disapproval of Ordinance #100-021

Chairman St. Vil,

I return to you the attached Ordinance #100-021 which is disapproved. Also attached are 2+ pages of comments from the Town Attorney, indicating issues with the document as well as 2 pages of comments from Parks and Rec Director Scott Johnson Jr. My concern is and continues to be a lack of a proper ordinance that reasonably addresses concerns raised in prior meetings, reduces liability exposure to the Town, does not adversely impact Parks and Rec programming for our residents and does not become a political weapon- as demonstrated in Montville and Waterford most recently. The Town Attorney has stated "he cannot defend this ordinance". Of grave concern is another attachment, which is Councilor Buhles reply email to me on Thursday, October 9th at 11:30AM. (You are provided both my email to her and her response to me). The one line response "I am working on it now and anticipate having it to you shortly" flies right in the face of governmental transparency as the Town Council voted on this ordinance the previous night (without the benefit of any Councilor having a copy of the ordinance they were voting on, other than Ms. Buhle). This email does not suggest, it says that she is ***working on an ordinance that was passed the night before.*** No ordinance should be edited in any way after approval- it should be exactly as was voted on the previous night. An ordinance that goes to Public Hearing is meant to be the final draft- it should not be amended post- Public Hearing. Lastly, I want to add further context to a memo you read at the October 8, 2025 meeting authored by Fred Allyn Jr, then Mayor. In said memo, it suggested the town create an ethics commission. What was omitted from the 10/8 meeting is that as part of the forensic audit- completed as a result of the embezzlement by a Town Employee, a decision was made to implement a Fraud Policy, require two sign-off's on checks of a certain dollar threshold, the

tax refund policy and the vehicle use policy. Since that time nearly two decades ago, the implemented policies continue to protect the Town and taxpayers.

As I previously stated in my letter to the Town Council on 9/24/25:

- The Town Charter grants the Town Council the power to investigate.
- The Fraud Policy outlines no less than eight different situations that constitute fraud.
- The Employee Handbook covers Nepotism, Conflict of Interest, Outside Employment and the Vehicle Use Policy.

Lastly, *there is no budget for this new commission or its attorneys.* Please note, the Authority/Duty of the new commission, upon receipt of a complaint is "To consult with The Town Attorney or another attorney" and "To request that the Town Attorney provide advisory opinions". These consultations, investigations and advisory opinions cost money. The Town Attorney has suggested a minimum of $20,000 for such a commission- though it can go markedly higher based on the allegations, if the result is appealed to Superior Court, etc. Also know, the Town is required to provide legal counsel to the accused. Our insurance carrier, CIRMA includes stated deductibles between $1,000 and $10,000 per occurrence.

In closing, please know I do fully support a proper "Code of Ethics" and updating to our Fraud Policy and Conflict of Interest statement, if warranted.

Thank you,

Fred B. Allyn III

Mayor

AN ORDINANCE ESTABLISHING A TOWN OF LEDYARD CODE OF ETHICS AND ETHICS COMMISSION

Be it ordained by the Town Council of the Town of Ledyard:

Section 1. Authority

In accordance with Chapter III of the Town Charter, there is hereby established a Town of Ledyard Code of Ethics and Ethics Commission.

Section 2. Declaration of Policy and Purpose

The trust of the public is essential for government to function effectively. The proper operation of the Town government requires that Town officials, 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, or immediate family 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.
An honorary degree.

i. Costs associated with attending a conference or business meeting and/or the registration or entrance fee to attend such conference or business meeting in which the Town official or Town employee participates in his or her official capacity.

j. Any gift provided to a Town Official or Town Employee or to an immediate family member of a Town Official or Town Employee for the celebration of a major life event provided any such gift provided to an individual does not exceed one thousand dollars ($1,000.00) in value. A major life event shall include, but not be limited to, a ceremony commemorating an individual's induction into religious adulthood such as a confirmation or bar mitzvah; a wedding; a funeral; the birth or adoption of a child; and retirement from public service or Town employment.

5. *"Immediate family"* means spouse, fiancé, child, parent, grandchild, brother, sister, grandparent, niece, nephew, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, 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, including outsourced administrative or executive professionals, including but not limited to consultants and the Town Attorney.

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, unless the contract or purchase order is awarded through the traditional bid or quote process and conflict is disclosed.

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. This provision does not apply to Town employees or Board of Education employees providing recreational including but not limited to classes, coaching, or camp counseling through Ledyard Parks and Recreation or Ledyard Board of Education.

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 unless disclosed to the Ethics Commission.

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

2. Terms of Appointment

a. Members shall be appointed by the Town Council for a term of three (3) years and shall serve until their successor has qualified or is removed by the Town Council.

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

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

d. Any vacancy on the Ethics Commission, other than by expiration of term, shall be filled for the unexpired portion of the term by the Town Council.

e. The Town Council may remove members for cause and fill the vacancy in accordance with the Town Charter. Cause for removal shall include, but is not limited to, an unexcused absence from three (3) consecutive meetings. It shall be the responsibility of the Chairman of the Ethics Commission to notify the Town Council when a member has not properly performed his or her duties.

f. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary.

3. Authority/Duties

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

a. To consult with the Town Attorney or another attorney hired by the Ethics Commission if so authorized by the Town Council.

b. To request that the Town Attorney provide advisory opinions.

4. Filing of Complaints

A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission and signed under penalty of false statement. The form shall be delivered to the Town Clerk who shall transmit a copy of the complaint to the Chairperson of the Ethics Commission and the respondent within five (5) days of receipt of the complaint. The Ethics Commission shall also notify the respondent that it will conduct a probable cause determination and invite the respondent to provide any information the respondent deems relevant to the Ethics Commission's determination of probable cause.

No complaint may be made under the Code of Ethics unless it is filed with the Ethics Commission within three (3) years after the violation alleged in the complaint has been committed.

The Complaint shall include:

a. Name of the person accused (respondent)

b. Name of the person filing the complaint.

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

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

5. Evaluation and Acknowledgement

a. Within sixty (60) business days of the receipt of a complaint, the Ethics Commission shall review and determine whether there is probable cause that a violation of the Code of Ethics has occurred. A finding of probable cause means that based on a review of the available information the Ethics Commission determines that reasonable grounds exist to believe that the respondent engaged in prohibited conduct by the Code of Ethics. If the Ethics Commission does not make a finding of probable cause, the complaint shall be dismissed and a copy of its decision shall be mailed to both the complainant and the respondent. Unless the Ethics Commission makes a finding of probable cause, a complaint alleging a violation of this Code of Ethics shall be confidential except upon the request of the respondent.

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

6. Hearings

If the Ethics Commission decides that probable cause of a violation of the Code of Ethics exists, it will conduct a public hearing to determine whether or not a violation occurred in accordance with Uniform Administrative Procedure Act ("UAPA") (See Chapter 54 of the Connecticut General Statutes). At the hearing, the respondent will have the right to be represented by legal counsel, to present evidence and witnesses, and compel attendance of witnesses and the production of books, documents, records, and papers, and to examine and cross-examine witnesses, and inspect and copy relevant and material records, papers, and documents not in such person's possession. Hearings are not governed by the legal rules of evidence, and any information relevant to the matter may be considered. The Ethics Commission will respect the rules of privilege recognized by the law. Not later than ten (10) days before the start of the hearing, the Ethics Commission will provide the respondent with a list of its intended witnesses. The Ethics Commission will make a record of the proceedings.

7. Final Decisions

a. Decisions by the Ethics Commission that a person is in violation of the Code of Ethics must result from the concurring vote of four (4) of its members.

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

c. Such finding and memorandum will be deemed to be final decision of the commission for the purposes of the UAPA. The respondent may appeal to the superior court in accordance with the provision of Section 4-183 of the Connecticut General Statutes.

d. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) days after its decision. It will also advise the respondent of his or her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

8. Penalties for Violations of the Code of Ethics

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

a. Order to cease and desist the violation;

b. Pay a civil penalty of up to the maximum amount permitted by State law;

c. Censure;

d. Suspension without pay;

e. Demotion;

f. Termination of employment;

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

Section 8. Severability

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

Adopted by the Ledyard Town Council on: October 8, 2025

Signed/Certified on: 10·14·2025

Gary St. Vil, Chairman

Approve/Disapprove on: 10/16/25

Fred B. Allyn, III, Mayor

Published on:

Patricia A. Riley, Town Clerk

Effective Date:

****

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

File #: 25-2156 **Agenda Date:** 10/22/2025 **Agenda #:** 1.

REPORT

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

File #: 25-2157 **Agenda Date:** 10/22/2025 **Agenda #:** 2.

REPORT

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

File #: 25-2159 **Agenda Date:** 10/22/2025 **Agenda #:** 3.

REPORT

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

File #: 25-2160 **Agenda Date:** 10/22/2025 **Agenda #:** 4.

REPORT

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

File #: 25-2161 **Agenda Date:** 10/22/2025 **Agenda #:**

REPORT

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

File #: 25-2637 **Agenda Date:** 10/22/2025 **Agenda #:** 1.

APPOINTMENT

Motion/Request:
MOTION to recommend the Town Council appoint Mr. Nathaniel Woody (U) 770 Long Cove Road, Gales Ferry as a Regular Member, to Planning & Zoning Commission for a three (3) term ending October 31, 2028 filling a vacancy left by Mr. Craig.

Background:
Mr. Howard Craig's term is due to expire on October 31, 2025. In seeking reappointment recommendations Planning & Zoning Commission Chairman Wood indicated that Mr. Craig was not interested in continuing to serve once his term ends. (Please see attached).

Chairman Wood has requested that Alternate Member Mr. Nathniel Woody be appointed as a Regular Member to fill Mr. Craig's vacancy. (Please see attached email dated October 7, 2025)

Administrative Notes:
Please see attached Planning & Zoning Roster

Nominating Committee Recommendation:
(type text here)

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.

Roxanne Maher

From: Marty Wood <martyengrew@gmail.com>
Sent: Tuesday, October 7, 2025 1:18 PM
To: Elizabeth Burdick; Roxanne Maher
Cc: martyengrew@gmail.com
Subject: Re: Appointment of Regular Member to PZC for 11/1/25

Good afternoon Liz and Roxanne,
LIz, thanks for providing the qualification information on the Planning and Zoning Commission alternate members.

Roxanne,
It is my recommendation that Mr. Nate Woody fill the vacancy created by Mr. Howard Craig's term expiring on October 31, 2025 and Mr. Craig choosing not to continue to serve on the Planning and Zoning Commission.
Mr. Nate Woody has completed all the requisite training and is qualified to fill this opening position.
Should you have any questions or concerns, please do not hesitate to contact me.
Sincerely,
Marty

Marcelle Wood
Chair, Planning and Zoning Commission
Gales Ferry, CT 06335
860-333-3147

On Tue, Oct 7, 2025 at 12:54 PM Elizabeth Burdick <planner@ledyardct.org> wrote:

> Good afternoon, Marty, The administration committee of the Town Council meets tomorrow, 10/8/25. If possible, would you please submit an email recommendation for an alternate to move to regular. Alternates are Nate Woody, Rhonda Spaziani, and Greg Lockhart. Nate has completed the required training, Rhonda has completed some of the training, but not the required 1.5hrs of Affordable Housing, Greg has not yet started his training as he is very new, but we've sent him the links to get started. I will give you a quick call to discuss. Thanks!
>
> *Liz Burdick*, Director of Land Use & Planning
>
> Town of Ledyard
>
> 741 Colonel Ledyard Highway, Ledyard, CT 06339
>
> Telephone: (860) 464-3215

Email: planner@ledyardct.org

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.

TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

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

August 5, 2025

Mr. Marcell Wood, Chairman
Planning and Zoning Commission
11 South Glenwoods Road
Gales Ferry, Connecticut 06335

Dear Mr. Wood:

A member of the Planning and Zoning 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 at council@ledyardct.org

Planning & Zoning Commission **3 Year Term**

Member's Name	Party Affiliation	Term Expiration	Commission Recommendation	Town Committee Endorsement	Attendance
Mr. Howard Craig 64 Stoddards View Gales Ferry, CT 06335	U	10/31/2025	No N	Y N	{ X }Excellent { } Good { } Fair { } Poor

Committee Chair Comments: __I have spoken to Mr. Howard Craig and it is intention not to continue as a Regular Member of the Planning and Zoning Commission at the expiration of his appointment.
His attendance has been excellent, his contributions to every facet of the Commission's process as a regular member is concise, meaningful and supported by facts. Mr. Craig will be missed as an active member of the Planning and Zoning Commission. I wish him well as he explores other ways to serve his community.
Sincerely,

M. E. Wood Chair, Planning and Zoning Commission

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

Sincerely,

Roxanne M. Maher
Administrative Assistant
to the Ledyard Town Council

PLANNING & ZONING COMMISSION

	Name	Term Expiration
R	Miello, Matthew 12 Cardinal Lane Gales Ferry, Connecticut 06335	10/31/2026
D	Wood Marcelle (Marty) 11 South Glenwoods Road Gales Ferry, Connecticut 06335	10/31/2027
U	Ribe, Beth 129 Rose Hill Road Ledyard, Connecticut 06339	10/31/2027
U	Vacant (Craig, Howard) Does not want to be Reappointed when term ends	10/31/2025
D	Harwood, James 10 Eska Drive Ledyard, Connecticut 06339	12/ 31/ 2026

ALTERNATES

D	Spaziani, Rhonda 9 Sunset Road Gales Ferry, Connecticut 06335	10/31/2026
U	Woody, Nathaniel 770 Long Cove Road Gales Ferry, Connecticut 06339	12/31/2026
D	Lockhart, Greg 30 Tanger Lane Gales Ferry, Connecticut 06335	12/31/2025

Town Council Appointment — 3 Year Term — 5 Reg. Members, 3 Alt. Members

Zoning Citation Officer
Eric Treaster
10 Huntington Way
Ledyard, Connecticut 06339
Email: bsaofnl-eric@yahoo.com

Blight Enforcement Officer
Eric Treaster

File #: 24-0923 **Agenda Date:** 10/22/2025 **Agenda #:** 2.

APPOINTMENT

Motion/Request:
MOTION to appoint Ms. Gillian Thorne (R) 3 Adios Lane, Ledyard, to the Library Commission to complete a two (2) year term ending November 7, 2027 filling a vacancy left by Ms. Candler.

Background:
Ms. Thorne is retired from UCONN where she was the Director of UCONN Early College Experience. She was also the former Principal Stonington Deans Mill and Franklin Elementary School.

Ms. Thorne has a PhD in UCONN Curriculum and Instruction, Master Degree UPENN Education.

Ms. Thorne has been an active member of the community, serving on the Republican Town Committee as their former secretary, Church Outreach, Chaired the Strawberry Supper for five ears, was the Rd Cross Blood Drive Manager, Women's Fellowship Program co-Chairman, Missions Secretary, Book Club Organizer.

Ms. Thorne believes that her thirty year career in education has made her knowledge about the important of and the evolution of libraries, specially the dissemination of information to the public.

Administrative Notes:
Ms. Barbara Candler term is due to expire on November 7, 2 025 and she had informed Library Commission Chairman Bolduc that she was not interested in continuing to serve on the Commission and would step down at the end of her term. (see attached reappointment form)

With Ms. Nash's resignation the Library Commission has one vacancy. (see attached roster).

Nominating Committee Recommendation:
9/11/2024 - The Republican Nominating Committee endorsed the appointment of Ms. Thorne to the Library Commission. (see attached).

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.

Application Form

Profile

Gillian (First Name) | B (Middle Initial) | Thorne (Last Name)

gbthorne@sbcglobal.net
Email Address

3 adios lane
Home Address

Suite or Apt

Ledyard
City

CT
State

06339
Postal Code

Mobile: (860) 912-0924
Primary Phone

Alternate Phone

Which Boards would you like to apply for?

Library Commission: Submitted

Education & Experiences

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

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

Civic engagement is the foundation of citizen involvement in government. My thirty-year career in education of course made me very knowledgeable about the importance of and evolution of libraries specifically and dissemination of information to the public in general.

Community Involvement

RTC membership, former secretary; church outreach (Strawberry Supper chair five years), Red Cross Blood Drive manager, Women's Fellowship Program co-chair, Missions Secretary, Visitation Chair, etc.); Book club organizer (open membership)

Educational Background

PhD UConn Curriculum and Instruction, Masters degree UPENN Education

Retired from UCONN; former principal Stonington Deans Mill and Franklin Elementary
Employer

Director UCONN Early College Experience eleven years
Job Title

Upload a Resume

Party Affiliation

Party Affiliation *

☑ Republican

Disclaimer & FOIA Information

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

Please Agree with the Following Statement

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

☑ I Agree

Signature (type full name below)

Gillian B. Thorne

9/11/24 RTC Endorses
Ms. Thorne for the Library Commission

Gillian B Thorne

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

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

August 5, 2025

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

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 — **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:

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

Sincerely,
Roxanne M. Maher
Administrative Assistant
to the Ledyard Town Council

LIBRARY COMMISSION

	Name	Term Expiration
U	Bolduc, John (Chairman) 14 Monticello Drive Gales Ferry, Connecticut 06335	11/07/2025
D	Grenger, Ellin M. 15 Bittersweet Drive Gales Ferry, Connecticut 06335	11/ 07/ 2025
D	Candler, Barbara (Does not want to be reappointed) Per Chairman Bolduc)	11/ 07/2025
D	Wright, Cynthia 6 Laurel Leaf Drive Gales Ferry, Connecticut 06335	11/ 07/ 2025
D	Hightower, Ralph 1-0 Lakeside Drive Ledyard, Connecticut 06335	11/ 07/ 2026
U	Racich, Rolf 18 Brewster Drive Gales Ferry, Connecticut 06335	11/ 07/ 2026
D	Hellekson, Wendy 14L Lakeside Drive Ledyard, Connecticut 06335	11/ 07/ 2026
U	Diette, Peter 15 Hyde Park Gales Ferry, Connecticut 06335	11/ 07/ 2026
D	Rumery, Elizabeth (Vice-Chairman) 22 Bluff Road Gales Ferry, Connecticut 06335	11/ 07/ 2025

Town Council Appointment 2 Year Term 9 Members

TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

Chairman S. Naomi Rodriguez

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

December 12, 2024

Ms. Gillian Thorne
3 Adios Lane
Ledyard, Connecticut 06339

Dear Ms. Thorne:

Thank you for your application to serve on the Library Commission. We received three applications to fill one vacancy on the Commission.

All of the candidates offered an extensive educational background, great experience, talent and demonstrated their commitment to our community. Although the selection was difficult, another individual was selected at this time.

Vacancies on our town's committees is an active list and volunteers are always needed. I would encourage you to consider possibly serving on another town committee and have enclosed a list of our current vacancies for your review. Also a list of vacancies can be found by visiting https://www.ledyardct.org/244/Commissions-Committees-Boards

In addition, I would like to note that the *Friends of the Library* is a volunteer organization that is always looking for additional members. The Friends of the Library assists the Library in a variety of ways including fundraising events to provide some monetary support. Library Director Jennifer Smith could provide you with more information regarding the *Friends of the Library;* and she can be reached at telephone (860) 464-9917 or by email at: jsmith@ledyardlibrary.org

Please contact Town Council Administrative Assistant Roxanne Maher at (860) 464-3202 or e-mail: council@ledyardct.org should you like to be considered for another committee.

The involvement of our citizens is of significant value and is instrumental to the success of our community. Your interest in serving our community is appreciated.

Sincerely,

S. Naomi Rodriguez

S. Naomi Rodriguez
Chairman

SNR/rm

Town of Ledyard
Committee/Commission/Board
Vacancy Report December 12, 2024

Committee/Commission/Board	Party	Term	Term Expiration	Appointing Authority
Board of Assessment Appeals (Regular Member)	D-R-U	4 year	12/05/2027	Town Council
Board of Assessment Appeals (Alternate Member)	D-R-U	4 year	(New Position)	Town Council
Board of Assessment Appeals (Alternate Member)	D-U	4 year	(New Position)	Town Council
Cable Advisory Board	Board of Education Rep	2 Year	7/1/2022	Mayor
Cable Advisory Board	D-R-U	2 Year	7/1/2022	Mayor
Conservation Commission (Alternate Member)	D-U-R	3 Year	7/31/2026	Mayor
Conservation Commission (Alternate Member)	D-U-R	3 Year	7/31/2026	Mayor
Economic Development Commission	D-R-U	3 Year	9/1/2025	Mayor
Inland Wetlanad & Water Courses (Alternate Member)	R-U	2 Year	10/31/2025	Town Council
Inland Wetlanad & Water Courses (Alternate Member)	D-R-U	2 Year	10/31/2025	Town Council
Ledyard Beautification Committee	D-R-U	3 Year	10/26/2025	Town Council
Ledyard Beautification Committee	D-R-U	3 Year	10/26/2027	Town Council
Ledyard Farmers Market (Alternate Member)	D-R-U	3 Year	5/9/2026	Town Council
Ledyard Farmers Market (Alternate Member	D-R-U	3 Year	5/9/2024	Town Council
Retirement Board (Regular Member)	D-R-U	3 Year	8/26/2026	Town Council
Retirement Board (Alternate Member)	D-R-U	3 Year	8/26/2026	Town Council
Southeastern CT Water Authority	SCWA Ratepayer	2 Year	8/31/2026	Town Council
Zoning Board of Appeals (Alternate)	D-R-U	6 Year	12/6/2029	Mayor
Zoning Board of Appeals (Alternate)	D-R-U	6 Year	12/6/2029	Mayor
Zoning Board of Appeals (Alternate)	D-R-U	6 Year	12/6/2029	Mayor

Apply on-line at:
https://www.ledyardct.org/244/Commissions-Committees-Boards
Or Scan QR Code

Or:

- Visit the Town's website at http://ledyardct.org
- From the "**Department Drop** Down menu select **Committee/Commissions/Boards**
- Click on the **Vacancy** Tab – You can review List
- Click on **Apply Tab** – Located at top right corner of screen
- Follow prompts

Contacts:

Republican Nominating Committee
Cory Watford
Telephone (860) 861-9627
E-Mail: cowboysr9@gmail.com

Democrat Nominating Committee
Naomi Rodriguez
Telephone: (860) 381-9209
E-Mail: ledyarddtcncnaomi@comcast.net

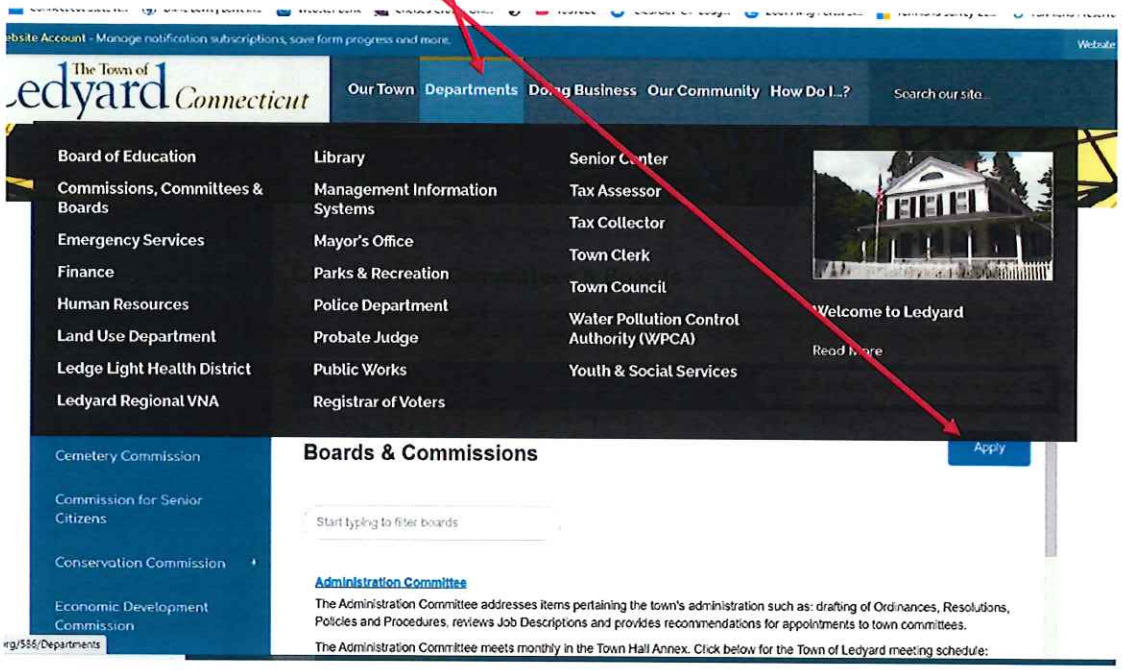
Unaffiliated
Administrative Assistant Roxanne Maher:
Telephone (860) 464-3203
e-mail council@ledyardct.org

Instructions below to apply on-line:

Visit the new Granicus/Legistar Meeting Portal at:
https://www.ledyardct.org/244/Commissions-Committees-Boards

Or It can be found by:

- Visiting the Town's website at http://ledyardct.org
- From the "**Department Drop** Down menu select **Committee/Commissions/Boards**
- Click on the **Vacancy** Tab – You can review List
- Click on **Apply Tab** – Located at top right corner of screen
- Follow prompts



TOWN OF LEDYARD

741 Colonel Ledyard Highway
Ledyard, CT 06339-1511

File #: 25-2567 **Agenda Date:** 10/22/2025 **Agenda #:** 3.

APPOINTMENT

Motion/Request:
MOTION to appoint the following members to the Sustainable CT Ad Hoc Committee for a two (2) year term ending December 15, 2027 in accordance with the structure provided in Res#004-20/25/Jan 25 "*Town of Ledyard Resolution Supporting Their Continued Participation In The Sustainable CT Municipal Certification Program And Establishing A Sustainable CT Ad Hoc Committee:*

- Mr. Michael Dreimiller (D) 37 Norman Drive, Gales Ferry (Economic Development Commission)
- Mr. Nathaniel Woody (U) 770 Long Cove Road, Gales Ferry (Planning & Zoning Commission
- Ms. Beth Ribe (U) 129 Rose Hill Road, Ledyard (Community -at-Large)
- Councilor Carmen Garcia-Irizarry (D) 58 Eagle Ridge Drive, Gales Ferry Land Use/Planning/Public Works Committee Member

Background:
In accordance with Res #004-2025/Jan 25 the Ledyard Sustainable CT Ad Hoc Committee shall be comprised of five members appointed by the Ledyard Town Council with the following representatives:

- One member from the Planning & Zoning Commission or Inland Wetlands & Water Courses Commission
- One member from the Economic Development Commission or Conservation Commission
- One member from the Town Council Land Use Committee
- Two members from the Community-at-Large

BE IT FURTHER RESOLVED, each member shall serve for a term of two (2) years. Members shall commence to serve their terms immediately upon appointment and shall serve until their successor has qualified or they have been reappointed or removed by the Town Council.

Administrative Notes:
(type text here)

Nominating Committee Recommendation:
(type text here)

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.

Roxanne Maher

From: Roxanne Maher
Sent: Monday, September 15, 2025 3:34 PM
To: Town Council Group
Cc: Anna Wynn; Elizabeth Burdick; Roxanne Maher
Subject: RE: Volunteer Members for Sustainable CT Ad Hod Committee

Tracking:

Recipient	Read
Town Council Group	
Anna Wynn	
Elizabeth Burdick	Read: 9/15/2025 3:35 PM
Roxanne Maher	
Jessica Buhle	Read: 9/15/2025 3:40 PM
William Barnes	Read: 9/15/2025 6:19 PM
Adrienne L. Parad	Read: 9/16/2025 12:35 PM
Carmen Garcia Irizarry	Read: 9/16/2025 9:20 PM
Timothy Ryan	Read: 9/17/2025 9:00 AM

Good Afternoon Anna:

I will pass along to the Town Council.

Roxanne

From: Anna Wynn <land.use.asst@ledyardct.org>
Sent: Monday, September 15, 2025 3:27 PM
To: Roxanne Maher <council@ledyardct.org>
Cc: Elizabeth Burdick <planner@ledyardct.org>
Subject: Volunteer Members for Sustainable CT Ad Hod Committee

Good Afternoon Roxanne,

The following members have volunteered to serve on the Sustainable CT Ad Hoc Committee:

Beth Ribe of the Inland Wetlands & Watercourses Commission
Nate Woody of the Planning & Zoning Commission
Michael Dreimiller of the Economic Development Commission

Chairman S. Naomi Rodriguez

TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

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

MEMORANDUM

TO: Conservation Commission
Economic Development Commission
Planning & Zoning Commission
Inland Wetlands & Water Courses Commission
Democratic Town Committee
Republican Town Committee

FROM: Chairman S. Naomi Rodriguez SNR

DATE: July 9, 2025

RE: Sustainable CT Ad Hoc Committee – Request for Nominations

In 2020 the Ledyard Town Council adopted a "*Town of Ledyard Resolution Supporting the Participation in the Sustainable CT Municipal Certification Program*"; with the hope to boost our local economy, help reduce costs with initiatives to provide for more efficient municipal operations, and to obtain grants and other programs to help support our community. However, due to the Covid-19 Pandemic and limited staff this initiative stalled.

Because Ledyard has continued to implement a number of Sustainable CT initiatives designed to create a resilient, collaborative, and a forward-looking community; the Town Council felt that it was appropriate to continue its efforts to obtain the *Sustainable CT Municipal Certification.* Therefore, at our June 25, 2025 meeting the attached "*Resolution Supporting the Town's Continued Participation in the Sustainable CT Municipal Certification Program And Establishing A Sustainable CT Ad Hoc Committee*" was adopted. The Sustainable CT Ad Hoc Committee would be a short-term two-year assignment and calls for five-members comprised of our knowledgeable and experienced Land Use and Development Commissions; as well as members from of our Community as follows:

- One member from the Planning & Zoning Commission or Inland Wetlands & Water Courses Commission;
- One member from the Economic Development Commission or Conservation Commission;
- Two members from the Community-at-Large
- One member from the Town Council Land Use Committee

The Town Council would like to appoint members to the *Sustainable CT Ad Hoc Committee* as soon as possible and respectfully requests that your Commission/Committee submit the names of those who are interested in participating on this progressive Committee.

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

Thank you.

cc: Mayor Allyn, III; Land Use Director/Town Planner

SNR/rm

TOWN OF LEDYARD
CONNECTICUT

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

Chairman S. Naomi Rodriguez

Res: 004-2025/Jun 25

TOWN OF LEDYARD
RESOLUTION SUPPORTING THEIR CONTINUED PARTICIPATION
IN THE SUSTAINABLE CT MUNICIPAL CERTIFICATION PROGRAM
AND ESTABLISHING A SUSTAINABLE CT AD HOC COMMITTEE

WHEREAS, On March 11, 2020 the Ledyard Town Council adopted a "*Town of Ledyard Resolution Supporting the Participation in the Sustainable CT Municipal Certification Program*"; recognizing that Sustainable CT is a comprehensive, statewide, action-oriented voluntary certification program, built by and for municipalities, with the vision that: "*Sustainable CT communities strive to be thriving, resilient, collaborative, and forward-looking*".

WHEREAS, Sustainable CT is designed to boost local economies, help municipal operations become more efficient, reduce operating costs, and provide grants and additional support to municipalities.

WHEREAS, the Town of Ledyard continues to embrace an ongoing process of working toward greater sustainability, selecting which actions it chooses to pursue from the voluntary menu of actions provided by Sustainable CT; and

WHEREAS; The Town of Ledyard has implemented a number of programs which included a streetlight assessment that resulted in the purchase of the streetlights from Eversource and converting them to Light-Emitting Diode (LED) light bulbs saving both energy and taxpayer dollars; constructed the Multi-Use Pathway from Ledyard High School to Ledyard Center to expand safe, connected, active transportation for pedestrians and bicyclists; extending the sewer line providing infrastructure for both affordable housing and business development; improvements to the Linda C. Davis Food Pantry providing an equitable community food action plan to ensure that all community members can access sustainable, nutritious food; improvements to the Town Green providing handicap access to one of the best Farmers' Markets in the State for residents to purchase fresh produce from local farmers and featuring many community organizations providing information to residents regarding fuel assistance, mental health services, public safety services, and many other commodities and programs; regionalization of shared services with the Town of Preston by providing Emergency Dispatch Communication Services, Tax Assessor Services, Public Works Mechanic Services, and the shared purchase of a streetsweeper to maintain the required MS4 (Municipal Separate Storm Sewer System) Permit Certifications.

WHEREAS, the Director of Land Use & Planning is authorized to serve as the Town of Ledyard's Sustainable CT contact person for the Sustainable CT Municipal Certification process and authorizes him/her to complete Municipal Registration on behalf of the Town of Ledyard;

WHEREAS: it is recognized that the town is minimally staffed; and supplemental support is needed to continue efforts to reach the Sustainable CT Goals of the community.

NOW, THEREFORE, BE IT RESOLVED, that to focus attention and effort within the Town of Ledyard on matters of sustainability, and in order to promote local initiatives and actions toward Sustainable CT Municipal Certification, the Ledyard Town Council establishes a Ledyard Sustainable CT Ad Hoc Committee to be comprised of five members appointed by the Ledyard Town Council.

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

- One member from the Planning & Zoning Commission or Inland Wetlands & Water Courses Commission
- One member from the Economic Development Commission or Conservation Commission
- One member from the Town Council Land Use Committee
- Two members from the Community-at-Large

BE IT FURTHER RESOLVED, each member shall serve for a term of two (2) years. Members shall commence to serve their terms immediately upon appointment and shall serve until their successor has qualified or they have been reappointed or removed by the Town Council.

Any vacancies on said committee shall be filled by the appointment of the Ledyard Town Council, with priority given to maintaining as much as possible the structure above; and

Any member of the Committee who is absent from three (3) consecutive regular meetings and any intervening duly called special meetings shall be considered to have resigned from the Commission and the vacancy shall be filled as hereinbefore provided, except that the Commission may vote to waive the requirements of the section in each case where illness or other extenuating circumstances make it impossible for a member to meet the attendance requirements of this action. It shall be the responsibility of the Chairman of the Committee to notify the Town Council when a member has not properly performed his/her duties.

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

(1). Work with the Land Use Director and the Mayor to engage staff; and or, contract with consultants, or a Sustainable CT Fellow through Southeastern Connecticut Council of Government (SCCOG) Program.

(2). Review the Sustainable CT Tool Kit and Guidelines; and to oversee the preparation and submission of Application at the appropriate time.

(3). Develop initiatives, goals, and recommendations to achieve Points required to complete the process to obtain the Sustainable CT Certification to include:

- Building our community and our local economy;
- Equitably promote the health and well-being of current and future residents;
- Encourage and participate in regional collaboration and other forms of partnership.
- Improve the services and quality of life for our residents, while focusing on sustainability, efficiencies, and reducing the impact of inflationary costs for residents.

(4). Work with the Public Works Director on Food Waste Composting and other waste management initiatives.

(5). Work with the Planning & Zoning Commission to ensure the Town's Plan of Conservation and Development supports the proposed Sustainable CT Initiatives.

(6). Work with the Board of Education to ensure that Ledyard's educational facility needs are considered and met in developing a plan and implementing Sustainable CT initiatives.

(7). Prepare and present to the Town Council for approval a Capital Improvement Plan to support and move the Sustainable CT Plan forward.

(8) Identify funding sources, including grant funding, and other grassroots funding options such as *In Our Backyard* (IOB) Grants, to support the goals and initiatives; complying with the town's Grant Policy.

(9) Work with the Finance Director on the application and administration of any grant funding received; and the preparation of bid specifications and advertisement for Requests for Proposals to facilitate approved Sustainable CT Initiatives, in accordance with Ordinance #200-001 "*Purchasing Ordinance for the Town of Ledyard*".

RESOLVED, that the first meeting of the Sustainability CT Ad Hoc Committee must be held within 90 days of passing this resolution and that the Sustainability Ad Hoc Committee shall meet as frequently as needed, but no less than quarterly; and shall select a Chairman, Recording Secretary, and Fiscal Officer from its body.

RESOLVED, that the Sustainability Ad Hoc Committee shall report annually to the Ledyard Town Council on the progress of its activities toward the Sustainable CT Certification, with reports and presentations being publicly available.

NOW, THEREFORE, BE IT FURTHER RESOLVED, that the adoption of this Resolution reaffirms the Town of Ledyard's March 11, 2020 initial desire and commitment to continue their work in achieving the Sustainable Development CT Certification.

Adopted by the Ledyard Town Council on: June 25, 2025

S. Naomi Rodriguez

S. Naomi Rodriguez, Chairman

****

The above is a certified a true copy of a Resolution adopted by the Town of Ledyard at a meeting of its Town Council on June 25, 2025 and which has not been rescinded or modified in any way whatsoever.

IN WITNESS WHEREOF: The undersigned has affixed his signature and corporate seal on this 26th day of June 2025.

Patricia A. Riley

Patricia A. Riley, Town Clerk

(SEAL)

****

Revision: "*Town of Ledyard Resolution Supporting the Participation in the Sustainable CT Municipal Certification Program" Adopted: March 11, 2020*

History:

Due to other competing demands on staff the Town of Ledyard was unable to continue their Application process to obtain the Sustainable CT Certifications. However, the Town has continued to take on and has completed a number of initiatives that have contributed to building its community and our local economy; to equitably promote the health and well-being of current and future residents; and has developed, fostered and participated in regional collaboration and other forms of partnership with other communities in the area.

The 2025 adoption of this Resolution reaffirms the Town of Ledyard's desire and interest to achieve the Sustainable CT Certification to continue to improve the services and quality of life for its residents, while focusing on sustainability, efficiencies, and reducing inflationary costs for its residents.

SNR/rm

File #: 25-2517 **Agenda Date:** 10/22/2025 **Agenda #:** 4.

GRANT REQUEST

Type Motion/Request here and complete the Grant Request Form Below:
MOTION to authorize the submission of a grant request to the State of Connecticut for the removal of foam and cleaning of the foam system for Gales Ferry Engine 21.

Background:
Existing legacy firefighting foam has been found to have PFAS in the product. Changes to state laws and awareness in industry have resulted in new ‘’clean foams’’ becoming the industry standard. The State of CT has a funding stream to support departments in the state including the payment of hazardous waste contractors to remove the old foam and clean the foam systems in the apparatus in order to prevent firefighter and environmental exposure to PFAS.

Department Comments/Recommendation:
This grant request is 100% reimbursement for the cleaning and disposal. I support the application.

Finance Director Comments/Recommendation:
If the grant were to be awarded, at this dollar threshold, three quotes would be required or a Council approved bid waiver.

Mayor Comments/Recommendation:
(Type text here)

Please Complete the Grant Request Form Below:

TOWN OF LEDYARD
GENERAL GOVERNMENT
GRANT APPLICATION POLICY AND PROCESS

The Ledyard Town Council will approve all grant applications submitted by the Town to any governmental agency or private foundation on behalf of the Town; and any items that are offered to the Town by any entity, and items taken in forfeiture by the Town. Every department, commission, or board acting on behalf of the

Town of Ledyard when seeking grants or responding to an offer to the Town of grant funds or items must follow this policy and process.

Grants, for these purposes include:

1. Grants that require a Town match -- whether the match is a dollar figure, an in-kind contribution, or a combination thereof
2. Grants that are 100% funded
3. Items or services that are offered ("gifted") to the Town such as land, equipment, buildings, or vehicles
4. Items that are taken by forfeiture and intended to be retained by the Town
5. Items granted to a fire company's 501(c)3 organization but expected to be maintained and/or insured by Town operating dollars

When applying for any grant, the grant seeker will create a legislative file and attach a completed GRANT REQUEST FORM and any pertinent information about the grant and grantor. The legislative file will be set up to go the Town Council using the Finance Committee workflow.

When applying for Federal funding, the grant seeker must include acknowledgement in the GRANT REQUEST FORM that they have read and understand the Federal Government procurement standards for federal funding in 2 CFR 200.318 through 200.325 (See Attachment 1).

Amended and Approved by the Town Council: on: July 22, 2020

Linda C Davis

_____

Linda C. Davis, Chairman

Revisions: "General Government Grant Application Policy and Process" Adopted: May 8, 2018.

History: Paragraph 5 added the following: "*When applying for Federal funding, the grant seeker must include acknowledgement in the GRANT REQUEST FORM that they have read and understand the Federal Government procurement standards for federal funding in 2 CFR 200.318 through 200.325 (See Attachment 1).*"

Below the Form added: *FOR FEDERAL GRANTS: "I confirm that I have read and understand the federal general procurement standards in 2 CFR § 200.318 through 200.325"*

Added to the Policy Attachment 1 "*Code of Federal Regulations: 2 CFR"* to Policy.

GRANT REQUEST FORM

Requestor Chief Erhart Date 9/11/25

Dept/Commission/Board Emergency Services

Name of Grant State of CT Foam Grant

Type of Grant (State of CT, Federal, Private Foundation, Individual - if combination, explain)

State of Conn

Reason for Applying for this Grant
To secure funding to remove and dispose of hazardous foam products from a town fire truck

Amount of Town Match 0

Source of Town Match NA

In-Kind Match - Explain

FOR FEDERAL GRANTS: I confirm that I have read and understand the federal general procurement standards in 2 CFR § 200.318 through 200.325 (Appendix 1)

___Stephen C Holyfield _____ ___Stephen C Holyfield ____ ____9/11/25_____
Signed Name Printed Name Date

ATTACHMENT 1

Code of Federal Regulations: 2 CFR

§200.318 General procurement standards.

(a) The non-Federal entity must use its own documented procurement procedures which reflect applicable State, local, and tribal laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in this part.

(b) Non-Federal entities must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

(c)(1) The non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and

agents of the non-Federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-Federal entities may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.

(2) If the non-Federal entity has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the non-Federal entity must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

(d) The non-Federal entity's procedures must avoid acquisition of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.

(e) To foster greater economy and efficiency, and in accordance with efforts to promote cost-effective use of shared services across the Federal Government, the non-Federal entity is encouraged to enter into state and local intergovernmental agreements or inter-entity agreements where appropriate for procurement or use of common or shared goods and services.

(f) The non-Federal entity is encouraged to use Federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.

(g) The non-Federal entity is encouraged to use value engineering clauses in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions. Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost.

(h) The non-Federal entity must award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. See also §200.213 Suspension and debarment.

(i) The non-Federal entity must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.

(j)(1) The non-Federal entity may use a time and materials type contract only after a determination that no other contract is suitable and if the contract includes a ceiling price that the contractor exceeds at its own risk. Time and materials type contract means a contract whose cost to a non-Federal entity is the sum of:

(i) The actual cost of materials; and

(ii) Direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.

(2) Since this formula generates an open-ended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. Therefore, each contract must set a ceiling price that the contractor exceeds at its own risk. Further, the non-Federal entity awarding such a contract

must assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.

(k) The non-Federal entity alone must be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to, source evaluation, protests, disputes, and claims. These standards do not relieve the non-Federal entity of any contractual responsibilities under its contracts. The Federal awarding agency will not substitute its judgment for that of the non-Federal entity unless the matter is primarily a Federal concern. Violations of law will be referred to the local, state, or Federal authority having proper jurisdiction.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75885, Dec. 19, 2014; 80 FR 43309, July 22, 2015]

§200.319 Competition.

(a) All procurement transactions must be conducted in a manner providing full and open competition consistent with the standards of this section. In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. Some of the situations considered to be restrictive of competition include but are not limited to:

(1) Placing unreasonable requirements on firms in order for them to qualify to do business;

(2) Requiring unnecessary experience and excessive bonding;

(3) Noncompetitive pricing practices between firms or between affiliated companies;

(4) Noncompetitive contracts to consultants that are on retainer contracts;

(5) Organizational conflicts of interest;

(6) Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement; and

(7) Any arbitrary action in the procurement process.

(b) The non-Federal entity must conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference. Nothing in this section preempts state licensing laws. When contracting for architectural and engineering (A/E) services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

(c) The non-Federal entity must have written procedures for procurement transactions. These procedures must ensure that all solicitations:

(1) Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be

avoided if at all possible. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers must be clearly stated; and

(2) Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.

(d) The non-Federal entity must ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the non-Federal entity must not preclude potential bidders from qualifying during the solicitation period.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75885, Dec. 19, 2014]

§200.320 Methods of procurement to be followed.

The non-Federal entity must use one of the following methods of procurement.

(a) Procurement by micro-purchases. Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (§200.67 Micro-purchase). To the extent practicable, the non-Federal entity must distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable.

(b) Procurement by small purchase procedures. Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold. If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources.

(c) Procurement by sealed bids (formal advertising). Bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bid method is the preferred method for procuring construction, if the conditions in paragraph (c)(1) of this section apply.

(1) In order for sealed bidding to be feasible, the following conditions should be present:

(i) A complete, adequate, and realistic specification or purchase description is available;

(ii) Two or more responsible bidders are willing and able to compete effectively for the business; and

(iii) The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

(2) If sealed bids are used, the following requirements apply:

(i) Bids must be solicited from an adequate number of known suppliers, providing them sufficient response time prior to the date set for opening the bids, for local, and tribal governments, the invitation for bids must be publicly advertised;

(ii) The invitation for bids, which will include any specifications and pertinent attachments, must define

the items or services in order for the bidder to properly respond;

(iii) All bids will be opened at the time and place prescribed in the invitation for bids, and for local and tribal governments, the bids must be opened publicly;

(iv) A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and

(v) Any or all bids may be rejected if there is a sound documented reason.

(d) Procurement by competitive proposals. The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:

(1) Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical;

(2) Proposals must be solicited from an adequate number of qualified sources;

(3) The non-Federal entity must have a written method for conducting technical evaluations of the proposals received and for selecting recipients;

(4) Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered; and

(5) The non-Federal entity may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.

(e) [Reserved]

(f) Procurement by noncompetitive proposals. Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

(1) The item is available only from a single source;

(2) The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;

(3) The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or

(4) After solicitation of a number of sources, competition is determined inadequate.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75885, Dec. 19, 2014; 80 FR 54409, Sept. 10, 2015]

§200.321 Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms.

(a) The non-Federal entity must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.

(b) Affirmative steps must include:

(1) Placing qualified small and minority businesses and women's business enterprises on solicitation lists;

(2) Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;

(3) Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;

(4) Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;

(5) Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and

(6) Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs (1) through (5) of this section.

§200.322 Procurement of recovered materials.

A non-Federal entity that is a state agency or agency of a political subdivision of a state and its contractors must comply with section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds $10,000 or the value of the quantity acquired during the preceding fiscal year exceeded $10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75885, Dec. 19, 2014]

§200.323 Contract cost and price.

(a) The non-Federal entity must perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold including contract modifications. The method and degree of analysis is dependent on the facts surrounding the particular procurement situation, but as a starting point, the non-Federal entity must make independent estimates before receiving bids or proposals.

(b) The non-Federal entity must negotiate profit as a separate element of the price for each contract in

which there is no price competition and in all cases where cost analysis is performed. To establish a fair and reasonable profit, consideration must be given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

(c) Costs or prices based on estimated costs for contracts under the Federal award are allowable only to the extent that costs incurred or cost estimates included in negotiated prices would be allowable for the non-Federal entity under Subpart E-Cost Principles of this part. The non-Federal entity may reference its own cost principles that comply with the Federal cost principles.

(d) The cost plus a percentage of cost and percentage of construction cost methods of contracting must not be used.

§200.324 Federal awarding agency or pass-through entity review.

(a) The non-Federal entity must make available, upon request of the Federal awarding agency or pass-through entity, technical specifications on proposed procurements where the Federal awarding agency or pass-through entity believes such review is needed to ensure that the item or service specified is the one being proposed for acquisition. This review generally will take place prior to the time the specification is incorporated into a solicitation document. However, if the non-Federal entity desires to have the review accomplished after a solicitation has been developed, the Federal awarding agency or pass-through entity may still review the specifications, with such review usually limited to the technical aspects of the proposed purchase.

(b) The non-Federal entity must make available upon request, for the Federal awarding agency or pass-through entity pre-procurement review, procurement documents, such as requests for proposals or invitations for bids, or independent cost estimates, when:

(1) The non-Federal entity's procurement procedures or operation fails to comply with the procurement standards in this part;

(2) The procurement is expected to exceed the Simplified Acquisition Threshold and is to be awarded without competition or only one bid or offer is received in response to a solicitation;

(3) The procurement, which is expected to exceed the Simplified Acquisition Threshold, specifies a “brand name” product;

(4) The proposed contract is more than the Simplified Acquisition Threshold and is to be awarded to other than the apparent low bidder under a sealed bid procurement; or

(5) A proposed contract modification changes the scope of a contract or increases the contract amount by more than the Simplified Acquisition Threshold.

(c) The non-Federal entity is exempt from the pre-procurement review in paragraph (b) of this section if the Federal awarding agency or pass-through entity determines that its procurement systems comply with the standards of this part.

(1) The non-Federal entity may request that its procurement system be reviewed by the Federal awarding agency or pass-through entity to determine whether its system meets these standards in order for its system to be certified. Generally, these reviews must occur where there is continuous high-dollar funding, and third party contracts are awarded on a regular basis;

(2) The non-Federal entity may self-certify its procurement system. Such self-certification must not limit the Federal awarding agency's right to survey the system. Under a self-certification procedure, the Federal awarding agency may rely on written assurances from the non-Federal entity that it is complying with these standards. The non-Federal entity must cite specific policies, procedures, regulations, or standards as being in compliance with these requirements and have its system available for review.

§200.325 Bonding requirements.

For construction or facility improvement contracts or subcontracts exceeding the Simplified Acquisition Threshold, the Federal awarding agency or pass-through entity may accept the bonding policy and requirements of the non-Federal entity provided that the Federal awarding agency or pass-through entity has made a determination that the Federal interest is adequately protected. If such a determination has not been made, the minimum requirements must be as follows:

(a) A bid guarantee from each bidder equivalent to five percent of the bid price. The “bid guarantee” must consist of a firm commitment such as a bid bond, certified check, or other negotiable instrument accompanying a bid as assurance that the bidder will, upon acceptance of the bid, execute such contractual documents as may be required within the time specified.

(b) A performance bond on the part of the contractor for 100 percent of the contract price. A “performance bond” is one executed in connection with a contract to secure fulfillment of all the contractor's obligations under such contract.

(c) A payment bond on the part of the contractor for 100 percent of the contract price. A “payment bond” is one executed in connection with a contract to assure payment as required by law of all persons supplying labor and material in the execution of the work provided for in the contract.

§200.326 Contract provisions.

The non-Federal entity's contracts must contain the applicable provisions described in Appendix II to Part 200-Contract Provisions for non-Federal Entity Contracts Under Federal Awards.

TOWN OF LEDYARD

741 Colonel Ledyard Highway
Ledyard, CT 06339-1511

File #: 25-2158 **Agenda Date:** 10/22/2025 **Agenda #:** 5.

FINANCIAL BUSINESS REQUEST (FBR)

Motion/Request:
MOTION to amend the Fiscal Year 2025/2026 Standing Bid Waiver List to include the following:

- Freightliner/Alliance in East Hartford.

Background:
The Water Pollution Control Authority and the Gales Ferry Fire Company have requested the Fiscal Year 2025/2026 Standing Bid Waiver List be amended to include the following:

- ***Groton Utilities for Emergency Repairs to the Ledyard Water Infrastructure*** - The Ledyard Water Pollution Control Authority (WPCA) contracts with Groton Utilities for water supply and delivery as well as maintenance of the water infrastructure. On occasion, an emergency repair of the WPCA essential water infrastructure is needed. Because Groton Utilities through their own purchasing process in vetting best cost/qualification and, therefore, the WPCA has requested for emergency repairs that Groton Utilities be added to the Standing Bid Waiver List to expedite the process for water infrastructure repairs. (Please see attached).

- ***Freightliner/Alliance in East Hartford*** -The Gales Ferry Fire Company has used Freightliner/Alliance in the past for routine maintenance and repairs to their fire apparatus. Freightliner/Alliance has intimate knowledge of a couple of the Fire Company's apparatus which was a benefit to help troubleshoot problems quicker and more efficient. Preventative maintenance, routine checks, and annual inspections cost on average a few thousand dollars. With the addition of any repairs the cost often exceeds the $5,000 limit in Ordinance #200-001 "Purchasing Ordinance" which would then require the Gales Ferry Fire Company to seek a minimum of three quotes. (Please see attached).

Town Council Meeting 8/6/2025: The Town Council approved the Fiscal Year 2025/2026 Standing Bid Waiver List in accordance with Ordinance #200-001 entitled "*An Ordinance for Purchasing*" the purchasing thresholds are as follows: (1) For purchases of goods or services between $5,000 - $14,999 the Town shall solicit a minimum of three quotes; and (2) For purchases over $15,000, a minimum of three (3) proposals are required through a competitive bid process. In addition, annually the Town Council approves a "*Standing Bid Waiver List*" for unique vendors, lowest possible prices obtainable, sole vendors, and fewer than three bidder situations, noting that the Town's Purchasing Ordinance requires them to request competitive bids for items in excess of $15,000.

Department Comment/Recommendation:

(type text here)

Finance Director Comment/Recommendation:
Regarding the addition of Groton Utilities for "Emergency Repairs", I would suggest emergency needs to be defined. Additionally, I would ask Mr. Lynch to provide a copy of GU's purchasing process that is referenced.

Mayor Comment/Recommendation:

Roxanne Maher

From: water pollution control authority
Sent: Wednesday, September 24, 2025 10:43 AM
To: Roxanne Maher; Christina Hostetler
Cc: Ian Stammel; Fred Allyn, III
Subject: Last Night meeting follow-up action items - WPCA

Hi Roxanne/Christina:

A couple of follow up items came up with last night's meeting. The first is to include Groton Utilities to be put on the preferred vendors list so that when an emergency repair of essential WPCA water infrastructure equipment is required that GU/WPCA does not have to go through the towns purchasing process that includes bids, etc. GU goes through their own purchasing process in vetting best cost/qualification and in an emergency, it would seem unproductive for the town to repeat this process. The second item is related to the first in that the above request might require us to amend the town's procurement ordinance to allow for such expenses to take place.

I am sure there will be further discussions on this! thanks!

Ed Lynch, WPCA
Mobile 646-732-9224

Roxanne Maher

From: Gales Ferry Fire Chief <chief@gffc.org>
Sent: Thursday, October 2, 2025 9:03 AM
To: Steve Holyfield; Roxanne Maher
Subject: Legislation for a Bid Waiver

Good morning,

I spoke with Matt at finance this morning about some upcoming repairs and bills that we anticipate being hit with. One of our apparatus, our tanker, is up at Freightliner/Alliance in East Hartford. The bills and repairs are going to fall somewhere between $6000 to $10,000. Alliance is not on our bid waiver list and I would like to add them.

My reason and rationale is I anticipate using them again in the future. We've used them before in the past, but costs weren't nearly that high at that time to have to add them to this list. They have intimate knowledge of a couple of our apparatus to help troubleshoot problems quicker and more efficient. These days, preventative maintenance, routine checks, and annual inspections cost on average a few thousand dollars. Once you add necessary repairs from these findings, we often exceed our $5000 limit. Alliance is our third and currently only repair company we use along with MES and Bulldog. I'd like to request legislation so that town council could consider adding them to the bid waiver.

I also was wondering if the foam mitigation grant legislation is on the docket for the next finance committee meeting. I don't see the agenda for it yet. Thanks!

Jeff

Jeffrey Erhart
Chief of the Department
Gales Ferry Fire Company
1772 Route 12
Gales Ferry, CT 06335
(W) 860.464.7228 / (C) 860.389.5339

Town of Ledyard
FY 25/26
Standing Bid Waiver List

Department	Vendor	Description	Reason	On List in Prior Year	Contract Term Date
Administrator of Emergency Services	Yale New Haven Healthcare	Firefighter physicals	Only area provider capable of supporting appointment based physicals	Yes	N/A
Debt Service	Munistat	Financial Services Advisor	Financial advisor for all bond and BAN issuances. Holds Town's debt records and history. Need to continue with them for consistency and institutional record keeping.	Yes	N/A
Human Resources	Isolved Inc. (Timeforce)	Time & Attendance Software for payroll	General government time and attendance system. Selected after RFQ process. Need to continue with this system for consistency and efficiency.	Yes	N/A
Human Resources	InTime Services Inc.	Time & Attendance Software for payroll	Police and Dispatch time and attendance system. Designed for unique police scheduling requirements. Need to continue for consistency and efficiency.	Yes	N/A
Ledyard Fire Company and Gales Ferry Fire Company	Firematic Supply Company Inc.	Hurst Extrication Tools & Morning Pride Turnout Gear	Sole authorized vendor and repair shop for Hurst jaws of life and for PPE for both fire companies.	Yes	N/A
Ledyard Fire Company and Gales Ferry Fire Company	MES - Shipman's Fire Equipment Co.	Scott Airpak Breathing Apparatus	Sole authorized vendor.	Yes	N/A
Ledyard Fire Company and Gales Ferry Fire Company	Bulldog Fire Apparatus Inc.	Fire Apparatus Repair and Maintenance	Specialized in fire apparatus repairs and familiar with the town's equipment. Long standing history of quality work. Close proximity (Bozrah, CT) helpful when towing is required.	Yes	N/A
Ledyard Fire Company and Gales Ferry Fire Company	ESO Solutions Inc.	Record Keeping and Reporting Software	Specialized software for fire and emergency services. Utilized for incident tracking, record keeping and required state reporting.	Yes	N/A
Libraries	Libraries Online, Inc. (LION)	Regional Computer Network	Automated network at Library. Unique vendor used by many of the state's municipal libraries.	Yes	N/A
MIS	Gemni Software	Computer Software Support	Assessor, Tax Collector software – current provider.	Yes	06/30/28
MIS	Tyler Technologies	Financial Software Support	Annual support, upgrades, and hosting fee for Munis software; sole provider of existing software.	Yes	N/A
MIS	Granicus	Meeting management and web streaming platform	Under contract for the next year	Yes	06/30/28
MIS	Fiber Store	Network Cables/Modules/Equipment	They provide lower cost fiber equipment than OEM's that work just as well.	Yes	N/A
Parks & Recreation	Hinding Tennis LLC	Crack Repairs for Tennis and basketball courts	Installed our tennis/basketball courts and holds the patent for the RiteWay Crack Repair System specifically designed for the membrane of those courts, ensuring we do not void warranty.	Yes	N/A
Parks & Recreation	M & M Hydroseeding LLC	Non contract field work	Perform field work not included in the contract as needed. Most work can be done in conjunction with work included under the contract resulting in savings.	Yes	N/A
Parks & Recreation	Pioneer Manufacturing Company	Field paint	Bulk purchasing direct from manufacturer	No	N/A

Town of Ledyard
FY 25/26
Standing Bid Waiver List

Department	Vendor	Description	Reason	On List in Prior Year	Contract Term Date
Police	MHQ Municipal Vehicles, Putnam Ford, Whaling City Ford, Colonial Ford or dealership with lowest price	Police Cruisers	Providers of police cruisers.	Yes	N/A
Police	CentralSquare (Tritech Software Systems)	CAD System	Sole provider for existing CAD system.	Yes	N/A
Police	Nexgen Public Safety Systems	CAD/RMS System Software	Proposed sole provider for new upgraded CAD/RMS System	Yes	N/A
Police	AAA Police Supply	Ammunition	Contract priced duty and training ammunition	Yes	N/A
Police	Communications Plus	Police Base Station & Radio Service and Installation	Sole provider of base station radios.	Yes	N/A
Police	Motorola Solutions (Watchguard Video)	In-Car Video System and Body Worn Cameras	For purchase and maintenance of system. State approved and priority vendor for maintenance of the system.	Yes	N/A
Police	Flock Safety	Automated License Plate Reader Technology	Sole provider with networked cameras in surrounding communities, full regional network info available to our	No	N/A
Police	PowerDMS Inc.	Document management system	Sole source provider	No	N/A
Public Works	CLA Engineers	Consulting Engineers	MS4 program requirements per RFQ selection in FY05 and subsequent TC bid waiver.	Yes	N/A
Public Works	Morton Salt, Inc	Treated Salt	Proprietary Ice-B-Gone blend used exclusively by the Town.	Yes	N/A
Public Works	BETA Group, Inc.	Consulting Engineer	Annual Pavement Management support and periodic comprehensive road inspection survey and reporting. Selected in 2010 to provide these services and has been authorized through formal bid waivers since.	Yes	N/A
Public Works	Frost Solutions	Road Surface Monitoring Stations	Permanently-installed proprietary road surface and weather monitoring stations for winter operations. Originally less than $5,000 per year but now above.	Yes	N/A
Public Works	Twin Cedars, Inc.; Freightliner of Hartford; and RJ's Diesel Repair, Inc	Truck/Heavy Equipment Service	These companies are specialized in heavy equipment repairs and familiar with the town's equipment	Yes	N/A
Town Clerk	New Vision (Catalis) and Adkins Printing	Land Record Indexing / Election Supplies	The Town has a contract with both vendors for these state mandated services.	Yes	N/A

File #: 25-1443 **Agenda Date:** 10/22/2025 **Agenda #:** 6.

RESOLUTION

Motion/Request:
MOTION to appropriate $8,000 to Account #20810201-50000-24207 (Cemetery Committee - Grant Expense) to recognize the grant awarded by the State of Connecticut Office of Policy and Management entitled " *Neglected Cemetery Account Grant Program*".

Background:
Town Council Meeting 2/12/2025: Adopted a "*Municipal Certification of Resolution ~2025 Office of Policy and Management Neglected Cemetery Account Grant Program*" to submit a Grant Application for improvements to .

Based on the work the Cemetery Committee submitted to the OPM, the Town has been awarded $8,000. This action will appropriate the funding to the Cemetery Committee Grant Account to facilitate the work as noted below:

Background:
The Office of Management & Policy (OPM) is accepting Grant Applications to assist Municipalities with the maintenance of neglected burial grounds and cemeteries.

The Grant Amount is $5,000 and does not require any local funding to be eligible for the grant. The Application Due Date is February 13, 2025.

The Ledyard Cemetery Committee's plan for the use of the funding is noted below:

Category (Optional): Overarching type of work (for example: mowing, repair fence, restoration/repair of memorial stone)	Tasks: The individual tasks to be performed in order to accomplish the objective of the grant award.
Clearing of Weeds, Briars and BushesDumping fees related to the removal of brush	
Mowing of GroundsLabor and associated fees for mowing	
Repairing of the Grounds Fences or WallsHardware and fence post replacement and associated labor to complete the task	

Straightening , Repair and restoration of Memorial StonesLabor associated with repairs performed by an outside contractor	
Clearing of fallen trees Cutting and removal fees associated with the removal by outside contractor	

Also attached is the Application Instructions and Completed Application.

Finance Director's Comment/Recommendation:
(type text here)

Mayor Comment/Recommendation:
The grant was initially offered to municipalities for $5,000. After the State received the applications, they were able to increase the award to $8,000. I support this motion.

Body:
(type text here)

DRAFT: 2/12/2025

MUNICIPAL CERTIFICATION OF RESOLUTION
~2025 ~
OFFICE OF POLICY AND MANAGEMENT
NEGLECTED CEMETERY ACCOUNT GRANT PROGRAM

I, Patricia A. Riley, Town Clerk of the Town of Ledyard, a municipality organized and existing under the laws of the State of Connecticut, hereby certify that the following is a true copy of the resolution adopted by the Ledyard Town Council of said municipality at its Regular Meeting held on February 12, 2025.

****

RESOLVED: that Mayor Fred B. Allyn, III, is hereby authorized to enter into and execute any and all agreements, contracts and documents necessary to obtain the Office of Policy Management *2025 Neglected Cemetery Account Grant* in the amount of $5,000; for the purpose of municipal maintenance of neglected burial grounds and cemeteries as described in CGS Section 19a-308;

FURTHER RESOLVED, that Mayor Fred B. Allyn, III, is hereby authorized to accept on behalf of the Town of Ledyard, a *2025 Neglected Cemetery Account Grant*.

Approved by the Ledyard Town Council on: February 12, 2025

_____
S. Naomi Rodriguez, Chairman

****

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

AND I DO FURTHER CERTIFY that Mayor Fred B. Allyn, III is the Mayor of the Town of Ledyard, and has been since December 7, 2017.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the Town of Ledyard this _____ day of _____, 2025.

(Seal)

_____
Patricia A. Riley, Town Clerk
Town of Ledyard

DRAFT

Neglected Cemetery Account Grant Program
2025 Grant Application

This application, its receipt, and/or any subsequent announcement or notification of an award associated with this application does not constitute a contract. A contract exists only when all required contractual documents are submitted and approved by the Office of Policy Management and the Grantee is notified that the contract is fully executed.

Name of Municipality: 072 Ledyard
Chief Executive Officer: Fred Allyn III
Contact Person for Grant Administration: William Vidal III
Contact Title and E-mail: Cemetery Commission Chairman William.vidaliii@gmail.com
Contact Street Address:183 Spicer Hill Road
Contact City, State, Zip: Ledyard, CT 06339
Contact Phone Number 203-808-6499
Remittance Address if Different from Above:

The certification below must be signed by the Chief Executive Officer (e.g., Mayor, First Selectman, Town/City Manager):

I do hereby certify the following:

1. I have reviewed this Grant Application and all attachments and links thereto;
2. The information contained herein is true and accurate to the best of my knowledge;
3. The cemetery/cemeteries where work will be performed meet the definition pursuant to Section 19a-308 of the CT General Statutes;
4. If any cemetery is considered an ancient burial ground (used for more than 100 years), the municipality will adhere to the compliance requirements of Historic Cemeteries and Gravestone Protection.
5. Should my municipality receive a grant award, grant funds will only be used for allowable purposes to maintain a neglected cemetery/cemeteries as defined in Section 19a-308 of the CT General Statutes; and
6. I am authorized to apply for these funds per municipal legislative body.

Signature: _____ Title: Mayor

Printed Name: Fred Allyn III Date:

2023 NEGLECTED CEMETERY ACCOUNT GRANT APPLICATION CHECKLIST

This checklist MUST be submitted when submitting your application.

Municipality Name: 072 Ledyard

☒The subject-line of the email used to submit an application includes the MUNICIPALITY NAME and the words "Neglected Cemetery Account Grant Application".

☒Shall any cemetery be considered an ancient burial ground (used for more than 100 years), the municipality will adhere to the compliance requirements of Historic Cemeteries and Gravestone Protection and attach a copy of required documentation.

☒I have included one complete, signed, and dated application

☒I have included the Statement of Work and Grant Award Budget

☒I have included a certified copy of the minutes of our legislative body (i.e.: Board of Selectmen, Town Meeting or Council) which:

- Identifies the Chief Executive Officer by name and title, and states that said official is authorized to enter into and execute any and all agreements, contracts and documents necessary to obtain said grant should the town be selected for a grant award. (For embossed certification stamps that do not contain ink, please darken the embossed stamp with graphite so that it can be seen when the document is scanned/copied.)

Completed By: William Vidal III E-mail Address: William.vidaliii@gmail.com

Date: 2/11/2025

THE FOLLOWING IS PROPOSED SUBJECT TO AWARD AND MAY BE AMENDED AND FINALIZED, AS MUTUALLY AGREED UPON, BY THE ADMINISTERING AGENCY AND GRANTEE.

STATEMENT OF WORK AND GRANT AWARD BUDGET

NAME OF APPLICANT MUNICIPALITY: 072 Ledyard

GRANT PROGRAM NAME: 2025 Neglected Cemetery Account Grant Program

CONCISE GRANT PROGRAM SUMMARY (PROGRAM PURPOSE/INTENT/MISSION): Municipal maintenance of neglected burial grounds and cemeteries, as described in Section 19a-308 of the Connecticut General Statutes. Cemetery maintenance can be, but not limited to, brush clearing, repairing of fences / gates, straightening of leaning headstones.

I. INTRODUCTION

CONCISE PROJECT DESCRIPTION INCLUDING ALL CEMETERY NAMES AND PHYSICAL ADDRESSES: Note if cemetery is an ancient burial ground defined as been used as a burial ground for more than 100 years

The overall project intent is to repair and maintain town cemeteries in various ways such as repairing/mending broken headstones, straightening of leaning headstones, repairing of gates / fences, etc. The following is a list of cemeteries, at the time of submittal, requiring some assistance with repairs and maintenance.

Maintown (#30) – 173 Indiantown Road, Ledyard, Connecticut : requires overall cleanup, wall maintenance

Peter Lester (#28) – 153 Vinegar Hill Road, Gales Ferry, Connecticut : requires repair of at least 7 fallen / broken stones

Latham-Hallett (#25) – 960 Shewville Road, Ledyard, Connecticut : requires overall cleanup, fallen tree removal, straightening of leaning headstones

Thomas Main (#29) – 32R Homestead Road, Ledyard, Connecticut : accessibility maintenance, repair of fallen / broken headstones

Stanton Fanning (#39) – 16 Captain Amos Stanton Drive, Ledyard, Connecticut : repair of fallen headstones and clearing of brush along access pathway

Christopher Avery (#5) – Oak Hills Trail, Ledyard, Connecticut : repair of broken / crumbling headstones, brush clearing for access.

Episcopal Churchyard (#16) – 51 Spicer Hill Road, Ledyard : Overall maintenance for brush removal and clearing

Stoddard-Hurlbutt (#42) – 29 Kings Highway, Gales Ferry, Connecticut : overall maintenance to include tree pruning, brush clearing

Robert – Stoddard (#43) – 1841 CT-12, Gales Ferry, Connecticut : repair of several broken and fallen headstones and minimal brush clearing

Judge Williams (#47) – 500 Shewville Road, Ledyard, Connecticut : repair of broken gate latch

Eldredge (#15) – 330 Shewville Road, Ledyard, Connecticut : repair of broken gate latch

THE FOLLOWING IS PROPOSED SUBJECT TO AWARD AND MAY BE AMENDED AND FINALIZED, AS MUTUALLY AGREED UPON, BY THE ADMINISTERING AGENCY AND GRANTEE.

II. STATEMENT OF WORK

The grantee proposes to complete the work and/or proposes to purchase goods and/or services as delineated in the following table and in accordance with the below proposed budget. Note that the items listed in the “Tasks” column are simply examples. You may delete any and all that are not applicable.

Category (Optional): Overarching type of work (for example: mowing, repair fence, restoration/repair of memorial stone)	Tasks: The individual tasks to be performed in order to accomplish the objective of the grant award.	Target Completion Date for Each Task (specific date or # months from contract execution date)
Clearing of Weeds, Briars and Bushes	Dumping fees related to the removal of brush	12
Mowing of Grounds	Labor and associated fees for mowing	12
Repairing of the Grounds Fences or Walls	Hardware and fence post replacement and associated labor to complete the task	12
Straightening , Repair and restoration of Memorial Stones	Labor associated with repairs performed by an outside contractor	12
Clearing of fallen trees	Cutting and removal fees associated with the removal by outside contractor	12

THE FOLLOWING IS PROPOSED SUBJECT TO AWARD AND MAY BE AMENDED AND FINALIZED, AS MUTUALLY AGREED UPON, BY THE ADMINISTERING AGENCY AND GRANTEE.

III. PROPOSED NEGLECTED CEMETERY ACCOUNT GRANT AWARD BUDGET :

List proposed grant award budget items below.

Description	Amount of Anticipated Neglected Cemetery Account Grant Funding (Up to $5,000)	Amount Federal Funding	Amount Grantee Match Funding	Amount Other Funding	If "Other", list source name and type (private, state, etc.)	TOTALS:
Tree Removal	2000					
Property Maintenance	1000					
Repair/Straightening of Headstones	500					
Brush Clearing	1000					
Fence / Gate Repairs	500					
TOTALS:	5000					

PAYMENT TERMS

· No payments will be made for expenditures incurred prior to the grant start date or after the grant end date unless provided for in statute or program provisions.

· Payment requests shall be submitted on OPM's approved payment request forms.

· Payment request forms shall be completed and signed by the appropriate authorized official who has the authority to sign binding contracts on behalf of the municipality.

2025 NEGLECTED CEMETERY ACCOUNT GRANT PROGRAM GUIDELINES

The Intergovernmental Policy and Planning Division of the Office of Policy and Management (OPM) is accepting Neglected Cemetery Account Grant Program applications from eligible Connecticut municipalities seeking grant funds from the Neglected Cemetery Account.

PROGRAM:

C.G.S. Sec. 19a-308b established the Neglected Cemetery Account and authorizes OPM to make grants to eligible municipalities for the purpose of municipal maintenance of neglected burial grounds and cemeteries, as described in C.G.S. Sec. 19a-308.

TIMELINE:

Application Release Date:	January 6, 2025
Application Due Date:	On or before 12:00 PM Thursday, February 13, 2025
Award Date:	On or about March 31, 2025

APPLICATION INSTRUCTIONS:

- The complete application, any associated updates, addendums or related documents are available at Neglected Cemetery Account Grant Program.
- All submissions related to this application must be sent via email to Debra.McCarthy@ct.gov The subject-line of the email must include the municipality's name and "Neglected Cemetery Grant Account Application".
- The submission must be in PDF format.
- Applications are due on or before noon on Friday, February 7, 2025.
- Eligible municipalities may submit **one application only**, on the prescribed application.
- The municipality must submit certified minutes of the meeting of its legislative body which:
    - identifies the Chief Executive Official by name and title, and states that said official is authorized to enter into and execute any and all agreements, contracts and documents necessary to obtain said grant should the town be selected for a grant award. For embossed certification stamps that do not contain ink, please darken the embossed stamp with graphite so that it can be seen when the document is scanned/copied.
- The municipality must submit a completed copy of the "Neglected Cemetery Application Checklist". (See application)
- The municipality must submit a "Statement of Work and Grant Award Budget". (See application)

GRANT AWARD FUNDING:

The program is funded from death certificate fees collected by the Department of Public Health, pursuant to C.G.S. §7-74(b)(2).

Actual award amounts will be made based on the number of approved applications and the available funds in the Neglected Cemetery Account.

In no event shall a municipality receive a grant unless and until the secretary determines, in the secretary's sole discretion, that the municipality has fully utilized or has plans to fully utilize any other funds previously granted to such municipality.

MUNICIPALITY ELIGIBILTY:

Municipality means any town, city or borough, consolidated town and city or consolidated town and borough.

Pursuant to C.G.S. Sec. 19a-308(a) a "neglected cemetery" is:

- a burial ground or cemetery containing more than six places of interment; and
- a burial ground or cemetery which has been neglected and allowed to grow up to weeds, briars and bushes, or about which the fences have become broken, decayed or dilapidated.

Subsection (b) of C.G.S. Sec. 19a-308 relieves municipalities, municipal employees, and agents and officers of municipalities from criminal or civil liability for undertaking the care and maintenance of a neglected cemetery.

C.G.S. Sec. 8-23 requires each municipality to prepare or amend and adopt a plan of conservation and development (POCD) at least once every ten years. In accordance with Public Act 24-132, any municipality that fails to adopt a POCD every ten years shall be ineligible for discretionary state funding in excess of $25,000 unless such prohibition is expressly waived by the OPM Secretary.

CONTRACT:

Grants will be awarded as a one-year (1) contract.

Municipalities selected to receive a grant will be notified and a listing of selected municipalities will be posted at Neglected Cemetery Account Grant Program.

Those municipalities selected to receive a grant will be required to submit additional paperwork and will be required to enter into a contract which will have a start date and end date. The start date will be the date on which the contract has been fully executed (signed by both the municipality and the state, of which the latest signature date shall be deemed the start date). Only those allowable expenditures incurred between the contract start and end dates will be reimbursable. No reimbursement will be made for expenditures incurred prior to the start date or after the end date of the contract.

Once a municipality has a fully executed contract, the municipality will receive reimbursement instructions and forms. Reimbursement will be limited to only those allowable expenditures incurred between the start and end dates of the contract, only those allowable expenditures incurred for the type of work listed on the application, and only allowable work performed at the locations specified on the application.

ALLOWABLE USES OF GRANT FUNDS:

In accordance with C.G.S. Sec. 19a-308(a), only expenditures for the following four types of work can be reimbursed with Neglected Cemetery Account Grant funds:

1. Clearing of weeds, briars and bushes;
2. Mowing of the ground's lawn areas;
3. Repairing of the ground's fences or walls; and
4. Straightening, repair and restoration of memorial stones.

ALLOWABLE (expenditures must be incurred between the start and end dates of the contract):

- Fuel necessary to operate mowers or other mechanical tools while tending to neglected cemeteries
- Fence posts or rails to replace existing, broken or damaged rails or posts
- Hardware (nails, hinges, etc.) needed to repair existing fences or gates
- Pea stones, cement, stone dust, or other materials needed for the straightening of stones, shoring up, or anchoring of fences and or walls
- Labor and supplies for the straightening, repair, or restoration of broken headstones
- Supplies related to the cleaning/preservation of headstones
- Dumping and or hauling fees related to the removal of brush
- Contracted labor for allowable work
- Overtime municipal labor (NOT regular time) for allowable work
- Other expenditures not specifically listed above will be considered on a case-by-case basis and may be allowed if they are deemed a necessary and allowable expenditure related to performing the type of work listed as 1 through 4 above

NOT ALLOWABLE:

- Any expenditures incurred prior to the start date or after the end date of the contract
- The purchase or rental of equipment or tools (lawn mowers, weed-whackers, shovels, post hole diggers, saws, drills, hammers, etc.)
- Ancillary supplies (hand cleaner, wipes, paper towels, drinks, food, etc.)
- Replacement of headstones
- Labor or materials for any activities NOT directly related to work that is deemed allowable
- Municipal labor that is performed during the course of the employee's regular work schedule

COMPLIANCE REQUIREMENTS:

Not only does state law protect Connecticut's ancient burial grounds and historic grave markers, it also mandates the respectful renovation and maintenance of historic cemeteries. These protections cover any tract of land within a municipality that has been used as a burial ground for more than 100 years, which is defined as an ancient burial ground. See: Historic Cemeteries and Gravestone Protection.

If you're planning any restoration, improvements or changes to an ancient burial ground, you must:

- notify the State Historic Preservation Office (SHPO);
- inform any direct descendants of the people buried there; and
- contact the appropriate probate court.

Depending on the nature of the project to be funded with this grant, certain projects may require additional reviews, evaluations, permits, approvals and or certifications, including but not limited to: Connecticut Commission on Human Rights and Opportunities (CHRO), Connecticut Environmental Policy Act (CEPA) evaluation, Flood Management Certification (FMC); State Historic and Preservation Office (SHPO) review. Such reviews, evaluations, permits and or certifications could significantly impact project costs and timelines. The grantee should only submit applications for such projects when it is able to continue with the proposed project and spend down the grant within the terms of the contract period despite these added costs and extended project timelines.

CONTACT INFORMATION:

- Program information: Martin.Heft@ct.gov or 860.418.6355
- Application submission: Debra.McCarthy@ct.gov or 860.418.6297

STATE OF CONNECTICUT | OFFICE OF POLICY AND MANAGEMENT

Intergovernmental Policy and Planning Division
450 Capitol Avenue | MS# 54SLP | Hartford, CT 06106-1379
NOTICE OF GRANT AWARD

The Office of Policy and Management, **Intergovernmental Policy and Planning Division**, hereby makes the following grant award in accordance with C.G.S. Sec. 19a-308 and in accordance with the Statement of Work.

Grantee: **Town of Ledyard**			Town Code: **072**
Street address: **741 Colonel Ledyard Hwy**	State Agency Code: **N/A**		UEI # (if applicable): **N/A**
City: **Ledyard**	State: **CT**	ZIP Code: **06339**	FEIN (required): **06-6002023**
Grant Program Name: **Neglected Cemetery Acct. Grant Program**			
OPM Grant No.: NCG-25-19	Project Title: **Maintown, Peter Lester, Latham-Hallett, Thomas Main, Stanton Fanning, Christopher Avery, Episcopal Churchyard, Stoddard Hurlbutt, Robert-Stoddard, Judge Williams, and Eldredge Cemetery**		
Date of Award: **4/3/2025**	Category (if applicable): **N/A**		
Period of Award: (Choose one) Start Date: ☒ The date Notice of Grant Award is signed by both Grantor & Grantee (whichever is later). ☐ On **Select Date** or after Notice of Grant Award is signed by both parties (whichever is later). ☐ **Select Date** pursuant to **Enter Statutory Authority** *(attach copy of authority w/ notice of grant award).*			End Date: ... **12 months from the execution of grant award by both grantor and grantee**
Amount of Award	Federal: **$N/A**	State: **$8,000.00**	Interest: **$N/A**
State Match: **$N/A**	Grantee Match: **$N/A**	Other: **$N/A**	Specify: **N/A**
Total Budget: **$8,000.00**	Catalog of Federal Domestic Assistance (CFDA) Number: **N/A**		
Federal Grant No: **N/A**	Grantee Fiscal Year: From: **July 1** To: **June 30**		

My signature below, for and on behalf of the above named grantee, indicates acceptance of the above referenced award and further certifies that: 1.) I have the authority to execute this agreement on behalf of the grantee; and 2.) The grantee will comply with all attached Grant Conditions.

BY: _____ 5/15/25
Signature of Authorized Grantee Official **Date**

Fred Allyn III **Mayor**

FOR THE OFFICE OF POLICY AND MANAGEMENT:

BY: _____ 5/19/25
Jeffrey R. Beckham, Secretary or Paul Potamianos, Deputy Secretary **Date**

For OPM Business Use Only

AMOUNT	FUND	DEPT	SID	PROG	ACCT	CHART 1	CHART 2	BR YR	PROJECT
$8,000.00	12060	OPM20600	35570	13046	55050			2024	OPM000000001111

Effective Date: May 19, 2023

STATEMENT OF WORK AND GRANT AWARD BUDGET

(Form Revision Date 09/17/2024)

NAME OF GRANTEE AS SHOWN ON NOGA: Town of Ledyard

GRANT PROGRAM NAME AS SHOWN ON NOGA: 2025 Neglected Cemetery Account Grant Program

CONCISE GRANT PROGRAM SUMMARY (PROGRAM PURPOSE/INTENT/MISSION): Municipal maintenance of neglected burial grounds and cemeteries, as described in Section 19a-308 of the Connecticut General Statutes.

OPM GRANT NUMBER AS SHOWN ON NOGA: NCG-25-19

PROJECT TITLE AS SHOWN ON NOGA: Maintown, Peter Lester, Latham-Hallett, Thomas Main, Stanton Fanning, Christopoher Avery, Episcopal Churchyard, Stoddard Hurlbutt, Robert Stoddard, judge Williams, and Eldredge Cemetery

I. INTRODUCTION

CONCISE PROJECT DESCRIPTION:

The funds will be used at Maintown Cemetery Located at 173 Indiantown Road, for clearing of weeds, briars and bushes, mowing of the ground's lawn areas and repairing of the ground's fences or walls pursuant to Section 19a-308 of the Connecticut State Statutes.

The funds will be used at Latham-Hallett Cemetery located at 960 Shewville Road, for clearing of weeds, briars and bushes, mowing of the ground's lawn areas and straightening, repair and restoration of memorial stones pursuant to Section 19a-308 of the Connecticut State Statutes.

The funds will be used at Thomas Main Cemetery located at 32R Homestead Road and Peter Lester Cemetery located at 153 Vinegar Hill Road, Gales Ferry for straightening, repair and restoration of memorial stones pursuant to Section 19a-308 of the Connecticut State Statutes.

The funds will be used at Stanton Fanning Cemetery located at 16 Captain Amos Stanton Drive, Christopher Avery Cemetery Located at Oak Hills Trail, Robert-Stoddard Cemetery located at 1841 CT-12, Gales Ferry, for clearing of weeds, briars and bushes, and straightening, repair and restoration of memorial stones pursuant to Section 19a-308 of the Connecticut State Statutes.

The funds will be used at Episcopal Churchyard Cemetery located at 51 Spicer Hill Road and Stoddard Hurlbutt Cemetery located at 29 Kings Highway, Gales Ferry for clearing of weeds, briars and bushes pursuant to Section 19a-308 of the Connecticut State Statutes.

The funds will be used at Judge Williams Cemetery located at 500 Shewville Road and Eldredge Cemetery located at 330 Shewville Road for repairing of the ground's fences or walls pursuant to Section 19a-308 of the Connecticut State Statutes.

II. STATEMENT OF WORK

The grantee shall complete the work and/or shall purchase goods and/or services as delineated in the following table and in accordance with the below approved budget, contract terms and conditions (including, but not limited to OPM's General Grant Conditions, Special Grant Conditions, and/or other requirements or conditions which may be outlined within this document or attached to and made a part of this grant).

Category:	Tasks: The individual tasks to be performed in order to accomplish the objective of the grant award.	Target Completion Date for Each Task (specific date or # months from contract execution date)
Clearing of weeds, briars and bushes	Labor and dumping associated to the removal of the brush	12 Months
Mowing of ground's lawn area	Labor and associated fees for the mowing services	12 Months
Repairing of the ground's fences or walls	Hardware and fence post repairs / replacement / etc	12 Months
Straightening, repair and restoration of memorial stones	Material and labor associated with repairs performed by contractors	12 Months

III. OPM APPROVED GRANT AWARD BUDGET:

The State shall award the Grantee a total sum not to exceed **$8,000.** for the work performed and/or goods/services purchased, as documented and accepted by the State as outlined below. Total payments shall not exceed the total amount of the grant award stated above.

List approved grant award budget items below.

Description	Amount State Funding	Amount Federal Funding	Amount State Match	Amount Grantee Match	Amount Other Funding	If "Other", list source	TOTALS:
Clearing of weeds, briars and bushes	1500						1500
Mowing of ground's lawn area	1500						1500
Repairing of the ground's fences or walls	2000						2000
Straightening, repair and restoration of memorial stones	3000						3000
TOTALS:	8000	0	0	0	0	0	8000

PAYMENT TERMS

- No payments will be made for expenditures incurred prior to the grant start date or after the grant end date unless provided for in statute or program provisions.
- Payment requests shall be submitted on OPM's approved payment request forms.
- Payment requests shall be submitted not more than 2 times per contract period and the final payment request must be received by OPM not later than 90 days after the end of the grant period.
- Payment request forms shall be completed and signed by the appropriate authorized official who has the authority to sign binding contracts for the entity.
- Other: N/A

OFFICE OF POLICY AND MANAGEMENT

Intergovernmental Policy and Planning Division
450 CAPITOL AVENUE
MS # 54SLP
HARTFORD, CT 06106

GENERAL GRANT CONDITIONS

SECTION 1: Use of Grant Funds.

The Grantee agrees to expend the grant funds awarded pursuant to this grant agreement ("Agreement") for allowable purposes only and to comply with all of the terms and conditions of the grant award, as may be amended, and any related documents that set forth its obligations as Grantee. Grant funds shall not, without advance written approval by the Office of Policy and Management ("OPM"), be obligated prior to the start date or subsequent to the end date of the grant period on the Notice of Grant Award form.

SECTION 2: Fiscal Control.

The Grantee shall maintain accounting records and establish policies and provide procedures to assure sound fiscal control, effective management, and efficient use of grant funds. The Grantee shall establish fiscal control and accounting procedures to assure proper disbursement of, and accounting for, grant funds. Accounting procedures must provide for the accurate and timely recording of receipt of funds by source, expenditures made from such funds, and unexpended balances. Controls must be adequate to ensure that expenditures charged to grant activities are made for allowable purposes only.

SECTION 3: Retention of Records and Records Accessibility.

3.1 All grant-funded activities performed by the Grantee, its subcontractors and its subgrantees shall be subject to the inspection and approval of OPM at all times, and Grantee shall furnish all information concerning the grant-funded activities. OPM or its representatives shall have the right, at reasonable hours, to inspect or examine the part of the plant or place of business or any books, records, and other documents of Grantee or its subcontractors or subgrantees pertaining to work performed under this Agreement and shall allow such representatives free access to any and all such plants, places of business, books and records. OPM or its representatives will give the Grantee and its subcontractors and subgrantees at least twenty-four (24) hours' notice of such intended examination. Notwithstanding the foregoing, if the State suspects fraud or other abuse, or in the event of an emergency, the State is not obligated to provide any prior notice. At OPM's request, the Grantee and subcontractors and subgrantees shall provide OPM with hard copies or an electronic format of any data or information in the possession or control of the Grantee, subcontractor, and subgrantee which pertains to OPM's business under this Agreement.

3.2 The Grantee shall retain and maintain accurate records and documents relating to performance of activities under this Agreement for a minimum of six (6) years for municipalities and Regional Councils of Government ("COG"), and three (3) years for all other grantees starting from the date of submission of the final report with the following qualifications and shall make them available for inspection and audit by OPM or its representative:

a. If any litigation, claim or audit is started before the expiration date of the three-year period, the records shall be retained until all litigation, claims or audit findings involving the records have been resolved; and

b. Records for the purchase of equipment (i.e., non-expendable, tangible personal property) acquired with grant funds shall be retained for three years after the final disposition of said property.

3.3 Any subcontractor or subgrantee under this Agreement shall retain and maintain accurate records and documents relating to performance of activities under this Agreement for a minimum of six (6) years for subgrantees contracted under a municipal or COG grant and three (3) years for all other grantees from the expiration of the subcontract or subgrant and shall make them available for inspection and audit by OPM or its representative. The Grantee must incorporate this paragraph verbatim into any agreement

it enters into with any subcontractor or subgrantee providing services and/or conducting activities under this Agreement.

SECTION 4: Insurance.

Grantee shall carry and maintain at all times during the Term of this Agreement, and during the time that any provisions survive the Term of this Agreement, sufficient commercial general liability insurance to satisfy its obligations under this Agreement. Grantee shall name the State as an additional insured on the policy and shall provide a copy of the certificate of Insurance to OPM prior to the Effective Date of this Agreement. Grantee shall not begin Performance until the delivery of the policy to OPM. The State shall be entitled to recover under the insurance policy even if a body of competent jurisdiction determines that the Agency or the State was contributorily negligent.

SECTION 5: Conflict of Interest.

No person who is an officer, employee, consultant or review board member of the Grantee shall participate in the selection, award or administration of a contract, subcontract, or subgrant or in the selection and supervision of an employee if a conflict of interest, real or apparent, would be involved. Such a conflict would arise when the officer, employee, consultant, review board member or any member of his/her immediate family, his/her partner, or an organization which employs, or is about to employ any of the above, has a financial interest in the entity or firm selected for the contract, subcontract, or subgrant or when the individual employee is related to any of the foregoing persons.

SECTION 6: Reports.

The Grantee shall submit such reports as OPM shall reasonably request and shall comply with all provisions regarding the submission of such reports as set forth in the Statement of Work ("SOW"), or as may be required by OPM. Reports may include, but not be limited to, revised project narratives, revised budgets and budget narratives, progress reports, financial reports, cash requests, Grantee affirmative action packets, and subgrantee packets and budgets. Cash requests may be withheld by OPM until complete and timely reports are received and approved.

SECTION 7: Funding Limitation.

Funding of this project in no way obligates OPM to fund the project in excess of this Agreement, beyond the period of this grant, or in future years.

SECTION 8: Audits.

8.1 In accordance with the following conditions, the Grantee agrees to have conducted audits of each of the fiscal years included in the period of this Agreement and any amendments thereto.

8.2 If the Grantee meets the requirements of the State Single Audit Act, §§ 4-230 through 4-236, as amended, of the Connecticut General Statutes, the Grantee's independent auditor is required to submit a State Single Audit Report to OPM. Connecticut General Statutes § 4-231 requires those non-state entities which expended a total amount of State Financial Assistance equal to or in excess of $300,000 in any fiscal year to have either a single audit or a program-specific audit conducted for such fiscal year. A program-specific audit may be conducted if the Grantee received State Financial Assistance from OPM for this Agreement and it is the only State Financial Assistance that the Grantee has expended during its fiscal year. The State Single Audit Report or Program-Specific Audit Report, including the management letter and corrective action plan, if applicable, should be uploaded by the Grantee's independent auditor to OPM's Electronic Audit Reporting System (EARS) website no later than six months after the end of the audit period. The Grantee shall submit one hard copy of the State Single Audit Report or Program-Specific Audit Report, including the management letter and corrective action plan, if applicable, to the OPM Office of Finance no later than six months after the end of the audit period. The Grantee shall also submit Form DE-2017 Supplement to the Audit Report, Detail of OPM Expenditures to the OPM Business Office by email no later than 3 months after the end of the audit period.

8.3 If the Grantee receives any federal funds in this Agreement identified on the Notice of Grant Award, and meets the audit requirements of OMB Circular A-133, Audits of State and Local Governments and Non-Profit Organizations, the Grantee is required to submit an audit conducted in accordance with Auditing Standards Generally Accepted In the United States of America, Government Auditing Standards issued by the Comptroller General of the United States, as well as OMB Circular A-133. This circular requires those state and local governments and non-profit organizations which expended a total amount of

federal financial assistance equal to or in excess of $750,000 in any fiscal year to have a federal single audit or a program-specific audit conducted for such fiscal year. A program-specific audit may be conducted if the Grantee expended Financial Assistance under only one federal program during its fiscal year. For audit purposes, State or grantee match funds, as identified on the Notice of Grant Award, are subject to the same requirements as the federal monies. OMB Circular A-133 requires that the audit report be submitted to the Federal Audit Clearinghouse by the earlier of 30 days after the date of receipt of the auditor's report(s), or 9 months after the end of the audit period.

SECTION 9: Unexpended Funds and or Disallowed Costs.

If project costs are less than the Agreement, and or any project costs have been disallowed, the Grantee agrees to return or forfeit the unexpended/disallowed funds to OPM no later than sixty (60) days following the end date of the Grant.

SECTION 10: Grant Extensions.

If permissible, pursuant to the provisions of the relevant grant program, Grantee may seek an extension of the grant term to secure more time (i) to finish a project or (ii) expend grant funds. It is the Grantee's responsibility to request an extension in writing to the Secretary of the Office of Policy and Management not later than 45 days prior to the Agreement's end date. Such requests will be considered on a case-by-case basis and decisions will be made at the sole discretion of the Secretary or designee. Requests for extensions submitted later than the last 45 days prior to the Agreement's end date may be denied. No extensions to the end date of a grant will be made if a grant's end date has already passed.

SECTION 11: Termination or Reduction for State's Best Interest and Default.

OPM has the right to terminate or reduce a grant. Such reasons to reduce or terminate a grant award include, but are not limited to, if the Grantee: cancels, suspends or significantly changes the scope and activities of a funded project; fails to progress in fulfilling objective(s) of the grant award; fails to comply with the terms of the grant award; owes a final or any past due reports for a previously received OPM grant; is unable to raise the required match; announces or takes steps to dissolve its business and or demonstrates inadequate financial or overall governance management or oversight.

SECTION 12: Nondiscrimination and Affirmative Action.

(a) For purposes of this Section, the following terms are defined as follows:

(1) "Commission" means the Commission on Human Rights and Opportunities;
(2) "Contract" and "contract" include any extension or modification of the Grant, Agreement or Contract;
(3) "Contractor" and "contractor" include any successors or assigns of the Grantee and grantee;
(4) "Gender identity or expression" means a person's gender-related identity, appearance or behavior, whether or not that gender-related identity, appearance or behavior is different from that traditionally associated with the person's physiology or assigned sex at birth, which gender-related identity can be shown by providing evidence including, but not limited to, medical history, care or treatment of the gender-related identity, consistent and uniform assertion of the gender-related identity or any other evidence that the gender-related identity is sincerely held, part of a person's core identity or not being asserted for an improper purpose.
(5) "good faith" means that degree of diligence which a reasonable person would exercise in the performance of legal duties and obligations;
(6) "good faith efforts" shall include, but not be limited to, those reasonable initial efforts necessary to comply with statutory or regulatory requirements and additional or substituted efforts when it is determined that such initial efforts will not be sufficient to comply with such requirements;
(7) "intellectual disability" means a significant limitation in intellectual functioning and deficits in adaptive behavior that originated during the developmental period before eighteen years of age;
(8) "marital status" means being single, married as recognized by the state of Connecticut, widowed, separated or divorced;
(9) "mental disability" means one or more mental disorders, as defined in the most recent edition of the American Psychiatric Association's "Diagnostic and Statistical Manual of Mental Disorders", or a record of or regarding a person as having one or more such disorders;
(10) "minority business enterprise" means any small contractor or supplier of materials fifty-one percent or more of the capital stock, if any, or assets of which is owned by a person or persons: (1) who are active in the daily affairs of the enterprise, (2) who have the power to direct the management

and policies of the enterprise, and (3) who are members of a minority, as such term is defined in subsection (a) of Connecticut General Statutes § 32-9n; and

(11) "public works contract" means any agreement between any individual, firm or corporation and the State or any political subdivision of the State other than a municipality for construction, rehabilitation, conversion, extension, demolition or repair of a public building, highway or other changes or improvements in real property, or which is financed in whole or in part by the State, including, but not limited to, matching expenditures, grants, loans, insurance or guarantees.

For purposes of this Section, the terms "Contract" and "contract" do not include a contract where each Contractor is (1) a political subdivision of the state, including, but not limited to, a municipality, (2) a quasi-public agency, as defined in Connecticut General Statutes § 1-120, (3) any other state, including but not limited to any federally recognized Indian tribal governments, as defined in Connecticut General Statutes § 1-267, (4) the federal government, (5) a foreign government, or (6) an agency of a subdivision, agency, state or government described in the immediately preceding enumerated items (1), (2), (3), (4) or (5).

(b) (1) The Contractor agrees and warrants that in the performance of the Contract such Contractor will not discriminate or permit discrimination against any person or group of persons on the grounds of race, color, religious creed, age, marital status, national origin, ancestry, sex, gender identity or expression, status as a veteran, status as a victim of domestic violence, intellectual disability, mental disability or physical disability, including, but not limited to, blindness, unless it is shown by such Contractor that such disability prevents performance of the work involved, in any manner prohibited by the laws of the United States or of the State of Connecticut; and the Contractor further agrees to take affirmative action to ensure that applicants with job-related qualifications are employed and that employees are treated when employed without regard to their race, color, religious creed, age, marital status, national origin, ancestry, sex, gender identity or expression, status as a veteran, status as a victim of domestic violence, intellectual disability, mental disability or physical disability, including, but not limited to, blindness, unless it is shown by the Contractor that such disability prevents performance of the work involved; (2) the Contractor agrees, in all solicitations or advertisements for employees placed by or on behalf of the Contractor, to state that it is an "affirmative action-equal opportunity employer" in accordance with regulations adopted by the Commission; (3) the Contractor agrees to provide each labor union or representative of workers with which the Contractor has a collective bargaining Agreement or other contract or understanding and each vendor with which the Contractor has a contract or understanding, a notice to be provided by the Commission, advising the labor union or workers' representative of the Contractor's commitments under this section and to post copies of the notice in conspicuous places available to employees and applicants for employment; (4) the Contractor agrees to comply with each provision of this Section and Connecticut General Statutes §§ 46a-68e and 46a-68f and with each regulation or relevant order issued by said Commission pursuant to Connecticut General Statutes §§ 46a-56, 46a-68e and 46a-68f; and (5) the Contractor agrees to provide the Commission on Human Rights and Opportunities with such information requested by the Commission, and permit access to pertinent books, records and accounts, concerning the employment practices and procedures of the Contractor as relate to the provisions of this Section and Connecticut General Statutes § 46a-56. If the contract is a public works contract, the Contractor agrees and warrants that he will make good faith efforts to employ minority business enterprises as subcontractors and suppliers of materials on such public works projects.

(c) Determination of the Contractor's good faith efforts shall include, but shall not be limited to, the following factors: The Contractor's employment and subcontracting policies, patterns and practices; affirmative advertising, recruitment and training; technical assistance activities and such other reasonable activities or efforts as the Commission may prescribe that are designed to ensure the participation of minority business enterprises in public works projects.

(d) The Contractor shall develop and maintain adequate documentation, in a manner prescribed by the Commission, of its good faith efforts.

(e) The Contractor shall include the provisions of subsection (b) of this Section in every subcontract or purchase order entered into in order to fulfill any obligation of a contract with the State and such provisions shall be binding on a subcontractor, vendor or manufacturer unless exempted by regulations or orders of the Commission. The Contractor shall take such action with respect to any such subcontract or purchase order as the Commission may direct as a means of enforcing such provisions including sanctions for noncompliance in accordance with Connecticut General Statutes §46a-56; provided if such Contractor becomes involved in, or is threatened with, litigation with a subcontractor or vendor as a result of such direction by the Commission, the Contractor may request the State of

Connecticut to enter into any such litigation or negotiation prior thereto to protect the interests of the State and the State may so enter.

(f) The Contractor agrees to comply with the regulations referred to in this Section as they exist on the date of this Contract and as they may be adopted or amended from time to time during the term of this Contract and any amendments thereto.

(g) (1) The Contractor agrees and warrants that in the performance of the Contract such Contractor will not discriminate or permit discrimination against any person or group of persons on the grounds of sexual orientation, in any manner prohibited by the laws of the United States or the State of Connecticut, and that employees are treated when employed without regard to their sexual orientation; (2) the Contractor agrees to provide each labor union or representative of workers with which such Contractor has a collective bargaining agreement or other contract or understanding and each vendor with which such Contractor has a contract or understanding, a notice to be provided by the Commission on Human Rights and Opportunities advising the labor union or workers' representative of the Contractor's commitments under this section, and to post copies of the notice in conspicuous places available to employees and applicants for employment; (3) the Contractor agrees to comply with each provision of this section and with each regulation or relevant order issued by said Commission pursuant to Connecticut General Statutes § 46a-56; and (4) the Contractor agrees to provide the Commission on Human Rights and Opportunities with such information requested by the Commission, and permit access to pertinent books, records and accounts, concerning the employment practices and procedures of the Contractor which relate to the provisions of this Section and Connecticut General Statutes § 46a-56.

(h) The Contractor shall include the provisions of the foregoing paragraph in every subcontract or purchase order entered into in order to fulfill any obligation of a contract with the State and such provisions shall be binding on a subcontractor, vendor or manufacturer unless exempted by regulations or orders of the Commission. The Contractor shall take such action with respect to any such subcontract or purchase order as the Commission may direct as a means of enforcing such provisions including sanctions for noncompliance in accordance with Connecticut General Statutes § 46a-56; provided, if such Contractor becomes involved in, or is threatened with, litigation with a subcontractor or vendor as a result of such direction by the Commission, the Contractor may request the State of Connecticut to enter into any such litigation or negotiation prior thereto to protect the interests of the State and the State may so enter.

(i) Pursuant to subsection (c) of section 4a-60 and subsection (b) of section 4a-60a of the Connecticut General Statutes, the Contractor, for itself and its authorized signatory of this Contract, affirms that it understands the obligations of this section and that it will maintain a policy for the duration of the Contract to assure that the Contract will be performed in compliance with the nondiscrimination requirements of such sections. ***The Contractor and its authorized signatory of this Contract demonstrate their understanding of this obligation by (A) having provided an affirmative response in the required online bid or response to a proposal question which asks if the contractor understands its obligations under such sections, (B) signing this Contract or (C) initialing this nondiscrimination affirmation in the following box:*** JB 9

SECTION 13: Executive Orders and Other Enactments.

13.1 All references in this Agreement to any Federal, State, or local law, statute, public or special act, executive order, ordinance, regulation or code (collectively, "Enactments") shall mean Enactments that apply to the Agreement at any time during its term, or that may be made applicable to the Agreement during its term. This Agreement shall always be read and interpreted in accordance with the latest applicable wording and requirements of the Enactments. Unless otherwise provided by Enactments, the Grantee is not relieved of its obligation to perform under this Agreement if it chooses to contest the applicability of the Enactments or OPM's authority to require compliance with the Enactments.

13.2 This Agreement is subject to the provisions of Executive Order No. Three of Governor Thomas J. Meskill, promulgated June 16, 1971, concerning labor employment practices, Executive Order No. Seventeen of Governor Thomas J. Meskill, promulgated February 15, 1973, concerning the listing of employment openings and Executive Order No. Sixteen of Governor John G. Rowland promulgated August 4, 1999, concerning violence in the workplace, all of which are incorporated into and are made a part of this Agreement as if they had been fully set forth in it.

13.3 This Agreement may be subject to (1) Executive Order No. 14 of Governor M. Jodi Rell, promulgated April 17, 2006, concerning procurement of cleaning products and services; (2) Executive Order No. 61 of Governor Dannel P. Malloy promulgated December 13, 2017 concerning the Policy for the Management of State Information Technology Projects, as issued by the Office of Policy and Management, Policy ID IT-SDLC-17-04. If any of the Executive Orders referenced in this subsection is applicable, it is deemed to be incorporated into and made a part of this Agreement as if fully set forth in it.

SECTION 14: Americans with Disabilities Act.

This section applies to those grantees, which are or will become responsible for compliance with the terms of the Americans with Disabilities Act, 42 U.S.C. §§12101 et seq, during the grant award period. The Grantee represents that it is familiar with the terms of this Act and that it is in compliance with the law. Failure of the Grantee to satisfy this standard either now or during the period of the Agreement, as it may be amended, will render the grant voidable at the option of OPM upon notice to the Grantee. The Grantee warrants that it will hold OPM and the State harmless from any liability, which may be imposed upon OPM or the State, or both, as a result of any failure of the Grantee to be in compliance with this Act.

SECTION 15: Independent Contractor.

The Grantee shall act as an independent contractor in performing this Agreement, maintaining complete control over its employees and all of its subcontractors. Before hiring outside consultants or entering into contractual agreements with persons, partnerships or companies, the Grantee will notify OPM of the contractor's identity.

SECTION 16: Federal Compliance and Assurances.

If the Grantee receives any federal funds in this Agreement, as identified on the Notice of Grant Award, the Grantee and all its subgrantees will comply with the nondiscrimination requirement of Title VI of the Civil Rights Act of 1964; Title IX of the Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973 as amended; and the Age Discrimination Act of 1975, to the effect that no person shall, on the grounds of race, color, national origin, age, sex, or disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under, or denied employment in connection with any program or activity funded in whole or in part with funds made available in this Agreement.

SECTION 17: Non-Supplanting.

17.1 If the Grantee receives any federal funds in this Agreement as identified on the Notice of Grant Award, the Grantee agrees that these grant funds will be used to supplement and increase, but not supplant, the level of state, local, private and federal funds that would, otherwise, be made available for this project and to serve this target population and will in no event replace such state, local, private and federal funds.

17.2 The Grantee shall not use state funds conveyed by the Agreement to supplant any local funds, if a municipality, or other state funds, if a state agency, which were budgeted for purposes analogous to that of the state grant funds. OPM may waive this provision upon request and for good cause shown, when it is satisfied that the reduction in local funds or other state funds, as the case may be, is due to circumstances not related to the Agreement.

SECTION 18: Additional Federal Conditions.

If the Grantee receives any federal funds in this Agreement as identified on the Notice of Grant Award, the Grantee agrees to comply with the attached Additional Federal Conditions which have been issued by the federal grantor agency to OPM and which are, hereby, made a part of this Grant Award.

SECTION 19: Indemnification.

Grantee shall indemnify, defend and hold harmless the State and its officers, representatives, agents, servants, employees, successors and assigns from and against any and all (1) claims arising, directly or indirectly, in connection with this Agreement for the acts of commission or omission (collectively, the "Acts") of the Grantee or Grantee Parties; and (2) liabilities, damages, losses, costs and expenses, including but not limited to, attorneys' and other professionals' fees, arising, directly or indirectly, in connection with claims, Acts or this Agreement. Grantee shall use counsel reasonably acceptable to the State in carrying out its obligations under this Section. Grantee's obligations under this Section to indemnify, defend and hold harmless against claims includes claims concerning confidentiality of any part of or all of the Grantee's bid, proposal or any records, any intellectual property rights, other proprietary rights of any

person or entity, copyrighted or non-copyrighted compositions, secret processes, patented or unpatented inventions, articles or appliances furnished or used in the performance of this Agreement.

SECTION 20: Municipal Public Works Contracts and Quasi-Public Agency Projects Funded in Whole or Part by the State in Excess of $50,000.

Municipalities awarding municipal public works contracts and quasi-public agencies entering into contracts for quasi-public agency projects, funded in whole or part with grant funds awarded pursuant to this Agreement, shall adhere to the requirements of Connecticut General Statutes §§ 4a-60, 4a-60a, 4a-60g, 46a-56, 46a-68c, 46a-68d, 46a-68g, and 46a-86 relating, but not limited to: nondiscrimination, affirmative action, and the set-aside program for small contractors and minority business enterprises. "Municipal Public Works Contract" is defined in accordance with Connecticut General Statutes § 4a-60g(a)(14) and "Quasi Public Agency Project" is defined in accordance with Connecticut General Statutes § 4a-60g(a)(15).

SECTION 21: Campaign Contribution and Solicitation Prohibitions.

For all State contracts, defined in section 9-612 of the Connecticut General Statutes as having a value in a calendar year of $50,000 or more, or a combination or series of such agreements or contracts having a value of $100,000 or more, the authorized signatory to this Agreement represents that they have received the State Elections Enforcement Commission's notice advising state contractors of state campaign contribution and solicitation prohibitions, and will inform its principals of the contents of the notice and, if applicable, Grantee shall complete and submit State of Connecticut Campaign Contribution Certification (OPM Form 1) to OPM at the time of submission of proposal and/or application, or if no proposal or application, the grantee shall submit OPM Form 1 to OPM prior to execution of Grant Award .

SECTION 22: Access to Grant Contract and State Data.

The Grantee shall provide to the Grantor access to any data, as defined in Connecticut General Statutes § 4e-1, concerning the Agreement and OPM that are in the possession or control of the Grantee upon demand and shall provide the data to OPM in a format prescribed by OPM and the State Auditors of Public Accounts at no additional cost.

SECTION 23: Protection of Confidential Information.

(a) This Grant may be subject protection of confidential requirements, and, if applicable to the Grant, Grantee and Grantee Parties have a duty to and shall, at their own expense, protect from a Confidential Information Breach any and all Confidential Information that they come to possess or control related to the Grant, wherever and however stored or maintained, in a commercially reasonable manner in accordance with the highest current industry standards and best practices - as they may be amended from time to time.

(b) Grantee and all Grantee Parties shall develop, implement and maintain a comprehensive Written Information Security Policy ("WISP") for the protection of Confidential Information that meets or exceeds current industry standards as may be amended from time to time. The safeguards contained in the WISP shall meet or exceed the standards for the protection of Confidential Information, and information of a similar character, as set forth in all applicable federal and State law and in the written policies of the State of Connecticut Department of Administrative Services ("DAS") or OPM concerning the confidentiality of Confidential Information. Such data-security program shall include, but not be limited to, the following:

1) A security policy for employees related to the storage, access and transportation of data containing Confidential Information;
2) Reasonable restrictions on access to records containing Confidential Information, including access to any locked storage where such records are kept and an auditable electronic system of logging and tracking the viewing, accessing. or both, of Confidential Information;
3) A process for reviewing policies and security measures at least annually;
4) Creating secure access controls to Confidential Information, including but not limited to passwords; and
5) Encrypting Confidential Information that is stored on laptops, portable devices, and storage media or being transmitted electronically.

(c) Grantee and Grantee Parties shall notify DAS, OPM and the Connecticut Office of the Attorney General as soon as practical, but no later than the next business day, after they become aware of or suspect that any Confidential Information which Grantee or Grantee Parties have come to possess or control has been subject to a Confidential Information Breach. If a Confidential Information Security Breach has occurred which, in the sole opinion of OPM after consultation with the Attorney General, constitutes a breach of security as defined in Connecticut General Statutes § 36a-701b, or otherwise (collectively, "Breach"), Grantee shall, within three (3) business days after the notification, present a credit monitoring and protection plan to the Commissioner of DAS, OPM and the Connecticut Office of the Attorney General, for review and approval. Such credit monitoring and protection plan shall be made available by Grantee at its own cost and expense to all individuals and entities affected by the Confidential Information Breach. Such credit monitoring and protection plans shall include, but is not limited to reimbursement for the cost of placing and lifting one (1) security freeze per credit file pursuant to Connecticut General Statutes § 36a-701a. Such credit monitoring and protection plans shall be approved by the State in accordance with this Section and shall cover a length of time commensurate with the circumstances of the Breach. Neither Grantee's nor any Grantee Party's costs and expenses for the credit monitoring and protection plan shall be recoverable from DAS, OPM or any State of Connecticut entity or any affected individuals and shall be outside of any liability cap or limitation contained in this Agreement.

(d) The Grantee shall incorporate the requirements of this Section in all subcontracts requiring each Grantee Party to safeguard Confidential Information in the same manner as provided for in this Section.

(e) Nothing in this Section shall supersede in any manner Grantee's or Grantee Party's obligations pursuant to HIPAA or the provisions of this Grant concerning the obligations of Grantee to OPM.

For purposes of this Section, the following terms are defined as follows:

"**Confidential Information**" shall mean any name, number or other information that may be used, alone or in conjunction with any other information, to identify a specific individual including, but not limited to, such individual's name, date of birth, mother's maiden name, motor vehicle operator's license number, Social Security number, employee identification number, employer or taxpayer identification number, alien registration number, government passport number, health insurance identification number, demand deposit account number, savings account number, credit card number, debit card number or unique biometric data such as fingerprint, voice print, retina or iris image, or other unique physical representation. Without limiting the foregoing, Confidential Information shall also include any information that OPM classifies as "confidential" or "restricted." Confidential Information shall not include information that may be lawfully obtained from publicly available sources or from federal, state, or local government records which are lawfully made available to the general public.

"**Confidential Information Breach**" shall mean an instance where an unauthorized person or entity accesses Confidential Information in any manner, including but not limited to the following occurrences: (1) any Confidential Information that is not encrypted or protected is misplaced, lost, stolen or in any way compromised; (2) one or more third parties have had access to or taken control or possession of any Confidential Information that is not encrypted or protected without prior written authorization from the State; (3) the unauthorized acquisition of encrypted or protected Confidential Information together with the confidential process or key that is capable of compromising the integrity of the Confidential Information; or (4) if there is a substantial risk of identity theft or fraud to the Contractor, consumers, OPM or the State.

"**Contractor Parties**" shall mean all of the Contractor's Subcontractors.

SECTION 24: <u>Call Center and Customer Service Work.</u>

This Grant may be subject to call center and customer service work laws, and if applicable to the Grant, Grantee shall perform all required state business-related call center and customer service work entirely within the State of Connecticut. If Grantee performs work outside of the State of Connecticut and adds

customer service employees who will perform work pursuant to this Contract, then Contractor shall employ such new employees within the State of Connecticut prior to any such employee performing any work pursuant to this Grant.

SECTION 25: Forum and Choice of Law.

The parties deem the Agreement to have been made in the City of Hartford, State of Connecticut. Both parties agree that it is fair and reasonable for the validity and construction of the Agreement to be, and it shall be, governed by the laws and court decisions of the State of Connecticut, without giving effect to its principles of conflicts of laws. To the extent that any immunities provided by Federal law or the laws of the State of Connecticut do not bar an action against the State, and to the extent that these courts are courts of competent jurisdiction, for the purpose of venue, the complaint shall be made returnable to the Judicial District of Hartford only or shall be brought in the United States District Court for the District of Connecticut only, and shall not be transferred to any other court, provided, however, that nothing here constitutes a waiver or compromise of the sovereign immunity of the State of Connecticut. The Grantee waives any objection which it may now have or will have to the laying of venue of any Claims in any forum and further irrevocably submits to such jurisdiction in any suit, action or proceeding.

SECTION 26: Sovereign Immunity.

The parties acknowledge and agree that nothing in the Solicitation or the Agreement shall be construed as a modification, compromise or waiver by the State of any rights or defenses of any immunities provided by Federal law or the laws of the State of Connecticut to the State or any of its officers and employees, which they may have had, now have or will have with respect to all matters arising out of the Agreement. To the extent that this section conflicts with any other Section, this Section shall govern.

SECTION 27: Requirements for Nonprofit Organizations.

If the Grantee is a nonprofit organization, the Grantee agrees to maintain its 501(c)(3) status and to maintain up-to-date annual filings as follows: (1) Certificate of Legal Existence with the Connecticut Secretary of the State; (2) Charitable Organization Registration with the Connecticut Department of Consumer Protection, unless exempted by Connecticut General Statutes § 21a-190d; and (3) Return of Organization Exempt From Income Tax Form 990 with the Internal Revenue Service. At OPM's request, the Grantee shall provide OPM with documentation pertaining to Grantee's 501(c) (3) and or annual filings.

SECTION 28: Special Grant Conditions.

The Grantee agrees to comply with the attached Special Grant Conditions, which have been issued in connection with this specific grant award, and which are hereby made a part of this award.

File #: 25-2560 **Agenda Date:** 10/22/2025 **Agenda #:** 7.

LAND USE

Land Transfer:
MOTION to recommend the Town of Ledyard transfer town-owned property located at 19 Avery Hill Road Extension, Ledyard Connecticut (Parcel ID: 50/130/19), known as the "Kettle Hole" property to Avalonia Land Conservancy for no consideration to be combined with other lands of the DDJJM, LLC., at 173 Stoddards Wharf Road and 175 Stoddards Wharf Road to be transferred to Avalonia Land Conservancy, to remain open to the public for passive recreation and to be protected in perpetuity under the Conservancy care with the following conditions:

1) Avalonia Land Conservancy will pay for all conveyances and fees regarding the transfer of the property.

2) In the event Avalonia Land Conservancy determines they no longer wish to own or no longer can own the so-called "Kettle Hole" property, Avalonia Land Conservancy will first offer the property back to the Town of Ledyard as the last owner of record. Such conveyance will be at no cost to the Town, other than customary recording and legal fees. The Town shall have 120 days to accept or reject re-acquisition. The Town shall notify Avalonia Land Conservancy in writing of its intent to accept or reject. Should the Town choose not to accept the property back, Avalonia Land Conservancy will then have the right to convey the parcel to a third party of their choice.

Background:

19 Avery Hill Road Extension (Kettle Hole) is a town-owned open space property located on about 5-acres in the R-60 Zoning District.

Should the Town approve to transfer this property to Avalonia Land Conservancy it would be added to other lands owned by or to be transferred to (173 & 175 Stoddards Wharf Road) Avalonia to create about 35-acres of contiguous open space land under the stewardship of Avalonia Land Conservancy.

Please see attached the following:
- Director of Planning & Zoning Elizabeth Burdick Memo dated September 10, 2025 with attachments.
- Director of Planning & Zoning Elizabeth Burdick Memo dated September 15, 2025.

Land Use Director/Town Planner:
(type text here)

TOWN OF LEDYARD

Department of Land Use and Planning

Elizabeth J. Burdick, Director

741 Colonel Ledyard Highway, Ledyard, CT 06339

Telephone: (860) 464-3215, Fax: (860) 464-0098

Email: planner@ledyardct.org

MEMORANDUM

DATE: September 10, 2025
TO: Ledyard Planning & Zoning Commission
FROM: Liz Burdick, Director of Land Use & Planning
RE: **C.G.S. 8-24 Referral for Report to Town Council regarding Transfer of Town-Owned Property at 19 Avery Hill Road Ext. to Avalonia Land Conservancy to be Combined with Other Lands to be transferred to Avalonia**

Request is for a report to the Town Council in accordance with C.G.S. 8-24 regarding Transfer of Town-Owned Property at 19 Avery Hill Road Ext. known as the "Kettle Hole" property to Avalonia Land Conservancy to be combined with Other Lands of DDJJM LLC to be transferred to Avalonia at 173 Stoddards Wharf Road and 175 Stoddards Wharf Road.

19 Avery Hill Road Ext. (Parcel ID: 50/130/19), Ledyard, CT is a town-owned open space property located on about 5-acres (4.97+/- or 216,447SF +/-) in the R-60 zoning district.

A preliminary plan entitled "Property Survey, Proposed Lot Configuration Plan, Property of Town of Ledyard & DDJJM LLC, Avery Hill Road Extension & Stoddards Wharf Road (CT Route 214), Ledyard, CT, Prepared by Star Surveying, LLC, Dated 8/2/2025" depicts the shaded areas of lands of DDJJM LLC to be conveyed to Avalonia of about 30.30-acres +/- (1,319,715SF+/-), which includes 173 Stoddards Wharf Road in its entirety and the majority of 175 Stoddards Wharf Road. If approved by the Ledyard Town Council, town-owned 19 Avery Hill Road Ext. will be combined with said lands to create about 35-acres of contiguous open-space land stewarded by Avalonia.

Avalonia Board President Dennis Main will be in attendance at the 9/11/25 meeting to discuss possible future connections to open space and will answer Commissioner questions.

The following Motion is suggested for any favorable recommendation:

I make a Motion to forward a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 to the Ledyard Town Council regarding Transfer of Town-Owned Property at 19 Avery Hill Road Ext. known as the "Kettle Hole" property to Avalonia Land Conservancy to be combined with Other Lands of DDJJM LLC at 173 Stoddards Wharf Road & 75 Stoddards Wharf Road to be transferred to Avalonia.

If the PZC is inclined to send an unfavorable report, it shall state its reasons on the record.

Sec. 8-24. Municipal improvements. No municipal agency or legislative body shall (1) locate, accept, abandon, widen, narrow or extend any street, bridge, parkway or other public way, (2) locate, relocate, substantially improve, acquire land for, abandon, sell or lease any airport, park, playground, school or other municipally owned property or public building, (3) locate or extend any public housing, development, redevelopment or urban renewal project, or (4) locate or extend public utilities and terminals for water, sewerage, light, power, transit and other purposes, until the proposal to take such action has been referred to the commission for a report. Notwithstanding the provisions of this section, a municipality may take final action approving an appropriation for any proposal prior to the approval of the proposal by the commission pursuant to this section. The failure of the commission to report within thirty-five days after the date of official submission of the proposal to it for a report shall be taken as approval of the proposal. In the case of the disapproval of the proposal by the commission the reasons therefor shall be recorded and transmitted to the legislative body of the municipality. A proposal disapproved by the commission shall be adopted by the municipality or, in the case of disapproval of a proposal by the commission subsequent to final action by a municipality approving an appropriation for the proposal and the method of financing of such appropriation, such final action shall be effective, only after the subsequent approval of the proposal by (A) a two-thirds vote of the town council where one exists, or a majority vote of those present and voting in an annual or special town meeting, or (B) a two-thirds vote of the representative town meeting or city council or the warden and burgesses, as the case may be. The provisions of this section shall not apply to maintenance or repair of existing property, buildings or public ways, including, but not limited to, resurfacing of roads.

19 Avery Hill Rd Ext., Et Al

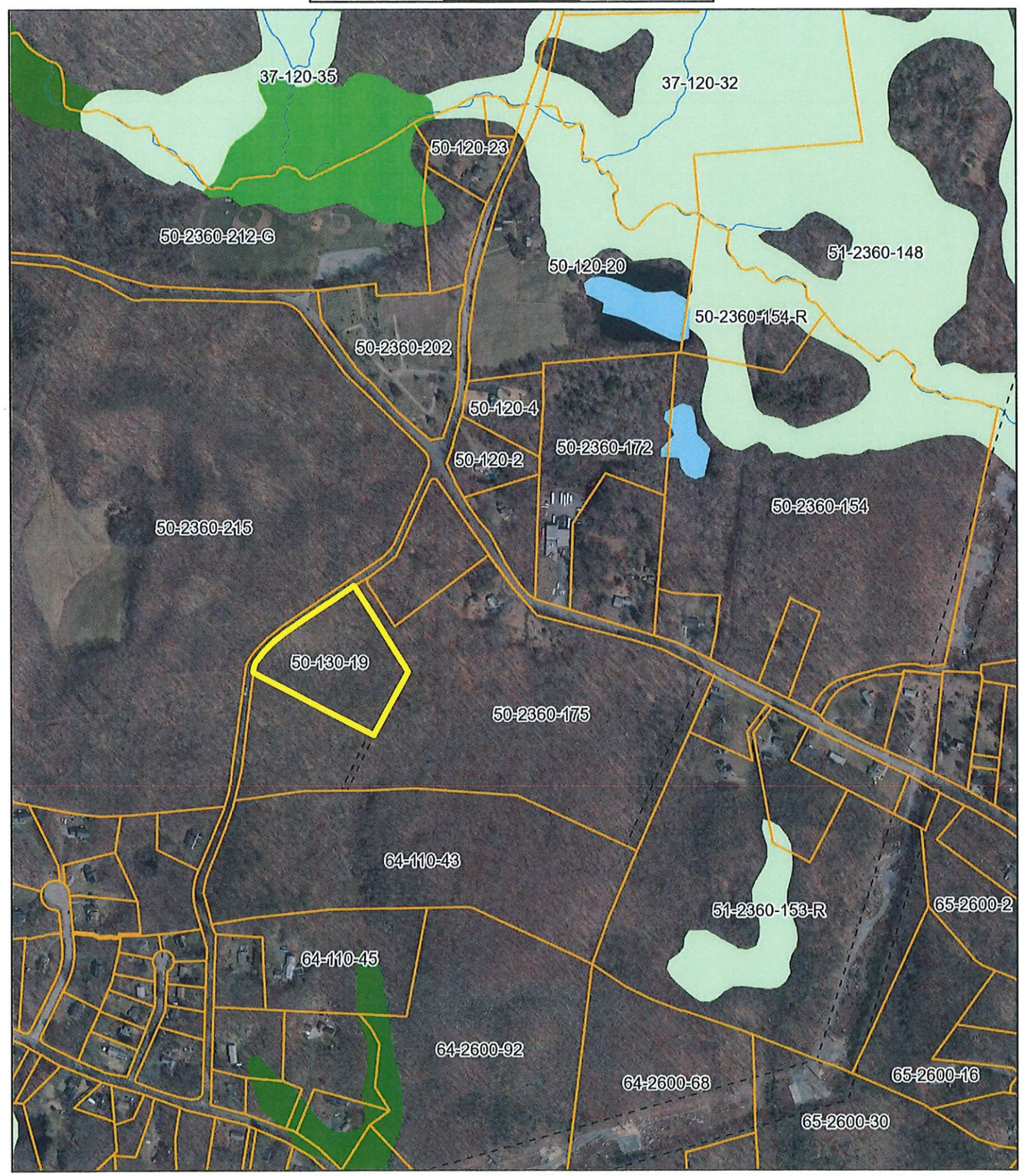
Ledyard, CT

1 inch = 565 Feet

0 565 1130 1695

September 10, 2025

CAI Technologies
Precision Mapping. Geospatial Solutions.
www.cai-tech.com



Data shown on this map is provided for planning and informational purposes only. The municipality and CAI Technologies are not responsible for any use for other purposes or misuse or misrepresentation of this map.

Property Location 19 AVERY HILL EXT | Map ID 50/ 130/ 19/ / | Bldg Name | State Use 9030
Vision ID 1624 | Account # 402915 | Bldg # 1 | Sec # 1 of 1 | Card # 1 of 1 | Print Date 12/19/2024 2:18:07 P

CURRENT OWNER
I TOWN OF LEDYARD
GLACIAL PARK
741 COLONEL LEDYARD HWY
LEDYARD CT 06339

TOPO		UTILITIES		STRT / ROAD		LOCATION	
2	Above Street			1	Paved	6	Recreation
8	Ledge						

SUPPLEMENTAL DATA

Alt Prcl ID	50-130-19	Solar Pane	
Sub-div		Generator	
Dev.Lot		Forest	
Survey#		Farm	
Elderly		MPT SB	
Census	07012		
GIS ID	1624	Assoc Pid#	

CURRENT ASSESSMENT

Description	Code	Appraised	Assessed
EX COM LN	21	100,500	70,350
	Total	100,500	70,350

6072
LEDYARD, CT

VISION

RECORD OF OWNERSHIP

BK-VOL/PAGE		SALE DATE	Q/U	V/I	SALE PRICE	VC
00130	0423	07-08-1983			0	

I TOWN OF LEDYARD

PREVIOUS ASSESSMENTS (HISTORY)

Year	Code	Assessed	Year	Code	Assessed V	Year	Code	Assessed
2023	21	70,350	2022	21	70,350	2021	21	70,350
Total		70,350	Total		70,350	Total		70,350

EXEMPTIONS

Year	Code	Description	Amount
		Total	0.00

OTHER ASSESSMENTS

Code	Description	Number	Amount	Comm Int

This signature acknowledges a visit by a Data Collector or Assessor

APPRAISED VALUE SUMMARY

Appraised Bldg. Value (Card)	0
Appraised Xf (B) Value (Bldg)	0
Appraised Ob (B) Value (Bldg)	0
Appraised Land Value (Bldg)	100,500
Special Land Value	0
Total Appraised Parcel Value	100,500
Valuation Method	C
Total Appraised Parcel Value	100,500

ASSESSING NEIGHBORHOOD

Nbhd	Nbhd Name	B	Tracing	Batch
0040				

NOTES

GLACIER PARK
SMALL POND

BUILDING PERMIT RECORD

Permit Id	Issue Date	Type	Description	Amount	Insp Date	% Comp	Date Comp	Comments

VISIT / CHANGE HISTORY

Date	Id	Type	Is	Cd	Purpost/Result
06-25-2020	DM			15	Reval Review
01-18-2001	BS			00	Measur+Listed
05-19-1992	KS	X		10	Letter Sent no response
09-23-1991	CM			00	Measur+Listed

LAND LINE VALUATION SECTION

B	Use Code	Description	Zone	Land Type	Land Units		Unit Price	Size Adj	Site Index	Cond.	Nbhd.	Nbhd. Adj	Notes	Location Adjustment		Adj Unit P	Land Value
1	903V	Municipal M00	R60		1.380	AC	72,000.00	0.75684	1	1.00	0050	1.000			1.0000	54,489.6	75,200
1	9030	Municipal M94	R60		2.760	AC	9,500.00	1.00000	0	0.90	0050	1.000	TOPO-STEEP		1.0000	8,550	23,600
1	9030	Municipal M94	R60		0.460	AC	4,700.00	1.00000	0	0.80	0050	1.000	TOPO		1.0000	3,760	1,700
		Total Card Land Units			5	AC	Parcel Total Land Area		5							Total Land Value	100,500

Property Location 19 AVERY HILL EXT | Map ID 50/ 130/ 19/ / | Bldg Name | State Use 9030
Vision ID 1624 | Account # 402915 | Bldg # 1 | Sec # 1 of 1 | Card # 1 of 1 | Print Date 12/19/2024 2:18:08 P

CONSTRUCTION DETAIL

Element	Cd	Description
Style:	99	Vacant Land
Model	00	Vacant
Grade:		
Stories:		
Occupancy		
Exterior Wall 1		
Exterior Wall 2		
Roof Structure:		
Roof Cover		
Interior Wall 1		
Interior Wall 2		
Interior Flr 1		
Interior Flr 2		
Heat Fuel		
Heat Type:		
AC Type:		
Total Bedrooms		
Total Bthrms:		
Total Half Baths		
Total Xtra Fixtrs		
Total Rooms:		
Bath Style:		
Kitchen Style:		

CONSTRUCTION DETAIL (CONTINUED)

Element	Cd	Description

MIXED USE

Code	Description	Percentage
903V	Municipal M00	100
		0
		0

COST / MARKET VALUATION

Building Value New	0
Adjusted Base Rate	
Year Built	0
Effective Year Built	0
Depreciation Code	
Remodel Rating	
Year Remodeled	
Depreciation %	
Functional Obsol	0
External Obsol	0
Trend Factor	1
Condition	
Condition %	0
Percent Good	
RCNLD	0
Dep % Ovr	
Dep Ovr Comment	
Misc Imp Ovr	
Misc Imp Ovr Comment	
Cost to Cure Ovr	
Cost to Cure Ovr Comment	

No Sketch

OB - OUTBUILDING & YARD ITEMS(L) / XF - BUILDING EXTRA FEATURES(B)

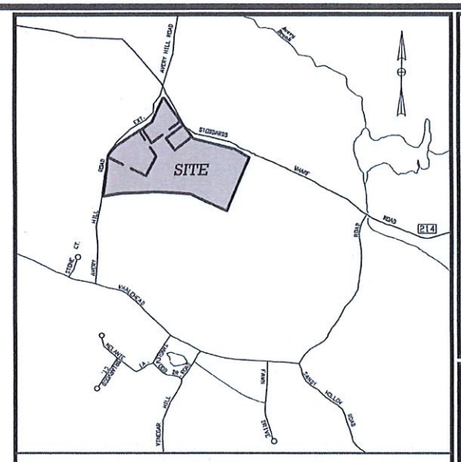
Code	Description	L/B	Units	Unit Price	Yr Blt	Cond. Cd	% Gd	Grade	Grade Adj.	Appr. Value

BUILDING SUB-AREA SUMMARY SECTION

Code	Description	Living Area	Floor Area	Eff Area	Unit Cost	Undeprec Value
	Ttl Gross Liv / Lease Area	0	0	0		0

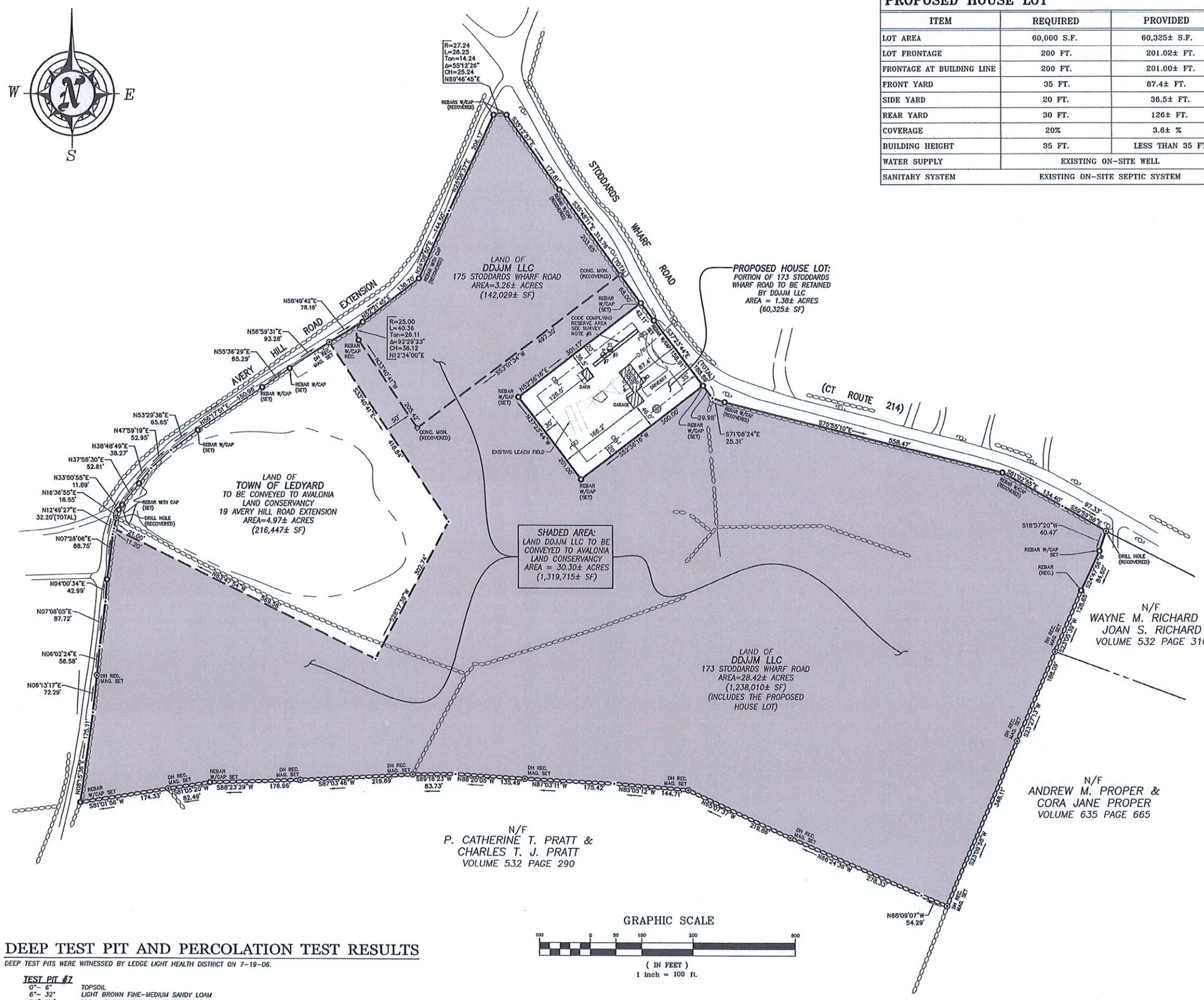
ZONING COMPLIANCE TABLE ZONE: R60
PROPOSED HOUSE LOT

ITEM	REQUIRED	PROVIDED
LOT AREA	60,000 S.F.	60,325± S.F.
LOT FRONTAGE	200 FT.	201.02± FT.
FRONTAGE AT BUILDING LINE	200 FT.	201.00± FT.
FRONT YARD	35 FT.	87.4± FT.
SIDE YARD	20 FT.	36.5± FT.
REAR YARD	30 FT.	126± FT.
COVERAGE	20%	3.6± %
BUILDING HEIGHT	35 FT.	LESS THAN 35 FT.
WATER SUPPLY	EXISTING ON-SITE WELL	
SANITARY SYSTEM	EXISTING ON-SITE SEPTIC SYSTEM	



LOCATION MAP
SCALE: 1" = 1000'

STAR SURVEYING, LLC
74 CRANBERRY POND ROAD
WATERFORD, CONNECTICUT 06385
TELEPHONE (860) 886-7002
MOBILE (860) 885-4424



SURVEY NOTES

1. THIS SURVEY HAS BEEN PREPARED PURSUANT TO THE REGULATIONS OF CONNECTICUT STATE AGENCIES SECTIONS 20-300b-1 THROUGH 20-300b-20 AND THE "STANDARDS FOR SURVEYS AND MAPS IN THE STATE OF CONNECTICUT" AS ADOPTED BY THE CONNECTICUT ASSOCIATION OF LAND SURVEYORS, INC. ON AUGUST 29, 2019. IT IS A PROPERTY SURVEY CONFORMING TO HORIZONTAL CLASS A-2 STANDARDS OF ACCURACY AS DEFINED IN THE ABOVE REGULATIONS.

   NO DECLARATION IS EXPRESSED OR IMPLIED BY THIS MAP OR COPIES THEREOF UNLESS THE PRINT BEARS THE IMPRESSION TYPE SEAL AND ORIGINAL LIVE SIGNATURE OF THE SURVEYOR WHOSE NAME AND REGISTRATION NUMBER APPEAR BELOW OR THEREON.

2. FOR RECORD TITLE TO THE SUBJECT PARCEL, REFERENCE IS MADE TO THE FOLLOWING DEEDS RECORDED IN THE TOWN OF LEDYARD LAND RECORDS:
   - A PROBATE TAX CERTIFICATE FROM THE ESTATE OF ALTHEA L. MAIN TO DDJJM, LLC RECORDED JUNE 27, 2012 IN VOLUME 499 PAGE 273.
   - A QUIT CLAIM DEED FROM ALTHEA L. MAIN TO DDJJM, LLC RECORDED JULY 8, 2010 IN VOLUME 477 PAGE 503.

3. MAP REFERENCES:

   A. "BOUNDARY SURVEY MAP SUBDIVISION PLAN PROPERTY OF RAYMOND G. MAIN & ALTHEA L. MAIN 175 STODDARDS WHARF ROAD (CONNECTICUT ROUTE 214) & AVERY HILL ROAD EXTENSION LEDYARD, CONNECTICUT DATE: JULY 14, 2006 SCALE: 1"=100' DRAWN BY: JB DRAWING NO: 06023-1 SHEETS NO. 1 & 2 OF 2" BY JAMES BERNARDO LAND SURVEYING, LLC REVISED TO 10/09/07

   B. PLAN SHOWING TRACTS OF LAND TO BE ACQUIRED BY THE TOWN OF LEDYARD AVERY HILL EXT. LEDYARD, CONNECTICUT JUNE 1980 BY GEORGE H. DIETER LS

   C. PLAN SHOWING MELANSON RESUBDIVISION OWNER/APPLICANT: WILLIAM MELANSON STODDARDS WHARF ROAD AKA CONNECTICUT ROUTE 214 LEDYARD, CONNECTICUT SEPTEMBER 28, 2004 REVISED 11-19-04 BY GERWICK-MEREEN LLC

   D. PLAN SHOWING PROPOSED HOUSE AND BUILDING LOT FOR RAYMOND G. MAIN & ALTHEA L. MAIN IN THE TOWN OF LEDYARD SCALE 1"=20'

4. BEARINGS REFER TO 1983 NORTH AMERICAN DATUM (NAD83) BASED ON GPS OBSERVATIONS TAKEN DURING AUGUST, 2024.

5. LAND RECORDS RESEARCH WAS COMPLETED ON OCTOBER 25, 2024. FIELD WORK WAS COMPLETED ON AUGUST 2, 2025.

6. THERE IS A CODE COMPLYING RESERVE AREA FOR A 4 BEDROOM HOUSE BASED ON THE TEST PIT AND PERCOLATION TEST DATA NOTED HEREON. SAID DATA WAS TAKEN FROM THE APPROVED SUBDIVISION PLAN REFERENCED IN SURVEY NOTE 3.A.

LEGEND

CL&P	CONNECTICUT LIGHT & POWER COMPANY
PVMT.	PAVEMENT
TYP.	TYPICAL
DH	DRILL HOLE
SMH	SEWER MANHOLE
N/F	NOW OR FORMERLY
O/W	OVERHEAD WIRES
REC.	RECOVERED
S.F.	SQUARE FEET
MAG.	MAGNETIC NAIL
±	MORE OR LESS
	UTILITY POLE
	POINT TO BE SET
	STONE WALL
W/	WITH
W	WELL
FT.	FEET
	BUILDING SETBACK LINE
	DEEP TEST PIT LOCATION
	PERCOLATION TEST LOCATION

DEEP TEST PIT AND PERCOLATION TEST RESULTS

DEEP TEST PITS WERE WITNESSED BY LEDGE LIGHT HEALTH DISTRICT ON 7-19-06.

TEST PIT #7

0"- 6"	TOPSOIL
6"- 32"	LIGHT BROWN FINE-MEDIUM SANDY LOAM
32"-76"	GREY MEDIUM-COARSE SAND/GRAVEL/ROCK

GROUNDWATER AT 72", BOULDER AT 72", ROOTS AT 32"

PERCOLATION TEST PT #3 WAS PERFORMED BY JAMES BERNARDO, LS. (TAKEN FROM APPROVED SUBDIVISION PLAN REFERENCED IN SURVEY NOTE #3.A.)

PT #3

TOTAL DEPTH = 37"
PRESOAK AT 12:00 PM

TIME	READING
12:14	29.27"

"TO MY KNOWLEDGE AND BELIEF, THIS MAP IS

REVISION	DESCRIPTION	DATE
"A"	BOUNDARY POINTS SET & REMOVE EASEMENTS	8/2/2025

DATE: NOVEMBER 16, 2024
SCALE: 1 inch = 100 feet
DRAWN BY: SRM
FILE NAME: MAIN SURVEY.DWG

PROPERTY SURVEY
PROPOSED LOT RECONFIGURATION PLAN
PROPERTY OF
THE TOWN OF LEDYARD & DDJJM LLC
LOCATED AT
AVERY HILL ROAD EXTENSION & STODDARDS WHARF ROAD (CT ROUTE 214), LEDYARD, CONNECTICUT

OTES:

LAN AND THE SURVEY IT IS BASED ON HAVE BEEN PREPARED IN ACCORDANCE WITH THE ATIONS OF CONNECTICUT STATE AGENCIES, SECTIONS 20-300B-1 THROUGH 20-300B-20, "MINIMUM ARDS FOR SURVEYS AND MAPS IN THE STATE OF CONNECTICUT" ENDORSED BY THE CONNECTICUT IATION OF LAND SURVEYORS, INC. THE TYPE OF SURVEY IS A PERIMETER SURVEY, THE BOUNDARY MINATION CATEGORY IS DEPENDENT RESURVEY AND THE HORIZONTAL ACCURACY CONFORMS TO A-2.

CLARATION IS EXPRESSED OR IMPLIED BY THIS MAP OR COPIES THEREOF UNLESS THE PRINT BEARS IMPRESSION TYPE SEAL AND ORIGINAL LIVE SIGNATURE OF THE SURVEYOR WHOSE NAME AND RATION NUMBER APPEARS BELOW OR THEREON.

ENCE IS MADE TO THE FOLLOWING TOWN OF LEDYARD LAND EVIDENCE RECORDS:

TH REGARDS TO PARCEL #1:
E VOLUME 19 AT PAGE 178 FOR A WARRANTEE DEED DATED OCTOBER 23, 1950 REGARDING RECORD LE TO THIS PARCEL.

TH REGARDS TO PARCEL #2:
E VOLUME 19 AT PAGE 219 FOR A WARRANTEE DEED DATED MAY 28, 1951 REGARDING RECORD TITLE THIS PARCEL.

TH REGARDS TO PARCEL #3:
E VOLUME 19 AT PAGE 220 FOR A WARRANTEE DEED DATED MAY 28, 1951 REGARDING RECORD TITLE THIS PARCEL.

TH REGARDS TO PARCEL #4:
E VOLUME 19 AT PAGE 573 FOR A WARRANTEE DEED DATED JANUARY 24, 1955 REGARDING RECORD LE TO THIS PARCEL.

ROPERTY SHOWN HEREON IS SUBJECT TO, OR MAY BE BENEFITTED BY THE FOLLOWING:

E VOLUME 130 AT PAGE 423 FOR A 20' WIDE PEDESTRIAN EASEMENT CONVEYED BY RAYMOND G. MAIN ALTHEA L. MAIN TO THE TOWN OF LEDYARD DATED JULY 8, 1993.

UBJECT PROPERTY IS LOCATED ENTIRELY WITHIN THE R-80 ZONE DISTRICT.

NAL FLOOD INSURANCE PROGRAM FLOOD INSURANCE RATE MAP TOWN OF LEDYARD, CTICUT NEW LONDON COUNTY PANEL 15 OF 20, COMMUNITY-PANEL NUMBER 090157C015B, MAP TIVE DATE: APRIL 1, 1991, FEDERAL EMERGENCY MANAGEMENT AGENCY" INDICATES THE SUBJECT RTY IS LOCATED ENTIRELY WITHIN FLOOD HAZARD ZONE C.

UBJECT PROPERTY IS SHOWN ON THE TOWN OF LEDYARD TAX ASSESSOR MAP 50 AS LOT 173 AS AN ASSIGNED STREET ADDRESS OF 173 & 175 STODDARDS WHARF ROAD.

ASIS FOR BEARINGS IS APPROXIMATE GRID NORTH.

PLAN REPRESENTS THE LOCATION OF THE BOUNDS AND SITE CONDITIONS DETERMINED BY FIELD Y ON JUNE 13, 2006. RECORD TITLE AND ADJOINER INFORMATION WAS OBTAINED FROM TAX SSOR AND LAND EVIDENCE RECORDS ON JUNE 13, 2006.

ROUND UTILITY, STRUCTURE AND FACILITY LOCATIONS DEPICTED AND NOTED HEREON HAVE COMPILED, IN PART, FROM RECORD MAPPING SUPPLIED BY THE RESPECTIVE UTILITY COMPANIES OR NMENTAL AGENCIES, FROM PAROLE TESTIMONY AND FROM OTHER SOURCES. THESE LOCATIONS MUST NSIDERED AS APPROXIMATE IN NATURE. ADDITIONALLY, OTHER SUCH FEATURES MAY EXIST ON THE THE EXISTENCE OF WHICH ARE UNKNOWN TO JAMES BERNARDO LAND SURVEYING, LLC. THE SIZE, ION AND EXISTENCE OF ALL SUCH FEATURES MUST BE FIELD DETERMINED AND VERIFIED BY THE OPRIATE AUTHORITIES PRIOR TO CONSTRUCTION. CALL BEFORE YOU DIG 1-800-922-4455.

RENCES:

SHOWING TRACTS OF LAND TO BE ACQUIRED BY THE TOWN OF LEDYARD AVERY HILL EXT. RD, CONNECTICUT JUNE 1980 BY GEORGE H. DIETER LS

SHOWING MELANSON RESUBDIVISION OWNER/APPLICANT: WILLIAM MELANSON STODDARDS WHARF A/K/A CONNECTICUT ROUTE 214 LEDYARD, CONNECTICUT SEPTEMBER 28, 2004 REVISED 11-18-04 BY OK-MEREEN LLC.

SHOWING PROPOSED HOUSE AND BUILDING LOT FOR RAYMOND G. MAIN & ALTHEA L. MAIN IN THE OF LEDYARD SCALE 1"=20'.

SUBDIVISION NOTES:

1. PURSUANT TO SECTION 8-25(b) OF THE CONNECTICUT GENERAL STATUTES PASSIVE SOLAR ENERGY TECHNIQUES HAVE BEEN CONSIDERED IN THE DESIGN OF THIS SUBDIVISION.
2. LOT MONUMENTS ARE TO BE SET AT ALL CORNERS IN ACCORDANCE WITH SECTION 5.4.3 OF THE LEDYARD SUBDIVISION REGULATIONS.
3. THE POTENTIAL HOUSE LOCATION, DRIVEWAY AND SEPTIC AREA IS SHOWN ONLY TO DEPICT A POTENTIAL LOCATION AND SITE SUITABILITY. FINAL LOCATIONS WILL BE DETERMINED AT TIME OF APPLICATION FOR BUILDING PERMIT.
4. ~~COMBINED~~
5. TOTAL AREA OF SUBDIVISION = 31.68 ACRES M/L.
6. NO OPEN SPACE IS PROPOSED FOR THIS APPLICATION; HOWEVER THE PROPERTY OWNER PROPOSES TO DEDICATE A PERPETUAL OPEN SPACE EASEMENT CORRIDOR NOT LESS THAN 50' IN WIDTH ACROSS THE SOUTHEASTERLY BOUNDARY OF THE PROPERTY AS SHOWN.

APPROVED BY THE LEDYARD PLANNING COMMISSION AS TO COMPLIANCE WITH THE REGULATIONS GOVERNING THE SUBDIVISION OF LAND. ALL IMPROVEMENTS SHALL BE COMPLETED BY _____

_____
CHAIRMAN OR SECRETARY

IWWC APPLICATION # _____

_____ APPROVED, _____ (DATE)

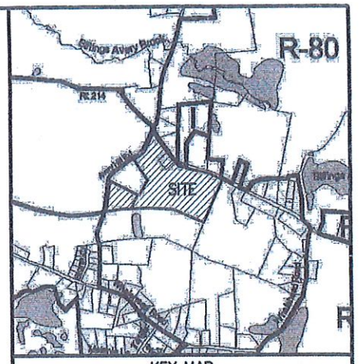
_____ NO PERMIT NECESSARY. (NOT WITHIN REGULATED AREA.)

_____ NOT APPLICABLE AT THIS TIME. (WITHIN A REGULATED AREA; NO REGULATED ACTIVITY PROPOSED AT THIS TIME.)

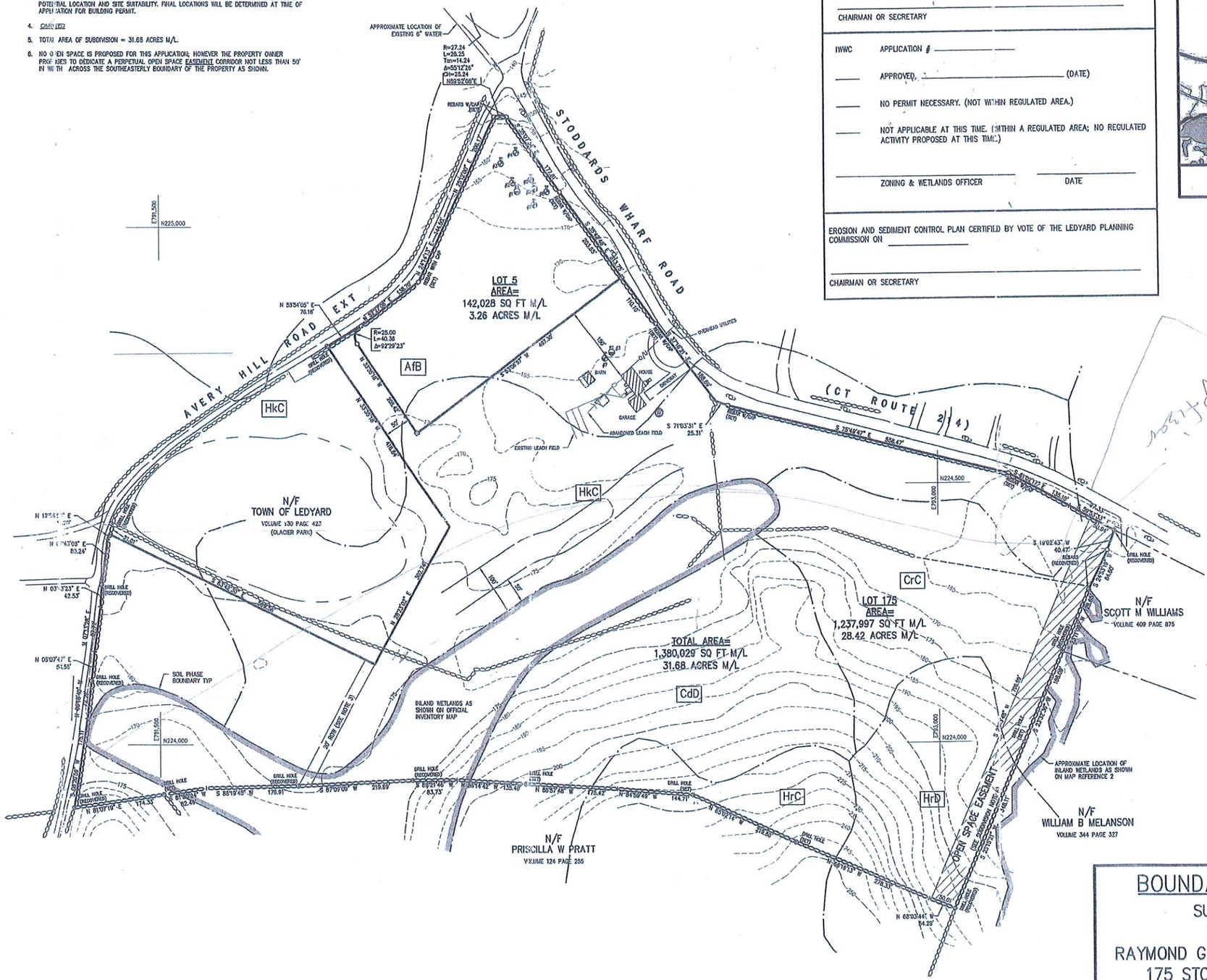
_____ _____
ZONING & WETLANDS OFFICER DATE

EROSION AND SEDIMENT CONTROL PLAN CERTIFIED BY VOTE OF THE LEDYARD PLANNING COMMISSION ON _____

_____
CHAIRMAN OR SECRETARY



KEY MAP
SCALE: 1"=1000'



LEGEND

THE FOLLOWING SYMBOLS/ABBREVIATIONS MAY APPEAR ON THIS DRAWING

AC	ACRES
BIT	BITUMINOUS
BCLC	BITUMINOUS CONCRETE LIP CURBING
CONC	CONCRETE
DIA	DIAMETER
DB	DISTRIBUTION BOX
EOP	EDGE OF PAVEMENT
ELEV	ELEVATION
LF	LINEAR FOOT
(MIN)	MINIMUM
M/L	MORE OR LESS
N/F	NOW OR FORMERLY
PVC	POLY VINYL CHLORIDE
SCH40	SCHEDULE 40
5.4x	SPOT ELEVATION
SF	SQUARE FEET
TR	TO REMAIN
TBR	TO BE REMOVED
TYP	TYPICAL
P-5	SOIL PERC TEST LOCATION
TH8	SOIL DEEP TEST LOCATION
W	WELL
BSL	BUILDING SETBACK LINE
	CLEARING LIMIT LINE
	EXISTING TREELINE
158	EXISTING CONTOUR
158	NEW CONTOUR
	SEDIMENT FENCE
	STORM DRAIN PIPE
	STONE WALL

BOUNDARY SURVEY MAP

SUBDIVISION PLAN
PROPERTY OF
RAYMOND G. MAIN & ALTHEA L. MAIN
175 STODDARDS WHARF ROAD
(CONNECTICUT ROUTE 214)
& AVERY HILL ROAD EXTENSION
LEDYARD, CONNECTICUT

DATE: SCALE:

2 Maps and Surveys
gineering & Surveying
vid A. King, PE
7 Norwich Road (Rte 82)
kdale, CT 06370

TO THE BEST OF MY KNOWLEDGE AND BELIEF THIS MAP IS SUBSTANTIALLY CORRECT AS NOTED HEREON.

JAMES BERNARDO LAND SURVEYING, LLC
102A SPITHEAD ROAD
WATERFORD, CONNECTICUT 06385

GRAPHIC SCALE
100 0 50 100 200 400

4	10/09/07	NO REVISIONS TO THIS SHEET	JB
3	7/19/07	SUBDIVISION NOTE 4 REMOVED	JB
		NO REVISIONS TO THIS SHEET	JB

TOWN OF LEDYARD
Department of Land Use and Planning
Elizabeth J. Burdick, Director
741 Colonel Ledyard Highway, Ledyard, CT 06339
Telephone: (860) 464-3215
Email: planner@ledyardct.org

September 15, 2025

Gary St. Vil, Chairman
Ledyard Town Council
741 Colonel Ledyard Highway
Ledyard, CT 06339

RE: C.G.S. 8-24 Referral – 19 Avery Hill Rd Ext. (Parcel ID: 50/130/19), Ledyard, CT – Transfer of Town-Owned Open Space property (Kettle Hole) to Avalonia Land Conservancy to be combined with property at 173 & 175 Stoddards Wharf Road owned by DDJJM, LLC also to be transferred to Avalonia Land Conservancy.

Dear Chairman St. Vil,

The Ledyard Planning & Zoning Commission, at its September 11, 2025 regular meeting, voted unanimously to forward a FAVORABLE REPORT in accordance with C.G.S. §8-24 to the Town Council for a MOTION to transfer town-owned property located at 19 Avery Hill Rd Ext. (Parcel ID: 50/130/19), Ledyard, CT to the Avalonia Land Conservancy ("Avalonia") to be combined with property at 173 & 175 Stoddards Wharf Road owned by DDJJM, LLC also to be transferred to Avalonia.

Please contact me at Town Hall with any questions. Thank you for your attention to this matter.

Sincerely,
Elizabeth J. Burdick
Director of Land Use & Planning

C: Roxanne Maher, Administrative Asst. to the Town Council
Dennis Main, President, Avalonia Land Conservancy
Marcelle Wood, Chairman, Ledyard Planning & Zoning Commission
Fred Allyn III, Mayor
Anna Wynn, Asst. to Director Land Use
Hannah Gienau, ZWBEO
File – Land Use Dept.

Roxanne Maher

From: Elizabeth Burdick
Sent: Tuesday, September 16, 2025 7:35 AM
To: Roxanne Maher
Cc: Fred Allyn, III
Subject: RE: CGS Section 8-24 - Transfer of 19 Avery Hill Road Ext. to Avalonia Land Conservancy

9/16/25 Good morning, Roxanne, I believe this is a “no (money) consideration” for this transfer, however, Avalonia will take over stewardship of the property and maintain any trails, wetlands crossings, etc. I hope this addresses your question. Thanks!

Liz Burdick, Director of Land Use & Planning
Town of Ledyard
741 Colonel Ledyard Highway, Ledyard, CT 06339
Telephone: (860) 464-3215
Email: planner@ledyardct.org

From: Roxanne Maher <council@ledyardct.org>
Sent: Tuesday, September 16, 2025 7:30 AM
To: Elizabeth Burdick <planner@ledyardct.org>
Cc: Fred Allyn, III <mayor@ledyardct.org>; Roxanne Maher <council@ledyardct.org>
Subject: FW: CGS Section 8-24 - Transfer of 19 Avery Hill Road Ext. to Avalonia Land Conservancy

Good Morning Liz:

Thank you for providing the Planning & Zoning Commission’s Report regarding the transfer of town-owned open space
Located at 19 Avery Hill road Extension to Avalonia Land Conservancy to be combined with open space currently owned
by Avalonia Land Conservancy..

Do you know if Avalonia will be providing any payment to the town for the property, or whether this transfer would be for
“ No Consideration”

Thank you,
Roxanne

From: Elizabeth Burdick <planner@ledyardct.org>
Sent: Monday, September 15, 2025 4:52 PM
To: Roxanne Maher <council@ledyardct.org>; Gary St. Vil <GSVil@ledyardct.org>
Cc: Anna Wynn <land.use.asst@ledyardct.org>; Hannah Gienau <zoning.official@ledyardct.org>; Fred Allyn, III <mayor@ledyardct.org>; martyengrew@gmail.com
Subject: CGS Section 8-24 - Transfer of 19 Avery Hill Road Ext. to Avalonia Land Conservancy

9/15/25 Good afternoon, Roxanne, Attached please find a Favorable Report to the Ledyard Town Council from the Ledyard Planning & Zoning Commission regarding the transfer of town-owned open space at 19 Avery Hill Road Ext. to Avalonia Land Conservancy. Also attached is my staff report with attachments for the Council's review. Please forward to Chairman St. Vil to be placed on the appropriate agendas for action. Thank you.

Liz Burdick, Director of Land Use & Planning
Town of Ledyard
741 Colonel Ledyard Highway, Ledyard, CT 06339
Telephone: (860) 464-3215
Email: planner@ledyardct.org

AVALONIA

Avalonia Land Conservancy, Inc.
PO Box 49
Old Mystic, CT 06372

Avalonia.org
info@Avalonialc.org

860.884.3500

BOARD OF DIRECTORS

Officers
Dennis Main
President
Neil Duncan
Vice President
Elanah Sherman
Secretary
Maria Miranda
Assistant Secretary
Mark Hibbard
Treasurer
Peter Gauthier
Assistant Treasurer

Directors at Large
Richard Conant
Scott Dawley
Christopher Houlihan
Sharon Lynch
Elizabeth Sorensen

STAFF

Director of Stewardship
Tobias Glaza

Director of Philanthropy
Christopher Kepple

Office Manager
Mary Anne Sherman

Administrator
Ukiah Pastor

Mayor Fred Allyn III,

Ledyard Town Hall

741 Colonel Ledyard Highway

Ledyard, CT 06339

Dear Mayor Allyn,

Since 2005 the Town of Ledyard has transferred over 20 parcels of open space to Avalonia Land Conservancy, Inc. with tremendous success as a collaborative undertaking resulting in significant habitat and passive recreation opportunities within Ledyard

Currently two additional parcels are under consideration. Avalonia would respectfully request that the Ledyard Town Council approve a Town Meeting consideration of the transfer of 13 Applewood Drive as an open space abutting parcel to the Pike Marshall Preserve and 19 Avery Hill Road Extension as an addition to the abutting pending transfer of 173-175 Stoddards Wharf Road to Avalonia.

Thank you for your consideration,

Dennis S. Main, President

Avalonia Land Conservancy, Inc.

ACCREDITED LAND TRUST ACCREDITATION COMMISSION

Avalonia Land Conservancy, Inc. preserves natural habitats in southeastern Connecticut by acquiring and protecting lands and by communicating the value of these irreplaceable resources. Avalonia Land Conservancy is a 501(c)3, non-profit organization. Your contribution is tax deductible to the extent allowed by law. No goods or services were provided in exchange for your financial donation. Please keep this written acknowledgment of your donation for your tax records.

Roxanne Maher

From: H James Harwood <h.james.harwood@gmail.com>
Sent: Wednesday, October 15, 2025 10:41 AM
To: Roxanne Maher
Subject: Support letters for transfer of Kettle Hole and 13 Applewood Drive to Avalonia
Attachments: support letter for transfer of Kettle Hole to Avalonia 10-14-25.pdf; support letter for transfer of open space at 13 Applewood Drive to Avalonia 10-14-25 - Copy.pdf

Hey Roxanne,

At the meeting on September 11th, Planning and Zoning approved motions to issue FAVORABLE REPORTS to the Town Council for the transfer of the Kettle Hole at 19 Avery Road Ext and for the transfer of the town-owned open space property at 13 Applewood Drive to Avalonia. At that time, the Planning and Zoning Commission discussed having the Conservation Commission send letters of support for the transfers to the Town Council.

At our regular meeting last night, the Conservation Commission approved drafts of two letters, one for the Kettle Hole property and one for the 13 Applewood Drive open space property, attesting and reaffirming our support for the transfer of these two properties to Avalonia. PDFs of the two letters are attached.

Let me know if submitting these as PDFs is satisfactory or if you need us to submit hard copies of the letters.

Thanks Roxanne !

Cheers,

Jim

TO: Ledyard Town Council

FROM: Ledyard Conservation Commission

October 14th, 2025

This letter, dated October 14th 2025, serves to attest and reaffirm the support of the Conservation Commission for the transfer of Town-Owned Property at 19 Avery Hill Road Ext. known as the "Kettle Hole" property to Avalonia Land Conservancy to be combined with Other Lands of DDJJM LLC at 173 Stoddards Wharf Road & 75 Stoddards Wharf Road to be transferred to Avalonia, for which a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 was approved and submitted to the Ledyard Town Council by the Ledyard Planning and Zoning Commission at their regular meeting of September 11th, 2025.

Sincerely,

Ledyard Conservation Commission

TO: Ledyard Town Council

FROM: Ledyard Conservation Commission

October 14th, 2025

This letter, dated October 14th 2025, serves to attest and reaffirm the support of the Conservation Commission for the transfer of Town-Owned Open Space Property at 13 Applewood Drive to Avalonia Land Conservancy to be combined with its existing Pike Marshall Preserve, for which a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 was approved and submitted to the Ledyard Town Council by the Ledyard Planning and Zoning Commission at their regular meeting of September 11th, 2025.

Sincerely,

Ledyard Conservation Commission

File #: 25-2561 **Agenda Date:** 10/22/2025 **Agenda #:** 8.

LAND USE

Land Transfer:
MOTION to recommend the Town of Ledyard transfer town-owned property located at 13 Applewood Drive (parcel ID: 99-530-13) to Avalonia Land Conservancy for no consideration, to be combined with the Avalonia Land Conservancy "Pike Marshall Preserve to remain open to the public for passive recreation and to be protected in perpetuity under the Conservancy care with the following conditions:

1). The 10-foot wide access to the property shall be clearly marked in the field by a Land Surveyor engaged by Avalonia Land Conservancy.

2) Appropriate signage identifying the open space parcel shall be installed by Avalonia Land Conservancy.

3) Avalonia Land Conservancy will pay for all conveyances and fees regarding the transfer of the property.

4) In the event Avalonia Land Conservancy determines they no longer wish to own or no longer can own 13 Applewood Drive property (parcel ID:99-530-13), Avalonia Land Conservancy will first offer the property back to the Town of Ledyard as the last owner of record. Such conveyance will be at no cost to the Town, other than customary recording and legal fees. The Town shall have 120 days to accept or reject re-acquisition. The Town shall notify Avalonia Land Conservancy in writing of its intent to accept or reject. Should the Town choose not to accept the property back, Avalonia Land Conservancy will then have the right to convey the parcel to a third party of their choice.

Background:

13 Applewood Drive was approximately 1.70-acres shown on a Plan entitled "*Plan showing Applewood Estate Resubdivision- Property of Applewood Estates, LLC*" and is a "*Park, Open Space and Recreational Purposes*" parcel that was conveyed to the Town of Ledyard on May 16, 2006.

Should the Town approve to transfer this property to Avalonia Land Conservancy it would be added to other lands (104 Gallup Hill Road, 104R Gallup Hill Road, 199 Lambtown Road, 489 Pumpkin Hill Road and 480 Pumpkin Hill Road) owned by Avalonia Land Conservancy known as the "*Avalonia Pike Marshal Preseve*" which was about 272-acres.

Please see attached the following:
- Director of Planning & Zoning Elizabeth Burdick Memo dated September 8, 2025 with attachments.
- Director of Planning & Zoning Elizabeth Burdick Memo dated September 15, 2025.

Land Use Director/Town Planner:
(type text here)

TOWN OF LEDYARD

Department of Land Use and Planning
Elizabeth J. Burdick, Director
741 Colonel Ledyard Highway, Ledyard, CT 06339
Telephone: (860) 464-3215, Fax: (860) 464-0098
Email: planner@ledyardct.org

MEMORANDUM

DATE: September 8, 2025
TO: Ledyard Planning & Zoning Commission
FROM: Liz Burdick, Director of Land Use & Planning
RE: **C.G.S. 8-24 Referral for Report to Town Council regarding Transfer of Town-Owned Property to Avalonia Land Conservancy to be Combined with Pike Marshall Preserve**

Request is for a report to the Town Council in accordance with C.G.S. 8-24 regarding the transfer of Town-Owned Property to Avalonia Land Conservancy to be Combined with Pike Marshall Preserve located at 104 Gallup Hill Road (Parcel ID: 85-810-104), Ledyard, CT.

13 Applewood Drive (Parcel ID: 99/530/13), Ledyard, CT is a "Park, Open Space and Recreational Purposes" parcel conveyed to the Town of Ledyard and is shown as Lot 13 on a plan entitled "Plan showing Applewood Estate Resubdivision – Property of Applewood Estates, LLC – Colonel Ledyard Highway – Ledyard, CT – Scale 1"=40' – April 2004, Revised September 16, 2024 – Sheet 3 of 11 – Dieter, Gardner & Mereen, Inc. – Land Surveying" and further described in a Warranty Deed filed on the Ledyard Land Records in Volume 435, Page 189.

The existing Avalonia Pike Marshall Preserve is located on about 272-acres and includes 104 Gallup Hill Road, 104R Gallup Hill Road, 199 Lambtown Road, 489 Pumpkin Hill Road and 480 Pumpkin Hill Road. 13 Applewood Drive Open Space parcel would add an additional 1.70-acres to the existing preserve and Avalonia Land Conservancy would become stewards of the land. Avalonia Board President Dennis Main will be in attendance at the meeting and will answer Commissioner questions.

The following Motion is suggested for any favorable recommendation:

I make a Motion to forward a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 to the Ledyard Town Council regarding the transfer of Town-Owned Property to Avalonia Land Conservancy to be combined with its existing Pike Marshall Preserve, Ledyard, CT.

If the PZC is inclined to send an unfavorable report, it shall state its reasons on the record.

Sec. 8-24. Municipal improvements. No municipal agency or legislative body shall (1) locate, accept, abandon, widen, narrow or extend any street, bridge, parkway or other public way, (2) locate, relocate, substantially improve, acquire land for, abandon, sell or lease any airport, park, playground, school or other municipally owned property or public building, (3) locate or extend any public housing, development, redevelopment or urban renewal project, or (4) locate or extend public utilities and terminals for water, sewerage, light, power, transit and other purposes, until the proposal to take such action has been referred to the commission for a report. Notwithstanding the provisions of this section, a municipality may take final action approving an appropriation for any proposal prior to the approval of the proposal by the commission pursuant to this section. The failure of the commission to report within thirty-five days after the date of official submission of the proposal to it for a report shall be taken as approval of the proposal. In the case of the disapproval of the proposal by the commission the reasons therefor shall be recorded and transmitted to the legislative body of the municipality. A proposal disapproved by the commission shall be adopted by the municipality or, in the case of disapproval of a proposal by the commission subsequent to final action by a municipality approving an appropriation for the proposal and the method of financing of such appropriation, such final action shall be effective, only after the subsequent approval of the proposal by (A) a two-thirds vote of the town council where one exists, or a majority vote of those present and voting in an annual or special town meeting, or (B) a two-thirds vote of the representative town meeting or city council or the warden and burgesses, as the case may be. The provisions of this section shall not apply to maintenance or repair of existing property, buildings or public ways, including, but not limited to, resurfacing of roads.

13 Applewood Drive Open Space

Ledyard, CT

1 inch = 565 Feet

0 565 1130 1695

September 8, 2025

CAI Technologies
Precision Mapping Geospatial Solutions
www.cai-tech.com



Data shown on this map is provided for planning and informational purposes only. The municipality and CAI Technologies are not responsible for any use for other purposes or misuse or misrepresentation of this map.

INSTR # 2007000121 VOL 00435 PG 0189 RECD 01/16/2007 09:17:37 AM
CALVIN K. BRDUWER TOWN CLERK LEDYARD CT
NO CONVEYANCE TAX

WARRANTY DEED - STATUTORY FORM

APPLEWOODS ESTATES, LLC, a Connecticut Limited Liability Company, having its principal place of business at 850 Gold Star Highway, Groton, Connecticut, hereinafter referred to as the GRANTOR for consideration paid, grants to **TOWN OF LEDYARD**, a municipal corporation within the State of Connecticut, herein referred to as the GRANTEE, with WARRANTY COVENANTS

A certain parcel of land for all PARK, OPEN SPACE AND RECREATIONAL PURPOSES located in the Town of Ledyard, County of New London and State of Connecticut, being more particularly bounded and described as follows:

All that certain parcel of land shown as "Open Space", also known as 13 Applewood Drive, on a map entitled "Plan Showing Applewood Estates Resubdivision – Property of Applewood Estates LLC – Colonel Ledyard Highway – Ledyard, Connecticut – Scale: 1" = 40' - April 2004 Revised September 16, 2004 - Sheet 3 of 11 - Dieter, Gardner & Mereen, Inc. – Land Surveying," which map is filed as Map # 2289 with the Ledyard Town Clerk. Said open space area is more particularly bounded and described as follows:

Begin at a point on the northerly line of Applewood Drive, which point marks the southwesterly corner of the access strip of Lot 11 as shown on said map, and thence run N 51° 12' 00" E, along said access strip, a distance of 370.00' to a point; thence run N 31° 00' 27" E, along said access strip, a distance of 94.67' to a point; thence run S 65° 12' 13" E, along the southerly boundary of Lot 11 as shown on said map, a distance of 265.67' to a point marked by a drill hole at the southeasterly corner of Lot 11; thence run S 36° 18' 33" W, along land now or formerly of Nature Conservancy of Connecticut, Inc., a distance of 181.22' to a point marked by a drill hole; thence run S 37° 18' 48" W, along said Nature Conservancy land, a distance of 115.21' to a point marked by a drill hole; thence run S 29° 42' 10" W, along said Nature Conservancy land a distance of 10.06' to a point marked by a drill hole; thence run S 41° 39' 06" W, along said Nature Conservancy land, a distance of 37.73' to a point marked by a drill hole; thence run S 34° 44' 47" W, along said Nature Conservancy land, a distance of 51.36' to a point marked by a drill hole; thence run N 17° 34' 04" W, along the northeasterly boundary of Lot 15 as shown on said map, a distance of 315.40' to a point; thence run S 51 12' 00" W, along the northwesterly boundary of Lot 15 as shown on said map, a distance of 309.82' to a point in the northerly line of Applewood Drive; thence along the northerly line of Applewood Drive, on the arc of a curve to the left having a radius of 325.00', a distance of 10.10' to the point and place of beginning.

Said Open Space parcel contains 74,060 s.f. or 1.70 acres.

Dated this 16th day of May 2006.

Witnessed by:

APPLEWOODS ESTATES, LLC

By _____
Peter R. Lampasona
Duly Authorized Member

_____
Peter W. Hoops

_____
Witness

HOOPS & JENSEN, LLC
attorneys at law

19A Thames Street,
Groton, CT 06340
Tel. (860) 445-8911
Or
Fax (860) 445-8919

JURIS No. 306839

STATE OF CONNECTICUT

ss: Groton May 16th, 2006

COUNTY OF NEW LONDON

Personally appeared **PETER R. LAMPASONA,** a duly authorized Member of **APPLEWOODS ESTATES, LLC,** signer and sealer of the foregoing instrument, and acknowledged the same to be his free act and deed and the free act and deed of the Limited Liability Company, before me.

PETER W. HOOPS
Commissioner of the Superior Court

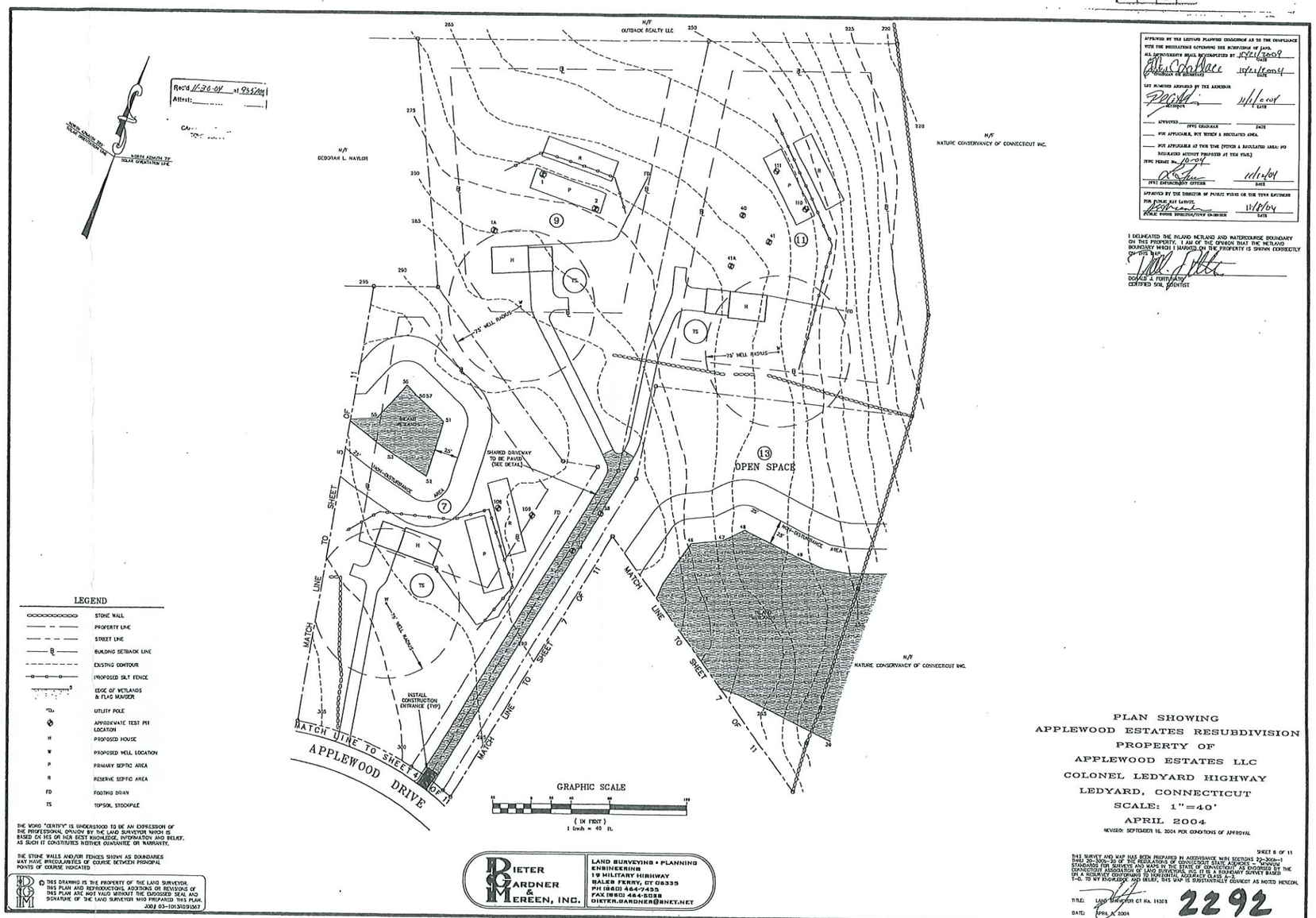
Grantee's mailing address: 850 Gold Star Highway, Groton, Connecticut 06340

HOOPS & JENSEN, LLC
attorneys at law

19A Thames Street,
Groton, CT 06340
Tel. (860) 445-3911
Or
Fax (860) 445-8919

JURIS No. 306539

2292



Rec'd 11-26-04 at 9:52 AM
Attest:

APPROVED BY THE LEDYARD PLANNING COMMISSION AS TO THE COMPLIANCE WITH THE REGULATIONS GOVERNING THE SUBDIVISION OF LAND.
ALL IMPROVEMENTS SHALL BE COMPLETED BY 10/21/2009 DATE
CHAIRMAN OR SECRETARY 11/1/2004 DATE
LOT NUMBERS ASSIGNED BY THE ASSESSOR
ASSESSOR 11/1/2004 DATE
APPROVED IWWC CHAIRMAN DATE
— NOT APPLICABLE, NOT WITHIN A REGULATED AREA.
— NOT APPLICABLE AT THIS TIME (WITHIN A REGULATED AREA; NO REGULATED ACTIVITY PROPOSED AT THIS TIME)
IWWC PERMIT No. 10-04
IWWC ENFORCEMENT OFFICER 11/1/2004 DATE
APPROVED BY THE DIRECTOR OF PUBLIC WORKS OR THE TOWN ENGINEER FOR PUBLIC USE PURPOSES
PUBLIC WORKS DIRECTOR/TOWN ENGINEER 11/8/04 DATE

I DELINEATED THE INLAND WETLAND AND WATERCOURSE BOUNDARY ON THIS PROPERTY. I AM OF THE OPINION THAT THE WETLAND BOUNDARY WHICH I MARKED ON THE PROPERTY IS SHOWN CORRECTLY ON THIS MAP.
DONALD J. FORTUNATY
CERTIFIED SOIL SCIENTIST

DRAWING NUMBER

DRAWING NUMBER

DRAWING NUMBER 2292

LEGEND

- STONE WALL
- PROPERTY LINE
- STREET LINE
- BUILDING SETBACK LINE
- EXISTING CONTOUR
- PROPOSED SILT FENCE
- EDGE OF WETLANDS & FLAG NUMBER
- UTILITY POLE
- APPROXIMATE TEST PIT LOCATION
- H PROPOSED HOUSE
- W PROPOSED WELL LOCATION
- P PRIMARY SEPTIC AREA
- R RESERVE SEPTIC AREA
- FD FOOTING DRAIN
- TS TOPSOIL STOCKPILE

THE WORD "CERTIFY" IS UNDERSTOOD TO BE AN EXPRESSION OF THE PROFESSIONAL OPINION BY THE LAND SURVEYOR WHICH IS BASED ON HIS OR HER BEST KNOWLEDGE, INFORMATION AND BELIEF, AS SUCH IT CONSTITUTES NEITHER GUARANTEE OR WARRANTY.

THE STONE WALLS AND/OR FENCES SHOWN AS BOUNDARIES MAY HAVE IRREGULARITIES OF COURSE BETWEEN PRINCIPAL POINTS OF COURSE INDICATED

© THIS DRAWING IS THE PROPERTY OF THE LAND SURVEYOR. THIS PLAN AND REPRODUCTIONS, ADDITIONS OR REVISIONS OF THIS PLAN ARE NOT VALID WITHOUT THE EXPOSED SEAL AND SIGNATURE OF THE LAND SURVEYOR WHO PREPARED THIS PLAN.
2003 03-1013103S1367

DIETER GARDNER & MEREEN, INC.
LAND SURVEYING • PLANNING
ENGINEERING
19 MILITARY HIGHWAY
BALES FERRY, CT 06335
PH (860) 464-7455
FAX (860) 464-5088
DIETER.GARDNER@SNET.NET

PLAN SHOWING
APPLEWOOD ESTATES RESUBDIVISION
PROPERTY OF
APPLEWOOD ESTATES LLC
COLONEL LEDYARD HIGHWAY
LEDYARD, CONNECTICUT
SCALE: 1"=40'
APRIL 2004
REVISED: SEPTEMBER 16, 2004 PER CONDITIONS OF APPROVAL

SHEET 6 OF 11

THIS SURVEY AND MAP HAS BEEN PREPARED IN ACCORDANCE WITH SECTIONS 20-300b-1 THRU 20-300b-20 OF THE REGULATIONS OF CONNECTICUT STATE AGENCIES - "MINIMUM STANDARDS FOR SURVEYS AND MAPS IN THE STATE OF CONNECTICUT" AS ADOPTED BY THE CONNECTICUT ASSOCIATION OF LAND SURVEYORS, INC. AND IS A CLASS A SURVEY BASED ON A RESURVEY CONFORMING TO HORIZONTAL ACCURACY CLASS A-2. TO THE BEST OF MY KNOWLEDGE AND BELIEF, THIS MAP IS SUBSTANTIALLY CORRECT AS NOTED HEREON.

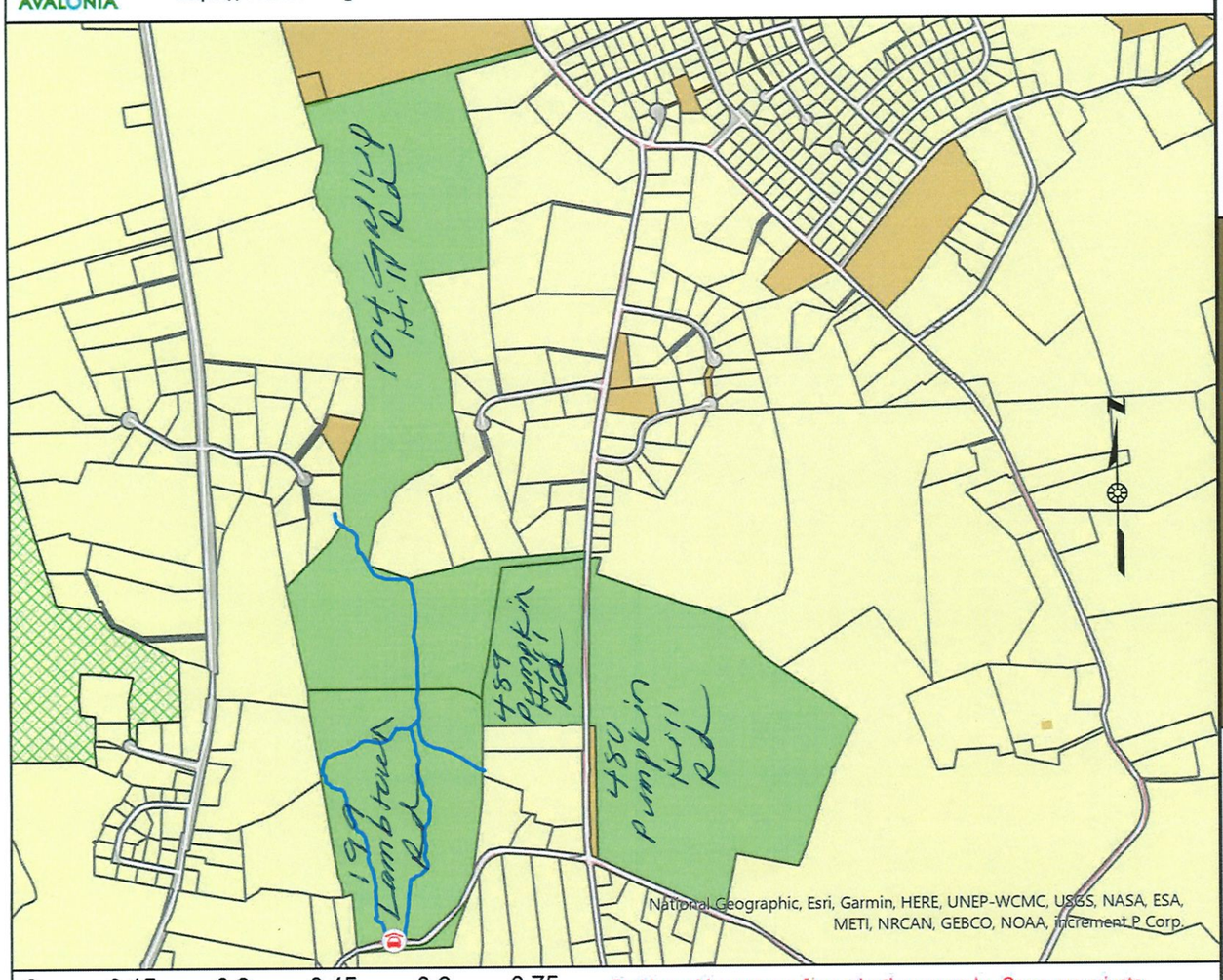
TITLE: LAND SURVEYOR CT No. 11328
DATE: APRIL 9, 2004

2292

Avalonia Land Conservancy
P.O. Box 49, Old Mystic, CT 06372
https://avalonia.org

Pike Marshall

272.05 Total Acres

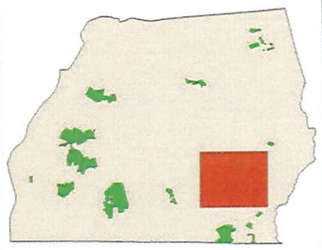


0 0.15 0.3 0.45 0.6 0.75 Miles

Copyright Avalonia Land Conservancy
Map Date - March 6, 2021

Parking addresses are for navigation use only. Some are private property near parking site. This map is intended for general guidance and recreational use of the property only. Data shown on this map may not be complete or current. Hikers do so at their own risk.

Ledyard



Legend

- Avalonia Properties
- Ledyard municipal property

Trail Blaze

- Blue

Parking

- Street

Notes

Avalonia Land Conservancy properties are open for public access. Dogs must remain on a leash at all times.

Do not disturb stone structures or remove plants or other artifacts from property.

Load free "ArcGIS Explorer" app and search for "Avalonia Online Map" to view our properties and follow trails interactively.

Pike Marshall Preserve

AVALONIA TRAIL FINDER

Town: Ledyard

Maintained Uses: walking, hiking, running, biking, horseback riding

Difficulty: moderate

Length: 4.0 +/- miles (blue blaze marked)

Type: point to point and loop

Surface: packed earth/dirt, bridle trails, old farm roads

Pets: permitted (dogs on leash)

Year Preserved: 1969

Acres: 272.05 (Pike Tract 159.97 acres, Hugh A Marshall Tract 100.00 acres, Mummert Tract 12.08)

Lat.: 41°24'49.4"N
Long.: 71°59'22.1"W

MAP **GET DIRECTIONS** **HIKE & SEEK**

Trails have been in existence upon acquisition by The Nature Conservancy of the first tracts in 1969 and accommodate walkers, bikers, runners and horseback riding. The main south to north trail is about 2 miles long and runs from the Lambtown Road pull-off parking area to the tennis courts on the Burton Tract. The trailhead is located on the north side of Lambtown Road (199) on the west tract of the Pike Preserve about .6 miles east of the Lambtown Road/Colonel Ledyard Highway intersection. The trail runs north through the Pike Preserve, the Hugh A. Marshall Preserve and the Burton Tract to a path behind the Ledyard High School tennis courts. The connector legs from Pike Marshall Preserve to the Burton Tract trails are not complete yet. The trail is blazed with (blue) markers. There are also overgrown unmarked trails on the east and west Pike Preserve tracts. Pets are permitted (dogs on leash).

TOWN OF LEDYARD

Department of Land Use and Planning

Elizabeth J. Burdick, Director

741 Colonel Ledyard Highway, Ledyard, CT 06339

Telephone: (860) 464-3215

Email: planner@ledyardct.org

September 15, 2025

Gary St. Vil, Chairman
Ledyard Town Council
741 Colonel Ledyard Highway
Ledyard, CT 06339

RE: C.G.S. 8-24 Referral – 13 Applewood Drive (Parcel ID: 99-530-13), Ledyard, CT – Transfer of Town-Owned Open Space property to Avalonia Land Conservancy to be combined with the Avalonia "Pike Marshall Preserve".

Dear Chairman St. Vil,

The Ledyard Planning & Zoning Commission, at its September 11, 2025 regular meeting, voted unanimously to forward a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 to the Town Council for a MOTION to transfer town-owned property located at 13 Applewood Drive (Parcel ID: 99-530-13), Ledyard, CT to the Avalonia Land Conservancy ("Avalonia") to be combined with the Avalonia "Pike Marshall Preserve" and to remain open to the public for passive recreation and to be protected in perpetuity under Avalonia's care. The following recommendation was made as a condition to said favorable approval: 1. The 10-foot wide access to the property shall be clearly marked in the field by a Land Surveyor engaged by Avalonia, and 2. Appropriate signage identifying the open space parcel shall be installed by Avalonia.

Please contact me at Town Hall with any questions. Thank you for your attention to this matter.

Sincerely,

Elizabeth J. Burdick

Director of Land Use & Planning

C: Roxanne Maher, Administrative Asst. to the Town Council
Dennis Main, President, Avalonia Land Conservancy
Marcelle Wood, Chairman, Ledyard Planning & Zoning Commission
Fred Allyn III, Mayor
Anna Wynn, Asst. to Director Land Use
Hannah Gienau, ZWBEO
File – Land Use Dept.

Roxanne Maher

From: Elizabeth Burdick
Sent: Tuesday, September 16, 2025 7:35 AM
To: Roxanne Maher
Cc: Fred Allyn, III
Subject: RE: CGS Section 8-24 - Transfer of 19 Avery Hill Road Ext. to Avalonia Land Conservancy

9/16/25 Good morning, Roxanne, I believe this is a “no (money) consideration” for this transfer, however, Avalonia will take over stewardship of the property and maintain any trails, wetlands crossings, etc. I hope this addresses your question. Thanks!

Liz Burdick, Director of Land Use & Planning
Town of Ledyard
741 Colonel Ledyard Highway, Ledyard, CT 06339
Telephone: (860) 464-3215
Email: planner@ledyardct.org

From: Roxanne Maher <council@ledyardct.org>
Sent: Tuesday, September 16, 2025 7:30 AM
To: Elizabeth Burdick <planner@ledyardct.org>
Cc: Fred Allyn, III <mayor@ledyardct.org>; Roxanne Maher <council@ledyardct.org>
Subject: FW: CGS Section 8-24 - Transfer of 19 Avery Hill Road Ext. to Avalonia Land Conservancy

Good Morning Liz:

Thank you for providing the Planning & Zoning Commission’s Report regarding the transfer of town-owned open space
Located at 19 Avery Hill road Extension to Avalonia Land Conservancy to be combined with open space currently owned
by Avalonia Land Conservancy..

Do you know if Avalonia will be providing any payment to the town for the property, or whether this transfer would be for
“ No Consideration”

Thank you,
Roxanne

From: Elizabeth Burdick <planner@ledyardct.org>
Sent: Monday, September 15, 2025 4:52 PM
To: Roxanne Maher <council@ledyardct.org>; Gary St. Vil <GSVil@ledyardct.org>
Cc: Anna Wynn <land.use.asst@ledyardct.org>; Hannah Gienau <zoning.official@ledyardct.org>; Fred Allyn, III <mayor@ledyardct.org>; martyengrew@gmail.com
Subject: CGS Section 8-24 - Transfer of 19 Avery Hill Road Ext. to Avalonia Land Conservancy

9/15/25 Good afternoon, Roxanne, Attached please find a Favorable Report to the Ledyard Town Council from the Ledyard Planning & Zoning Commission regarding the transfer of town-owned open space at 19 Avery Hill Road Ext. to Avalonia Land Conservancy. Also attached is my staff report with attachments for the Council's review. Please forward to Chairman St. Vil to be placed on the appropriate agendas for action. Thank you.

Liz Burdick, Director of Land Use & Planning
Town of Ledyard
741 Colonel Ledyard Highway, Ledyard, CT 06339
Telephone: (860) 464-3215
Email: planner@ledyardct.org

AVALONIA

Avalonia Land Conservancy, Inc.
PO Box 49
Old Mystic, CT 06372

Avalonia.org
info@Avalonialc.org

860.884.3500

BOARD OF DIRECTORS

Officers
Dennis Main
President
Neil Duncan
Vice President
Elanah Sherman
Secretary
Maria Miranda
Assistant Secretary
Mark Hibbard
Treasurer
Peter Gauthier
Assistant Treasurer

Directors at Large
Richard Conant
Scott Dawley
Christopher Houlihan
Sharon Lynch
Elizabeth Sorensen

STAFF

Director of Stewardship
Tobias Glaza

Director of Philanthropy
Christopher Kepple

Office Manager
Mary Anne Sherman

Administrator
Ukiah Pastor

Mayor Fred Allyn III,

Ledyard Town Hall

741 Colonel Ledyard Highway

Ledyard, CT 06339

Dear Mayor Allyn,

Since 2005 the Town of Ledyard has transferred over 20 parcels of open space to Avalonia Land Conservancy, Inc. with tremendous success as a collaborative undertaking resulting in significant habitat and passive recreation opportunities within Ledyard

Currently two additional parcels are under consideration. Avalonia would respectfully request that the Ledyard Town Council approve a Town Meeting consideration of the transfer of 13 Applewood Drive as an open space abutting parcel to the Pike Marshall Preserve and 19 Avery Hill Road Extension as an addition to the abutting pending transfer of 173-175 Stoddards Wharf Road to Avalonia.

Thank you for your consideration,

Dennis S. Main, President

Avalonia Land Conservancy, Inc.

ACCREDITED LAND TRUST ACCREDITATION COMMISSION

Avalonia Land Conservancy, Inc. preserves natural habitats in southeastern Connecticut by acquiring and protecting lands and by communicating the value of these irreplaceable resources. Avalonia Land Conservancy is a 501(c)3, non-profit organization. Your contribution is tax deductible to the extent allowed by law. No goods or services were provided in exchange for your financial donation. Please keep this written acknowledgment of your donation for your tax records.

Roxanne Maher

From: H James Harwood <h.james.harwood@gmail.com>
Sent: Wednesday, October 15, 2025 10:41 AM
To: Roxanne Maher
Subject: Support letters for transfer of Kettle Hole and 13 Applewood Drive to Avalonia
Attachments: support letter for transfer of Kettle Hole to Avalonia 10-14-25.pdf; support letter for transfer of open space at 13 Applewood Drive to Avalonia 10-14-25 - Copy.pdf

Hey Roxanne,

At the meeting on September 11th, Planning and Zoning approved motions to issue FAVORABLE REPORTS to the Town Council for the transfer of the Kettle Hole at 19 Avery Road Ext and for the transfer of the town-owned open space property at 13 Applewood Drive to Avalonia. At that time, the Planning and Zoning Commission discussed having the Conservation Commission send letters of support for the transfers to the Town Council.

At our regular meeting last night, the Conservation Commission approved drafts of two letters, one for the Kettle Hole property and one for the 13 Applewood Drive open space property, attesting and reaffirming our support for the transfer of these two properties to Avalonia. PDFs of the two letters are attached.

Let me know if submitting these as PDFs is satisfactory or if you need us to submit hard copies of the letters.

Thanks Roxanne !

Cheers,

Jim

TO: Ledyard Town Council

FROM: Ledyard Conservation Commission

October 14th, 2025

This letter, dated October 14th 2025, serves to attest and reaffirm the support of the Conservation Commission for the transfer of Town-Owned Property at 19 Avery Hill Road Ext. known as the "Kettle Hole" property to Avalonia Land Conservancy to be combined with Other Lands of DDJJM LLC at 173 Stoddards Wharf Road & 75 Stoddards Wharf Road to be transferred to Avalonia, for which a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 was approved and submitted to the Ledyard Town Council by the Ledyard Planning and Zoning Commission at their regular meeting of September 11th, 2025.

Sincerely,

Ledyard Conservation Commission

TO: Ledyard Town Council

FROM: Ledyard Conservation Commission

October 14th, 2025

This letter, dated October 14th 2025, serves to attest and reaffirm the support of the Conservation Commission for the transfer of Town-Owned Open Space Property at 13 Applewood Drive to Avalonia Land Conservancy to be combined with its existing Pike Marshall Preserve, for which a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 was approved and submitted to the Ledyard Town Council by the Ledyard Planning and Zoning Commission at their regular meeting of September 11th, 2025.

Sincerely,

Ledyard Conservation Commission

File #: 25-2562 **Agenda Date:** 10/22/2025 **Agenda #:** 9.

LAND USE

Land Transfer:
MOTION to schedule a Hybird (in-Person and Video Conference) Public Hearing date for November 12, 2025 at 6:15 p.m., in accordance with CGS 07-163e, to receive comment and recommendation on the following:

(1) The transfer town-owned property located at 19 Avery Hill Road Extension, Ledyard Connecticut (Parcel ID:50/130/19), known as the "Kettle Hole" property to Avalonia Land Conservancy for no consideration, to be combined with other lands of the DDJJM, LLC., at 173 Stoddards Wharf Road and 175 Stoddards Wharf Road to be transferred to Avalonia Land Conservancy, to remain open to the public for passive recreation and to be protected in perpetuity under the Conservancy care with the following conditions:

1). Avalonia Land Conservancy will pay for all conveyances and fees regarding the transfer of the property.

2). In the event Avalonia Land Conservancy determines they no longer wish to own or no longer can own the so-called "Kettle Hole" property, Avalonia Land Conservancy will first offer the property back to the Town of Ledyard as the last owner of record. Such conveyance will be at no cost to the Town, other than customary recording and legal fees. The Town shall have 120 days to accept or reject re-acquisition. The Town shall notify Avalonia Land Conservancy in writing of its intent to accept or reject. Should the Town choose not to accept the property back, Avalonia Land Conservancy will then have the right to convey the parcel to a third party of their choice.

(2) The transfer town-owned property located at 13 Applewood Drive(parcel ID:99-530-13) to Avalonia Land Conservancy for no consideration, to be combined with the Avalonia Land Conservancy "Pike Marshall Preserve to remain open to the public for passive recreation and to be protected in perpetuity under the Conservancy care with the following conditions:

1). The 10-foot wide access to the property shall be clearly marked in the filed by a Land Surveyor engaged by Avalonia Land Conservancy.

2). Appropriate signage identifying the open space parcel shall be installed by Avalonia Land Conservancy.

3). Avalonia Land Conservancy will pay for all conveyances and fees regarding the transfer of the property.

4). In the event Avalonia Land Conservancy determines they no longer wish to own or no longer can own 13 Applewood Drive property (parcel ID:99-530-13), Avalonia Land Conservancy will first offer the property back to the Town of Ledyard as the last owner of record. Such conveyance will be at no cost to the Town, other than customary recording and legal fees. The Town shall have 120 days to accept or reject acquisition. The Town shall notify Avalonia Land Conservancy in writing of its intent to accept

or reject. Should the Town choose not to accept the property back, Avalonia Land Conservancy will then have the right to convey the parcel to a third party of their choice.

.

Background:

In accordance with CGS Section 7-162e - The legislative body of a municipality, or in any municipality where the legislative body is a town meeting or representative town meeting, the board of selectmen, ***shall conduct a public hearing on the sale,*** lease or transfer of real property owned by the municipality prior to final approval of such sale, lease or transfer.

CHAPTER 98*
MUNICIPAL POWERS

Sec. 7-163e. Public hearing on the sale, lease or transfer of real property owned by a municipality. (a) The legislative body of a municipality, or in any municipality where the legislative body is a town meeting or representative town meeting, the board of selectmen, shall conduct a public hearing on the sale, lease or transfer of real property owned by the municipality prior to final approval of such sale, lease or transfer. Notice of the hearing shall be published in a newspaper having a general circulation in such municipality where the real property that is the subject of the hearing is located at least twice, at intervals of not less than two days, the first not more than fifteen days or less than ten days and the last not less than two days before the date set for the hearing. The municipality shall also post a sign conspicuously on the real property that is the subject of the public hearing.

(b) The provisions of subsection (a) of this section shall not apply to (1) sales of real property, except parkland, open space or playgrounds, if the fair market value of such property does not exceed ten thousand dollars, (2) renewals of leases where there is no change in use of the real property, and (3) the sale, lease or transfer of real property acquired by the municipality by foreclosure.

Additional Background:

19 Avery Hill Road Extension (Kettle Hole) is a town-owned open space property located on about 5-acres in the R-60 Zoning District.

Should the Town approve to transfer this property to Avalonia Land Conservancy it would be added to other lands owned by or to be transferred to (173 & 175 Stoddards Wharf Road) Avalonia to create about 35-acres of contiguous open space land under the stewardship of Avalonia Land Conservancy.

Please see attached the following:

- Director of Planning & Zoning Elizabeth Burdick Memo dated September 10, 2025 with attachments.
- Director of Planning & Zoning Elizabeth Burdick Memo dated September 15, 2025.

13 Applewood Drive was approximately 1.70-acres shown on a Plan entitled "*Plan showing Applewood Estate*

Resubdivision- Property of Applewood Estates, LLC" and is a "*Park, Open Space and Recreational Purposes*" parcel that was conveyed to the Town of Ledyard on May 16, 2006.

Should the Town approve to transfer this property to Avalonia Land Conservancy it would be added to other lands (104 Gallup Hill Road, 104R Gallup Hill Road, 199 Lambtown Road, 489 Pumpkin Hill Road and 480 Pumpkin Hill Road) owned by Avalonia Land Conservancy known as the "*Avalonia Pike Marshal Preseve*" which was about 272-acres.

Please see attached the following:

- Director of Planning & Zoning Elizabeth Burdick Memo dated September 8, 2025 with attachments.
- Director of Planning & Zoning Elizabeth Burdick Memo dated September 15, 2025.

Land Use Director/Town Planner:
(type text here)

Sec. 7-163e. Public hearing on the sale, lease or transfer of real property owned by a municipality. (a) The legislative body of a municipality, or in any municipality where the legislative body is a town meeting or representative town meeting, the board of selectmen, shall conduct a public hearing on the sale, lease or transfer of real property owned by the municipality prior to final approval of such sale, lease or transfer. Notice of the hearing shall be published in a newspaper having a general circulation in such municipality where the real property that is the subject of the hearing is located at least twice, at intervals of not less than two days, the first not more than fifteen days or less than ten days and the last not less than two days before the date set for the hearing. The municipality shall also post a sign conspicuously on the real property that is the subject of the public hearing.

(b) The provisions of subsection (a) of this section shall not apply to (1) sales of real property, except parkland, open space or playgrounds, if the fair market value of such property does not exceed ten thousand dollars, (2) renewals of leases where there is no change in use of the real property, and (3) the sale, lease or transfer of real property acquired by the municipality by foreclosure.

Sec. 7-163e. Public hearing on the sale, lease or transfer of real property owned by a municipality. (a) The legislative body of a municipality, or in any municipality where the legislative body is a town meeting or representative town meeting, the board of selectmen, shall conduct a public hearing on the sale, lease or transfer of real property owned by the municipality prior to final approval of such sale, lease or transfer. Notice of the hearing shall be published in a newspaper having a general circulation in such municipality where the real property that is the subject of the hearing is located at least twice, at intervals of not less than two days, the first not more than fifteen days or less than ten days and the last not less than two days before the date set for the hearing. The municipality shall also post a sign conspicuously on the real property that is the subject of the public hearing.

(b) The provisions of subsection (a) of this section shall not apply to (1) sales of real property, except parkland, open space or playgrounds, if the fair market value of such property does not exceed ten thousand dollars, (2) renewals of leases where there is no change in use of the real property, and (3) the sale, lease or transfer of real property acquired by the municipality by foreclosure.

Sec. 7-163e. Public hearing on the sale, lease or transfer of real property owned by a municipality. (a) The legislative body of a municipality, or in any municipality where the legislative body is a town meeting or representative town meeting, the board of selectmen, shall conduct a public hearing on the sale, lease or transfer of real property owned by the municipality prior to final approval of such sale, lease or transfer. Notice of the hearing shall be published in a newspaper having a general circulation in such municipality where the real property that is the subject of the hearing is located at least twice, at intervals of not less than two days, the first not more than fifteen days or less than ten days and the last not less than two days before the date set for the hearing. The municipality shall also post a sign conspicuously on the real property that is the subject of the public hearing.

(b) The provisions of subsection (a) of this section shall not apply to (1) sales of real property, except parkland, open space or playgrounds, if the fair market value of such property does not exceed ten thousand dollars, (2) renewals of leases where there is no change in use of the real property, and (3) the sale, lease or transfer of real property acquired by the municipality by foreclosure.

TOWN OF LEDYARD

Department of Land Use and Planning

Elizabeth J. Burdick, Director

741 Colonel Ledyard Highway, Ledyard, CT 06339

Telephone: (860) 464-3215, Fax: (860) 464-0098

Email: planner@ledyardct.org

MEMORANDUM

DATE: September 10, 2025
TO: Ledyard Planning & Zoning Commission
FROM: Liz Burdick, Director of Land Use & Planning
RE: **C.G.S. 8-24 Referral for Report to Town Council regarding Transfer of Town-Owned Property at 19 Avery Hill Road Ext. to Avalonia Land Conservancy to be Combined with Other Lands to be transferred to Avalonia**

Request is for a report to the Town Council in accordance with C.G.S. 8-24 regarding Transfer of Town-Owned Property at 19 Avery Hill Road Ext. known as the "Kettle Hole" property to Avalonia Land Conservancy to be combined with Other Lands of DDJJM LLC to be transferred to Avalonia at 173 Stoddards Wharf Road and 175 Stoddards Wharf Road.

19 Avery Hill Road Ext. (Parcel ID: 50/130/19), Ledyard, CT is a town-owned open space property located on about 5-acres (4.97+/- or 216,447SF +/-) in the R-60 zoning district.

A preliminary plan entitled "Property Survey, Proposed Lot Configuration Plan, Property of Town of Ledyard & DDJJM LLC, Avery Hill Road Extension & Stoddards Wharf Road (CT Route 214), Ledyard, CT, Prepared by Star Surveying, LLC, Dated 8/2/2025" depicts the shaded areas of lands of DDJJM LLC to be conveyed to Avalonia of about 30.30-acres +/- (1,319,715SF+/-), which includes 173 Stoddards Wharf Road in its entirety and the majority of 175 Stoddards Wharf Road. If approved by the Ledyard Town Council, town-owned 19 Avery Hill Road Ext. will be combined with said lands to create about 35-acres of contiguous open-space land stewarded by Avalonia.

Avalonia Board President Dennis Main will be in attendance at the 9/11/25 meeting to discuss possible future connections to open space and will answer Commissioner questions.

The following Motion is suggested for any favorable recommendation:

I make a Motion to forward a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 to the Ledyard Town Council regarding Transfer of Town-Owned Property at 19 Avery Hill Road Ext. known as the "Kettle Hole" property to Avalonia Land Conservancy to be combined with Other Lands of DDJJM LLC at 173 Stoddards Wharf Road & 75 Stoddards Wharf Road to be transferred to Avalonia.

If the PZC is inclined to send an unfavorable report, it shall state its reasons on the record.

Sec. 8-24. Municipal improvements. No municipal agency or legislative body shall (1) locate, accept, abandon, widen, narrow or extend any street, bridge, parkway or other public way, (2) locate, relocate, substantially improve, acquire land for, abandon, sell or lease any airport, park, playground, school or other municipally owned property or public building, (3) locate or extend any public housing, development, redevelopment or urban renewal project, or (4) locate or extend public utilities and terminals for water, sewerage, light, power, transit and other purposes, until the proposal to take such action has been referred to the commission for a report. Notwithstanding the provisions of this section, a municipality may take final action approving an appropriation for any proposal prior to the approval of the proposal by the commission pursuant to this section. The failure of the commission to report within thirty-five days after the date of official submission of the proposal to it for a report shall be taken as approval of the proposal. In the case of the disapproval of the proposal by the commission the reasons therefor shall be recorded and transmitted to the legislative body of the municipality. A proposal disapproved by the commission shall be adopted by the municipality or, in the case of disapproval of a proposal by the commission subsequent to final action by a municipality approving an appropriation for the proposal and the method of financing of such appropriation, such final action shall be effective, only after the subsequent approval of the proposal by (A) a two-thirds vote of the town council where one exists, or a majority vote of those present and voting in an annual or special town meeting, or (B) a two-thirds vote of the representative town meeting or city council or the warden and burgesses, as the case may be. The provisions of this section shall not apply to maintenance or repair of existing property, buildings or public ways, including, but not limited to, resurfacing of roads.

19 Avery Hill Rd Ext., Et Al

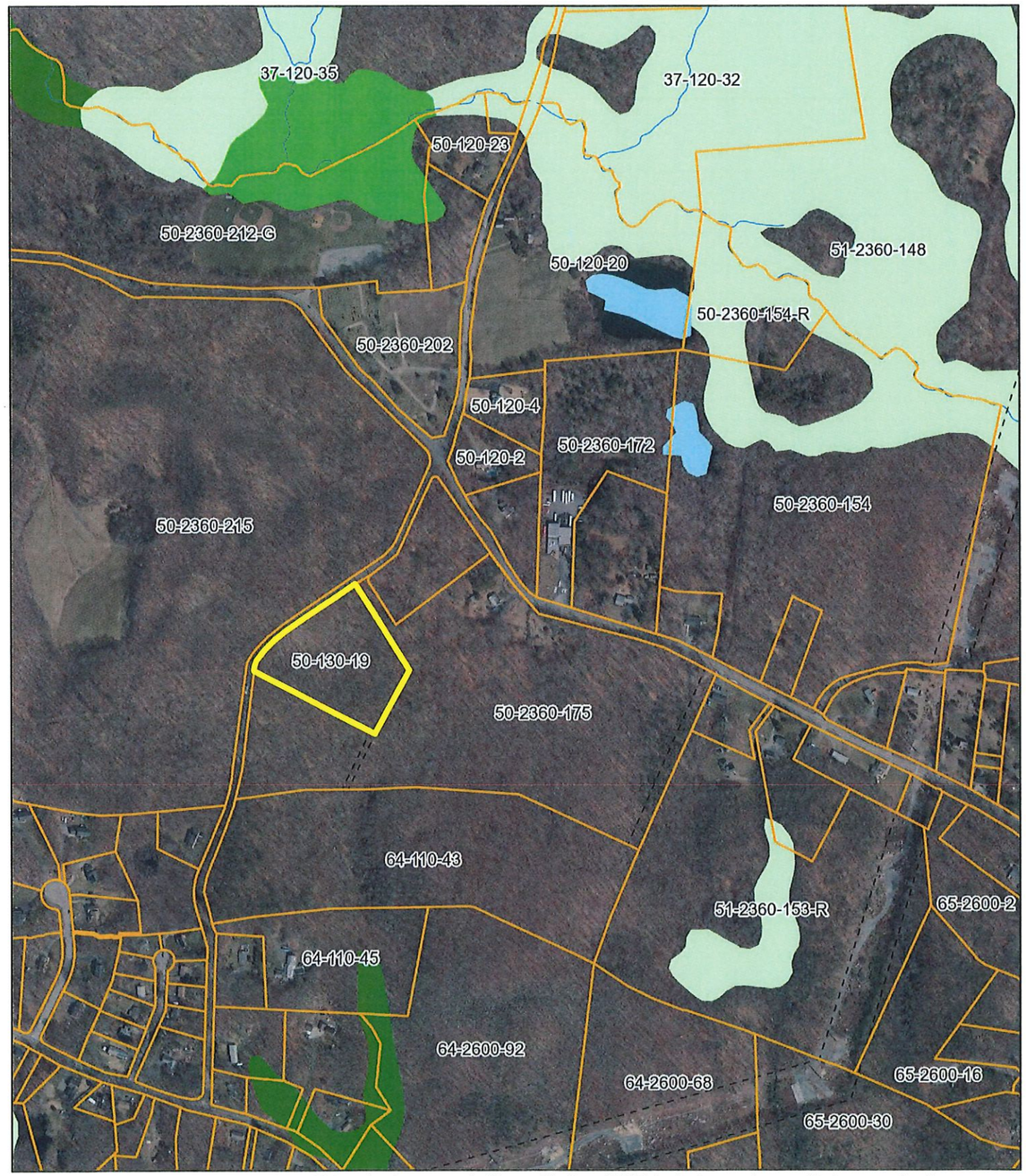
Ledyard, CT

1 inch = 565 Feet

0 565 1130 1695

September 10, 2025

CAI Technologies
Precision Mapping. Geospatial Solutions.
www.cai-tech.com



Data shown on this map is provided for planning and informational purposes only. The municipality and CAI Technologies are not responsible for any use for other purposes or misuse or misrepresentation of this map.

Property Location 19 AVERY HILL EXT | Map ID 50/ 130/ 19/ / | Bldg Name | State Use 9030
Vision ID 1624 | Account # 402915 | Bldg # 1 | Sec # 1 of 1 | Card # 1 of 1 | Print Date 12/19/2024 2:18:07 P

CURRENT OWNER
I TOWN OF LEDYARD
GLACIAL PARK
741 COLONEL LEDYARD HWY
LEDYARD CT 06339

TOPO		UTILITIES		STRT / ROAD		LOCATION	
2	Above Street			1	Paved	6	Recreation
8	Ledge						

SUPPLEMENTAL DATA

Alt Prcl ID	50-130-19	Solar Pane	
Sub-div		Generator	
Dev.Lot		Forest	
Survey#		Farm	
Elderly		MPT SB	
Census	07012		
GIS ID	1624	Assoc Pid#	

CURRENT ASSESSMENT

Description	Code	Appraised	Assessed
EX COM LN	21	100,500	70,350
	Total	100,500	70,350

6072
LEDYARD, CT

VISION

RECORD OF OWNERSHIP

BK-VOL/PAGE		SALE DATE	Q/U	V/I	SALE PRICE	VC
00130	0423	07-08-1983			0	

I TOWN OF LEDYARD

PREVIOUS ASSESSMENTS (HISTORY)

Year	Code	Assessed	Year	Code	Assessed V	Year	Code	Assessed
2023	21	70,350	2022	21	70,350	2021	21	70,350
Total		70,350	Total		70,350	Total		70,350

EXEMPTIONS

Year	Code	Description	Amount
		Total	0.00

OTHER ASSESSMENTS

Code	Description	Number	Amount	Comm Int

This signature acknowledges a visit by a Data Collector or Assessor

APPRAISED VALUE SUMMARY

Appraised Bldg. Value (Card)	0
Appraised Xf (B) Value (Bldg)	0
Appraised Ob (B) Value (Bldg)	0
Appraised Land Value (Bldg)	100,500
Special Land Value	0
Total Appraised Parcel Value	100,500
Valuation Method	C
Total Appraised Parcel Value	100,500

ASSESSING NEIGHBORHOOD

Nbhd	Nbhd Name	B	Tracing	Batch
0040				

NOTES

GLACIER PARK
SMALL POND

BUILDING PERMIT RECORD

Permit Id	Issue Date	Type	Description	Amount	Insp Date	% Comp	Date Comp	Comments

VISIT / CHANGE HISTORY

Date	Id	Type	Is	Cd	Purpost/Result
06-25-2020	DM			15	Reval Review
01-18-2001	BS			00	Measur+Listed
05-19-1992	KS	X		10	Letter Sent no response
09-23-1991	CM			00	Measur+Listed

LAND LINE VALUATION SECTION

B	Use Code	Description	Zone	Land Type	Land Units		Unit Price	Size Adj	Site Index	Cond.	Nbhd.	Nbhd. Adj	Notes	Location Adjustment		Adj Unit P	Land Value
1	903V	Municipal M00	R60		1.380	AC	72,000.00	0.75684	1	1.00	0050	1.000			1.0000	54,489.6	75,200
1	9030	Municipal M94	R60		2.760	AC	9,500.00	1.00000	0	0.90	0050	1.000	TOPO-STEEP		1.0000	8,550	23,600
1	9030	Municipal M94	R60		0.460	AC	4,700.00	1.00000	0	0.80	0050	1.000	TOPO		1.0000	3,760	1,700
		Total Card Land Units			5	AC	Parcel Total Land Area		5							Total Land Value	100,500

Property Location 19 AVERY HILL EXT | Map ID 50/ 130/ 19/ / | Bldg Name | State Use 9030
Vision ID 1624 | Account # 402915 | Bldg # 1 | Sec # 1 of 1 | Card # 1 of 1 | Print Date 12/19/2024 2:18:08 P

CONSTRUCTION DETAIL

Element	Cd	Description
Style:	99	Vacant Land
Model	00	Vacant
Grade:		
Stories:		
Occupancy		
Exterior Wall 1		
Exterior Wall 2		
Roof Structure:		
Roof Cover		
Interior Wall 1		
Interior Wall 2		
Interior Flr 1		
Interior Flr 2		
Heat Fuel		
Heat Type:		
AC Type:		
Total Bedrooms		
Total Bthrms:		
Total Half Baths		
Total Xtra Fixtrs		
Total Rooms:		
Bath Style:		
Kitchen Style:		

CONSTRUCTION DETAIL (CONTINUED)

Element	Cd	Description

MIXED USE

Code	Description	Percentage
903V	Municipal M00	100
		0
		0

COST / MARKET VALUATION

Building Value New	0
Adjusted Base Rate	
Year Built	0
Effective Year Built	0
Depreciation Code	
Remodel Rating	
Year Remodeled	
Depreciation %	
Functional Obsol	0
External Obsol	0
Trend Factor	1
Condition	
Condition %	0
Percent Good	
RCNLD	0
Dep % Ovr	
Dep Ovr Comment	
Misc Imp Ovr	
Misc Imp Ovr Comment	
Cost to Cure Ovr	
Cost to Cure Ovr Comment	

No Sketch

OB - OUTBUILDING & YARD ITEMS(L) / XF - BUILDING EXTRA FEATURES(B)

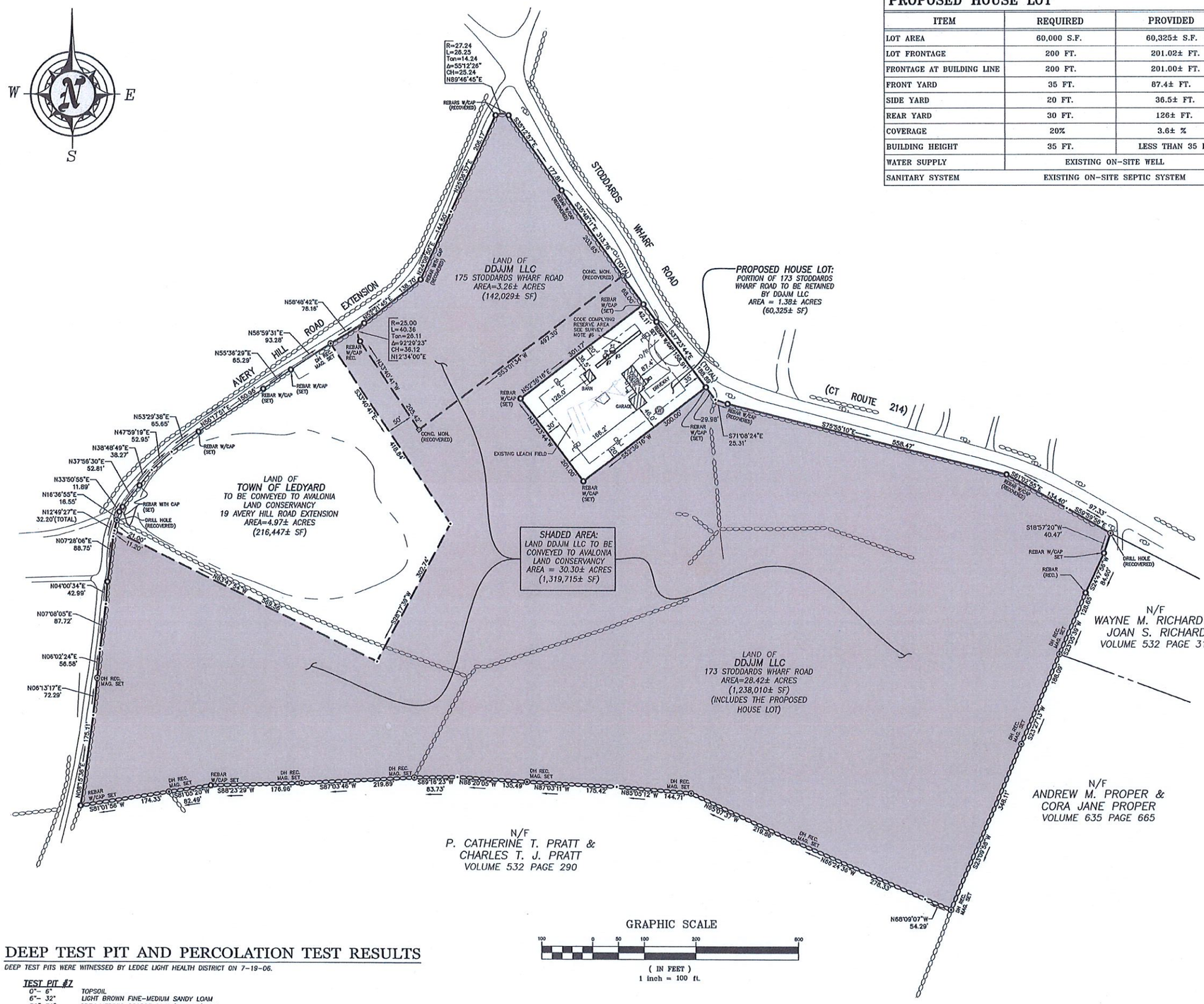
Code	Description	L/B	Units	Unit Price	Yr Blt	Cond. Cd	% Gd	Grade	Grade Adj.	Appr. Value

BUILDING SUB-AREA SUMMARY SECTION

Code	Description	Living Area	Floor Area	Eff Area	Unit Cost	Undeprec Value
	Ttl Gross Liv / Lease Area	0	0	0		0

ZONING COMPLIANCE TABLE ZONE: R60
PROPOSED HOUSE LOT

ITEM	REQUIRED	PROVIDED
LOT AREA	60,000 S.F.	60,325± S.F.
LOT FRONTAGE	200 FT.	201.02± FT.
FRONTAGE AT BUILDING LINE	200 FT.	201.00± FT.
FRONT YARD	35 FT.	87.4± FT.
SIDE YARD	20 FT.	36.5± FT.
REAR YARD	30 FT.	126± FT.
COVERAGE	20%	3.6± %
BUILDING HEIGHT	35 FT.	LESS THAN 35 FT.
WATER SUPPLY	EXISTING ON-SITE WELL	
SANITARY SYSTEM	EXISTING ON-SITE SEPTIC SYSTEM	


N
W
E
S
LAND OF
DDJJM LLC
175 STODDARDS WHARF ROAD
AREA=3.26± ACRES
(142,029± SF)
PROPOSED HOUSE LOT:
PORTION OF 173 STODDARDS WHARF ROAD TO BE RETAINED BY DDJJM LLC
AREA = 1.38± ACRES
(60,325± SF)
STODDARDS WHARF ROAD
(CT ROUTE 214)
AVERY HILL ROAD EXTENSION
AVERY HILL ROAD
LAND OF
TOWN OF LEDYARD
TO BE CONVEYED TO AVALONIA LAND CONSERVANCY
19 AVERY HILL ROAD EXTENSION
AREA=4.97± ACRES
(216,447± SF)
SHADED AREA:
LAND DDJJM LLC TO BE CONVEYED TO AVALONIA LAND CONSERVANCY
AREA = 30.30± ACRES
(1,319,715± SF)
LAND OF
DDJJM LLC
173 STODDARDS WHARF ROAD
AREA=28.42± ACRES
(1,238,010± SF)
(INCLUDES THE PROPOSED HOUSE LOT)
N/F
WAYNE M. RICHARD &
JOAN S. RICHARD
VOLUME 532 PAGE 310
N/F
ANDREW M. PROPER &
CORA JANE PROPER
VOLUME 635 PAGE 665
N/F
P. CATHERINE T. PRATT &
CHARLES T. J. PRATT
VOLUME 532 PAGE 290
GARAGE
BARN
DRIVEWAY
EXISTING LEACH FIELD
CONC. MON. (RECOVERED)
REBAR W/CAP (SET)
REBAR W/CAP (RECOVERED)
DRILL HOLE (RECOVERED)
DH REC. MAG. SET
REBAR (REC.)
R=27.24
L=26.23
Tan=14.24
Δ=55°12'26"
CH=25.24
N89°46'45"E
R=25.00
L=40.36
Tan=26.11
Δ=92°29'23"
CH=36.12
N12°34'00"E
S53°01'34"W 497.30'
S37°30'41"W 313.76'
S37°23'44"E 158.91'
S71°08'24"E 29.31'
S75°55'10"E 558.47'
S81°07'25"E 134.40'
S58°53'58"E 87.33'
S18°57'20"W 40.47'
S32°47'59"W 84.60'
S32°27'13"W 166.09'
S32°09'39"W 246.17'
S68°09'07"W 54.29'
N89°15'36"W 278.83'
N83°07'37"W 219.89'
N85°03'12"W 144.71'
N87°03'11"W 175.42'
S89°16'23"W 63.73'
N88°20'05"W 135.49'
S87°03'46"W 219.69'
N88°23'29"W 176.90'
S88°23'29"W 82.49'
N39°05'20"W 174.33'
S81°01'56"W 175.31'
N08°15'36"E 175.31'
N07°08'05"E 87.72'
N06°02'24"E 56.58'
N06°13'17"E 72.29'
N04°00'34"E 42.99'
N07°28'06"E 88.75'
N16°36'55"E 16.55'
N33°50'55"E 11.89'
N37°56'30"E 52.81'
N38°48'49"E 38.27'
N47°59'19"E 52.95'
N53°29'38"E 65.65'
N55°36'29"E 65.29'
N56°59'31"E 93.28'
N58°46'42"E 76.18'
N12°49'27"E 32.20'(TOTAL)
S37°40'41"E 208.17'
S52°19'19"W 144.80'
N52°19'19"E 136.20'
S52°19'19"W 160.08'
N53°30'41"W 235.42'
S37°40'41"E 188.64'
S36°27'29"W 302.24'
N53°27'54"W 88.56'
S39°17'29"E 208.17'
N39°17'29"W 208.17

OTES:

LAN AND THE SURVEY IT IS BASED ON HAVE BEEN PREPARED IN ACCORDANCE WITH THE ATIONS OF CONNECTICUT STATE AGENCIES, SECTIONS 20-300B-1 THROUGH 20-300B-20, "MINIMUM ARDS FOR SURVEYS AND MAPS IN THE STATE OF CONNECTICUT" ENDORSED BY THE CONNECTICUT IATION OF LAND SURVEYORS, INC. THE TYPE OF SURVEY IS A PERIMETER SURVEY, THE BOUNDARY MINATION CATEGORY IS DEPENDENT RESURVEY AND THE HORIZONTAL ACCURACY CONFORMS TO A-2.

CLARATION IS EXPRESSED OR IMPLIED BY THIS MAP OR COPIES THEREOF UNLESS THE PRINT BEARS IMPRESSION TYPE SEAL AND ORIGINAL LIVE SIGNATURE OF THE SURVEYOR WHOSE NAME AND RATION NUMBER APPEARS BELOW OR THEREON.

ENCE IS MADE TO THE FOLLOWING TOWN OF LEDYARD LAND EVIDENCE RECORDS:

TH REGARDS TO PARCEL #1:
E VOLUME 19 AT PAGE 178 FOR A WARRANTEE DEED DATED OCTOBER 23, 1950 REGARDING RECORD LE TO THIS PARCEL.

TH REGARDS TO PARCEL #2:
E VOLUME 19 AT PAGE 219 FOR A WARRANTEE DEED DATED MAY 28, 1951 REGARDING RECORD TITLE THIS PARCEL.

TH REGARDS TO PARCEL #3:
E VOLUME 19 AT PAGE 220 FOR A WARRANTEE DEED DATED MAY 28, 1951 REGARDING RECORD TITLE THIS PARCEL.

TH REGARDS TO PARCEL #4:
E VOLUME 19 AT PAGE 573 FOR A WARRANTEE DEED DATED JANUARY 24, 1955 REGARDING RECORD LE TO THIS PARCEL.

ROPERTY SHOWN HEREON IS SUBJECT TO, OR MAY BE BENEFITTED BY THE FOLLOWING:

E VOLUME 130 AT PAGE 423 FOR A 20' WIDE PEDESTRIAN EASEMENT CONVEYED BY RAYMOND G. MAIN ALTHEA L. MAIN TO THE TOWN OF LEDYARD DATED JULY 8, 1993.

UBJECT PROPERTY IS LOCATED ENTIRELY WITHIN THE R-80 ZONE DISTRICT.

NAL FLOOD INSURANCE PROGRAM FLOOD INSURANCE RATE MAP TOWN OF LEDYARD, CTICUT NEW LONDON COUNTY PANEL 15 OF 20, COMMUNITY-PANEL NUMBER 090157C015B, MAP TIVE DATE: APRIL 1, 1991, FEDERAL EMERGENCY MANAGEMENT AGENCY" INDICATES THE SUBJECT RTY IS LOCATED ENTIRELY WITHIN FLOOD HAZARD ZONE C.

UBJECT PROPERTY IS SHOWN ON THE TOWN OF LEDYARD TAX ASSESSOR MAP 50 AS LOT 173 AS AN ASSIGNED STREET ADDRESS OF 173 & 175 STODDARDS WHARF ROAD.

ASIS FOR BEARINGS IS APPROXIMATE GRID NORTH.

PLAN REPRESENTS THE LOCATION OF THE BOUNDS AND SITE CONDITIONS DETERMINED BY FIELD Y ON JUNE 13, 2006. RECORD TITLE AND ADJOINER INFORMATION WAS OBTAINED FROM TAX SSOR AND LAND EVIDENCE RECORDS ON JUNE 13, 2006.

RGROUND UTILITY, STRUCTURE AND FACILITY LOCATIONS DEPICTED AND NOTED HEREON HAVE COMPILED, IN PART, FROM RECORD MAPPING SUPPLIED BY THE RESPECTIVE UTILITY COMPANIES OR RNMENTAL AGENCIES, FROM PAROLE TESTIMONY AND FROM OTHER SOURCES. THESE LOCATIONS MUST NSIDERED AS APPROXIMATE IN NATURE. ADDITIONALLY, OTHER SUCH FEATURES MAY EXIST ON THE THE EXISTENCE OF WHICH ARE UNKNOWN TO JAMES BERNARDO LAND SURVEYING, LLC. THE SIZE, ION AND EXISTENCE OF ALL SUCH FEATURES MUST BE FIELD DETERMINED AND VERIFIED BY THE OPRIATE AUTHORITIES PRIOR TO CONSTRUCTION. CALL BEFORE YOU DIG 1-800-922-4455.

RENCES:

SHOWING TRACTS OF LAND TO BE ACQUIRED BY THE TOWN OF LEDYARD AVERY HILL EXT. RD, CONNECTICUT JUNE 1980 BY GEORGE H. DIETER LS

SHOWING MELANSON RESUBDIVISION OWNER/APPLICANT: WILLIAM MELANSON STODDARDS WHARF AKA CONNECTICUT ROUTE 214 LEDYARD, CONNECTICUT SEPTEMBER 28, 2004 REVISED 11-18-04 BY OK-MEREEN LLC.

SHOWING PROPOSED HOUSE AND BUILDING LOT FOR RAYMOND G. MAIN & ALTHEA L. MAIN IN THE OF LEDYARD SCALE 1"=20'.

SUBDIVISION NOTES:

1. PURSUANT TO SECTION 8-25(b) OF THE CONNECTICUT GENERAL STATUTES PASSIVE SOLAR ENERGY TECHNIQUES HAVE BEEN CONSIDERED IN THE DESIGN OF THIS SUBDIVISION.
2. LOT MONUMENTS ARE TO BE SET AT ALL CORNERS IN ACCORDANCE WITH SECTION 5.4.3 OF THE LEDYARD SUBDIVISION REGULATIONS.
3. THE POTENTIAL HOUSE LOCATION, DRIVEWAY AND SEPTIC AREA IS SHOWN ONLY TO DEPICT A POTENTIAL LOCATION AND SITE SUITABILITY. FINAL LOCATIONS WILL BE DETERMINED AT TIME OF APPLICATION FOR BUILDING PERMIT.
4. COMBINED
5. TOTAL AREA OF SUBDIVISION = 31.68 ACRES M/L.
6. NO OPEN SPACE IS PROPOSED FOR THIS APPLICATION; HOWEVER THE PROPERTY OWNER PROPOSES TO DEDICATE A PERPETUAL OPEN SPACE EASEMENT CORRIDOR NOT LESS THAN 50' IN WIDTH ACROSS THE SOUTHEASTERLY BOUNDARY OF THE PROPERTY AS SHOWN.

APPROVED BY THE LEDYARD PLANNING COMMISSION AS TO COMPLIANCE WITH THE REGULATIONS GOVERNING THE SUBDIVISION OF LAND. ALL IMPROVEMENTS SHALL BE COMPLETED BY _____

_____
CHAIRMAN OR SECRETARY

IWWC APPLICATION # _____

_____ APPROVED, _____ (DATE)

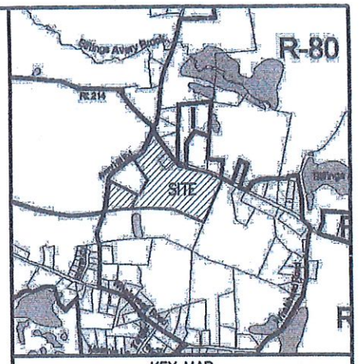
_____ NO PERMIT NECESSARY. (NOT WITHIN REGULATED AREA.)

_____ NOT APPLICABLE AT THIS TIME. (WITHIN A REGULATED AREA; NO REGULATED ACTIVITY PROPOSED AT THIS TIME.)

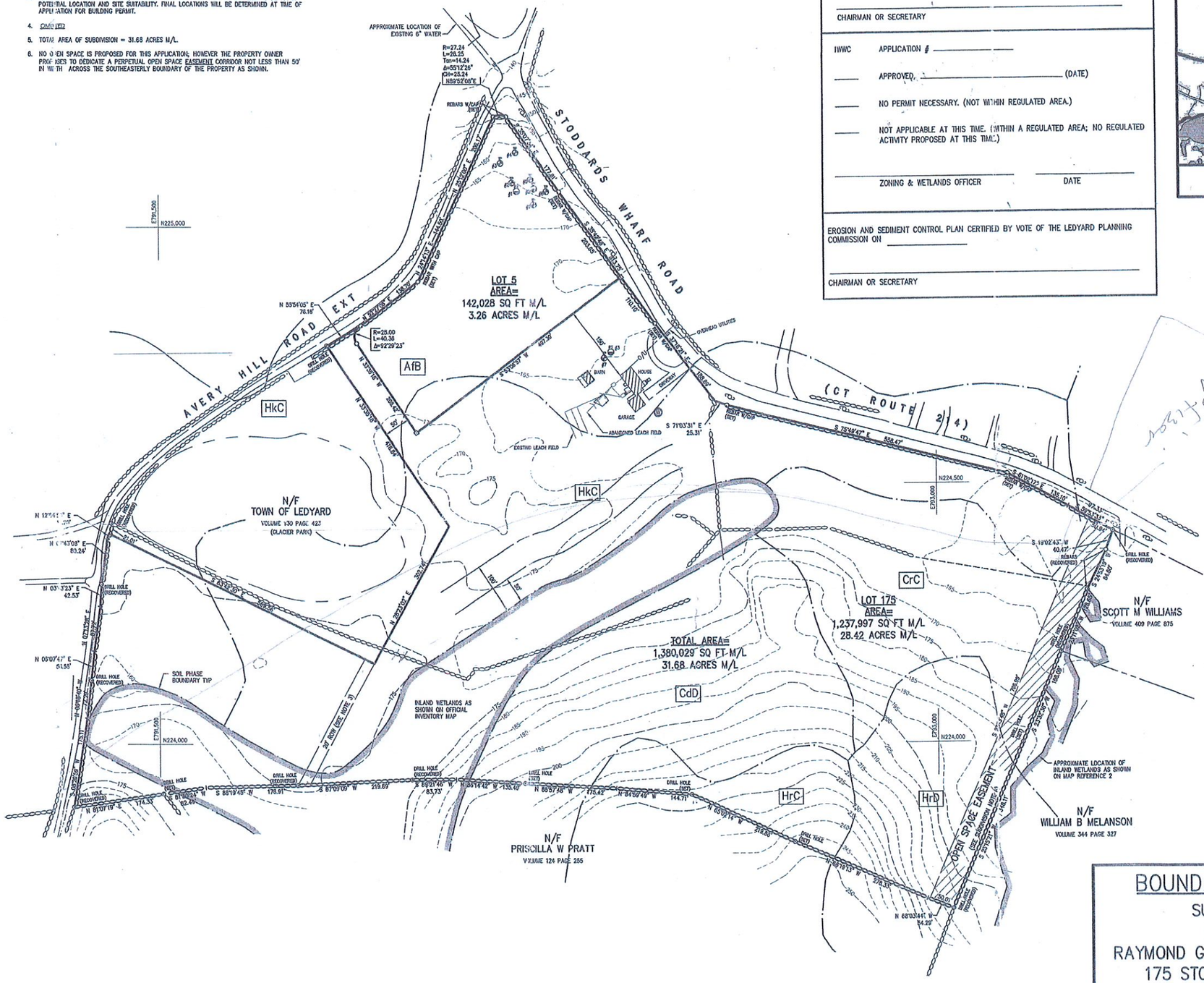
_____ _____
ZONING & WETLANDS OFFICER DATE

EROSION AND SEDIMENT CONTROL PLAN CERTIFIED BY VOTE OF THE LEDYARD PLANNING COMMISSION ON _____

_____
CHAIRMAN OR SECRETARY



KEY MAP
SCALE: 1"=1000'



BOUNDARY SURVEY MAP

SUBDIVISION PLAN
PROPERTY OF
RAYMOND G. MAIN & ALTHEA L. MAIN
175 STODDARDS WHARF ROAD
(CONNECTICUT ROUTE 214)
& AVERY HILL ROAD EXTENSION
LEDYARD, CONNECTICUT

DATE: SCALE:

A-2 Maps and Surveys
Engineering & Surveying
David A. King, PE
57 Norwich Road (Rte 82)
Hackdale, CT 06370

LEGEND
THE FOLLOWING SYMBOLS/ABBREVIATIONS MAY APPEAR ON THIS DRAWING

AC	ACRES
BIT	BITUMINOUS
BCLC	BITUMINOUS CONCRETE LIP CURBING
CONC	CONCRETE
DIA	DIAMETER
DB	DISTRIBUTION BOX
EOP	EDGE OF PAVEMENT
ELEV	ELEVATION
LF	LINEAR FOOT
(MIN)	MINIMUM
M/L	MORE OR LESS
N/F	NOW OR FORMERLY
PVC	POLY VINYL CHLORIDE
SCH40	SCHEDULE 40
5.4x	SPOT ELEVATION
SF	SQUARE FEET
TR	TO REMAIN
TBR	TO BE REMOVED
TYP	TYPICAL
P-5	SOIL PERC TEST LOCATION
TH8	SOIL DEEP TEST LOCATION
W	WELL
	BUILDING SETBACK LINE
	CLEARING LIMIT LINE
	EXISTING TREELINE
158	EXISTING CONTOUR
158	NEW CONTOUR
	SEDIMENT FENCE
	STORM DRAIN PIPE
	STONE WALL

TO THE BEST OF MY KNOWLEDGE AND BELIEF THIS MAP IS SUBSTANTIALLY CORRECT AS NOTED HEREON.

JAMES BERNARDO LAND SURVEYING, LLC
102A SPITHEAD ROAD
WATERFORD, CONNECTICUT 06385

GRAPHIC SCALE
100 0 50 100 200 400

4	10/09/07	NO REVISIONS TO THIS SHEET	JB
3	7/19/07	SUBDIVISION NOTE 4 REMOVED	JB
		NO REVISIONS TO THIS SHEET	JB

TOWN OF LEDYARD
Department of Land Use and Planning
Elizabeth J. Burdick, Director
741 Colonel Ledyard Highway, Ledyard, CT 06339
Telephone: (860) 464-3215
Email: planner@ledyardct.org

September 15, 2025

Gary St. Vil, Chairman
Ledyard Town Council
741 Colonel Ledyard Highway
Ledyard, CT 06339

RE: C.G.S. 8-24 Referral – 19 Avery Hill Rd Ext. (Parcel ID: 50/130/19), Ledyard, CT – Transfer of Town-Owned Open Space property (Kettle Hole) to Avalonia Land Conservancy to be combined with property at 173 & 175 Stoddards Wharf Road owned by DDJJM, LLC also to be transferred to Avalonia Land Conservancy.

Dear Chairman St. Vil,

The Ledyard Planning & Zoning Commission, at its September 11, 2025 regular meeting, voted unanimously to forward a FAVORABLE REPORT in accordance with C.G.S. §8-24 to the Town Council for a MOTION to transfer town-owned property located at 19 Avery Hill Rd Ext. (Parcel ID: 50/130/19), Ledyard, CT to the Avalonia Land Conservancy ("Avalonia") to be combined with property at 173 & 175 Stoddards Wharf Road owned by DDJJM, LLC also to be transferred to Avalonia.

Please contact me at Town Hall with any questions. Thank you for your attention to this matter.

Sincerely,
Elizabeth J. Burdick
Director of Land Use & Planning

C: Roxanne Maher, Administrative Asst. to the Town Council
Dennis Main, President, Avalonia Land Conservancy
Marcelle Wood, Chairman, Ledyard Planning & Zoning Commission
Fred Allyn III, Mayor
Anna Wynn, Asst. to Director Land Use
Hannah Gienau, ZWBEO
File – Land Use Dept.

TOWN OF LEDYARD

Department of Land Use and Planning

Elizabeth J. Burdick, Director

741 Colonel Ledyard Highway, Ledyard, CT 06339

Telephone: (860) 464-3215, Fax: (860) 464-0098

Email: planner@ledyardct.org

MEMORANDUM

DATE: September 8, 2025
TO: Ledyard Planning & Zoning Commission
FROM: Liz Burdick, Director of Land Use & Planning
RE: **C.G.S. 8-24 Referral for Report to Town Council regarding Transfer of Town-Owned Property to Avalonia Land Conservancy to be Combined with Pike Marshall Preserve**

Request is for a report to the Town Council in accordance with C.G.S. 8-24 regarding the transfer of Town-Owned Property to Avalonia Land Conservancy to be Combined with Pike Marshall Preserve located at 104 Gallup Hill Road (Parcel ID: 85-810-104), Ledyard, CT.

13 Applewood Drive (Parcel ID: 99/530/13), Ledyard, CT is a "Park, Open Space and Recreational Purposes" parcel conveyed to the Town of Ledyard and is shown as Lot 13 on a plan entitled "Plan showing Applewood Estate Resubdivision – Property of Applewood Estates, LLC – Colonel Ledyard Highway – Ledyard, CT – Scale 1"=40' – April 2004, Revised September 16, 2024 – Sheet 3 of 11 – Dieter, Gardner & Mereen, Inc. – Land Surveying" and further described in a Warranty Deed filed on the Ledyard Land Records in Volume 435, Page 189.

The existing Avalonia Pike Marshall Preserve is located on about 272-acres and includes 104 Gallup Hill Road, 104R Gallup Hill Road, 199 Lambtown Road, 489 Pumpkin Hill Road and 480 Pumpkin Hill Road. 13 Applewood Drive Open Space parcel would add an additional 1.70-acres to the existing preserve and Avalonia Land Conservancy would become stewards of the land. Avalonia Board President Dennis Main will be in attendance at the meeting and will answer Commissioner questions.

The following Motion is suggested for any favorable recommendation:

I make a Motion to forward a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 to the Ledyard Town Council regarding the transfer of Town-Owned Property to Avalonia Land Conservancy to be combined with its existing Pike Marshall Preserve, Ledyard, CT.

If the PZC is inclined to send an unfavorable report, it shall state its reasons on the record.

Sec. 8-24. Municipal improvements. No municipal agency or legislative body shall (1) locate, accept, abandon, widen, narrow or extend any street, bridge, parkway or other public way, (2) locate, relocate, substantially improve, acquire land for, abandon, sell or lease any airport, park, playground, school or other municipally owned property or public building, (3) locate or extend any public housing, development, redevelopment or urban renewal project, or (4) locate or extend public utilities and terminals for water, sewerage, light, power, transit and other purposes, until the proposal to take such action has been referred to the commission for a report. Notwithstanding the provisions of this section, a municipality may take final action approving an appropriation for any proposal prior to the approval of the proposal by the commission pursuant to this section. The failure of the commission to report within thirty-five days after the date of official submission of the proposal to it for a report shall be taken as approval of the proposal. In the case of the disapproval of the proposal by the commission the reasons therefor shall be recorded and transmitted to the legislative body of the municipality. A proposal disapproved by the commission shall be adopted by the municipality or, in the case of disapproval of a proposal by the commission subsequent to final action by a municipality approving an appropriation for the proposal and the method of financing of such appropriation, such final action shall be effective, only after the subsequent approval of the proposal by (A) a two-thirds vote of the town council where one exists, or a majority vote of those present and voting in an annual or special town meeting, or (B) a two-thirds vote of the representative town meeting or city council or the warden and burgesses, as the case may be. The provisions of this section shall not apply to maintenance or repair of existing property, buildings or public ways, including, but not limited to, resurfacing of roads.

13 Applewood Drive Open Space

Ledyard, CT

1 inch = 565 Feet

September 8, 2025

0 565 1130 1695

CAI Technologies
Precision Mapping Geospatial Solutions
www.cai-tech.com



Data shown on this map is provided for planning and informational purposes only. The municipality and CAI Technologies are not responsible for any use for other purposes or misuse or misrepresentation of this map.

INSTR # 2007000121 VOL 00435 PG 0189 RECD 01/16/2007 09:17:37 AM
CALVIN K. BRDUWER TOWN CLERK LEDYARD CT
NO CONVEYANCE TAX

WARRANTY DEED - STATUTORY FORM

APPLEWOODS ESTATES, LLC, a Connecticut Limited Liability Company, having its principal place of business at 850 Gold Star Highway, Groton, Connecticut, hereinafter referred to as the GRANTOR for consideration paid, grants to **TOWN OF LEDYARD**, a municipal corporation within the State of Connecticut, herein referred to as the GRANTEE, with WARRANTY COVENANTS

A certain parcel of land for all PARK, OPEN SPACE AND RECREATIONAL PURPOSES located in the Town of Ledyard, County of New London and State of Connecticut, being more particularly bounded and described as follows:

All that certain parcel of land shown as "Open Space", also known as 13 Applewood Drive, on a map entitled "Plan Showing Applewood Estates Resubdivision – Property of Applewood Estates LLC – Colonel Ledyard Highway – Ledyard, Connecticut – Scale: 1" = 40' - April 2004 Revised September 16, 2004 - Sheet 3 of 11 - Dieter, Gardner & Mereen, Inc. – Land Surveying," which map is filed as Map # 2289 with the Ledyard Town Clerk. Said open space area is more particularly bounded and described as follows:

Begin at a point on the northerly line of Applewood Drive, which point marks the southwesterly corner of the access strip of Lot 11 as shown on said map, and thence run N 51° 12' 00" E, along said access strip, a distance of 370.00' to a point; thence run N 31° 00' 27" E, along said access strip, a distance of 94.67' to a point; thence run S 65° 12' 13" E, along the southerly boundary of Lot 11 as shown on said map, a distance of 265.67' to a point marked by a drill hole at the southeasterly corner of Lot 11; thence run S 36° 18' 33" W, along land now or formerly of Nature Conservancy of Connecticut, Inc., a distance of 181.22' to a point marked by a drill hole; thence run S 37° 18' 48" W, along said Nature Conservancy land, a distance of 115.21' to a point marked by a drill hole; thence run S 29° 42' 10" W, along said Nature Conservancy land a distance of 10.06' to a point marked by a drill hole; thence run S 41° 39' 06" W, along said Nature Conservancy land, a distance of 37.73' to a point marked by a drill hole; thence run S 34° 44' 47" W, along said Nature Conservancy land, a distance of 51.36' to a point marked by a drill hole; thence run N 17° 34' 04" W, along the northeasterly boundary of Lot 15 as shown on said map, a distance of 315.40' to a point; thence run S 51 12' 00" W, along the northwesterly boundary of Lot 15 as shown on said map, a distance of 309.82' to a point in the northerly line of Applewood Drive; thence along the northerly line of Applewood Drive, on the arc of a curve to the left having a radius of 325.00', a distance of 10.10' to the point and place of beginning.

Said Open Space parcel contains 74,060 s.f. or 1.70 acres.

Dated this 16th day of May 2006.

Witnessed by:

APPLEWOODS ESTATES, LLC

Peter W. Hoops

By Peter R. Lampasona
Peter R. Lampasona
Duly Authorized Member

Witness

HOOPS & JENSEN, LLC
attorneys at law

19A Thames Street,
Groton, CT 06340
Tel. (860) 445-8911
Or
Fax (860) 445-8919

JURIS No. 306839

STATE OF CONNECTICUT

ss: Groton May 16th, 2006

COUNTY OF NEW LONDON

Personally appeared **PETER R. LAMPASONA,** a duly authorized Member of **APPLEWOODS ESTATES, LLC,** signer and sealer of the foregoing instrument, and acknowledged the same to be his free act and deed and the free act and deed of the Limited Liability Company, before me.

PETER W. HOOPS
Commissioner of the Superior Court

Grantee's mailing address: 850 Gold Star Highway, Groton, Connecticut 06340

HOOPS & JENSEN, LLC
attorneys at law

19A Thames Street,
Groton, CT 06340
Tel. (860) 445-3911
Or
Fax (860) 445-8919

JURIS No. 306539

2292

Rec'd 11-26-04 at 9:52 AM
Attest:

N/F
OUTBACK REALTY LLC

N/F
DEBORAH L. NAYLOR

N/F
NATURE CONSERVANCY OF CONNECTICUT INC.

APPROVED BY THE LEDYARD PLANNING COMMISSION AS TO THE COMPLIANCE WITH THE REGULATIONS GOVERNING THE SUBDIVISION OF LAND.
ALL IMPROVEMENTS SHALL BE COMPLETED BY 10/21/2009 DATE
COMMISSION SECRETARY 11/1/2004 DATE
LOT NUMBERS ASSIGNED BY THE ASSESSOR
ASSESSOR 11/1/2004 DATE
APPROVED IWWC CHAIRMAN DATE
— NOT APPLICABLE, NOT WITHIN A REGULATED AREA.
— NOT APPLICABLE AT THIS TIME (WITHIN A REGULATED AREA; NO REGULATED ACTIVITY PROPOSED AT THIS TIME)
IWWC PERMIT No. 10-04
IWWC ENFORCEMENT OFFICER 11/4/2004 DATE
APPROVED BY THE DIRECTOR OF PUBLIC WORKS OR THE TOWN ENGINEER FOR PUBLIC ROAD LAYOUT
PUBLIC WORKS DIRECTOR/TOWN ENGINEER 11/8/04 DATE

I DELINEATED THE INLAND WETLAND AND WATERCOURSE BOUNDARY ON THIS PROPERTY. I AM OF THE OPINION THAT THE WETLAND BOUNDARY WHICH I MARKED ON THE PROPERTY IS SHOWN CORRECTLY ON THIS MAP.
DONALD J. FORTUNATY
CERTIFIED SOIL SCIENTIST

DRAWING NUMBER

DRAWING NUMBER

DRAWING NUMBER 2292

LEGEND

- STONE WALL
- PROPERTY LINE
- STREET LINE
- BUILDING SETBACK LINE
- EXISTING CONTOUR
- PROPOSED SILT FENCE
- EDGE OF WETLANDS & FLAG NUMBER
- UTILITY POLE
- APPROXIMATE TEST PIT LOCATION
- H PROPOSED HOUSE
- W PROPOSED WELL LOCATION
- P PRIMARY SEPTIC AREA
- R RESERVE SEPTIC AREA
- FD FOOTING DRAIN
- TS TOPSOIL STOCKPILE

THE WORD "CERTIFY" IS UNDERSTOOD TO BE AN EXPRESSION OF THE PROFESSIONAL OPINION BY THE LAND SURVEYOR WHICH IS BASED ON HIS OR HER BEST KNOWLEDGE, INFORMATION AND BELIEF, AS SUCH IT CONSTITUTES NEITHER GUARANTEE OR WARRANTY.

THE STONE WALLS AND/OR FENCES SHOWN AS BOUNDARIES MAY HAVE IRREGULARITIES OF COURSE BETWEEN PRINCIPAL POINTS OF COURSE INDICATED

© THIS DRAWING IS THE PROPERTY OF THE LAND SURVEYOR. THIS PLAN AND REPRODUCTIONS, ADDITIONS OR REVISIONS OF THIS PLAN ARE NOT VALID WITHOUT THE EXPOSED SEAL AND SIGNATURE OF THE LAND SURVEYOR WHO PREPARED THIS PLAN.
JOB # 03-10131019567

SHEET 6 OF 11

GRAPHIC SCALE
(IN FEET)
1 inch = 40 ft.

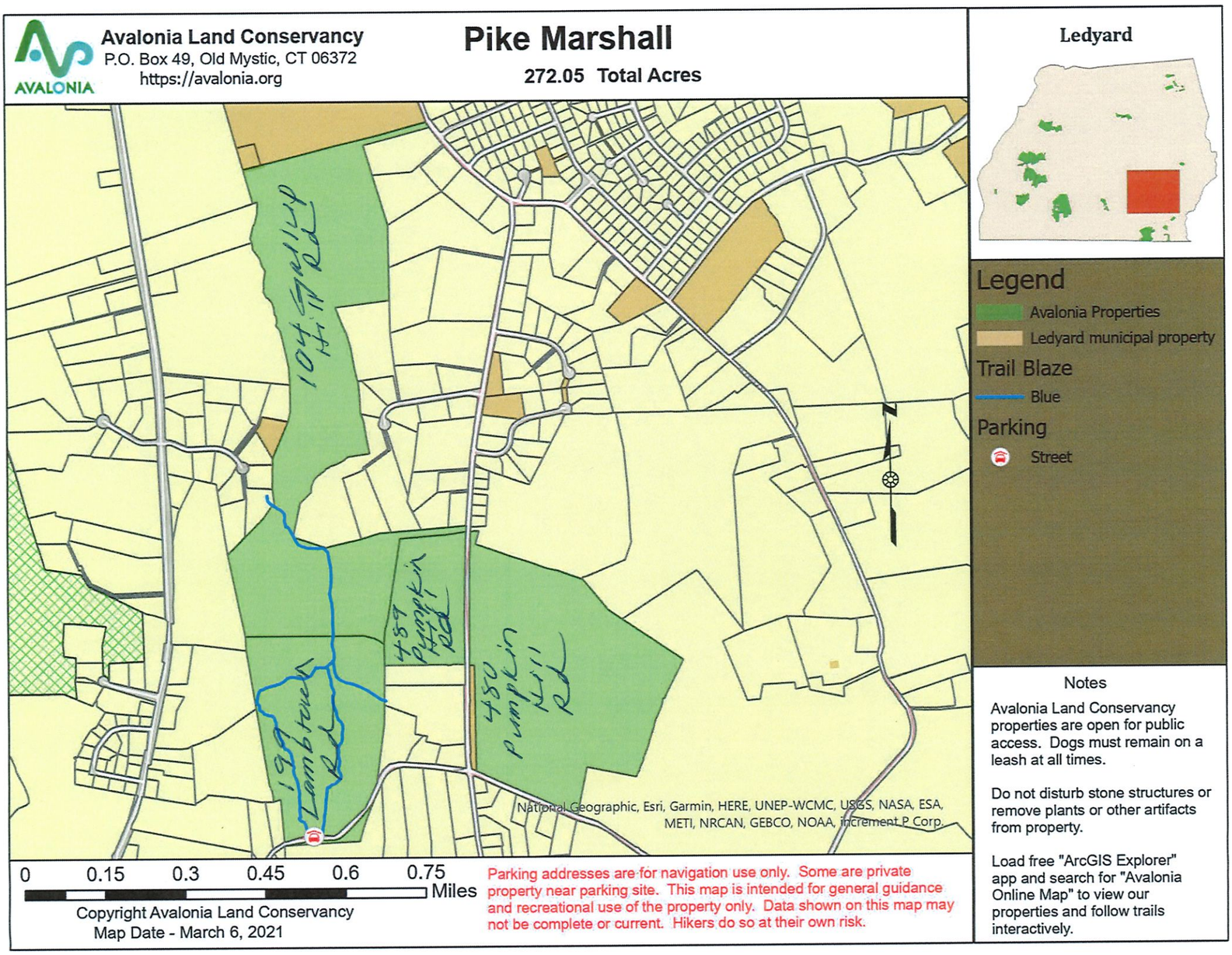
DIETER GARDNER & MEREEN, INC.
LAND SURVEYING • PLANNING
ENGINEERING
19 MILITARY HIGHWAY
BALES FERRY, CT 06335
PH (860) 464-7455
FAX (860) 464-5088
DIETER.GARDNER@SNET.NET

PLAN SHOWING
APPLEWOOD ESTATES RESUBDIVISION
PROPERTY OF
APPLEWOOD ESTATES LLC
COLONEL LEDYARD HIGHWAY
LEDYARD, CONNECTICUT
SCALE: 1"=40'
APRIL 2004
REVISED: SEPTEMBER 16, 2004 PER CONDITIONS OF APPROVAL

THIS SURVEY AND MAP HAS BEEN PREPARED IN ACCORDANCE WITH SECTIONS 20-300b-1 THRU 20-300b-20 OF THE REGULATIONS OF CONNECTICUT STATE AGENCIES - "MINIMUM STANDARDS FOR SURVEYS AND MAPS IN THE STATE OF CONNECTICUT" AS ENDORSED BY THE CONNECTICUT ASSOCIATION OF LAND SURVEYORS, INC. AND IS A CLASS A SURVEY BASED ON A RESURVEY CONFORMING TO HORIZONTAL ACCURACY CLASS A-2. TO THE BEST OF MY KNOWLEDGE AND BELIEF, THIS MAP IS SUBSTANTIALLY CORRECT AS NOTED HEREON.

TITLE: LAND SURVEYOR CT No. 11328
DATE: APRIL 9, 2004

2292


Avalonia Land Conservancy
P.O. Box 49, Old Mystic, CT 06372
https://avalonia.org
AVALONIA
Pike Marshall
272.05 Total Acres
104 Gallup Hill Rd
451 Pumpkin Hill Rd
450 Pumpkin Hill Rd
190 Lambstown Rd
National Geographic, Esri, Garmin, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.
0 0.15 0.3 0.45 0.6 0.75 Miles
Copyright Avalonia Land Conservancy
Map Date - March 6, 2021
Parking addresses are for navigation use only. Some are private property near parking site. This map is intended for general guidance and recreational use of the property only. Data shown on this map may not be complete or current. Hikers do so at their own risk.
Ledyard
Legend
Avalonia Properties
Ledyard municipal property
Trail Blaze
Blue
Parking
Street
Notes
Avalonia Land Conservancy properties are open for public access. Dogs must remain on a leash at all times.
Do not disturb stone structures or remove plants or other artifacts from property.
Load free "ArcGIS Explorer" app and search for "Avalonia Online Map" to view our properties and follow trails interactively.

Pike Marshall Preserve

AVALONIA TRAIL FINDER

Town: Ledyard

Maintained Uses: walking, hiking, running, biking, horseback riding

Difficulty: moderate

Length: 4.0 +/- miles (blue blaze marked)

Type: point to point and loop

Surface: packed earth/dirt, bridle trails, old farm roads

Pets: permitted (dogs on leash)

Year Preserved: 1969

Acres: 272.05 (Pike Tract 159.97 acres, Hugh A Marshall Tract 100.00 acres, Mummert Tract 12.08)

Lat.: 41°24'49.4"N
Long.: 71°59'22.1"W

MAP **GET DIRECTIONS** **HIKE & SEEK**

Trails have been in existence upon acquisition by The Nature Conservancy of the first tracts in 1969 and accommodate walkers, bikers, runners and horseback riding. The main south to north trail is about 2 miles long and runs from the Lambtown Road pull-off parking area to the tennis courts on the Burton Tract. The trailhead is located on the north side of Lambtown Road (199) on the west tract of the Pike Preserve about .6 miles east of the Lambtown Road/Colonel Ledyard Highway intersection. The trail runs north through the Pike Preserve, the Hugh A. Marshall Preserve and the Burton Tract to a path behind the Ledyard High School tennis courts. The connector legs from Pike Marshall Preserve to the Burton Tract trails are not complete yet. The trail is blazed with (blue) markers. There are also overgrown unmarked trails on the east and west Pike Preserve tracts. Pets are permitted (dogs on leash).

TOWN OF LEDYARD

Department of Land Use and Planning

Elizabeth J. Burdick, Director

741 Colonel Ledyard Highway, Ledyard, CT 06339

Telephone: (860) 464-3215

Email: planner@ledyardct.org

September 15, 2025

Gary St. Vil, Chairman
Ledyard Town Council
741 Colonel Ledyard Highway
Ledyard, CT 06339

RE: C.G.S. 8-24 Referral – 13 Applewood Drive (Parcel ID: 99-530-13), Ledyard, CT – Transfer of Town-Owned Open Space property to Avalonia Land Conservancy to be combined with the Avalonia "Pike Marshall Preserve".

Dear Chairman St. Vil,

The Ledyard Planning & Zoning Commission, at its September 11, 2025 regular meeting, voted unanimously to forward a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 to the Town Council for a MOTION to transfer town-owned property located at 13 Applewood Drive (Parcel ID: 99-530-13), Ledyard, CT to the Avalonia Land Conservancy ("Avalonia") to be combined with the Avalonia "Pike Marshall Preserve" and to remain open to the public for passive recreation and to be protected in perpetuity under Avalonia's care. The following recommendation was made as a condition to said favorable approval: 1. The 10-foot wide access to the property shall be clearly marked in the field by a Land Surveyor engaged by Avalonia, and 2. Appropriate signage identifying the open space parcel shall be installed by Avalonia.

Please contact me at Town Hall with any questions. Thank you for your attention to this matter.

Sincerely,

Elizabeth J. Burdick

Director of Land Use & Planning

C: Roxanne Maher, Administrative Asst. to the Town Council
Dennis Main, President, Avalonia Land Conservancy
Marcelle Wood, Chairman, Ledyard Planning & Zoning Commission
Fred Allyn III, Mayor
Anna Wynn, Asst. to Director Land Use
Hannah Gienau, ZWBEO
File – Land Use Dept.

Roxanne Maher

From: Elizabeth Burdick
Sent: Tuesday, September 16, 2025 7:35 AM
To: Roxanne Maher
Cc: Fred Allyn, III
Subject: RE: CGS Section 8-24 - Transfer of 19 Avery Hill Road Ext. to Avalonia Land Conservancy

9/16/25 Good morning, Roxanne, I believe this is a “no (money) consideration” for this transfer, however, Avalonia will take over stewardship of the property and maintain any trails, wetlands crossings, etc. I hope this addresses your question. Thanks!

Liz Burdick, Director of Land Use & Planning
Town of Ledyard
741 Colonel Ledyard Highway, Ledyard, CT 06339
Telephone: (860) 464-3215
Email: planner@ledyardct.org

From: Roxanne Maher <council@ledyardct.org>
Sent: Tuesday, September 16, 2025 7:30 AM
To: Elizabeth Burdick <planner@ledyardct.org>
Cc: Fred Allyn, III <mayor@ledyardct.org>; Roxanne Maher <council@ledyardct.org>
Subject: FW: CGS Section 8-24 - Transfer of 19 Avery Hill Road Ext. to Avalonia Land Conservancy

Good Morning Liz:

Thank you for providing the Planning & Zoning Commission’s Report regarding the transfer of town-owned open space
Located at 19 Avery Hill road Extension to Avalonia Land Conservancy to be combined with open space currently owned
by Avalonia Land Conservancy..

Do you know if Avalonia will be providing any payment to the town for the property, or whether this transfer would be for
“ No Consideration”

Thank you,
Roxanne

From: Elizabeth Burdick <planner@ledyardct.org>
Sent: Monday, September 15, 2025 4:52 PM
To: Roxanne Maher <council@ledyardct.org>; Gary St. Vil <GSVil@ledyardct.org>
Cc: Anna Wynn <land.use.asst@ledyardct.org>; Hannah Gienau <zoning.official@ledyardct.org>; Fred Allyn, III <mayor@ledyardct.org>; martyengrew@gmail.com
Subject: CGS Section 8-24 - Transfer of 19 Avery Hill Road Ext. to Avalonia Land Conservancy

9/15/25 Good afternoon, Roxanne, Attached please find a Favorable Report to the Ledyard Town Council from the Ledyard Planning & Zoning Commission regarding the transfer of town-owned open space at 19 Avery Hill Road Ext. to Avalonia Land Conservancy. Also attached is my staff report with attachments for the Council's review. Please forward to Chairman St. Vil to be placed on the appropriate agendas for action. Thank you.

Liz Burdick, Director of Land Use & Planning
Town of Ledyard
741 Colonel Ledyard Highway, Ledyard, CT 06339
Telephone: (860) 464-3215
Email: planner@ledyardct.org

AVALONIA

Avalonia Land Conservancy, Inc.
PO Box 49
Old Mystic, CT 06372

Avalonia.org
info@Avalonialc.org

860.884.3500

BOARD OF DIRECTORS

Officers
Dennis Main
President
Neil Duncan
Vice President
Elanah Sherman
Secretary
Maria Miranda
Assistant Secretary
Mark Hibbard
Treasurer
Peter Gauthier
Assistant Treasurer

Directors at Large
Richard Conant
Scott Dawley
Christopher Houlihan
Sharon Lynch
Elizabeth Sorensen

STAFF

Director of Stewardship
Tobias Glaza

Director of Philanthropy
Christopher Kepple

Office Manager
Mary Anne Sherman

Administrator
Ukiah Pastor

Mayor Fred Allyn III,

Ledyard Town Hall

741 Colonel Ledyard Highway

Ledyard, CT 06339

Dear Mayor Allyn,

Since 2005 the Town of Ledyard has transferred over 20 parcels of open space to Avalonia Land Conservancy, Inc. with tremendous success as a collaborative undertaking resulting in significant habitat and passive recreation opportunities within Ledyard

Currently two additional parcels are under consideration. Avalonia would respectfully request that the Ledyard Town Council approve a Town Meeting consideration of the transfer of 13 Applewood Drive as an open space abutting parcel to the Pike Marshall Preserve and 19 Avery Hill Road Extension as an addition to the abutting pending transfer of 173-175 Stoddards Wharf Road to Avalonia.

Thank you for your consideration,

Dennis S. Main, President

Avalonia Land Conservancy, Inc.

ACCREDITED LAND TRUST ACCREDITATION COMMISSION

Avalonia Land Conservancy, Inc. preserves natural habitats in southeastern Connecticut by acquiring and protecting lands and by communicating the value of these irreplaceable resources. Avalonia Land Conservancy is a 501(c)3, non-profit organization. Your contribution is tax deductible to the extent allowed by law. No goods or services were provided in exchange for your financial donation. Please keep this written acknowledgment of your donation for your tax records.

Roxanne Maher

From: H James Harwood <h.james.harwood@gmail.com>
Sent: Wednesday, October 15, 2025 10:41 AM
To: Roxanne Maher
Subject: Support letters for transfer of Kettle Hole and 13 Applewood Drive to Avalonia
Attachments: support letter for transfer of Kettle Hole to Avalonia 10-14-25.pdf; support letter for transfer of open space at 13 Applewood Drive to Avalonia 10-14-25 - Copy.pdf

Hey Roxanne,

At the meeting on September 11th, Planning and Zoning approved motions to issue FAVORABLE REPORTS to the Town Council for the transfer of the Kettle Hole at 19 Avery Road Ext and for the transfer of the town-owned open space property at 13 Applewood Drive to Avalonia. At that time, the Planning and Zoning Commission discussed having the Conservation Commission send letters of support for the transfers to the Town Council.

At our regular meeting last night, the Conservation Commission approved drafts of two letters, one for the Kettle Hole property and one for the 13 Applewood Drive open space property, attesting and reaffirming our support for the transfer of these two properties to Avalonia. PDFs of the two letters are attached.

Let me know if submitting these as PDFs is satisfactory or if you need us to submit hard copies of the letters.

Thanks Roxanne !

Cheers,

Jim

TO: Ledyard Town Council

FROM: Ledyard Conservation Commission

October 14th, 2025

This letter, dated October 14th 2025, serves to attest and reaffirm the support of the Conservation Commission for the transfer of Town-Owned Property at 19 Avery Hill Road Ext. known as the "Kettle Hole" property to Avalonia Land Conservancy to be combined with Other Lands of DDJJM LLC at 173 Stoddards Wharf Road & 75 Stoddards Wharf Road to be transferred to Avalonia, for which a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 was approved and submitted to the Ledyard Town Council by the Ledyard Planning and Zoning Commission at their regular meeting of September 11th, 2025.

Sincerely,

Ledyard Conservation Commission

TO: Ledyard Town Council

FROM: Ledyard Conservation Commission

October 14th, 2025

This letter, dated October 14th 2025, serves to attest and reaffirm the support of the Conservation Commission for the transfer of Town-Owned Open Space Property at 13 Applewood Drive to Avalonia Land Conservancy to be combined with its existing Pike Marshall Preserve, for which a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 was approved and submitted to the Ledyard Town Council by the Ledyard Planning and Zoning Commission at their regular meeting of September 11th, 2025.

Sincerely,

Ledyard Conservation Commission

File #: 25-2563 **Agenda Date:** 10/22/2025 **Agenda #:** 10.

LAND USE

Land Transfer:
MOTION to schedule a Hybird Format (In-Person & Video Conference) Special Town Meeting date for November 12, 2025 at 6:30 p.m. to be held in the Council Chambers, 741 Colonel Ledyard Highway, to consider, discuss and vote upon the following:

(1) "*Shall the Town of Ledyard transfer town-owned property located at 19 Avery Hill Road Extension, Ledyard Connecticut (Parcel ID:50/130/19), known as the "Kettle Hole" property to Avalonia Land Conservancy for no consideration, to be combined with other lands of the DDJJM, LLC., at 173 Stoddards Wharf Road and 175 Stoddards Wharf Road to be transferred to Avalonia Land Conservancy, to remain open to the public for passive recreation and to be protected in perpetuity under the Conservancy care with the following conditions:*

1). Avalonia Land Conservancy will pay for all conveyances and fees regarding the transfer of the property.

2). In the event Avalonia Land Conservancy determines they no longer wish to own or no longer can own the so-called "Kettle Hole" property, Avalonia Land Conservancy will first offer the property back to the Town of Ledyard as the last owner of record. Such conveyance will be at no cost to the Town, other than customary recording and legal fees. The Town shall have 120 days to accept or reject re-acquisition. The Town shall notify Avalonia Land Conservancy in writing of its intent to accept or reject. Should the Town choose not to accept the property back, Avalonia Land Conservancy will then have the right to convey the parcel to a third party of their choice?".

(2) "*Shall the Town of Ledyard transfer town-owned property located at 13 Applewood Drive(parcel ID:99-530-13) to Avalonia Land Conservancy for no consideration, to be combined with the Avalonia Land Conservancy "Pike Marshall Preserve to remain open to the public for passive recreation and to be protected in perpetuity under the Conservancy care with the following conditions:*

1). The 10-foot wide access to the property shall be clearly marked in the field by a Land Surveyor engaged by Avalonia Land Conservancy.

2). Appropriate signage identifying the open space parcel shall be installed by Avalonia Land Conservancy.

3). Avalonia Land Conservancy will pay for all conveyances and fees regarding the transfer of the property.

4). In the event Avalonia Land Conservancy determines they no longer wish to own or no longer can own

13 Applewood Drive property (parcel ID:99-530-13), Avalonia Land Conservancy will first offer the property back to the Town of Ledyard as the last owner of record. Such conveyance will be at no cost to the Town, other than customary recording and legal fees. The Town shall have 120 days to accept or reject re-acquisition. The Town shall notify Avalonia Land Conservancy in writing of its intent to accept or reject. Should the Town choose not to accept the property back, Avalonia Land Conservancy will then have the right to convey the parcel to a third party of their choice?"..

Background:

In accordance with Chapter VII, Section 9 of the Town Charter "……..any sale or purchase of real estate or interest therein shall become effective only after it has been ***approved by the Town Council and adopted at a Town meeting by a majority vote of the qualified voters present and voting at such meeting.***

SECTION 9. FINANCIAL POWERS

Any appropriation in excess of the limitations in Section 9 above shall become effective only after it has been approved by resolution of the Town Council and adopted at a Town meeting by a majority vote of the qualified voters present and voting.

Any resolution making a non-budgeted appropriation of more than one (1) percent of the current tax levy, but less than five (5) percent for any purpose, any resolution authorizing the issuance of bonds or notes or other borrowing of less than five (5) percent of the current tax levy, except notes in anticipation of taxes to be paid within the fiscal year in which issued, and any sale or purchase of real estate or interest therein shall become effective only after it has been approved by the Town Council and adopted at a Town meeting by a majority vote of the qualified voters present and voting at such meeting.

The Town Meeting shall not act upon any proposal for the sale or purchase of real estate or any interest therein, or the issuance of bonds or other borrowing, except upon the recommendation of the Town Council; nor act upon any appropriation which has not been acted upon by the Town Council, unless the same shall have been before the Town Council for sixty (60) days without action.

No Town Meeting shall increase the amount of any bond issue or appropriation above the amount recommended by the Town Council, or make any appropriation not recommended by the Town Council.

Additional Background:

19 Avery Hill Road Extension (Kettle Hole) is a town-owned open space property located on about 5-acres in the R-60 Zoning District.

Should the Town approve to transfer this property to Avalonia Land Conservancy it would be added to other lands owned by or to be transferred to (173 & 175 Stoddards Wharf Road) Avalonia to create about 35-acres of contiguous open space land under the stewardship of Avalonia Land Conservancy.

Please see attached the following:

- Director of Planning & Zoning Elizabeth Burdick Memo dated September 10, 2025 with attachments.
- Director of Planning & Zoning Elizabeth Burdick Memo dated September 15, 2025.

13 Applewood Drive was approximately 1.70-acres shown on a Plan entitled "*Plan showing Applewood Estate Resubdivision- Property of Applewood Estates, LLC*" and is a "*Park, Open Space and Recreational Purposes*" parcel that was conveyed to the Town of Ledyard on May 16, 2006.

Should the Town approve to transfer this property to Avalonia Land Conservancy it would be added to other lands (104 Gallup Hill Road, 104R Gallup Hill Road, 199 Lambtown Road, 489 Pumpkin Hill Road and 480 Pumpkin Hill Road) owned by Avalonia Land Conservancy known as the "*Avalonia Pike Marshal Preseve*" which was about 272-acres.

Please see attached the following:

- Director of Planning & Zoning Elizabeth Burdick Memo dated September 8, 2025 with attachments.
- Director of Planning & Zoning Elizabeth Burdick Memo dated September 15, 2025.

Land Use Director/Town Planner:
(type text here)

TOWN OF LEDYARD

Department of Land Use and Planning

Elizabeth J. Burdick, Director

741 Colonel Ledyard Highway, Ledyard, CT 06339

Telephone: (860) 464-3215, Fax: (860) 464-0098

Email: planner@ledyardct.org

MEMORANDUM

DATE: September 10, 2025
TO: Ledyard Planning & Zoning Commission
FROM: Liz Burdick, Director of Land Use & Planning
RE: **C.G.S. 8-24 Referral for Report to Town Council regarding Transfer of Town-Owned Property at 19 Avery Hill Road Ext. to Avalonia Land Conservancy to be Combined with Other Lands to be transferred to Avalonia**

Request is for a report to the Town Council in accordance with C.G.S. 8-24 regarding Transfer of Town-Owned Property at 19 Avery Hill Road Ext. known as the "Kettle Hole" property to Avalonia Land Conservancy to be combined with Other Lands of DDJJM LLC to be transferred to Avalonia at 173 Stoddards Wharf Road and 175 Stoddards Wharf Road.

19 Avery Hill Road Ext. (Parcel ID: 50/130/19), Ledyard, CT is a town-owned open space property located on about 5-acres (4.97+/- or 216,447SF +/-) in the R-60 zoning district.

A preliminary plan entitled "Property Survey, Proposed Lot Configuration Plan, Property of Town of Ledyard & DDJJM LLC, Avery Hill Road Extension & Stoddards Wharf Road (CT Route 214), Ledyard, CT, Prepared by Star Surveying, LLC, Dated 8/2/2025" depicts the shaded areas of lands of DDJJM LLC to be conveyed to Avalonia of about 30.30-acres +/- (1,319,715SF+/-), which includes 173 Stoddards Wharf Road in its entirety and the majority of 175 Stoddards Wharf Road. If approved by the Ledyard Town Council, town-owned 19 Avery Hill Road Ext. will be combined with said lands to create about 35-acres of contiguous open-space land stewarded by Avalonia.

Avalonia Board President Dennis Main will be in attendance at the 9/11/25 meeting to discuss possible future connections to open space and will answer Commissioner questions.

The following Motion is suggested for any favorable recommendation:

I make a Motion to forward a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 to the Ledyard Town Council regarding Transfer of Town-Owned Property at 19 Avery Hill Road Ext. known as the "Kettle Hole" property to Avalonia Land Conservancy to be combined with Other Lands of DDJJM LLC at 173 Stoddards Wharf Road & 75 Stoddards Wharf Road to be transferred to Avalonia.

If the PZC is inclined to send an unfavorable report, it shall state its reasons on the record.

Sec. 8-24. Municipal improvements. No municipal agency or legislative body shall (1) locate, accept, abandon, widen, narrow or extend any street, bridge, parkway or other public way, (2) locate, relocate, substantially improve, acquire land for, abandon, sell or lease any airport, park, playground, school or other municipally owned property or public building, (3) locate or extend any public housing, development, redevelopment or urban renewal project, or (4) locate or extend public utilities and terminals for water, sewerage, light, power, transit and other purposes, until the proposal to take such action has been referred to the commission for a report. Notwithstanding the provisions of this section, a municipality may take final action approving an appropriation for any proposal prior to the approval of the proposal by the commission pursuant to this section. The failure of the commission to report within thirty-five days after the date of official submission of the proposal to it for a report shall be taken as approval of the proposal. In the case of the disapproval of the proposal by the commission the reasons therefor shall be recorded and transmitted to the legislative body of the municipality. A proposal disapproved by the commission shall be adopted by the municipality or, in the case of disapproval of a proposal by the commission subsequent to final action by a municipality approving an appropriation for the proposal and the method of financing of such appropriation, such final action shall be effective, only after the subsequent approval of the proposal by (A) a two-thirds vote of the town council where one exists, or a majority vote of those present and voting in an annual or special town meeting, or (B) a two-thirds vote of the representative town meeting or city council or the warden and burgesses, as the case may be. The provisions of this section shall not apply to maintenance or repair of existing property, buildings or public ways, including, but not limited to, resurfacing of roads.

19 Avery Hill Rd Ext., Et Al

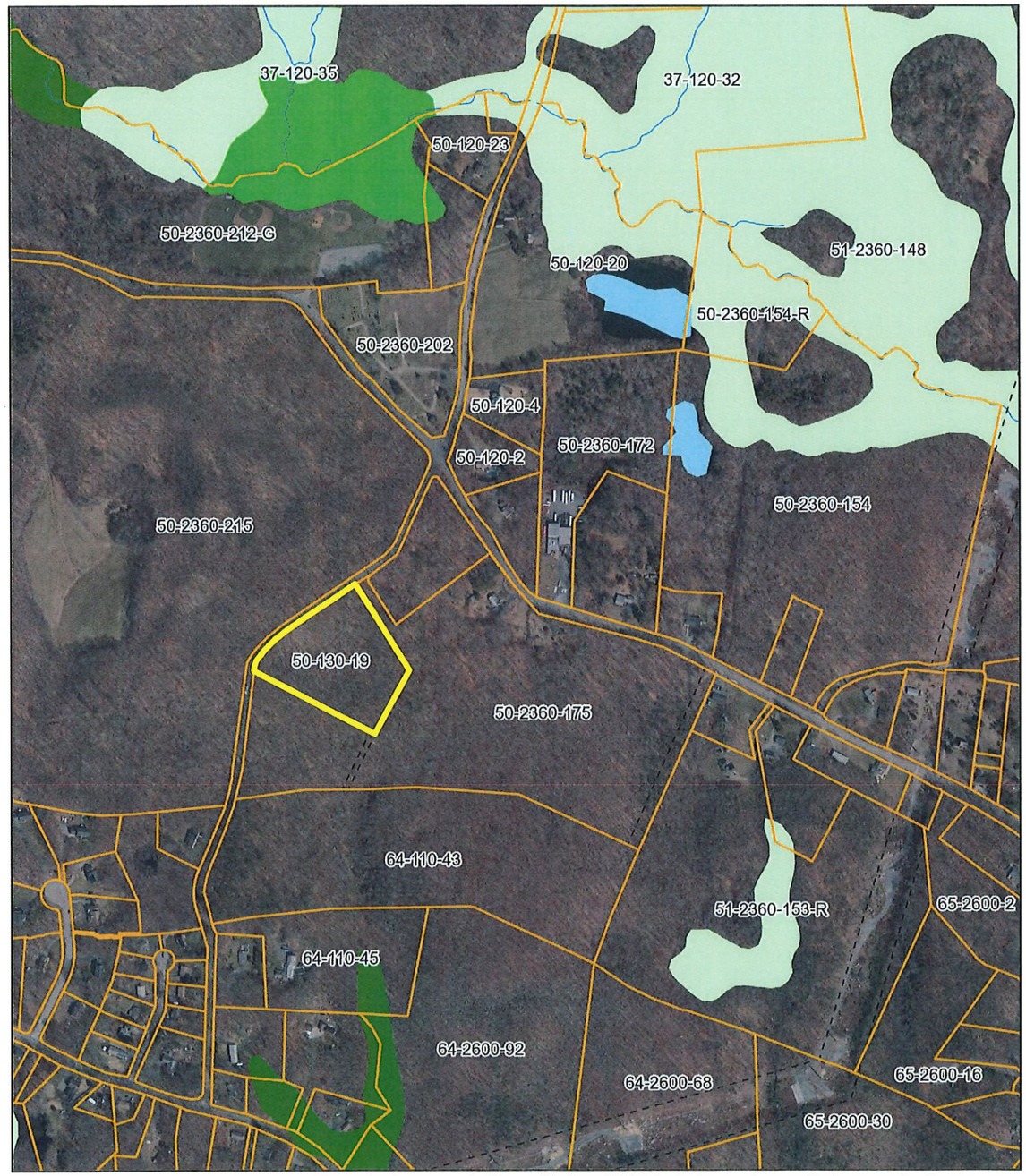
Ledyard, CT

1 inch = 565 Feet

0 565 1130 1695

CAI Technologies
Precision Mapping. Geospatial Solutions.
www.cai-tech.com

September 10, 2025



Data shown on this map is provided for planning and informational purposes only. The municipality and CAI Technologies are not responsible for any use for other purposes or misuse or misrepresentation of this map.

Property Location 19 AVERY HILL EXT | Map ID 50/ 130/ 19/ / | Bldg Name | State Use 9030
Vision ID 1624 | Account # 402915 | Bldg # 1 | Sec # 1 of 1 | Card # 1 of 1 | Print Date 12/19/2024 2:18:07 P

CURRENT OWNER

I TOWN OF LEDYARD
GLACIAL PARK
741 COLONEL LEDYARD HWY
LEDYARD CT 06339

TOPO		UTILITIES		STRT / ROAD		LOCATION	
2	Above Street			1	Paved	6	Recreation
8	Ledge						

SUPPLEMENTAL DATA

Alt Prcl ID	50-130-19	Solar Pane	
Sub-div		Generator	
Dev.Lot		Forest	
Survey#		Farm	
Elderly		MPT SB	
Census	07012		
GIS ID	1624	Assoc Pid#	

CURRENT ASSESSMENT

Description	Code	Appraised	Assessed
EX COM LN	21	100,500	70,350
	Total	100,500	70,350

6072
LEDYARD, CT

VISION

RECORD OF OWNERSHIP

BK-VOL/PAGE		SALE DATE	Q/U	V/I	SALE PRICE	VC
00130	0423	07-08-1983			0	

I TOWN OF LEDYARD

PREVIOUS ASSESSMENTS (HISTORY)

Year	Code	Assessed	Year	Code	Assessed V	Year	Code	Assessed
2023	21	70,350	2022	21	70,350	2021	21	70,350
Total		70,350	Total		70,350	Total		70,350

EXEMPTIONS

Year	Code	Description	Amount
		Total	0.00

OTHER ASSESSMENTS

Code	Description	Number	Amount	Comm Int

This signature acknowledges a visit by a Data Collector or Assessor

APPRAISED VALUE SUMMARY

Appraised Bldg. Value (Card)	0
Appraised Xf (B) Value (Bldg)	0
Appraised Ob (B) Value (Bldg)	0
Appraised Land Value (Bldg)	100,500
Special Land Value	0
Total Appraised Parcel Value	100,500
Valuation Method	C
Total Appraised Parcel Value	100,500

ASSESSING NEIGHBORHOOD

Nbhd	Nbhd Name	B	Tracing	Batch
0040				

NOTES

GLACIER PARK
SMALL POND

BUILDING PERMIT RECORD

Permit Id	Issue Date	Type	Description	Amount	Insp Date	% Comp	Date Comp	Comments

VISIT / CHANGE HISTORY

Date	Id	Type	Is	Cd	Purpost/Result
06-25-2020	DM			15	Reval Review
01-18-2001	BS			00	Measur+Listed
05-19-1992	KS	X		10	Letter Sent no response
09-23-1991	CM			00	Measur+Listed

LAND LINE VALUATION SECTION

B	Use Code	Description	Zone	Land Type	Land Units		Unit Price	Size Adj	Site Index	Cond.	Nbhd.	Nbhd. Adj	Notes	Location Adjustment		Adj Unit P	Land Value
1	903V	Municipal M00	R60		1.380	AC	72,000.00	0.75684	1	1.00	0050	1.000			1.0000	54,489.6	75,200
1	9030	Municipal M94	R60		2.760	AC	9,500.00	1.00000	0	0.90	0050	1.000	TOPO-STEEP		1.0000	8,550	23,600
1	9030	Municipal M94	R60		0.460	AC	4,700.00	1.00000	0	0.80	0050	1.000	TOPO		1.0000	3,760	1,700
		Total Card Land Units			5	AC	Parcel Total Land Area		5							Total Land Value	100,500

Property Location 19 AVERY HILL EXT | Map ID 50/ 130/ 19/ / | Bldg Name | State Use 9030
Vision ID 1624 | Account # 402915 | Bldg # 1 | Sec # 1 of 1 | Card # 1 of 1 | Print Date 12/19/2024 2:18:08 P

CONSTRUCTION DETAIL

Element	Cd	Description
Style:	99	Vacant Land
Model	00	Vacant
Grade:		
Stories:		
Occupancy		
Exterior Wall 1		
Exterior Wall 2		
Roof Structure:		
Roof Cover		
Interior Wall 1		
Interior Wall 2		
Interior Flr 1		
Interior Flr 2		
Heat Fuel		
Heat Type:		
AC Type:		
Total Bedrooms		
Total Bthrms:		
Total Half Baths		
Total Xtra Fixtrs		
Total Rooms:		
Bath Style:		
Kitchen Style:		

CONSTRUCTION DETAIL (CONTINUED)

Element	Cd	Description

MIXED USE

Code	Description	Percentage
903V	Municipal M00	100
		0
		0

COST / MARKET VALUATION

Building Value New	0
Adjusted Base Rate	
Year Built	0
Effective Year Built	0
Depreciation Code	
Remodel Rating	
Year Remodeled	
Depreciation %	
Functional Obsol	0
External Obsol	0
Trend Factor	1
Condition	
Condition %	0
Percent Good	
RCNLD	0
Dep % Ovr	
Dep Ovr Comment	
Misc Imp Ovr	
Misc Imp Ovr Comment	
Cost to Cure Ovr	
Cost to Cure Ovr Comment	

No Sketch

OB - OUTBUILDING & YARD ITEMS(L) / XF - BUILDING EXTRA FEATURES(B)

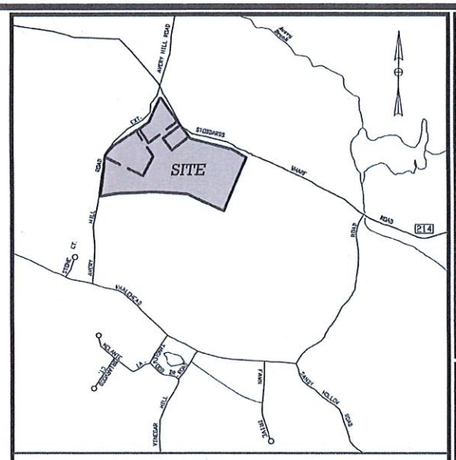
Code	Description	L/B	Units	Unit Price	Yr Blt	Cond. Cd	% Gd	Grade	Grade Adj.	Appr. Value

BUILDING SUB-AREA SUMMARY SECTION

Code	Description	Living Area	Floor Area	Eff Area	Unit Cost	Undeprec Value
	Ttl Gross Liv / Lease Area	0	0	0		0

ZONING COMPLIANCE TABLE ZONE: R60
PROPOSED HOUSE LOT

ITEM	REQUIRED	PROVIDED
LOT AREA	60,000 S.F.	60,325± S.F.
LOT FRONTAGE	200 FT.	201.02± FT.
FRONTAGE AT BUILDING LINE	200 FT.	201.00± FT.
FRONT YARD	35 FT.	87.4± FT.
SIDE YARD	20 FT.	36.5± FT.
REAR YARD	30 FT.	126± FT.
COVERAGE	20%	3.6± %
BUILDING HEIGHT	35 FT.	LESS THAN 35 FT.
WATER SUPPLY	EXISTING ON-SITE WELL	
SANITARY SYSTEM	EXISTING ON-SITE SEPTIC SYSTEM	



LOCATION MAP
SCALE: 1" = 1000'

74 CRANBERRY POND ROAD
WESTBROOK, CONNECTICUT 06498
TELEPHONE (860) 399-7002
MOBILE (860) 885-4424
STAR SURVEYING, LLC

SURVEY NOTES

1. THIS SURVEY HAS BEEN PREPARED PURSUANT TO THE REGULATIONS OF CONNECTICUT STATE AGENCIES SECTIONS 20-300b-1 THROUGH 20-300b-20 AND THE "STANDARDS FOR SURVEYS AND MAPS IN THE STATE OF CONNECTICUT" AS ADOPTED BY THE CONNECTICUT ASSOCIATION OF LAND SURVEYORS, INC. ON AUGUST 29, 2019. IT IS A PROPERTY SURVEY CONFORMING TO HORIZONTAL CLASS A-2 STANDARDS OF ACCURACY AS DEFINED IN THE ABOVE REGULATIONS.

   NO DECLARATION IS EXPRESSED OR IMPLIED BY THIS MAP OR COPIES THEREOF UNLESS THE PRINT BEARS THE IMPRESSION TYPE SEAL AND ORIGINAL LIVE SIGNATURE OF THE SURVEYOR WHOSE NAME AND REGISTRATION NUMBER APPEAR BELOW OR THEREON.

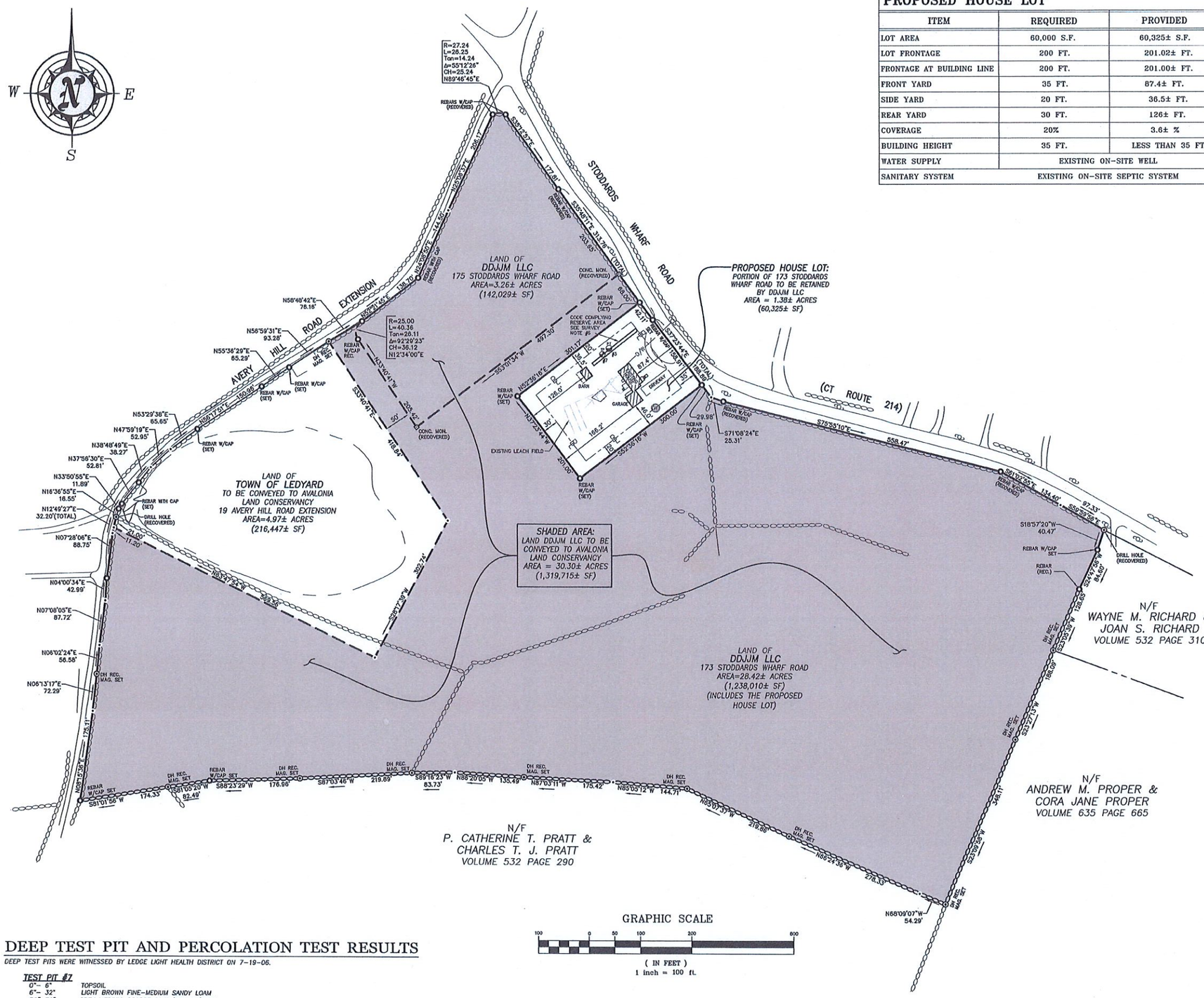
2. FOR RECORD TITLE TO THE SUBJECT PARCEL, REFERENCE IS MADE TO THE FOLLOWING DEEDS RECORDED IN THE TOWN OF LEDYARD LAND RECORDS:
   - A PROBATE TAX CERTIFICATE FROM THE ESTATE OF ALTHEA L. MAIN TO DDJJM, LLC RECORDED JUNE 27, 2012 IN VOLUME 499 PAGE 273.
   - A QUIT CLAIM DEED FROM ALTHEA L. MAIN TO DDJJM, LLC RECORDED JULY 8, 2010 IN VOLUME 477 PAGE 503.

3. MAP REFERENCES:
   A. "BOUNDARY SURVEY MAP SUBDIVISION PLAN PROPERTY OF RAYMOND G. MAIN & ALTHEA L. MAIN 175 STODDARDS WHARF ROAD (CONNECTICUT ROUTE 214) & AVERY HILL ROAD EXTENSION LEDYARD, CONNECTICUT DATE: JULY 14, 2006 SCALE: 1"=100' DRAWN BY: JB DRAWING NO: 06023-1 SHEETS NO. 1 & 2 OF 2" BY JAMES BERNARDO LAND SURVEYING, LLC REVISED TO 10/09/07
   B. PLAN SHOWING TRACTS OF LAND TO BE ACQUIRED BY THE TOWN OF LEDYARD AVERY HILL EXT. LEDYARD, CONNECTICUT JUNE 1980 BY GEORGE H. DIETER LS
   C. PLAN SHOWING MELANSON RESUBDIVISION OWNER/APPLICANT: WILLIAM MELANSON STODDARDS WHARF ROAD AKA CONNECTICUT ROUTE 214 LEDYARD, CONNECTICUT SEPTEMBER 28, 2004 REVISED 11-19-04 BY GERWICK-MEREEN LLC
   D. PLAN SHOWING PROPOSED HOUSE AND BUILDING LOT FOR RAYMOND G. MAIN & ALTHEA L. MAIN IN THE TOWN OF LEDYARD SCALE 1"=20'

4. BEARINGS REFER TO 1983 NORTH AMERICAN DATUM (NAD83) BASED ON GPS OBSERVATIONS TAKEN DURING AUGUST, 2024.

5. LAND RECORDS RESEARCH WAS COMPLETED ON OCTOBER 25, 2024. FIELD WORK WAS COMPLETED ON AUGUST 2, 2025.

6. THERE IS A CODE COMPLYING RESERVE AREA FOR A 4 BEDROOM HOUSE BASED ON THE TEST PIT AND PERCOLATION TEST DATA NOTED HEREON. SAID DATA WAS TAKEN FROM THE APPROVED SUBDIVISION PLAN REFERENCED IN SURVEY NOTE 3.A.



LEGEND

CL&P	CONNECTICUT LIGHT & POWER COMPANY
PVMT.	PAVEMENT
TYP.	TYPICAL
DH	DRILL HOLE
SMH	SEWER MANHOLE
N/F	NOW OR FORMERLY
O/W	OVERHEAD WIRES
REC.	RECOVERED
S.F.	SQUARE FEET
MAG.	MAGNETIC NAIL
±	MORE OR LESS
	UTILITY POLE
	POINT TO BE SET
	STONE WALL
W/	WITH
W	WELL
FT.	FEET
	BUILDING SETBACK LINE
	DEEP TEST PIT LOCATION
	PERCOLATION TEST LOCATION

DEEP TEST PIT AND PERCOLATION TEST RESULTS

DEEP TEST PITS WERE WITNESSED BY LEDGE LIGHT HEALTH DISTRICT ON 7-19-06.

TEST PIT #7

0"- 6"	TOPSOIL
6"- 32"	LIGHT BROWN FINE-MEDIUM SANDY LOAM
32"-76"	GREY MEDIUM-COARSE SAND/GRAVEL/ROCK

GROUNDWATER AT 72", BOULDER AT 72", ROOTS AT 32"

PERCOLATION TEST PT #3 WAS PERFORMED BY JAMES BERNARDO, LS. (TAKEN FROM APPROVED SUBDIVISION PLAN REFERENCED IN SURVEY NOTE #3.A.)

PT #3

TOTAL DEPTH = 37"
PRESOAK AT 12:00 PM

TIME	READING
12:14	29.27"

"TO MY KNOWLEDGE AND BELIEF, THIS MAP IS

REVISION	DESCRIPTION	DATE
"A"	BOUNDARY POINTS SET & REMOVE EASEMENTS	8/2/2025

DATE: NOVEMBER 16, 2024
SCALE: 1 inch = 100 feet
DRAWN BY: SRM
FILE NAME: MAIN SURVEY.DWG

PROPERTY SURVEY
PROPOSED LOT RECONFIGURATION PLAN
PROPERTY OF
THE TOWN OF LEDYARD & DDJJM LLC
LOCATED AT
AVERY HILL ROAD EXTENSION & STODDARDS WHARF ROAD (CT ROUTE 214), LEDYARD, CONNECTICUT

OTES:

LAN AND THE SURVEY IT IS BASED ON HAVE BEEN PREPARED IN ACCORDANCE WITH THE ATIONS OF CONNECTICUT STATE AGENCIES, SECTIONS 20-300B-1 THROUGH 20-300B-20, "MINIMUM ARDS FOR SURVEYS AND MAPS IN THE STATE OF CONNECTICUT" ENDORSED BY THE CONNECTICUT IATION OF LAND SURVEYORS, INC. THE TYPE OF SURVEY IS A PERIMETER SURVEY, THE BOUNDARY MINATION CATEGORY IS DEPENDENT RESURVEY AND THE HORIZONTAL ACCURACY CONFORMS TO A-2.

CLARATION IS EXPRESSED OR IMPLIED BY THIS MAP OR COPIES THEREOF UNLESS THE PRINT BEARS IMPRESSION TYPE SEAL AND ORIGINAL LIVE SIGNATURE OF THE SURVEYOR WHOSE NAME AND RATION NUMBER APPEARS BELOW OR THEREON.

ENCE IS MADE TO THE FOLLOWING TOWN OF LEDYARD LAND EVIDENCE RECORDS:

TH REGARDS TO PARCEL #1:
E VOLUME 19 AT PAGE 178 FOR A WARRANTEE DEED DATED OCTOBER 23, 1950 REGARDING RECORD LE TO THIS PARCEL.

TH REGARDS TO PARCEL #2:
E VOLUME 19 AT PAGE 219 FOR A WARRANTEE DEED DATED MAY 28, 1951 REGARDING RECORD TITLE THIS PARCEL.

TH REGARDS TO PARCEL #3:
E VOLUME 19 AT PAGE 220 FOR A WARRANTEE DEED DATED MAY 28, 1951 REGARDING RECORD TITLE THIS PARCEL.

TH REGARDS TO PARCEL #4:
E VOLUME 19 AT PAGE 573 FOR A WARRANTEE DEED DATED JANUARY 24, 1955 REGARDING RECORD LE TO THIS PARCEL.

ROPERTY SHOWN HEREON IS SUBJECT TO, OR MAY BE BENEFITTED BY THE FOLLOWING:

E VOLUME 130 AT PAGE 423 FOR A 20' WIDE PEDESTRIAN EASEMENT CONVEYED BY RAYMOND G. MAIN ALTHEA L. MAIN TO THE TOWN OF LEDYARD DATED JULY 8, 1993.

UBJECT PROPERTY IS LOCATED ENTIRELY WITHIN THE R-80 ZONE DISTRICT.

NAL FLOOD INSURANCE PROGRAM FLOOD INSURANCE RATE MAP TOWN OF LEDYARD, CTICUT NEW LONDON COUNTY PANEL 15 OF 20, COMMUNITY-PANEL NUMBER 090157C015B, MAP TIVE DATE: APRIL 1, 1991, FEDERAL EMERGENCY MANAGEMENT AGENCY" INDICATES THE SUBJECT RTY IS LOCATED ENTIRELY WITHIN FLOOD HAZARD ZONE C.

UBJECT PROPERTY IS SHOWN ON THE TOWN OF LEDYARD TAX ASSESSOR MAP 50 AS LOT 173 AS AN ASSIGNED STREET ADDRESS OF 173 & 175 STODDARDS WHARF ROAD.

ASIS FOR BEARINGS IS APPROXIMATE GRID NORTH.

PLAN REPRESENTS THE LOCATION OF THE BOUNDS AND SITE CONDITIONS DETERMINED BY FIELD Y ON JUNE 13, 2006. RECORD TITLE AND ADJOINER INFORMATION WAS OBTAINED FROM TAX SOR AND LAND EVIDENCE RECORDS ON JUNE 13, 2006.

RGROUND UTILITY, STRUCTURE AND FACILITY LOCATIONS DEPICTED AND NOTED HEREON HAVE COMPILED, IN PART, FROM RECORD MAPPING SUPPLIED BY THE RESPECTIVE UTILITY COMPANIES OR RNMENTAL AGENCIES, FROM PAROLE TESTIMONY AND FROM OTHER SOURCES. THESE LOCATIONS MUST NSIDERED AS APPROXIMATE IN NATURE. ADDITIONALLY, OTHER SUCH FEATURES MAY EXIST ON THE THE EXISTENCE OF WHICH ARE UNKNOWN TO JAMES BERNARDO LAND SURVEYING, LLC. THE SIZE, ION AND EXISTENCE OF ALL SUCH FEATURES MUST BE FIELD DETERMINED AND VERIFIED BY THE OPRIATE AUTHORITIES PRIOR TO CONSTRUCTION. CALL BEFORE YOU DIG 1-800-922-4455.

RENCES:

SHOWING TRACTS OF LAND TO BE ACQUIRED BY THE TOWN OF LEDYARD AVERY HILL EXT. RD, CONNECTICUT JUNE 1980 BY GEORGE H. DIETER LS

SHOWING MELANSON RESUBDIVISION OWNER/APPLICANT: WILLIAM MELANSON STODDARDS WHARF A/K/A CONNECTICUT ROUTE 214 LEDYARD, CONNECTICUT SEPTEMBER 28, 2004 REVISED 11-18-04 BY OK-MEREEN LLC.

SHOWING PROPOSED HOUSE AND BUILDING LOT FOR RAYMOND G. MAIN & ALTHEA L. MAIN IN THE OF LEDYARD SCALE 1"=20'.

SUBDIVISION NOTES:

1. PURSUANT TO SECTION 8-25(b) OF THE CONNECTICUT GENERAL STATUTES PASSIVE SOLAR ENERGY TECHNIQUES HAVE BEEN CONSIDERED IN THE DESIGN OF THIS SUBDIVISION.
2. LOT MONUMENTS ARE TO BE SET AT ALL CORNERS IN ACCORDANCE WITH SECTION 5.4.3 OF THE LEDYARD SUBDIVISION REGULATIONS.
3. THE POTENTIAL HOUSE LOCATION, DRIVEWAY AND SEPTIC AREA IS SHOWN ONLY TO DEPICT A POTENTIAL LOCATION AND SITE SUITABILITY. FINAL LOCATIONS WILL BE DETERMINED AT TIME OF APPLICATION FOR BUILDING PERMIT.
4. ~~COMBINED~~
5. TOTAL AREA OF SUBDIVISION = 31.68 ACRES M/L.
6. NO OPEN SPACE IS PROPOSED FOR THIS APPLICATION; HOWEVER THE PROPERTY OWNER PROPOSES TO DEDICATE A PERPETUAL OPEN SPACE EASEMENT CORRIDOR NOT LESS THAN 50' IN WIDTH ACROSS THE SOUTHEASTERLY BOUNDARY OF THE PROPERTY AS SHOWN.

APPROVED BY THE LEDYARD PLANNING COMMISSION AS TO COMPLIANCE WITH THE REGULATIONS GOVERNING THE SUBDIVISION OF LAND. ALL IMPROVEMENTS SHALL BE COMPLETED BY _____

_____
CHAIRMAN OR SECRETARY

IWWC APPLICATION # _____

_____ APPROVED, _____ (DATE)

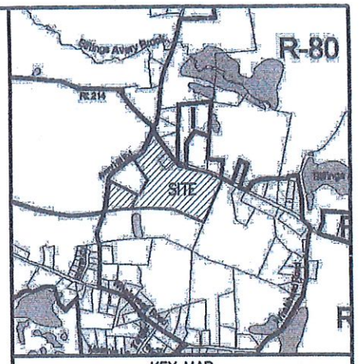
_____ NO PERMIT NECESSARY. (NOT WITHIN REGULATED AREA.)

_____ NOT APPLICABLE AT THIS TIME. (WITHIN A REGULATED AREA; NO REGULATED ACTIVITY PROPOSED AT THIS TIME.)

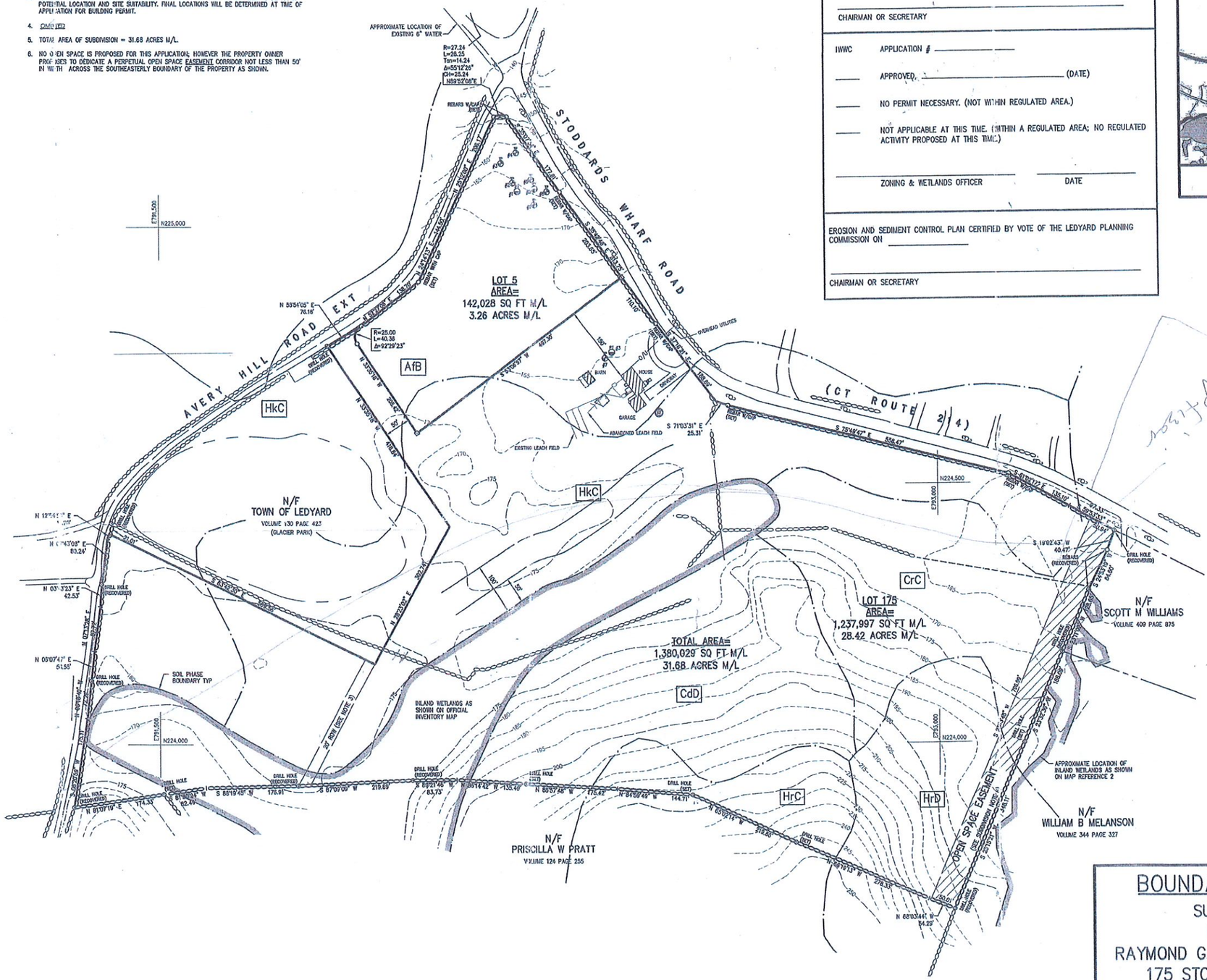
_____ _____
ZONING & WETLANDS OFFICER DATE

EROSION AND SEDIMENT CONTROL PLAN CERTIFIED BY VOTE OF THE LEDYARD PLANNING COMMISSION ON _____

_____
CHAIRMAN OR SECRETARY



KEY MAP
SCALE: 1"=1000'



LEGEND
THE FOLLOWING SYMBOLS/ABBREVIATIONS MAY APPEAR ON THIS DRAWING

AC	ACRES
BIT	BITUMINOUS
BCLC	BITUMINOUS CONCRETE LIP CURBING
CONC	CONCRETE
DIA	DIAMETER
DB	DISTRIBUTION BOX
EOP	EDGE OF PAVEMENT
ELEV	ELEVATION
LF	LINEAR FOOT
(MIN)	MINIMUM
M/L	MORE OR LESS
N/F	NOW OR FORMERLY
PVC	POLY VINYL CHLORIDE
SCH40	SCHEDULE 40
5.4x	SPOT ELEVATION
SF	SQUARE FEET
TR	TO REMAIN
TBR	TO BE REMOVED
TYP	TYPICAL
P-5	SOIL PERC TEST LOCATION
TH8	SOIL DEEP TEST LOCATION
W	WELL
BSL	BUILDING SETBACK LINE
	CLEARING LIMIT LINE
	EXISTING TREELINE
158	EXISTING CONTOUR
158	NEW CONTOUR
	SEDIMENT FENCE
	STORM DRAIN PIPE
	STONE WALL

BOUNDARY SURVEY MAP

SUBDIVISION PLAN
PROPERTY OF
RAYMOND G. MAIN & ALTHEA L. MAIN
175 STODDARDS WHARF ROAD
(CONNECTICUT ROUTE 214)
& AVERY HILL ROAD EXTENSION
LEDYARD, CONNECTICUT

DATE: SCALE:

2 Maps and Surveys
gineering & Surveying
vid A. King, PE
7 Norwich Road (Rte 82)
kdale, CT 06370

TO THE BEST OF MY KNOWLEDGE AND BELIEF THIS MAP IS SUBSTANTIALLY CORRECT AS NOTED HEREON.

JAMES BERNARDO LAND SURVEYING, LLC
102A SPITHEAD ROAD
WATERFORD, CONNECTICUT 06385

GRAPHIC SCALE
100 0 50 100 200 400

4	10/09/07	NO REVISIONS TO THIS SHEET	JB
3	7/19/07	SUBDIVISION NOTE 4 REMOVED	JB
		NO REVISIONS TO THIS SHEET	JB

TOWN OF LEDYARD
Department of Land Use and Planning
Elizabeth J. Burdick, Director
741 Colonel Ledyard Highway, Ledyard, CT 06339
Telephone: (860) 464-3215
Email: planner@ledyardct.org

September 15, 2025

Gary St. Vil, Chairman
Ledyard Town Council
741 Colonel Ledyard Highway
Ledyard, CT 06339

RE: C.G.S. 8-24 Referral – 19 Avery Hill Rd Ext. (Parcel ID: 50/130/19), Ledyard, CT – Transfer of Town-Owned Open Space property (Kettle Hole) to Avalonia Land Conservancy to be combined with property at 173 & 175 Stoddards Wharf Road owned by DDJJM, LLC also to be transferred to Avalonia Land Conservancy.

Dear Chairman St. Vil,

The Ledyard Planning & Zoning Commission, at its September 11, 2025 regular meeting, voted unanimously to forward a FAVORABLE REPORT in accordance with C.G.S. §8-24 to the Town Council for a MOTION to transfer town-owned property located at 19 Avery Hill Rd Ext. (Parcel ID: 50/130/19), Ledyard, CT to the Avalonia Land Conservancy ("Avalonia") to be combined with property at 173 & 175 Stoddards Wharf Road owned by DDJJM, LLC also to be transferred to Avalonia.

Please contact me at Town Hall with any questions. Thank you for your attention to this matter.

Sincerely,
Elizabeth J. Burdick
Director of Land Use & Planning

C: Roxanne Maher, Administrative Asst. to the Town Council
Dennis Main, President, Avalonia Land Conservancy
Marcelle Wood, Chairman, Ledyard Planning & Zoning Commission
Fred Allyn III, Mayor
Anna Wynn, Asst. to Director Land Use
Hannah Gienau, ZWBEO
File – Land Use Dept.

TOWN OF LEDYARD

Department of Land Use and Planning

Elizabeth J. Burdick, Director

741 Colonel Ledyard Highway, Ledyard, CT 06339

Telephone: (860) 464-3215, Fax: (860) 464-0098

Email: planner@ledyardct.org

MEMORANDUM

DATE: September 8, 2025
TO: Ledyard Planning & Zoning Commission
FROM: Liz Burdick, Director of Land Use & Planning
RE: **C.G.S. 8-24 Referral for Report to Town Council regarding Transfer of Town-Owned Property to Avalonia Land Conservancy to be Combined with Pike Marshall Preserve**

Request is for a report to the Town Council in accordance with C.G.S. 8-24 regarding the transfer of Town-Owned Property to Avalonia Land Conservancy to be Combined with Pike Marshall Preserve located at 104 Gallup Hill Road (Parcel ID: 85-810-104), Ledyard, CT.

13 Applewood Drive (Parcel ID: 99/530/13), Ledyard, CT is a "Park, Open Space and Recreational Purposes" parcel conveyed to the Town of Ledyard and is shown as Lot 13 on a plan entitled "Plan showing Applewood Estate Resubdivision – Property of Applewood Estates, LLC – Colonel Ledyard Highway – Ledyard, CT – Scale 1"=40' – April 2004, Revised September 16, 2024 – Sheet 3 of 11 – Dieter, Gardner & Mereen, Inc. – Land Surveying" and further described in a Warranty Deed filed on the Ledyard Land Records in Volume 435, Page 189.

The existing Avalonia Pike Marshall Preserve is located on about 272-acres and includes 104 Gallup Hill Road, 104R Gallup Hill Road, 199 Lambtown Road, 489 Pumpkin Hill Road and 480 Pumpkin Hill Road. 13 Applewood Drive Open Space parcel would add an additional 1.70-acres to the existing preserve and Avalonia Land Conservancy would become stewards of the land. Avalonia Board President Dennis Main will be in attendance at the meeting and will answer Commissioner questions.

The following Motion is suggested for any favorable recommendation:

I make a Motion to forward a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 to the Ledyard Town Council regarding the transfer of Town-Owned Property to Avalonia Land Conservancy to be combined with its existing Pike Marshall Preserve, Ledyard, CT.

If the PZC is inclined to send an unfavorable report, it shall state its reasons on the record.

Sec. 8-24. Municipal improvements. No municipal agency or legislative body shall (1) locate, accept, abandon, widen, narrow or extend any street, bridge, parkway or other public way, (2) locate, relocate, substantially improve, acquire land for, abandon, sell or lease any airport, park, playground, school or other municipally owned property or public building, (3) locate or extend any public housing, development, redevelopment or urban renewal project, or (4) locate or extend public utilities and terminals for water, sewerage, light, power, transit and other purposes, until the proposal to take such action has been referred to the commission for a report. Notwithstanding the provisions of this section, a municipality may take final action approving an appropriation for any proposal prior to the approval of the proposal by the commission pursuant to this section. The failure of the commission to report within thirty-five days after the date of official submission of the proposal to it for a report shall be taken as approval of the proposal. In the case of the disapproval of the proposal by the commission the reasons therefor shall be recorded and transmitted to the legislative body of the municipality. A proposal disapproved by the commission shall be adopted by the municipality or, in the case of disapproval of a proposal by the commission subsequent to final action by a municipality approving an appropriation for the proposal and the method of financing of such appropriation, such final action shall be effective, only after the subsequent approval of the proposal by (A) a two-thirds vote of the town council where one exists, or a majority vote of those present and voting in an annual or special town meeting, or (B) a two-thirds vote of the representative town meeting or city council or the warden and burgesses, as the case may be. The provisions of this section shall not apply to maintenance or repair of existing property, buildings or public ways, including, but not limited to, resurfacing of roads.

13 Applewood Drive Open Space

Ledyard, CT

1 inch = 565 Feet

0 565 1130 1695

September 8, 2025

CAI Technologies
Precision Mapping Geospatial Solutions
www.cai-tech.com



Data shown on this map is provided for planning and informational purposes only. The municipality and CAI Technologies are not responsible for any use for other purposes or misuse or misrepresentation of this map.

INSTR # 2007000121 VOL 00435 PG 0189 RECD 01/16/2007 09:17:37 AM
CALVIN K. BRDUWER TOWN CLERK LEDYARD CT
NO CONVEYANCE TAX

WARRANTY DEED - STATUTORY FORM

APPLEWOODS ESTATES, LLC, a Connecticut Limited Liability Company, having its principal place of business at 850 Gold Star Highway, Groton, Connecticut, hereinafter referred to as the GRANTOR for consideration paid, grants to **TOWN OF LEDYARD**, a municipal corporation within the State of Connecticut, herein referred to as the GRANTEE, with WARRANTY COVENANTS

A certain parcel of land for all PARK, OPEN SPACE AND RECREATIONAL PURPOSES located in the Town of Ledyard, County of New London and State of Connecticut, being more particularly bounded and described as follows:

All that certain parcel of land shown as "Open Space", also known as 13 Applewood Drive, on a map entitled "Plan Showing Applewood Estates Resubdivision – Property of Applewood Estates LLC – Colonel Ledyard Highway – Ledyard, Connecticut – Scale: 1" = 40' - April 2004 Revised September 16, 2004 - Sheet 3 of 11 - Dieter, Gardner & Mereen, Inc. – Land Surveying," which map is filed as Map # 2289 with the Ledyard Town Clerk. Said open space area is more particularly bounded and described as follows:

Begin at a point on the northerly line of Applewood Drive, which point marks the southwesterly corner of the access strip of Lot 11 as shown on said map, and thence run N 51° 12′ 00" E, along said access strip, a distance of 370.00′ to a point; thence run N 31° 00′ 27" E, along said access strip, a distance of 94.67′ to a point; thence run S 65° 12′ 13" E, along the southerly boundary of Lot 11 as shown on said map, a distance of 265.67′ to a point marked by a drill hole at the southeasterly corner of Lot 11; thence run S 36° 18′ 33" W, along land now or formerly of Nature Conservancy of Connecticut, Inc., a distance of 181.22′ to a point marked by a drill hole; thence run S 37° 18′ 48" W, along said Nature Conservancy land, a distance of 115.21′ to a point marked by a drill hole; thence run S 29° 42′ 10" W, along said Nature Conservancy land a distance of 10.06′ to a point marked by a drill hole; thence run S 41° 39′ 06" W, along said Nature Conservancy land, a distance of 37.73′ to a point marked by a drill hole; thence run S 34° 44′ 47" W, along said Nature Conservancy land, a distance of 51.36′ to a point marked by a drill hole; thence run N 17° 34′ 04" W, along the northeasterly boundary of Lot 15 as shown on said map, a distance of 315.40′ to a point; thence run S 51 12′ 00" W, along the northwesterly boundary of Lot 15 as shown on said map, a distance of 309.82′ to a point in the northerly line of Applewood Drive; thence along the northerly line of Applewood Drive, on the arc of a curve to the left having a radius of 325.00′, a distance of 10.10′ to the point and place of beginning.

Said Open Space parcel contains 74,060 s.f. or 1.70 acres.

Dated this 16th day of May 2006.

Witnessed by:

APPLEWOODS ESTATES, LLC

Peter W. Hoops

By Peter R. Lampasona
Peter R. Lampasona
Duly Authorized Member

Witness

HOOPS & JENSEN, LLC
attorneys at law

19A Thames Street,
Groton, CT 06340
Tel. (860) 445-8911
Or
Fax (860) 445-8919

JURIS No. 306839

STATE OF CONNECTICUT

ss: Groton May 16th, 2006

COUNTY OF NEW LONDON

Personally appeared **PETER R. LAMPASONA,** a duly authorized Member of **APPLEWOODS ESTATES, LLC,** signer and sealer of the foregoing instrument, and acknowledged the same to be his free act and deed and the free act and deed of the Limited Liability Company, before me.

PETER W. HOOPS
Commissioner of the Superior Court

Grantee's mailing address: 850 Gold Star Highway, Groton, Connecticut 06340

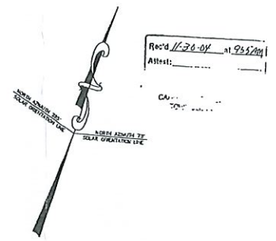
HOOPS & JENSEN, LLC
attorneys at law

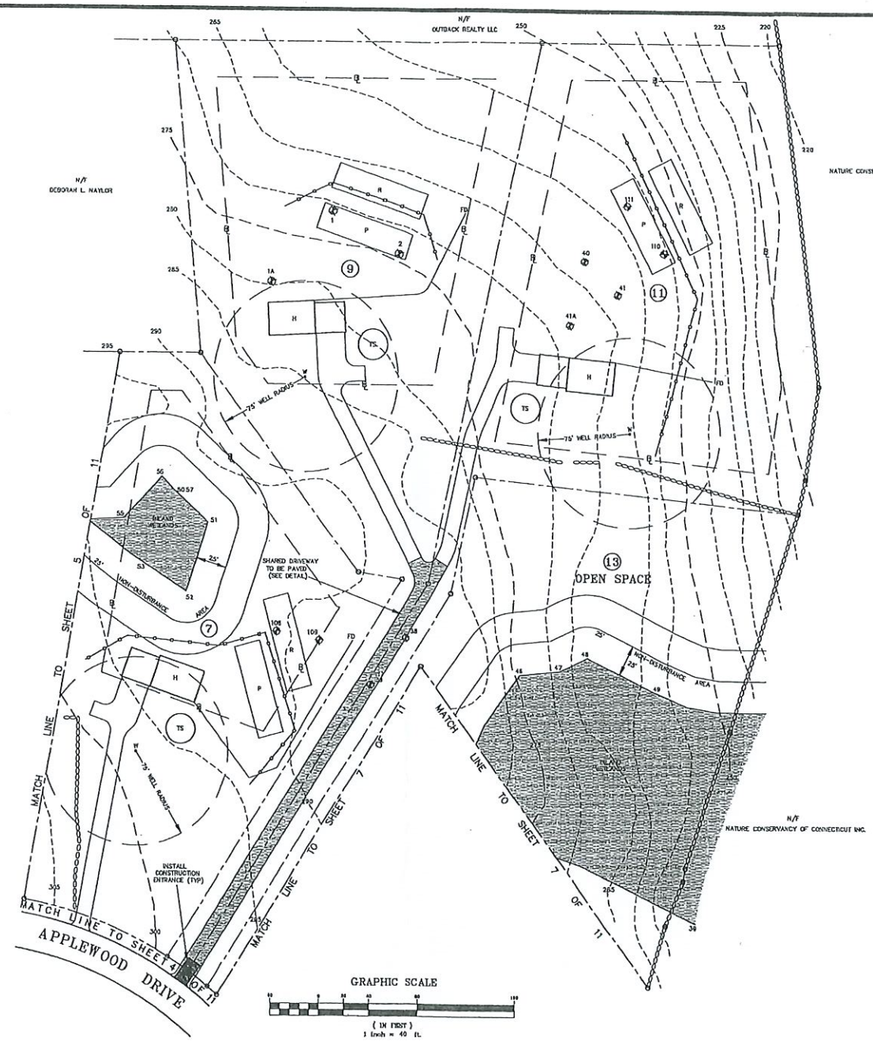
19A Thames Street,
Groton, CT 06340
Tel. (860) 445-3911
Or
Fax (860) 445-8919

JURIS No. 306539

2292

Rec'd 11-26-04 at 9:52AM
Attest: _____





APPROVED BY THE LEDYARD PLANNING COMMISSION AS TO THE COMPLIANCE WITH THE REGULATIONS GOVERNING THE SUBDIVISION OF LAND.
ALL IMPROVEMENTS SHALL BE COMPLETED BY 10/21/2009
DATE
CHAIRMAN OR SECRETARY — 11/1/2004 DATE

LOT NUMBERS ASSIGNED BY THE ASSESSOR
ASSESSOR — 11/1/2004 DATE

_____ APPROVED — IWWC CHAIRMAN — DATE
FOR APPLICABLE, BUT WITHIN A REGULATED AREA.
POT APPLICABLE AT THIS TIME (WITHIN A REGULATED AREA; NO REGULATED ACTIVITY PROPOSED AT THIS TIME.)
IWWC PERMIT No. 10-04
IWWC ENFORCEMENT OFFICER — 11/1/2004 DATE

APPROVED BY THE DIRECTOR OF PUBLIC WORKS OR THE TOWN ENGINEER FOR PUBLIC USE PURPOSES
PUBLIC WORKS DIRECTOR/TOWN ENGINEER — 11/8/04 DATE

I DELINEATED THE INLAND WETLAND AND WATERCOURSE BOUNDARY ON THIS PROPERTY. I AM OF THE OPINION THAT THE WETLAND BOUNDARY WHICH I MARKED ON THE PROPERTY IS SHOWN CORRECTLY ON THIS MAP.
DONALD J. FORTUNATY
CERTIFIED SOIL SCIENTIST

DRAWING NUMBER
DRAWING NUMBER
DRAWING NUMBER 2292

LEGEND

- STONE WALL
- PROPERTY LINE
- STREET LINE
- BUILDING SETBACK LINE
- EXISTING CONTOUR
- PROPOSED SILT FENCE
- EDGE OF WETLANDS & FLAG NUMBER
- UTILITY POLE
- APPROXIMATE TEST PIT LOCATION
- H PROPOSED HOUSE
- W PROPOSED WELL LOCATION
- P PRIMARY SEPTIC AREA
- R RESERVE SEPTIC AREA
- FD FOOTING DRAIN
- TS TOPSOIL STOCKPILE

THE WORD "CERTIFY" IS UNDERSTOOD TO BE AN EXPRESSION OF THE PROFESSIONAL OPINION BY THE LAND SURVEYOR WHICH IS BASED ON HIS OR HER BEST KNOWLEDGE, INFORMATION AND BELIEF, AS SUCH IT CONSTITUTES NEITHER GUARANTEE OR WARRANTY.

THE STONE WALLS AND/OR FENCES SHOWN AS BOUNDARIES MAY HAVE IRREGULARITIES OF COURSE BETWEEN PRINCIPAL POINTS OF COURSE INDICATED

© THIS DRAWING IS THE PROPERTY OF THE LAND SURVEYOR. THIS PLAN AND REPRODUCTIONS, ADDITIONS OR REVISIONS OF THIS PLAN ARE NOT VALID WITHOUT THE EXPOSED SEAL AND SIGNATURE OF THE LAND SURVEYOR WHO PREPARED THIS PLAN.
2008 03-1013103567

GRAPHIC SCALE
(IN FEET)
1 inch = 40 ft.

DIETER GARDNER & MEREEN, INC.
LAND SURVEYING • PLANNING
ENGINEERING
19 MILITARY HIGHWAY
BALES FERRY, CT 06335
PH (860) 464-7455
FAX (860) 464-5088
DIETER.GARDNER@SNET.NET

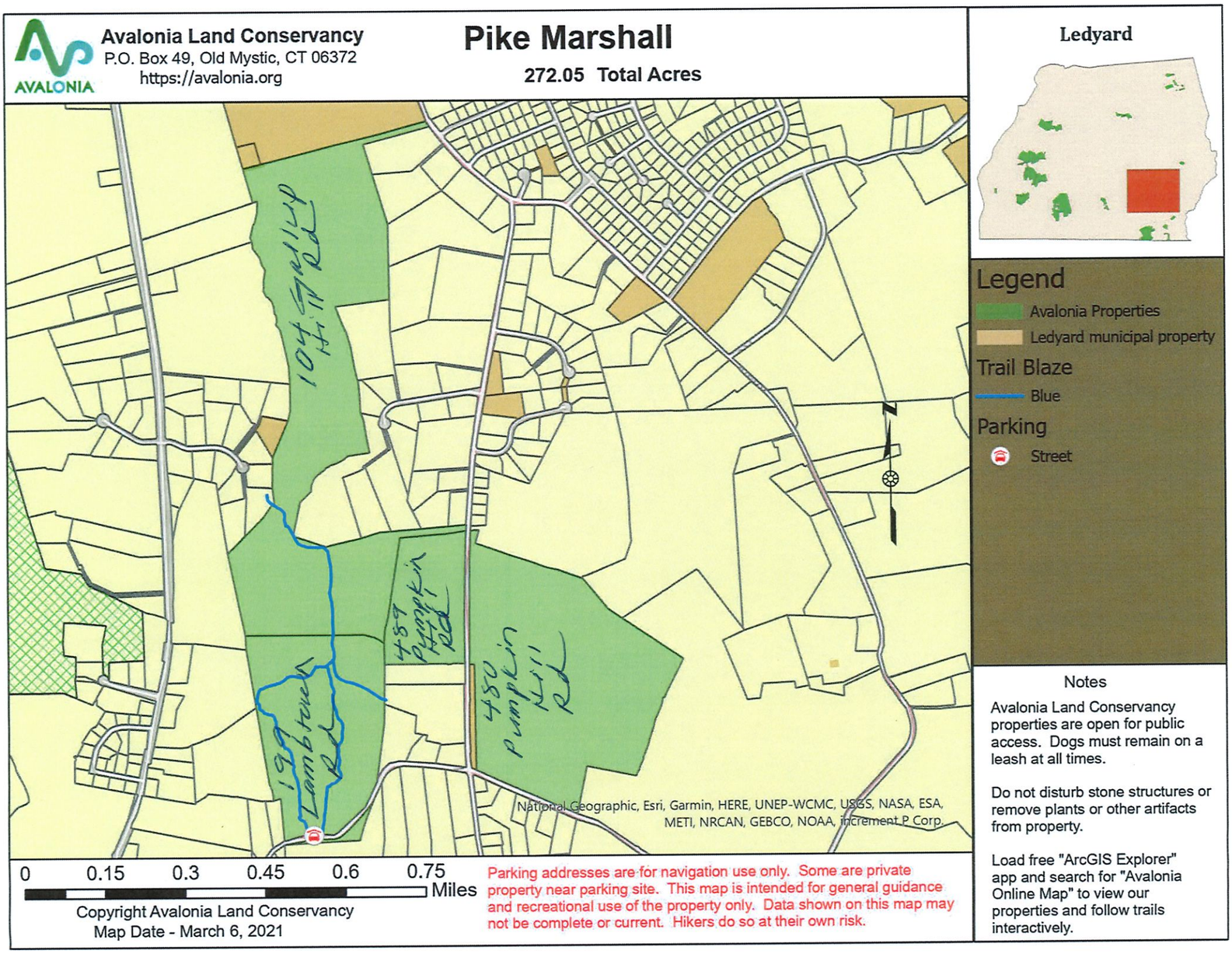
PLAN SHOWING
APPLEWOOD ESTATES RESUBDIVISION
PROPERTY OF
APPLEWOOD ESTATES LLC
COLONEL LEDYARD HIGHWAY
LEDYARD, CONNECTICUT
SCALE: 1"=40'
APRIL 2004
REVISED: SEPTEMBER 16, 2004 PER CONDITIONS OF APPROVAL

SHEET 6 OF 11

THIS SURVEY AND MAP HAS BEEN PREPARED IN ACCORDANCE WITH SECTIONS 20-300b-1 THRU 20-300b-20 OF THE REGULATIONS OF CONNECTICUT STATE AGENCIES - "MINIMUM STANDARDS FOR SURVEYS AND MAPS IN THE STATE OF CONNECTICUT" AS ADOPTED BY THE CONNECTICUT ASSOCIATION OF LAND SURVEYORS, INC. AND IS A CLASS A SURVEY BASED ON A RESURVEY CONFORMING TO HORIZONTAL ACCURACY CLASS A-2. TO THE BEST OF MY KNOWLEDGE AND BELIEF, THIS MAP IS SUBSTANTIALLY CORRECT AS NOTED HEREON.

TITLE: LAND SURVEYOR CT No. 11328
DATE: APRIL 9, 2004

2292


Avalonia Land Conservancy
P.O. Box 49, Old Mystic, CT 06372
https://avalonia.org
AVALONIA
Pike Marshall
272.05 Total Acres
104 Gallup Hill Rd
451 Pumpkin Hill Rd
450 Pumpkin Hill Rd
199 Lambtown Rd
National Geographic, Esri, Garmin, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.
0 0.15 0.3 0.45 0.6 0.75 Miles
Copyright Avalonia Land Conservancy
Map Date - March 6, 2021
Parking addresses are for navigation use only. Some are private property near parking site. This map is intended for general guidance and recreational use of the property only. Data shown on this map may not be complete or current. Hikers do so at their own risk.
Ledyard
Legend
Avalonia Properties
Ledyard municipal property
Trail Blaze
Blue
Parking
Street
Notes
Avalonia Land Conservancy properties are open for public access. Dogs must remain on a leash at all times.
Do not disturb stone structures or remove plants or other artifacts from property.
Load free "ArcGIS Explorer" app and search for "Avalonia Online Map" to view our properties and follow trails interactively.

Pike Marshall Preserve

AVALONIA TRAIL FINDER

Town: Ledyard

Maintained Uses: walking, hiking, running, biking, horseback riding

Difficulty: moderate

Length: 4.0 +/- miles (blue blaze marked)

Type: point to point and loop

Surface: packed earth/dirt, bridle trails, old farm roads

Pets: permitted (dogs on leash)

Year Preserved: 1969

Acres: 272.05 (Pike Tract 159.97 acres, Hugh A Marshall Tract 100.00 acres, Mummert Tract 12.08)

Lat.: 41°24'49.4"N
Long.: 71°59'22.1"W

MAP **GET DIRECTIONS** **HIKE & SEEK**

Trails have been in existence upon acquisition by The Nature Conservancy of the first tracts in 1969 and accommodate walkers, bikers, runners and horseback riding. The main south to north trail is about 2 miles long and runs from the Lambtown Road pull-off parking area to the tennis courts on the Burton Tract. The trailhead is located on the north side of Lambtown Road (199) on the west tract of the Pike Preserve about .6 miles east of the Lambtown Road/Colonel Ledyard Highway intersection. The trail runs north through the Pike Preserve, the Hugh A. Marshall Preserve and the Burton Tract to a path behind the Ledyard High School tennis courts. The connector legs from Pike Marshall Preserve to the Burton Tract trails are not complete yet. The trail is blazed with (blue) markers. There are also overgrown unmarked trails on the east and west Pike Preserve tracts. Pets are permitted (dogs on leash).

TOWN OF LEDYARD

Department of Land Use and Planning

Elizabeth J. Burdick, Director

741 Colonel Ledyard Highway, Ledyard, CT 06339

Telephone: (860) 464-3215

Email: planner@ledyardct.org

September 15, 2025

Gary St. Vil, Chairman
Ledyard Town Council
741 Colonel Ledyard Highway
Ledyard, CT 06339

RE: C.G.S. 8-24 Referral – 13 Applewood Drive (Parcel ID: 99-530-13), Ledyard, CT – Transfer of Town-Owned Open Space property to Avalonia Land Conservancy to be combined with the Avalonia "Pike Marshall Preserve".

Dear Chairman St. Vil,

The Ledyard Planning & Zoning Commission, at its September 11, 2025 regular meeting, voted unanimously to forward a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 to the Town Council for a MOTION to transfer town-owned property located at 13 Applewood Drive (Parcel ID: 99-530-13), Ledyard, CT to the Avalonia Land Conservancy ("Avalonia") to be combined with the Avalonia "Pike Marshall Preserve" and to remain open to the public for passive recreation and to be protected in perpetuity under Avalonia's care. The following recommendation was made as a condition to said favorable approval: 1. The 10-foot wide access to the property shall be clearly marked in the field by a Land Surveyor engaged by Avalonia, and 2. Appropriate signage identifying the open space parcel shall be installed by Avalonia.

Please contact me at Town Hall with any questions. Thank you for your attention to this matter.

Sincerely,

Elizabeth J. Burdick

Director of Land Use & Planning

C: Roxanne Maher, Administrative Asst. to the Town Council
Dennis Main, President, Avalonia Land Conservancy
Marcelle Wood, Chairman, Ledyard Planning & Zoning Commission
Fred Allyn III, Mayor
Anna Wynn, Asst. to Director Land Use
Hannah Gienau, ZWBEO
File – Land Use Dept.

Roxanne Maher

From: Elizabeth Burdick
Sent: Tuesday, September 16, 2025 7:35 AM
To: Roxanne Maher
Cc: Fred Allyn, III
Subject: RE: CGS Section 8-24 - Transfer of 19 Avery Hill Road Ext. to Avalonia Land Conservancy

9/16/25 Good morning, Roxanne, I believe this is a “no (money) consideration” for this transfer, however, Avalonia will take over stewardship of the property and maintain any trails, wetlands crossings, etc. I hope this addresses your question. Thanks!

Liz Burdick, Director of Land Use & Planning
Town of Ledyard
741 Colonel Ledyard Highway, Ledyard, CT 06339
Telephone: (860) 464-3215
Email: planner@ledyardct.org

From: Roxanne Maher <council@ledyardct.org>
Sent: Tuesday, September 16, 2025 7:30 AM
To: Elizabeth Burdick <planner@ledyardct.org>
Cc: Fred Allyn, III <mayor@ledyardct.org>; Roxanne Maher <council@ledyardct.org>
Subject: FW: CGS Section 8-24 - Transfer of 19 Avery Hill Road Ext. to Avalonia Land Conservancy

Good Morning Liz:

Thank you for providing the Planning & Zoning Commission’s Report regarding the transfer of town-owned open space
Located at 19 Avery Hill road Extension to Avalonia Land Conservancy to be combined with open space currently owned
by Avalonia Land Conservancy..

Do you know if Avalonia will be providing any payment to the town for the property, or whether this transfer would be for
“ No Consideration”

Thank you,
Roxanne

From: Elizabeth Burdick <planner@ledyardct.org>
Sent: Monday, September 15, 2025 4:52 PM
To: Roxanne Maher <council@ledyardct.org>; Gary St. Vil <GSVil@ledyardct.org>
Cc: Anna Wynn <land.use.asst@ledyardct.org>; Hannah Gienau <zoning.official@ledyardct.org>; Fred Allyn, III <mayor@ledyardct.org>; martyengrew@gmail.com
Subject: CGS Section 8-24 - Transfer of 19 Avery Hill Road Ext. to Avalonia Land Conservancy

9/15/25 Good afternoon, Roxanne, Attached please find a Favorable Report to the Ledyard Town Council from the Ledyard Planning & Zoning Commission regarding the transfer of town-owned open space at 19 Avery Hill Road Ext. to Avalonia Land Conservancy. Also attached is my staff report with attachments for the Council's review. Please forward to Chairman St. Vil to be placed on the appropriate agendas for action. Thank you.

Liz Burdick, Director of Land Use & Planning
Town of Ledyard
741 Colonel Ledyard Highway, Ledyard, CT 06339
Telephone: (860) 464-3215
Email: planner@ledyardct.org

AVALONIA

Avalonia Land Conservancy, Inc.
PO Box 49
Old Mystic, CT 06372

Avalonia.org
info@Avalonialc.org

860.884.3500

BOARD OF DIRECTORS

Officers
Dennis Main
President
Neil Duncan
Vice President
Elanah Sherman
Secretary
Maria Miranda
Assistant Secretary
Mark Hibbard
Treasurer
Peter Gauthier
Assistant Treasurer

Directors at Large
Richard Conant
Scott Dawley
Christopher Houlihan
Sharon Lynch
Elizabeth Sorensen

STAFF

Director of Stewardship
Tobias Glaza

Director of Philanthropy
Christopher Kepple

Office Manager
Mary Anne Sherman

Administrator
Ukiah Pastor

Mayor Fred Allyn III,

Ledyard Town Hall

741 Colonel Ledyard Highway

Ledyard, CT 06339

Dear Mayor Allyn,

Since 2005 the Town of Ledyard has transferred over 20 parcels of open space to Avalonia Land Conservancy, Inc. with tremendous success as a collaborative undertaking resulting in significant habitat and passive recreation opportunities within Ledyard

Currently two additional parcels are under consideration. Avalonia would respectfully request that the Ledyard Town Council approve a Town Meeting consideration of the transfer of 13 Applewood Drive as an open space abutting parcel to the Pike Marshall Preserve and 19 Avery Hill Road Extension as an addition to the abutting pending transfer of 173-175 Stoddards Wharf Road to Avalonia.

Thank you for your consideration,

Dennis S. Main, President

Avalonia Land Conservancy, Inc.

ACCREDITED LAND TRUST ACCREDITATION COMMISSION

Avalonia Land Conservancy, Inc. preserves natural habitats in southeastern Connecticut by acquiring and protecting lands and by communicating the value of these irreplaceable resources. Avalonia Land Conservancy is a 501(c)3, non-profit organization. Your contribution is tax deductible to the extent allowed by law. No goods or services were provided in exchange for your financial donation. Please keep this written acknowledgment of your donation for your tax records.

Roxanne Maher

From: H James Harwood <h.james.harwood@gmail.com>
Sent: Wednesday, October 15, 2025 10:41 AM
To: Roxanne Maher
Subject: Support letters for transfer of Kettle Hole and 13 Applewood Drive to Avalonia
Attachments: support letter for transfer of Kettle Hole to Avalonia 10-14-25.pdf; support letter for transfer of open space at 13 Applewood Drive to Avalonia 10-14-25 - Copy.pdf

Hey Roxanne,

At the meeting on September 11th, Planning and Zoning approved motions to issue FAVORABLE REPORTS to the Town Council for the transfer of the Kettle Hole at 19 Avery Road Ext and for the transfer of the town-owned open space property at 13 Applewood Drive to Avalonia. At that time, the Planning and Zoning Commission discussed having the Conservation Commission send letters of support for the transfers to the Town Council.

At our regular meeting last night, the Conservation Commission approved drafts of two letters, one for the Kettle Hole property and one for the 13 Applewood Drive open space property, attesting and reaffirming our support for the transfer of these two properties to Avalonia. PDFs of the two letters are attached.

Let me know if submitting these as PDFs is satisfactory or if you need us to submit hard copies of the letters.

Thanks Roxanne !

Cheers,

Jim

TO: Ledyard Town Council

FROM: Ledyard Conservation Commission

October 14th, 2025

This letter, dated October 14th 2025, serves to attest and reaffirm the support of the Conservation Commission for the transfer of Town-Owned Property at 19 Avery Hill Road Ext. known as the "Kettle Hole" property to Avalonia Land Conservancy to be combined with Other Lands of DDJJM LLC at 173 Stoddards Wharf Road & 75 Stoddards Wharf Road to be transferred to Avalonia, for which a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 was approved and submitted to the Ledyard Town Council by the Ledyard Planning and Zoning Commission at their regular meeting of September 11th, 2025.

Sincerely,

Ledyard Conservation Commission

TO: Ledyard Town Council

FROM: Ledyard Conservation Commission

October 14th, 2025

This letter, dated October 14th 2025, serves to attest and reaffirm the support of the Conservation Commission for the transfer of Town-Owned Open Space Property at 13 Applewood Drive to Avalonia Land Conservancy to be combined with its existing Pike Marshall Preserve, for which a FAVORABLE REPORT in accordance with C.G.S. Section 8.24 was approved and submitted to the Ledyard Town Council by the Ledyard Planning and Zoning Commission at their regular meeting of September 11th, 2025.

Sincerely,

Ledyard Conservation Commission

File #: 25-2585 **Agenda Date:** 10/22/2025 **Agenda #:** 11.

ORDINANCE

Motion/Request:
MOTION to extend Archery Hunting on Certain Town Owned Lands and Certain Open Space Properties for one-year in accordance with provisions in Ordinance#100-018 (rev. 1) "*An Ordinance Providing Archery Hunting on Certain Town Owned Lands and Certain Open Space Properties"*

In addition, amend Ordinance #100-018 "Appendix A - Town of Ledyard Hunting Rules and Regulations" to paragraph (5) as follows:

5) *Hunting shall be limited to the following Town of Ledyard owned properties and open space properties not owned by the Town of Ledyard, as recorded on the Deed of the Land Records or with written consent of the property owner.*

   a) *Clark Farm (1025 Colonel Ledyard Highway) (Town Owned Property)*
   b) *Founders Preserve Parcel (**REMOVE** ~~332~~ - **CHANGE TO** **334** Colonel Ledyard Highway (Avalonia Land Conservancy)*

.

Background:

In 2018 the Town Council adopted Ordinance #100-018 "*An Ordinance Providing for Archery Hunting on Certain Town Owned Lands*".

The two properties that would be used for archery hunting were: (1) Clark Farm located on Route 117 on the north end of town; and (2) Founders Preserve (fka -Paint Mill) Property located between Colonel Ledyard Highway and Pumpkin Hill Road on the south end of town (both properties were about 100 acres).

At a Special Town Meeting held on October 28, 2020 the townspeople approved to transfer the Founders Preserve (also formerly known as: Quakertown Preserve/Paint Mill) to Avalonia Land Conservancy. One of the terms for the land transfer was that Avalonia Land Conservancy would continue to allow archery hunting on the Founders Preserve property.

Because the Founders Preserve would no longer be town-owned property that on April 25, 2021 Ordinance #100-108 (rev. 1) and its accompanying Appendix was amended to include provisions for *"non-town owned properties/certain open space properties".*

This program was a Lottery System in which six people would win a lottery for each property to bow hunt.

This was an Administrative Action - ***In accordance with Section 4. "Annual Expiration" the Ordinance would expire annually at the end of the calendar year, unless a vote of the Town Council was taken to approve to extend it for one year***.

Amend Appendix A: Because there were some property boundary adjustments regarding the properties located ***332 & 334*** *Colonel Ledyard Highway* and the two parcels have been merged. The New address for the merged properties is ***334 Colonel Ledyard Highway***. Therefore, Appendix A is being updated to reflect the correct number/address which is now ***334 Colonel Ledyard Highway*** (Please see attached Appendix)

Appendix A - Town of Ledyard Hunting Rules and Regulations" paragraph (5) is being updated as follows:

(5) Hunting shall be limited to the following Town of Ledyard owned properties and open space properties not owned by the Town of Ledyard, as recorded on the Deed of the Land Records or with written consent of the property owner.

a) Clark Farm (1025 Colonel Ledyard Highway) (Town Owned Property)
*b) Founders Preserve Parcel (~~332~~ **334** Colonel Ledyard Highway (Avalonia Land Conservancy*

Department Comment/Recommendation:
(type text here)

Mayor Comment/Recommendation:
(type text here)

Town of Ledyard
Hunting Rules and Regulations

All hunting activity will be strictly regulated to ensure the safety of all recreationalists and to protect the natural resources of Ledyard.

1) Hunting permits for hunting deer (archery only) on certain designated parcels of Town owned land shall be issued via lottery system to any legal resident of the Town of Ledyard who has completed a CT Bowhunting Safety Course and can pass a qualifications check administered by the Town.

   a) A legal resident is one who has a legal permanent physical address in Ledyard, normally a state issued ID (requiring notification of change of address within 48 hours). Residence must be verified by presenting a valid CT Drivers License. Residents currently serving in the military must show appropriate proof of residence within Ledyard if they do not have a CT Drivers License (utility bill with current mailing address, etc.).

   b) Applicants must present a certificate from the State of Connecticut showing they have completed the State's Bowhunting Safety Course.

   c) Lottery applications may be submitted in writing between May 1 and May 31 for the hunting season during the current calendar year only.

   d) The lottery will be held in Town Hall prior to July 1. Applicants need not be present, and will be notified via email. Winning lottery entries are valid for the current hunting season only.

   e) Winning lottery permits are not transferable.

   f) Applicants winning the lottery must pass the qualifications test administered by the Town to prove minimum competency with a compound bow (shoot from an elevated stand at various ranges at a 3D target, minimum score 75%).

   g) A maximum of 6 permits shall be issued for each property (total of 12). Winning lottery permission slips may be picked up at the Town Clerk's office with proper identification and valid CT archery hunting license.

2) All hunters will be required to secure written permission from the Town of Ledyard using official CT DEEP Private Land Permission forms found on the CT DEEP website before hunting on Town owned and regulated deer hunting property as specified herein. The Town will administer written permission slips through the Town Clerk's office beginning July 1 for hunters holding winning lottery entry slips.

3) Hunters must hold a current, valid CT hunting license for archery deer with tags, and shall comply with all CT DEEP hunting regulations.

4) At the time of permit issuance, individuals shall be required to complete and sign the town's Hunting Legal Release Form and Waiver of Liability which relieves the Town of all liability in the case of accident or injury. Individual hunters must have read and understood all applicable federal, state, and Town of Ledyard hunting regulations before being issued a permit.

5) Hunting shall be limited to the following Town of Ledyard owned properties and open space properties not owned by the Town of Ledyard, as recorded on the Deed of the Land Records or with written consent of the property owner.

   a) Clark Farm (1025 Colonel Ledyard Highway) (Town Owned Property)
   b) Founders Preserve Parcel (~~332~~ ***334*** Colonel Ledyard Highway (Avalonia Land Conservancy)

6) Hunting days and times will follow State regulations with the following exceptions:
   a) Hunting is prohibited on Sundays.
   b) Hunting will be closed on Columbus Day.
   c) Hunting hours will follow State regulations. In addition, all hunting must end at 10:00 AM every Saturday during the hunting seasons.

7) Applicants for recreational use of town owned property shall not be assessed a tax or charged a fee, for the granting of such privilege.

8) Only archery deer hunting will be permitted, subject to the regulations herein. All other types of hunting on Town owned land is prohibited.

Regulated Deer Hunting Rules

1) The methods of taking deer are limited by archery equipment consisting of a long bow (straight limb, reflex, re-curve, and compound bow) of not less than forty (40) pounds pull, and broad-head arrows with at least two cutting edges seven eighths inches (7/8") or greater at the widest point, and shall comply with all CT regulations.

   a) A bowstring release device where the bow is hand-held, hand-drawn, and finger-released is allowed.
   b) Legal bows must meet the definition of a legal bow as defined in these regulations.
   c) Crossbows are not permitted.

2) Firearms or other weapons are not allowed at any time for any purpose.

3) No hunter shall harass, injure, hunt, or take any other wildlife while hunting deer on Town property.

4) Bowhunting while under the influence of, or in possession of, alcohol or any controlled substance is prohibited.

5) No permanent tree stands or ground blinds allowed.

6) The use of nails, spikes, bolts, or devices that may damage trees is prohibited.

7) Portable commercial tree stands and/or ground blinds are encouraged for all deer hunting activity. All such equipment must be removed at the end of each day's hunt.

8) The Town of Ledyard will not be responsible for lost, stolen, or damaged equipment.

9) Any hunter utilizing a portable tree stand must wear a fall arresting, full safety harness when hunting from a stand. Light pruning of trees and branches less than 2 inches in diameter (except for CT protected species) is permitted.

10) All deer hunting activity must be conducted from a stationary position.

11) Organized deer drives are strictly prohibited.

12) No motor vehicles are allowed for use on the premises except for those specifically authorized for use by the handicapped or for parking in designated parking areas or roadside parking not otherwise prohibited by law. All motor vehicle use (except for parking) shall be authorized in writing on the consent form.

13) No dressing of game shall occur on the property. All waste material shall be removed from the property.

14) Hunters must carry written permission slips, licenses, and deer tags on their person while hunting, in accordance with State law.

15) All other deer laws and regulations enacted by the State of Connecticut will be in effect and must be followed by all deer hunters.

Amended and Adopted by Ledyard Town Council on:___

_____
Gary St. Vil, Chairman

TOWN OF LEDYARD

741 Colonel Ledyard Highway
Ledyard, CT 06339-1511

File #: 24-0481 **Agenda Date:** 10/22/2025 **Agenda #:** 12.

ORDINANCE

Motion/Request:
MOTION to override the Mayor's disapproval/veto dated October 16, 2025 and approved the *"An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission"* as approved by the Town Council at their October 8, 2025 meeting.

Background:

Town Council Meeting - October 8, 2025: Town Council approved Amendments to the proposed *"An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" dated September 10, 2025 as follows:

- ✓ ***Section 4, paragraph 3b,*** remove the phrase "~~spouse or minor child~~" and replace it with "***or immediate family of***".
- ✓ ***Section 4, paragraph*** 8, Town Employee definition will be modified to add the phrase, ***"including outsourced administrative or executive professionals, including but not limited to consultants and the Town Attorney***"
- ✓ ***Section 5, paragraph 3,*** add the phrase, "***unless the contract or purchase order is awarded through the traditional bid or quote process and conflict is disclosed.***"
- ✓ ***Section 5, paragraph 4,*** add the following sentence, "***This provision does not apply to Town employees or Board of Education employees providing recreational services including but not limited to classes, coaching, camp counseling through Ledyard Parks and Recreation or Ledyard Board of Education".***
- ✓ ***Section 7, paragraph 1b6***, add the phrase "***unless disclosed to the Ethics Commission.***"

And adopted a proposed *"An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" dated October 8, 2025.

October 14, 2025: The adopted Ordinance was certified/signed and submitted to the Mayor.

Public Hearing- September 24, 2025

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

1) Resident Questions & Responses
For the September 24, 2025 Public Hearing on the proposed **"Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"** (draft attached), please submit:

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

These Q&As will be included in the 9/24/2025 Public Hearing Minutes as "Post Meeting Notes."
2) Proposed Amendments

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

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

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

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

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

- ***June 23, 2025*** the Administration Committee forwarded a draft Ordinance dated June 11, 2025 to Town Attorney Matt Ritter for his legal review and recommendations.

- ***June 25, 2025*** Councilor Buhle and Attorney Ritter spoke by telephone about the proposed Ordinance.

- ***July 14, 2025*** Attorney Ritter provided a Red Line document with his legal recommendations
- ***August 6, 2025*** Administration Committee Meeting; Councilor Buhle asked the Administration Committee to review Attorney Ritters comments and recommendation for discussion at their September 01, 2025 meeting.

- ***September 8, 2025*** Councilor Buhle provided a revised draft "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethic Commission".*(dated July 8, 2025).

- ***September 10, 2025*** Administration Committee Meeting the Committee reviewed the revised draft provided by Councilor Buhle and made a change to the Section 8 "*Penalties for Violations of the Code of Ethics* "(f) to strike the following langue ***"and/or removal from elected or appointed office***" as noted below:
  - Termination of employment ~~and/or removal from elected or appointed office;~~

- And forwarded a proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethic Commission"* presented in the draft dated September 10, 2025 to the Town Council for approval and also recommend setting a Public Hearing on September 24, 2025.

- ***September 10, 2025*** Town Council Meeting - Set Public Hearing on September 24, 2025 to receive public comment on the *An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethic Commission"* presented in the draft dated September 10, 2025.

- ***September 24, 2025*** Public Hearing - 20 Residents/Town Staff provided comments regarding the proposed Ordinance.

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

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

Please find attached the following documentation:

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

Department Comment/Recommendation:
(type text here)

Mayor Comment/Recommendation:
(type text here)

Body:
(type text here)

TOWN OF LEDYARD
CONNECTICUT

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

Chairman Gary St. Vil

MEMORANDUM

DATE: October 16, 2025
TO: Ledyard Town Council
FROM: Roxanne M. Maher, Administrative Assistant RM
To the Ledyard Town Council

Subject: *"Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission for the Town of Ledyard"*

In accordance with the Town Charter, I am transmitting *"Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission for the Town of Ledyard* which the Mayor stated his disapproval in his letter dated October 16, 2025 listing his reasons for not approving the proposed Ordinance.

Chapter III, Section12 of the Town Charter states the following:

Every ordinance, except an emergency ordinance or an ordinance relating to the Town Council or its procedures, shall, before it becomes effective, be certified to the Mayor for his approval within seven (7) days of the final passage by the Town Council. The Mayor shall sign the proposed ordinance, if he approves it, whereupon, subject to the provisions of Section 5 of this Chapter, it shall become effective. If he disapproves a proposed ordinance, he shall, within five (5) days of its receipt by him, return it to the clerk of the Town Council with a statement of the reasons for his disapproval, which statement shall be transmitted by said clerk to the Town Council at its next meeting.

If the Town Council shall pass the proposed ordinance by an affirmative vote of at least six (6) members within fourteen (14) days after such ordinance has been returned with the Mayor's disapproval, it shall become effective without his approval subject to said Section 5. *If the Mayor does not return the proposed ordinance within the time required, it shall become effective without his approval subject to said Section 5.*

Should you have any questions, please feel free to contact me.

Thank you.

TOWN OF LEDYARD
CONNECTICUT
OFFICE OF THE MAYOR

Fred B. Allyn III
Mayor

Kristen Chapman
Executive Assistant to the Mayor

741 Colonel Ledyard Highway
Ledyard, CT 06339-1551
(860) 464-3222
FAX (860) 464-8455

October 16, 2025

Ledyard Town Council
C/O Chairman Gary St. Vil
741 Colonel Ledyard Hwy.
Ledyard, CT 06339

RE: Disapproval of Ordinance #100-021

Chairman St. Vil,

I return to you the attached Ordinance #100-021 which is disapproved. Also attached are 2+ pages of comments from the Town Attorney, indicating issues with the document as well as 2 pages of comments from Parks and Rec Director Scott Johnson Jr. My concern is and continues to be a lack of a proper ordinance that reasonably addresses concerns raised in prior meetings, reduces liability exposure to the Town, does not adversely impact Parks and Rec programming for our residents and does not become a political weapon- as demonstrated in Montville and Waterford most recently. The Town Attorney has stated "he cannot defend this ordinance". Of grave concern is another attachment, which is Councilor Buhles reply email to me on Thursday, October 9th at 11:30AM. (You are provided both my email to her and her response to me). The one line response "I am working on it now and anticipate having it to you shortly" flies right in the face of governmental transparency as the Town Council voted on this ordinance the previous night (without the benefit of any Councilor having a copy of the ordinance they were voting on, other than Ms. Buhle). This email does not suggest, it says that she is ***working on an ordinance that was passed the night before.*** No ordinance should be edited in any way after approval- it should be exactly as was voted on the previous night. An ordinance that goes to Public Hearing is meant to be the final draft- it should not be amended post- Public Hearing. Lastly, I want to add further context to a memo you read at the October 8, 2025 meeting authored by Fred Allyn Jr, then Mayor. In said memo, it suggested the town create an ethics commission. What was omitted from the 10/8 meeting is that as part of the forensic audit- completed as a result of the embezzlement by a Town Employee, a decision was made to implement a Fraud Policy, require two sign-off's on checks of a certain dollar threshold, the

tax refund policy and the vehicle use policy. Since that time nearly two decades ago, the implemented policies continue to protect the Town and taxpayers.

As I previously stated in my letter to the Town Council on 9/24/25:

- The Town Charter grants the Town Council the power to investigate.
- The Fraud Policy outlines no less than eight different situations that constitute fraud.
- The Employee Handbook covers Nepotism, Conflict of Interest, Outside Employment and the Vehicle Use Policy.

Lastly, *there is no budget for this new commission or its attorneys.* Please note, the Authority/Duty of the new commission, upon receipt of a complaint is "To consult with The Town Attorney or another attorney" and "To request that the Town Attorney provide advisory opinions". These consultations, investigations and advisory opinions cost money. The Town Attorney has suggested a minimum of $20,000 for such a commission- though it can go markedly higher based on the allegations, if the result is appealed to Superior Court, etc. Also know, the Town is required to provide legal counsel to the accused. Our insurance carrier, CIRMA includes stated deductibles between $1,000 and $10,000 per occurrence.

In closing, please know I do fully support a proper "Code of Ethics" and updating to our Fraud Policy and Conflict of Interest statement, if warranted.

Thank you,

Fred B. Allyn III

Mayor

AN ORDINANCE ESTABLISHING A TOWN OF LEDYARD CODE OF ETHICS AND ETHICS COMMISSION

Be it ordained by the Town Council of the Town of Ledyard:

Section 1. Authority

In accordance with Chapter III of the Town Charter, there is hereby established a Town of Ledyard Code of Ethics and Ethics Commission.

Section 2. Declaration of Policy and Purpose

The trust of the public is essential for government to function effectively. The proper operation of the Town government requires that Town officials, 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, or immediate family 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.
An honorary degree.

i. Costs associated with attending a conference or business meeting and/or the registration or entrance fee to attend such conference or business meeting in which the Town official or Town employee participates in his or her official capacity.

j. Any gift provided to a Town Official or Town Employee or to an immediate family member of a Town Official or Town Employee for the celebration of a major life event provided any such gift provided to an individual does not exceed one thousand dollars ($1,000.00) in value. A major life event shall include, but not be limited to, a ceremony commemorating an individual's induction into religious adulthood such as a confirmation or bar mitzvah; a wedding; a funeral; the birth or adoption of a child; and retirement from public service or Town employment.

5. *"Immediate family"* means spouse, fiancé, child, parent, grandchild, brother, sister, grandparent, niece, nephew, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, 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, including outsourced administrative or executive professionals, including but not limited to consultants and the Town Attorney.

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, unless the contract or purchase order is awarded through the traditional bid or quote process and conflict is disclosed.

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. This provision does not apply to Town employees or Board of Education employees providing recreational including but not limited to classes, coaching, or camp counseling through Ledyard Parks and Recreation or Ledyard Board of Education.

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 unless disclosed to the Ethics Commission.

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

2. Terms of Appointment

a. Members shall be appointed by the Town Council for a term of three (3) years and shall serve until their successor has qualified or is removed by the Town Council.

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

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

d. Any vacancy on the Ethics Commission, other than by expiration of term, shall be filled for the unexpired portion of the term by the Town Council.

e. The Town Council may remove members for cause and fill the vacancy in accordance with the Town Charter. Cause for removal shall include, but is not limited to, an unexcused absence from three (3) consecutive meetings. It shall be the responsibility of the Chairman of the Ethics Commission to notify the Town Council when a member has not properly performed his or her duties.

f. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary.

3. Authority/Duties

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

a. To consult with the Town Attorney or another attorney hired by the Ethics Commission if so authorized by the Town Council.

b. To request that the Town Attorney provide advisory opinions.

4. Filing of Complaints

A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission and signed under penalty of false statement. The form shall be delivered to the Town Clerk who shall transmit a copy of the complaint to the Chairperson of the Ethics Commission and the respondent within five (5) days of receipt of the complaint. The Ethics Commission shall also notify the respondent that it will conduct a probable cause determination and invite the respondent to provide any information the respondent deems relevant to the Ethics Commission's determination of probable cause.

No complaint may be made under the Code of Ethics unless it is filed with the Ethics Commission within three (3) years after the violation alleged in the complaint has been committed.

The Complaint shall include:

a. Name of the person accused (respondent)

b. Name of the person filing the complaint.

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

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

5. Evaluation and Acknowledgement

a. Within sixty (60) business days of the receipt of a complaint, the Ethics Commission shall review and determine whether there is probable cause that a violation of the Code of Ethics has occurred. A finding of probable cause means that based on a review of the available information the Ethics Commission determines that reasonable grounds exist to believe that the respondent engaged in prohibited conduct by the Code of Ethics. If the Ethics Commission does not make a finding of probable cause, the complaint shall be dismissed and a copy of its decision shall be mailed to both the complainant and the respondent. Unless the Ethics Commission makes a finding of probable cause, a complaint alleging a violation of this Code of Ethics shall be confidential except upon the request of the respondent.

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

6. Hearings

If the Ethics Commission decides that probable cause of a violation of the Code of Ethics exists, it will conduct a public hearing to determine whether or not a violation occurred in accordance with Uniform Administrative Procedure Act ("UAPA") (See Chapter 54 of the Connecticut General Statutes). At the hearing, the respondent will have the right to be represented by legal counsel, to present evidence and witnesses, and compel attendance of witnesses and the production of books, documents, records, and papers, and to examine and cross-examine witnesses, and inspect and copy relevant and material records, papers, and documents not in such person's possession. Hearings are not governed by the legal rules of evidence, and any information relevant to the matter may be considered. The Ethics Commission will respect the rules of privilege recognized by the law. Not later than ten (10) days before the start of the hearing, the Ethics Commission will provide the respondent with a list of its intended witnesses. The Ethics Commission will make a record of the proceedings.

7. Final Decisions

a. Decisions by the Ethics Commission that a person is in violation of the Code of Ethics must result from the concurring vote of four (4) of its members.

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

c. Such finding and memorandum will be deemed to be final decision of the commission for the purposes of the UAPA. The respondent may appeal to the superior court in accordance with the provision of Section 4-183 of the Connecticut General Statutes.

d. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) days after its decision. It will also advise the respondent of his or her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

8. Penalties for Violations of the Code of Ethics

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

a. Order to cease and desist the violation;

b. Pay a civil penalty of up to the maximum amount permitted by State law;

c. Censure;

d. Suspension without pay;

e. Demotion;

f. Termination of employment;

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

Section 8. Severability

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

Adopted by the Ledyard Town Council on: October 8, 2025

Signed/Certified on: 10·14·2025

Gary St. Vil, Chairman

Approve/Disapprove on: 10/16/25

Fred B. Allyn, III, Mayor

Published on:

Patricia A. Riley, Town Clerk

Effective Date:

****

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

6X.1

Fred Allyn, III

From: Ritter, Matthew D. <MRitter@goodwin.com>
Sent: Wednesday, October 15, 2025 1:33 PM
To: Fred Allyn, III; Kristen Chapman
Subject: Comments to Ordinance

Mayor – I hope you can kindly share my comments with the Town Council. I would note that some of my previously suggested edits have been made.

However, I did flag many of the same sections discussed below in my prior draft and I did not review any subsequent drafts after my initial review. In addition, this ordinance appears to be a blend of several other municipal ordinances. In some cases, as I will note below, there are capitalized terms or key terms that are not defined or the ordinance contains redundant sections. I would suggest the Town start over with an ordinance from a single Town and add in provisions to that ordinance. I believe that will lead to a more streamlined review process and avoid inconsistencies within the ordinance.

Comments Below:

1. Definition of a "Financial Interest" – in the new subsection (b) it says "pecuniary or material benefit." A pecuniary benefit is defined in subsection (a) above as anything worth more than $100. I would add a definition to clarify what a "material benefit" is for a Town official or Town employee.

2. I would recommend merging subsections (b) and (c) under the new definition of financial interest because there is little difference between the two definitions. Both provisions are aimed at preventing a Town official or employee from obtaining a financial gain or loss due to official Town action.

However, subsection (c) does not have the same carve out that appears in subsection (b) – "except for such contracts or 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."

I also want to clarify the following fact pattern: a BOE secretary has a husband who is an electrician. Can the electrician bid on a Town contract under the new definitions? Is this a "contract or 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?"

3. Under the language in subsection (c), if a Town Council member owns $200 worth of stock in a company and that company wants to move to Town, is it a violation of this provision for that member of the Town Council to vote on an agreement with the company to relocate to Ledyard? What if the stock is held in a trust or 401k? Same outcome?

Subection (c) also says that a Town employee has a financial interest if they are an "employee" of a business or professional enterprise that may "directly or indirectly" receive a financial gain or loss as a result of a Town action. These types of sections usually run to the owner (or other high ranking officials) of the company and not regular employees. For example, what if a member of the Planning & Zoning Commission works at CVS as a cash clerk in New London. Are they prohibited from voting on a CVS zoning application in Ledyard?

EX. 1

4. Typo in this sentence: "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"… it should say "or" not "of."

5. New definition of immediate family – "anyone living in the same household." Does this include someone who may rent a room and is not related to the owner? What about two roommates who are not related and move in together?

6. Town employee definition has been expanded to include the "town attorney' and "outsourced administrative or executive professionals."

A. Whose responsibility is it to alert every outsourced administrative or executive professionals that they are subject to the Town's Code of Ethics and that they are held to the same standard as Town employees? Will these provisions be part of standard Town contracts?

B. Who is an "outsourced administrative or executive professional?" I would make this a defined term if it is to remain in the ordinance.

C. Under the current draft, if the Town hires an "executive professional", certain provisions of Section 5 apply to the spouse or the child, for example, of that executive professional. Section 5, subsection 6. now provides that the spouse of an executive professional cannot receive a gift from another Town contractor (and in this example neither the executive professional or the Town contractor work for the Town or the BOE). I think the Town will find it difficult, if not legally impossible, to regulate non-Town employees to this extent.

7. Section 5 – I deleted this provision in my original comments because it is a subjective standard as opposed to an objective standard. I think the Ethics Commission and lawyers will have a hard time agreeing on what is "incompatible with the proper discharge" of a person's "independent judgment or action in the performance of that person or person's duties."

8. Section 5, subsection (4) typo: "This provision does not apply to Town employees or Board of Education employees providing recreational including but not limited to classes, coaching, or camp counseling through Ledyard Parks and Recreation or Ledyard Board of Education."

Should it say "recreational services"?

9. Section 5, subsection 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.

What does "may be awarded" mean? I would clarify that it means someone who has bid on a contract or has been awarded a contract.

10. Section 5, Subsection 7. – I would recommend deleting subjective standards. What constitutes private employment that "could tend to impair independence of judgment or action by the Town official or Town employee"?

11. Section 5 – Subsection 8. – what does this mean- "A Town official or a Town employee, not otherwise restrained by the Code"?

Ex. 1

In addition, that same section cites to "Agencies" which is capitalized and not defined elsewhere in the Ordinance.

12. Section 5 – Subsection 12 – what is "personal gain?" It is not defined in the ordinance.

13. Section 5 – Subsection 15 – I am not sure whether the Town can prohibit former employees from working in a job for 1 year after leaving Town service. I am OK with the language as it applies to former Town officials but Town employees may have a claim as to the legality of this provision.

EX.2

Sections 1&2:

- Both sections mention establishing a "Code of Ethics" and "standards of ethical conduct" (section 2). Where is the Code of Ethics or standards of ethical conduct?

Section 3:

- "Shall apply to all" groups town, BOE employees and officials together. In a small town essentially every PR&SC instructor falls into one of those 4 categories. Note: Program Instructors are paid as 1099 contractors for classes, Town/ BOE employees are W-2 creating the "conflict of interest". Same applies to volunteer officials.

Section 4:

- 3.(a) "is not common to the other citizens of the town" Does this sufficiently cover instructors?
- 4.(d) "*or fiancé*" Not needed, fiancé is already defined as "Immediate family" in Sec. 5
- 5. "*anyone living in the same household*" This means we can't hire roommates, further restricting ability to hire camp staff.
- 8. Classifying contractors as "town employees" has major concerns
    - Contracts are already executed and this would require amendments.
    - Possible conflicts with Fed/ State grants.

Code of Ethics?:

- Where is the Code of Ethics- should be after definitions? A Code of Ethics is referenced multiple times, but one is not included in this ordinance. If a Code of Ethics from another source is used (ex. charter, employe handbook) it should be referenced.

Section 5:

- 3. "Unless the contract or purchase order is awarded through the traditional bid or quote process and conflict is disclosed." Instructors don't go through the traditional bid or quote process. The conflict is disclosed to HR.
- 3. Concerns with P&R maintenance contractors due to newly added language. This will not allow us to use our maintenance contractors for things that are not included in the initial contract. Example M&M Hydroseeding recommends after soil testing that we apply lime to a field. We would currently set up a PO for the lime, and he applies it at the same time as an application covered under the contract so there are no added labor costs.
- 3. Provision from Section 5-4 should be included in 5-3 with correct department name.

- 4. Provision is in wrong section, and the department name is incorrect, should read Parks, Recreation, and Senior Citizens Department. Provision should be kept in this section but worded to allow the Mayor, volunteer board/ commission members, and BOE members to teach. Also, wording is wrong as it states "...employees providing recreational including..."

General Concerns/Result:

- Conflicts with Fed/ State grants that have required ethic/ equal right codes. There are also VERY specific reporting and investigation procedures, who has the authority to conduct that investigation, appeal processes, and timelines for all of the above.
- Loss of $30,690.00 in program fees, almost $7,000.00 in revenue.
- Eliminate more than 15 programs enjoyed by more than 500 residents annually.
- Loss of revenue will result in increased budgetary needs to subsidize Senior Center programs and an increase in camp fees.
- This ordinance eliminates all our inclusive programing. This is a possible Federal ADA violation.
- Reduces our ability to hire summer camp staff because we can't hire roommates or family within the same department. We already have measures in place to hire a siblings/ roommate. We allow it but they work at different camp sites so there are no conflicts or sibling rivalries.
- We would no longer be able to use P&R Assistant Courtney for shirt orders. We do get quotes for substantial orders but some of the companies won't quote an order for 2-3 shirts.

EX. 3

Fred Allyn, III

From: Jessica Buhle
Sent: Thursday, October 9, 2025 11:30 AM
To: Fred Allyn, III
Subject: Re: Redline copy of proposed ordinance

Importance: High

Good morning,

I am working on it now and anticipate having it to you shortly.

Thank you.

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

On Oct 9, 2025, at 11:29 AM, Fred Allyn, III <mayor@ledyardct.org> wrote:

Good morning,

Following up on when I can anticipate receiving the electronic copy of the redline draft of the Town Attorney draft, showing all deletions, additions, edits. Councilor Buhle stated last night that she would send the newly revised copy this morning. The window of time for review is narrow and I will not permit the Town to be exposed to additional liability of not having a final review of an ordinance that has inherent liability risks anyway.

Best,

Fred

Fred B. Allyn III
<image001.png>
Mayor, Town of Ledyard, CT
741 Colonel Ledyard Hwy.
Ledyard, CT 06339
Tel (860) 464-3221
www.ledyardct.org

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

TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

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

DRAFT
PUBLIC HEARING MINUTES 5:00 PM; SEPTEMBER 24, 2025

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

II. PLEDGE OF ALLEGIANCE

III. PROCEDURE OF THE PUBLIC HEARING

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

Chairman St. Vil provided an overview of the procedure of the Public Hearing, and he asked those attending remotely to put their name and address in the "*Chat"* noting that they would be called upon during the Public Comment portion of tonight's meeting.

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

IV. CALL OF THE PUBLIC HEARING

The following call of the Public Hearing was read by Town Council Administrative Assistant Roxanne M. Maher:

LEGAL NOTICE
TOWN OF LEDYARD

NOTICE OF PUBLIC HEARING

The Ledyard Town Council will conduct a Hybrid Format Public Hearing
(In-Person & Video Conference)
on Wednesday, September 24, 2025 at 5:00 p.m.
to receive comments/recommendations regarding a Proposed

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

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

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

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

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

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

At this hearing interested persons may appear and be heard and written communications will be accepted at towncouncil@ledyardct.org.

Dated at Ledyard, Connecticut this 11th day of September, 2025.

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

Please Publish on Monday, September 15, 2025

V. PRESENTATIONS

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

DRAFT: 9/10/2025

Ordinance # XXX-XXX

AN ORDINANCE
ESTABLISHING A TOWN OF LEDYARD
CODE OF ETHICS AND ETHICS COMMISSION

Be it ordained by the Town Council of the Town of Ledyard:

Section 1. Authority

In accordance with Chapter III of the Town Charter, there is hereby established a Town of Ledyard Code of Ethics and Ethics Commission.

Section 2. Declaration of Policy and Purpose

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

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

Section 3. Applicability

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

Section 4. Definitions

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

1. *"Complainant"* means any person who signs a complaint under penalties of false statement alleging a violation of this Code.

2. *"Confidential Information"* means information acquired by a Town official or Town employee in the course of and by reason of performing an individual's official duties and which is not a matter of public record or public knowledge.

3. *"Financial Interest"* means:

a. any interest that has a monetary value of more than one hundred dollars ($100.00) in any calendar year and is not common to the other citizens of the Town;

b. pecuniary or material benefit accruing to a Town official or Town employee, spouse or minor child of an official or employee of the Town as a result of a contract, transaction, zoning decision or other matter which is, or may be, the subject of an official act or action by or with the Town of Ledyard except for such contracts of transactions which by their terms and by the substance of their provisions confer the opportunity and right to realize the accrual of similar benefits to all persons and/or property similarly situated;

c. shall be deemed to exist if any Town official, Town employee, immediate family of a Town official or employee might, directly or indirectly, derive financial gain or suffer loss from any purchase, contract, transaction, zoning decision, or other matter involving any such Town office, board, commission, authority or committee, and shall also be deemed to exist if a business or professional enterprise in which the Town official or employee has any financial interest as owner, member, partner, officer, employee or stockholder or has any other form of participation which will be affected by the outcome of the matter under consideration.

4. *"Gift"* means anything of economic value in excess of one hundred dollars ($100.00), including but not limited to entertainment, food, beverage, travel, and lodging. A gift does not include:

   a. A political contribution that is otherwise reported in accordance with the law.

   b. Services provided by persons volunteering their time.

   c. A commercially reasonable loan that is made on terms not more favorable than loans made in the ordinary course of business.

   d. A gift received from a member of a person's immediate family or fiancé.

   e. Goods or services which are provided to the municipality and facilitate government actions or functions.

   f. A certificate, plaque, or other ceremonial award.

   g. A rebate or discount on the price of anything of value made in the ordinary course of business, without regard to that person's status.

   h. Printed or recorded information germane to municipal action or functions.

   i. An honorary degree.

   j. Costs associated with attending a conference or business meeting and/or the registration or entrance fee to attend such conference or business meeting in which the Town official or Town employee participates in his or her official capacity.

   k. Any gift provided to a Town Official or Town Employee or to an immediate family member of a Town Official or Town Employee for the celebration of a major life event provided any such gift provided to an individual does not exceed one thousand dollars ($1,000.00) in value. A major life event shall include, but not be limited to, a ceremony commemorating an individual's induction into religious adulthood such as a confirmation or bar mitzvah; a wedding; a funeral; the birth or adoption of a child; and retirement from public service or Town employment.

5. *"Immediate family"* means spouse, fiancé, child, parent, grandchild, brother, sister, grandparent, niece, nephew, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, brother-in-law, or anyone living in the same household.

6. *"Respondent"* means any person accused of violating this Code.

7. *"Town Official"* means any person holding elective or appointive office in the government of the Town, including members of the Board of Education.

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

Section 5. Conflict of Interest Provisions

1. A Town official, Town employee, or any member of his or her immediate family shall not engage in or participate in any business or transaction, nor have an interest, direct or indirect, which is incompatible with the proper discharge of that person or persons' independent judgement or action in the performance of that person or persons' official duties.

2. A Town official or any member of his or her immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment or contractual services furnished to or used by the board, agency or commission of which that person is an elected or appointed member.

3. A Town employee or any member of his or her immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment, or contractual services that is within the purview of such Town employee.

4. The Mayor of the Town of Ledyard and members of the Town Council of the Town of Ledyard, members of the Board of Education of the Town of Ledyard, and any members of their immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment, or contractual services furnished to or used by the Town of Ledyard.

5. A Town official or employee shall refrain from voting upon or otherwise participating in any matter on behalf of the municipality if he or she, a member of his or her immediate family, or a business with which the person is associated has a financial or personal interest in the transaction or contract, including but not limited to the sale of real state, material, supplies, or services to the municipality. If such participation is within the scope of the Town official's or Town employee's responsibility, he or she shall be required to provide written disclosure, that sets forth in detail the nature and extent of such interest.

6. A Town official or Town employee shall not accept or receive, directly or indirectly, from any person or business to which any contract or purchase order may be awarded by the Town of Ledyard or any of its boards, agencies, or commissions any money, rebate, or gifts, or any promise, obligation, or contract for future reward or compensation.

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

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

9. A Town official or employee who have a financial or personal interest in any transactions or contract with the Town, including but not limited to the sale of real estate, materials, supplies, or services to the Town, on which that person or persons may be called upon to act in that persons official capacity shall not vote or otherwise participate in the transaction on behalf of the Town. The Town official or employee shall declare on the record that he or she has or have a conflict of interest.

10. No Town official or Town employee shall solicit or accept a gift from any person or business entity which is interested directly or indirectly in any business transaction or pending matter that is within the purview of such Town official or Town employee.

11. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials, or property for personal convenience or profit.

12. No Town official or Town employee shall disclose or use confidential information acquired in the course of and by reason of his or her official duties for personal or financial gain or for the personal or financial gain of a member of his or her immediate family.

13. No Town official or Town employee may directly hire or supervise a member of his or her immediate family or participate in influencing the appointment or hiring of his or her immediate family.

14. No former Town official shall represent anyone before any Town agency, board, commission, council, or committee in which he or she was formerly an elected or appointed member for a period of one (1) year following the end of such former member's service on such agency, board, commission, council, or committee.

15. No former Town employee shall represent anyone before any Town agency or department for which he or she was formerly employed for a period of one (1) year following the end of such former employee's employment with the Town.

Section 6. Disclosure of Interests Required

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

a. Contracts awarded to the lowest responsible bidder after public advertisement.

b. Unpaid appointed officials during a declared state of emergency.

c. Matters requiring disclosure to or approval by a court.

d. The Town Attorney, Town Engineer, or similar Official, who is participating in or offering an opinion on behalf of said agency, and whose financial interest is merely in being paid for such services.

2. All Town Councilors, Board of Education members, and the Mayor shall, on or before January 1st each year, file with the Town Clerk, on a form to be prepared by the Town Attorney, a statement, under oath, containing the following information:

a. All real estate located within the Town of Ledyard owned by such elected official or held under a lease for a term exceeding five years, excluding, however, his or her principal residence. The foregoing shall also apply to real estate owned or leased, as aforesaid, by a corporation, trust or partnership in which any such elected official is the legal or equitable holder of at least 5% of the legal or equitable interest in said corporation, trust, or partnership.

b. The names of any firm, proprietorship, partnership, or corporation of which said elected official is an employee or in which such elected official holds at least a five (5) percent interest, and which firm, proprietorship, partnership, corporation, or limited liability corporation has sold or supplied goods or services in excess of ten thousand dollars ($10,000) per annum to the Town of Ledyard during the two years immediately preceding such official's election to office.

c. Any income, fees, salary, or wages directly or indirectly, received by such official from the Town of Ledyard or its political subdivisions during the two years immediate proceeding such official's election to public office.

Section 7. Establishment of an Ethics Commission

1. Membership

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

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

b. No regular member or alternate member of the Ethics Commission shall:

i. Be a Town official or Town employee of the Town of Ledyard or be a member of the immediate family of any Town official;

ii. Have held any elected Town or State office for a period of one (1) year prior to being appointed to the Ethics Commission.

iii. Be a member of a Town committee or commission.

iv. Serve as a member of another Town agency, board, commission, council, or committee.

v. Have been employed by the Town for a period of one (1) year prior to being appointed to the Ethics Commission.

vi. Have any financial interest in matters before the Town or the Board of Education;

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

2. Terms of Appointment

a. Members shall be appointed by the Town Council for a term of three (3) years and shall serve until their successor has qualified or is removed by the Town Council.

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

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

d. Any vacancy on the Ethics Commission, other than by expiration of term, shall be filled for the unexpired portion of the term by the Town Council.

e. The Town Council may remove members for cause and fill the vacancy in accordance with the Town Charter. Cause for removal shall include, but is not limited to, an unexcused absence from three (3) consecutive meetings. It shall be the responsibility of the Chairman of the Ethics Commission to notify the Town Council when a member has not properly performed his or her duties.

f. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary.

3. Authority/Duties

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

a. To consult with the Town Attorney or another attorney hired by the Ethics Commission if so authorized by the Town Council.

b. To request that the Town Attorney provide advisory opinions.

4. Filing of Complaints

A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission and signed under penalty of false statement. The form shall be delivered to the Town Clerk who shall transmit a copy of the complaint to the Chairperson of the Ethics Commission and the respondent within five (5) days of receipt of the complaint. The Ethics Commission shall also notify the respondent that it will conduct a probable cause determination and invite the respondent to provide any information the respondent deems relevant to the Ethics Commission's determination of probable cause.

No complaint may be made under the Code of Ethics unless it is filed with the Ethics Commission within three (3) years after the violation alleged in the complaint has been committed.

The Complaint shall include:

a. Name of the person accused (respondent)

b. Name of the person filing the complaint.

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

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

5. Evaluation and Acknowledgement

a. Within sixty (60) business days of the receipt of a complaint, the Ethics Commission shall review and determine whether there is probable cause that a violation of the Code of Ethics has occurred. A finding of probable cause means that based on a review of the available information the Ethics Commission determines that reasonable grounds exist to believe that the respondent engaged in prohibited conduct by the Code of Ethics. If the Ethics Commission does not make a finding of probable cause, the complaint shall be dismissed and a copy of its decision shall be mailed to both the complainant and the respondent. Unless the Ethics Commission makes a finding of probable cause, a complaint alleging a violation of this Code of Ethics shall be confidential except upon the request of the respondent.

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

6. Hearings

If the Ethics Commission decides that probable cause of a violation of the Code of Ethics exists, it will conduct a public hearing to determine whether or not a violation occurred in accordance with Uniform Administrative Procedure Act ("UAPA") (See Chapter 54 of the Connecticut General Statutes). At the hearing, the respondent will have the right to be represented by legal counsel, to present evidence and witnesses, and compel attendance of witnesses and the production of books, documents, records, and papers, and to examine and cross-examine witnesses, and inspect and copy relevant and material records, papers, and documents not in such person's possession. Hearings are not governed by the legal rules of evidence, and any information relevant to the matter may be considered. The Ethics Commission will respect the rules of privilege recognized by the law. Not later than ten (10) days before the start of the hearing, the Ethics Commission will provide the respondent with a list of its intended witnesses. The Ethics Commission will make a record of the proceedings.

7. Final Decisions

a. Decisions by the Ethics Commission that a person is in violation of the Code of Ethics must result from the concurring vote of four (4) of its members.

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

c. Such finding and memorandum will be deemed to be final decision of the commission for the purposes of the UAPA. The respondent may appeal to the superior court in accordance with the provision of Section 4-183 of the Connecticut General Statutes.

d. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) days after its decision. It will also advise the respondent of his or her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

8. Penalties for Violations of the Code of Ethics

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

a. Order to cease and desist the violation;

b. Pay a civil penalty of up to the maximum amount permitted by State law;

c. Censure;

d. Suspension without pay;

e. Demotion;

f. Termination of employment;

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

Section 8. Severability

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

Adopted by the Ledyard Town Council on: _____

_____
Gary St. Vil, Chairman

Approve/Disapprove on: _____

_____
Fred B. Allyn, III

Published on: _____

Effective Date:_____

_____
Patricia A. Riley, Town Clerk

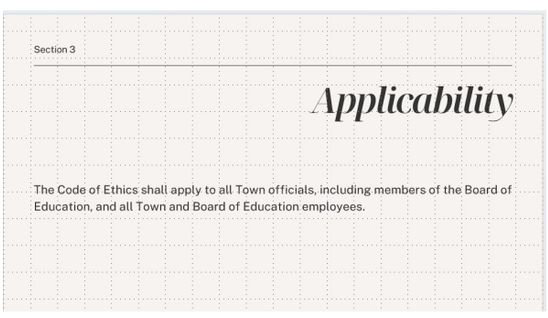
****

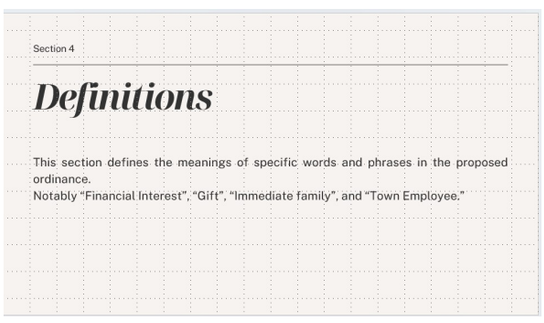
History: Based on the public's interest to establish standards of ethical conduct for all town officials, employees, and for those who serve or conduct business with the Town of Ledyard, this Code of Ethics and Ethics Commission was developed to establish guidelines for the conduct of those in public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

Councilor Buhle reviewed the following PowerPoint Presentation









Section 5

Conflict of Interest Provisions

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

Section 6

Disclosure of Interests

This section has two parts, which I've summarized below:
Part one requires all Town officials or Town employees who have a private financial interest in any action, legislative or otherwise, that they participate in discussion on or are a part of to disclose the true nature and extent of such interest.

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

Section 5

Conflict of Interest Provisions

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

Section 6

Disclosure of Interests

This section has two parts, which I've summarized below:
Part one requires all Town officials or Town employees who have a private financial interest in any action, legislative or otherwise, that they participate in discussion on or are a part of to disclose the true nature and extent of such interest.

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

Section 7.1-2

Establishment of an Ethics Commission

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

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

Section 7.3-5

Establishment of an Ethics Commission

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

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

The Ethics Commission must determine probable cause within 60 days of the receipt of a complaint. Unless the Ethics Commission makes a finding of probable cause, a complaint alleging a violation of this Code of Ethics shall be confidential except upon the request of the respondent.

Section 7.6-7

Establishment of an Ethics Commission

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

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

Section 7.8

Establishment of an Ethics Commission

A violation of the Code of Ethics may lead to any one or a combination of the following penalties:
a. Order to cease and desist the violation;
b. Pay a civil penalty of up to the maximum amount permitted by State law;
c. Censure;
d. Suspension without pay;
e. Demotion;
f. Termination of employment;
g. Restitution of any pecuniary benefits received because of the violation committed.

Section 8

Severability

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

Why an Ethics ordinance?

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

John Rawls
Political Philosopher

79% ↑

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

Inspiration

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

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



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

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

VI. PUBLIC COMMENT

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

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

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

- ***Section 6 "Disclosure of Interests Required"*** Mr. Treaster noted that he believed that this Section should be deleted, because he thought that it would discourage people from running for elected office.

  ✓ Section 6; Paragraph (1) – Mr. Treaster pointed out that this text allowed a town official or town employee ***to participate in a discussion; or give an official opinion if he/she disclosed the nature and extent of his/her financial interest in the issue being decided.*** However, he stated in Section 5 "*Conflict of Interest*"; Paragraph (5) the ***elected official was not allowed to participate if he/she had a financial interest in the issue.*** He stated the text of these two Sections were in conflict with each other because Section 6; paragraph (1) does not permit participation, even with disclosure. Therefore, he stated that these types of things within the proposed Ordinance needed to be resolved before the Town Council moved forward to consider the adoption of the proposed Ordinance.

- ***Hearings*** – Mr. Treaster stated everywhere the proposed Ordinance talked about "Public Hearing" there should be an option for an Executive Session, noting that the Executive Session should come first, because he thought that it was only fair to the respondent to first discuss the matter in an Executive Session.

- ***Section 7 "Final Decision:"*** – Mr. Treaster noted that the maximum of each Phase of the process would take 155 days for something to happen.

- ***Section 8 "Penalties for Violations of the Code of Ethics***" – Mr. Treaster stated that it was unclear whether the Penalties issued by an Ethics Commission were *Orders* or *Suggestions.* He noted for example:

  ✓ Order to cease and desist the violation - Mr. Treaster questioned whether there was an opportunity to make restitution of community benefits; if appropriate.

  ✓ Pay a civil penalty of up to the maximum amount permitted by State law – Mr. Treaster noted that there were unanswered questions about the civil penalty. What would happen if the civil penalty was not paid.

  ✓ Censure.

  ✓ Suspension without pay – Mr. Treaster stated there were questions regarding suspension without pay.

  ✓ Demotion - Mr. Treaster stated there were questions regarding *Demotion;* noting that it should be a suggestion.

  ✓ Termination of employment - Mr. Treaster stated there were questions regarding *Termination;* noting that it should be a suggestion.

- ***Section 7; Subsection 2 "Terms"*** – Mr. Treaster stated the three-year term limit was too short, noting that there should not be a term limit. He stated if everyone was doing a good job they should let them go on forever; in 3-year increments, but be allowed to continue to serve on the Ethics Commission.

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

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

"Councilors,

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

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

2) *The Town Charter, Chapter III, Section 9 grants this power to the Town Council to investigate, call witnesses, appear before the Town Council and testify. The electors of this town have vested this power with the Town Council, not another group.*

3) *Town of Ledyard Fraud Policy. Dated May 28, 2014 clearly outlines no less than eight (8) different actions that constitute fraud. It is noted the language also include the words "….but not limited to".*

4) *Town of Ledyard Employee Handbook. The handbook includes Nepotism (page 20), Conflict of Interest (page 20), Outside employment (page 21) and Vehicle Use Policy (appendix 8). Every Town employee received a copy of the handbook and are required to sign and accept the obligations contained in said handbook.*

5) *Though the draft ordinance, dated 6/11/25 did receive a legal review, the Council has not requested a legal review for the draft dated 9/7/2025. At the September 10, 2025 meeting, Councilor Buhle states "…the draft for tonight incorporates probably 80% of the Town Attorney's language." That statement would imply the newly revised ordinance would be approximately 20% shorter, however the proposed document is now 2+ pages longer than the 6/11/2025 draft. In an ordinance where substantial liability exposure to the Town may exist, I would certainly think a second legal review of the 9/7/25 draft should be mandatory.*

6) *There is no budget line for this new commission. The Town Attorney has suggested a minimum of $20,000 annually for legal fees, with some towns spending as much as $200,000. Keep in mind, if the aggrieved party does not agree with the outcome, the next stop for the town and the aggrieved party does not agree with the outcome, the next stop for the town and the aggrieved is Superior Court. Sincerely, Fred B. Allyn",*

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

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

- ***Section 7; Paragraph 4***, The Town Clerk shall transmit a copy of the Complaint Form to the Chairperson of the Ethics Commission and the respondent within 5 days. Ms. Riley stated that this was a major problem noting the following:

  ✓ Ms. Riley questioned what would happen if she was on vacation for a week, the 5 days would have already passed. If the Town Clerk's Office cannot accept the Complaint Form; while she was out of the Office would the person need to come back when she returned to the office; and she questioned how this type of situation be handled.

  ✓ Ms. Riley noted if that she was not available or out of the office and unable to receive the initial Complaint Form; that she had concerns that this would cause complaints against her.

  ✓ Ms. Riley questioned whether Town Staff (Herself or Assistant Town Clerk) should have knowledge of complaints of other employees.

  ✓ Ms. Riley questioned what if the complaint was about an Ethics Commission Member. What would that process be.

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

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

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

- ***FOIA Concerns vs. Ethics Exemptions*** – Ms. Riley questioned the following:

  ✓ What about the Ethics Commission Members emails.

  ✓ What happens to the paperwork/emails when they come off the Commission relative to the FOIA/Retention requirements.

  ✓ Where would she as Town Clerk store the confidential records away from staff. She stated her Assistant Town Clerk had access to all locked and unlocked spaces in the Town Clerk's Office. .

  ✓ As Town Clerk that she did not have access to the Board of Education Members to send notifications in the event of a complaint. Would the MIS Director be required to get all Board of Education Members into the Town's Outlook email system.

- ***Record Retention Schedule Requirements*** – Ms. Riley questioned whether anyone researched the Record Retention for ethics documents with the State Library.

- ***Freedom of Information Act (FOIA) Requirements –*** Ms. Riley questioned whether anyone researched FOIA Laws against Ledyard's Town Charter, Employee Handbook & Union Contracts regarding Ethics Commission vs any exemptions. She stated that she would have liked the opportunity to research other towns and to consult with the State FOIA Commission about these concerns.

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

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

     -OR-

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

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

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

- ***Town Clerk's Concerns –*** Mr. Eilenberger questioned whether anyone talked to the Town Clerk during the last fourteen-days to try to iron some things out.

- ***Legal Fees -*** Mr. Eilenberger noted the $4,000 cost for the Town Attorney to provide a legal review and recommendations regarding the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Ordinance*", noting that it did not make sense to disregard the Attorney's recommendations.

- ***Budget to Support the work of the Ethics Commission*** – Mr. Eilenberger questioned the budget for the first year; and the cost per year to maintain. He stated if there was no budget to go along with the proposal that anyone would be insane to vote for it.

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

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

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

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

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

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

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

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

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

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

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

"Dear Mr. Chair and Members of the Council:

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

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

Key Legal Issues:

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

- ***Unfair Labor Practice:*** *By introducing new oversight and penalties outside the scope of negotiated agreements, the ordinance effectively alters terms and conditions of employment without bargaining. This constitutes an unfair labor practice and exposes the Town to legal liability.*

- ***Failure to Differentiate Roles:*** *The ordinance does not distinguish between classified civil service positions and appointed or at-will roles. It treats all Town employees uniformly, ignoring the contractual protections unionized workers depend on. Disciplining union members outside the grievance procedure may be legally indefensible.*

- ***Lack of Due Process:*** *The Ethics Commission is empowered to impose penalties - including suspension and termination—without specifying representation rights, evidentiary standards, or appeal mechanisms. For union members, this omission bypasses contractual safeguards and invites arbitrary enforcement.*

- ***Statutory Conflict:*** *The ordinance conflicts with Connecticut General Statutes §7-474, which require municipalities to negotiate in good faith with recognized bargaining units over employment conditions. Applying the ordinance broadly to "Town employees" disregards this statutory framework and risks preemption by state law.*

Specific Concern: Town Clerk's Role

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

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

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

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

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

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

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

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

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

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

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

Mrs. Ball continued by addressing the following:

- ***Volunteers*** – Mrs. Ball stated Volunteers should be excluded from the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"*. She stated that the town's volunteers donate hundreds and hundreds of hours of time to this town. She stated as an example, that all it would take to turn someone's whole life upside down was for somebody to say, "*Oh, I saw somebody take money out of the donation jar at the Farmer's Market".*

- ***Ethics Commission*** *Members* – Mrs. Ball stated the volunteers serving on the Ethics Commission were not a jury of peers, noting that a jury and a judge were trained people. She stated that juries were vetted for every single instance when they were needed. She stated that she would use the Farmers Market again as an example, questioning: *What if somebody complains to the Farmer's Market; and what if there were people on the Ethics Commission that know people on the Farmer's Market, or they were familiar with the situation. Would those volunteer Ethics Commission Members be removed, and would new people be vetted to serve on the Ethics Commission?*

- ***Complaint Form*** – Mrs. Ball stated that the Complaint Form and proposed Ordinance should state which issues would be excluded. She state the proposed Ordinance should not be voted on without the Complaint Form, because it was an integral part of the process.

- ***Financial*** Matters – Mrs. Ball stated that she understands that it was implied that only financial things would be addressed under the Code of Ethics and Ethics Commission. However, she stated that the Compliant Form and Ordinance should list the types of things that were not applicable.

- ***Conflict of Interest***- Ms. Ball suggested outlining all the details of what constituted a "*Conflict of Interest*" in Chapter IX; Section 6, of the Town Charter to include the text in the proposed Ordinance. She stated that the town should fix the Town Charter; so they would not have neighbors sitting in judgment of neighbors.

- ***Town Charter*** – Mrs. Ball stated that she believed that all this could be addressed by a Charter Revision. She stated if they had the time and energy to form an Ethics Commission and to educate the town, then she thought that they had time to revise the Town Charter, and educate the people about the amendments to the Town Charter.

- ***Impartiality*** – Mrs. Ball addressed a comment about the Town Council struggling to be impartial, noting that as the Town's Elected Officials that the Town Council had a duty to be impartial. She stated that she did not think that if the Town Council was struggling with impartiality, they could see an impartial Ethics Commission. She stated that there was no guarantee that an Ethics Commission would be impartial, because so many people know so many other people in their small town.

- ***Legal Costs*** - Mrs. Ball stated that all it would take was one lawsuit from somebody who was accused of something to have their life ruined. She stated although the accuser could file the *Form Under Penalty of False Statement*, and they could truly believe their accusation was true; that the accusation still might not be right. She stated that it does not have to be a deliberate lie to be untrue.

- ***Frequently Asked Questions and Answers –*** Mrs. Ball noted the *Frequently Asked Questions and Answers* included the following Questions: "*Why do we need this*?" She stated that she did not think the town needed the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Comission*". She stated that she believed that they needed to make the Town Charter more clear. She stated that she thought it was awful for people in town to be judging other people in town or judging town volunteers, or judging town employees; and then making recommendations about their employment.

- ***Commission Member Terms*** – Mrs. Ball stated the Section 7; Paragraph 2 in the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" stated that members would be removed if they missed three consecutive meetings. She stated what Ethics Commission members bullied people; or; or harassed people on Social Media. She stated that none of those reasons were listed as reasons to be removed from the Commission; noting the only one reason listed was for missing three consecutive meetings. She stated if they were going to have an Ethics Commission that passes judgment on people in their community that they need to have better guidance as to what it would take to get them kicked off the Commission.

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

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

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

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

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

- ***Small Town – Small Government*** – Mr. Sabbag stated that Ledyard was a small town, and therefore, he believed they we should have small government. He stated adding more things that were already covered by the Town Charter, which many have said this evening, would just adding more money and more time, which were two valuable things to all of them.

- ***Taxes -*** Mr. Sabbag stated that Ledyard just saw the highest tax increase in 20 years. He stated the townspeople voted on the Budget two times, and the Town Council completely negated the votes of the townspeople.

- ***Staff Concerns*** - Mr. Sabbag stated today they have heard comments from the Mayor, the Mayor's Executive Assistant, the Town Clerk, the Director of Human Resources and the Director of Parks, Recreation & Senior Citizens. He stated their comments and concerns were very clear that they were against the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission".* He stated that these were people that work full-time every day for their town and that he thought their concerns were something they should strongly consider.

- ***Local Election*** – Mr. Sabbag stated that Ledyard was literally one month away from an election. Therefore, he stated if anything else, that maybe they should wait to let the townspeople speak and see the results of the November 4, 2025 Election before they move forward with the proposed Ordinance, noting that there might be some new appointments to see what that Town Council would say.

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

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

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

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

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

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

- ***Monitor the adequacy of the Ordinance*** – Mr. Schroeder suggested the proposed *"An Ordinance Establishing a Code of Ethics and Ethics Commission*" include a Section for the Ethics Commission to monitor the adequacy of the Ordinance and to report back and advise to the Town Council when they think amendments needed to be made. He stated they were going to come up with a 100% amazing thing right from the get-go. He stated as others have already mentioned the people that would serve on the Commission were going to be fully invested in this, and would be able to advise the Town Council.

- ***Advisory Role*** – Mr. Schroeder noted that it was his understanding that the Ethics Commission was going to essentially be an Advisory Role. He stated the Ethics Commission was not going to be the Judge, Jury, and Executioner. He stated that the Commission's role would be to investigate complaints; and to come up with a decision, and then they would advise the proper authority, whether that was the Town

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

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

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

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

- ***Town Charter-Chapter IX; Section 6 "Conflict of Interest"*** – Mr. Porazzi stated that it was not sufficient.

- ***Advisory Role*** – Mr. Porazzi noted as Mr. Schroeder mentioned the Ethics Commission would be Advisory; and that he believed that it would only be used for Grievous Reporting and Grievous Conduct.

- ***Impact on Programs*** – Mr. Porazzi stated that he personally cannot see how having an Ethics Commission would impact Programs. He stated if he was not well educated on that, that he would like to be.

- ***Fees*** – Mr. Porazzi stated if there was a fee for something like this, that he thought that it would be small, and irrelevant in the big picture of the town budget.

- ***Government Transparency*** – Mr. Porazzi stated that he thought having an Ethics Commission would go a long way for governmental transparency. He stated that he felt strongly that there needed to be an impartial panel to vet suspected violations; or else the public would be left with possible partisan local Town Councils; and any existing biases. He stated that this would mean that someone could complain all day and it was only going to go so far depending on the channels available.

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

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

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

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

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

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

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

I'm also concerned about the process. Eighteen months of limited public input is not enough, and the public hearing tonight is scheduled for only two hours—hardly sufficient for a decision of this importance. Likewise. if the Council approves a ballot question, the proposed 40-day window is too short to educate thousands of voters and allow meaningful discussion.
For these reasons, I urge the Council to revise the ballot question. Instead of asking residents to vote yes or no on this draft, ask whether they support forming an ad hoc committee to develop a stronger Code of Ethics and bring that final document back for public approval.

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

Ledyard deserves a clear, thoughtful, and truly effective Code of Ethics. Please give our community the time and process it needs to achieve that goal.
Thank you.
Edwin Murray
26 Devonshire Drive, Gales Ferry, Connecticut"

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

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

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

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

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

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

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

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

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

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

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

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

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

- ***If it's not broke don't fix it*** – Mr. Munger stated that he uses common sense, noting that he does not look at numbers or statistics. He stated "*If it's not broke don't fix it.* He stated that he has done this his whole life, and it has been pretty successful.

- ***A Committee that doesn't lean one way or the other*** - Mr. Munger stated that they need to look at the climate in the country right now, noting that it was pretty much split. Therefore, he stated that he would find it really hard to believe they could find 3 people who say, "O*h, I won't, I won't, I won't."* He stated if the proposed *"An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" does get passed that he would like to make sure that those people would be very strongly looked at before being appointed to the Commission, and that he would follow what they decide after each incident.

- ***80% of Connecticut Towns have an Ethics Commission*** - Mr. Munger stated that he did not care about what other towns were doing. He stated this was Ledyard and that they should be concerned about what happens in Ledyard. He questioned because 80% of Connecticut Towns have an Ethics Commission would that also mean if 100 people stand at a cliff and 80 people jump over; should the rest of them jump over the cliff too; commenting "*No we do not have to jump over the cliff*" . He stated he was not saying the 80% towns were right or wrong. However, he stated he did not see any reason why they keep bringing those other people into a Ledyard issue. He stated this was something they have to discuss, argue, and fight about; and the decide amongst themselves in Ledyard and do what was best for their town.

- ***Just pass the Ordinance, we will fix it later*** – Mr. Munger noted comments made this evening that they should pass the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* and fix it later. He stated although he did not like to bring federal politics into this, that the best analogy he has was when House Representative Nancy Pelosi said: " *Oh let's just pass this, we'll read it later".* Mr. Munger stated what they got was terrible. Therefore, he stated if they were going to move forward with an Ethics Commission, noting that he would support whatever way it goes; that they do not rush it and they should make sure it was right before they adopt the Ordinance, so they do not run into problems later. He stated let's not have a cavalier attitude, like, "O*h, let's just pass it, and we'll worry about it later.* He stated that was not the way they should operate. He stated that they need to make sure they have it right the first time, and then pursue it, noting that he personally did not want to see the town form an Ethics Commission.

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

- Connecticut General Statutes -Chapter 124 – Zoning
  - Section 8-11 "*Disqualification of Members of Zoning Authorities*"

- Connecticut General Statutes - Chapter 128 – Municipal Planning Commission
  - Section 8-21- "*Disqualification of Planning Commission Members"*

- Connecticut General Statutes - Chapter 440 – Wetlands and Watercourses
  - Section 22a-42(c)

- Connecticut General Statutes - Chapter 98- Municipal Powers
  - 7-148t- *Conflict of Interest for Members of Land Use and Purchasing Commissions*

- Connecticut General Statutes - Chapter 113 – Municipal Employees
  - Section 7-479 "*Conflicts of Interest*"

- Ledyard Town Charter
  - Chapter III; Section 9 "*Investigation*"
  - Chapter IV; Section 9 "*Appointments and Removals"*
  - Chapter IX; Section 6 "Conflicts of Interest"

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

- ***Code of Ethics*** – Mr. Cherry stated although he saw the words *Code of Ethics* that he did not see a *Code of Ethics* in the draft Ordinance dated September 10, 2025, noting that what he saw was a *Conflict of Interest List.* He explained that a Code of Ethics was something they could hang on the wall listing the positive things that they want to live by. He noted that the a good example of a *Code of Ethics* was provided in the Board of Education's Handbook as Attachment A "*Policy Notes*" and on the next page, it provided *Conflict of Interest Rules*. He stated the proposed draft "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* dated September 10, 2025 was missing this type of information. He stated during his lifetime he has been part of Government Organizations which included the Engineers Nuclear Society, noting that event the Military has a Code that they live by.

- ***Does the proposed "An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission" apply to the Board of Education*** – Mr. Cherry stated the Board of Education has their own *Code of Ethics and Conflict of Interest List*; therefore, he questioned whether the proposed Ordinance would conflict with what the Board of Education has published and had in place for a while.

- ***Section 5 "Conflict of Interest Provisions"***- Mr. Cherry stated Connecticut General Statute Section 7-479 says that the town can establish an ordinance saying what a *Conflict of Interest* is; noting that it was covered by state statute.

- ***Section 7 "Establishment of an Ethics Commission" Paragraph 1 (b)*** **-** Mr. Cherry stated he was not sure what they were talking about noting that it looked like there was a difference between what the Town Attorney said, in what they published. He suggested this section be looked at.

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

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

- ✓ ***Section 7; Paragraph 6 "Hearings"*** Mr. Cherry stated these sections and others in the proposed "*An Ordinance Establishing a Code of Ethics and Ethics Ordinance*" mentions public hearings or executive sessions and he questioned whether they were talking about labor things, or individuals. He stated for privacy that he was not sure that a public hearing was the right answer. He suggested the Town Council talk with the Director of Human Resources.

- ✓ ***Section 7; Paragraph 7 Final Decisions*** – Mr. Cherry stated that Mr. Schroeder did a good job with the wording that would require the Ethics Commission to write a report, and make recommendations to provide to the people with the authority to implement the recommended actions. He noted that Mr. Schroeder indicated that the words needed to be workable and clear and to improve existing draft Ordinance.

- ***Sunset Clause*** – Mr. Cherry suggested they think about including a Sunset Clause to force the Town Council in 2 or 3-years to review the Ordinance.

- ***Training*** – Mr. Cherry stated that he agreed with the comment to require training for the Ethics Commission. He suggested that they also require training for all those who were covered by the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* including all the employees, all the volunteers, all the board members. He stated if they're covered by the Ordinance, they ought to be trained in what the Ordinance says.

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

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

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

VII. ADJOURNMENT

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

_____
Transcribed by Roxanne M. Maher
Administrative Assistant to the Town Council

I, Gary St. Vil, Chairman of the Ledyard Town Council,
hereby certify that the above and foregoing is a true and correct
copy of the minutes of the Public Hearing held on September 24, 2025

Attest:_____
Gary St. Vil, Chairman

DRAFT: ~~6/30/2025~~7/14/2025

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~~, 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 ($~~25.00~~100.00), including but not limited to entertainment, food, beverage, travel~~,~~ and lodging~~, given or paid~~.

A gift does not include:

a. A political contribution ~~reported as required by law or a donation or payment as described in subdivision (9) or (11) of subsection (b) of 9-333b~~that is otherwise reported in accordance with the law.

b. Services provided by persons volunteering their time.

c. A commercially reasonable loan that is made on terms not more favorable than loans made in the ordinary course of business.

d. A gift received from a member of a person's immediate family ~~or fiancé~~.

e. Goods or services which are provided to the municipality and facilitate government actions or functions.

f. A certificate, plaque~~,~~ or other ceremonial award.

g. A rebate or discount on the price of anything of value made in the ordinary course of business, without regard to that person's status.

~~h. Printed or recorded information germane to government action or functions.~~

h. ~~i.~~ An honorary degree ~~bestowed upon a public official or public employee by a public or private university~~.

i. ~~j. A meal provided at an event~~Costs associated with attending a conference or business meeting and/or the registration or entrance fee to attend such ~~an event,~~conference or business meeting in which the ~~public~~Town official or ~~public~~Town employee participates in his or her official capacity.

~~k. A meal provided in the home by a Ledyard resident.~~

j. Any gift provided to a Town Official or Town Employee or to an immediate family member of a Town Official or Town Employee for the celebration of a major life event provided any such gift provided to an individual does not exceed one thousand dollars ($1,000.00) in value. A major life event shall include, but not be limited to, a ceremony commemorating an individual's induction into religious adulthood such as a confirmation or bar mitzvah; a wedding; a funeral; the birth or adoption of a child; and retirement from public service or Town employment.

~~l. Gift giving occasions recognized by the public, including, Christmas, Chanukah, birthdays, the birth or adoption of a child, weddings, First Communions, Confirmations, or Bar/Bat Mitzvahs, provided the total value of such gifts for each event shall not exceed $25.00.~~

5. ~~8.~~ *"Immediate family"* means spouse, fiancé, child, parent, grandchild, brother, sister, grandparent, niece, nephew, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, and brother-in-law.

~~9. *"On The Record"* means in writing, signed and dated, or a directive to the secretary taking the minutes of a meeting to note in the minutes of the meeting a special disclosure or statement.~~

~~10. *"Personal Beneficial Interest"* means any interest, other than financial, which would affect the action of the official or employee, except if that interest is based solely on the responsibility of his/her town office or employment. Membership in or affiliation with a social, fraternal, charitable, service, educational, religious, governmental or similar non-profit organization is not deemed to automatically create a presumption of personal interest unless the official employee is also an employee of the organization.~~

~~11. *"Probable Cause"* is defined by determining whether the facts would warrant a reasonable person to believe that a Town official, officer, or employee violated this Code; the belief should be more than mere suspicions, but less than proof beyond a reasonable doubt.~~

6. ~~12.~~ *"Respondent"* means any person accused of violating this Code.

7. ~~13.~~ "*Town Official~~, Officer, or Employee"~~ ~~means an individual whether elected or appointed, whether paid or unpaid, full or part time~~*"* means any person holding elective or appointive office in the government of the Town, including members of ~~boards, commissions, and committees in the service of the Town of Ledyard~~the Board of Education.

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

Section 5. Conflict of Interest Provisions

~~1. Persons governed by this Code shall not engage in or participate in any business or transaction, nor have an interest, direct or indirect, which is incompatible with the proper discharge of that person or persons' independent judgement or action in the performance of that person or persons' official duties.~~

1. ~~2.~~ ~~Persons governed by this Code shall not be financially interested or have any personal beneficial~~A Town official or any member of his or her immediate family shall not have a financial interest~~,~~ in any contract or purchase order for any supplies, materials, equipment or contractual services furnished to or used by the board, agency or commission of which that person ~~or persons is or are an employee(s)~~is an elected or appointed member.

2. A Town employee or any member of his or her immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment or contractual services that is within the purview of such Town employee.

3. ~~It is further provided, notwithstanding the above, that the~~The Mayor of the Town of Ledyard~~,~~ and members of the Town Council of the Town of Ledyard~~, members of the Board of Education of the Town of Ledyard shall not be financially interested, or have any personal beneficial interest, either directly or indirectly,~~ and any members of their immediate family shall not have a financial interest in any contract or purchase order

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

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

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

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

~~B. Persons governed by this Code shall not accept or receive, directly or indirectly, from any person or business to which any contract or purchase order may be awarded by the Town of Ledyard or any of its boards, agencies, or commissions any money, rebate, or gifts, or any promise, obligation, or contract for future reward or compensation.~~

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

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

~~D. Persons governed by this Code who have a financial or personal interest in any transactions or contract with the Town, including but not limited to the sale of real estate, materials, supplies, or services to the Town, on which that person or persons may be called upon to act in that persons official capacity shall not vote or otherwise participate in the transaction on behalf of the Town. That person (or persons) shall declare on the record that person (or persons) has or have a conflict of interest.~~

~~E. Persons governed by this Code shall not request or permit the use of Town owned vehicles, equipment, facilities, materials, or property for personal convenience or profit, except when such are available to the public generally, or provided a municipal policy for the use of such Town official/employee in the interest of the Town.~~

~~F. No Town official or Town employee shall use his or her position or office and any confidential information acquired by a Town official or Town employee through his or her office or position to further such official's or employee's personal or financial interest, or interest of his or her spouse, child, child's spouse, parent, grandparent, brother or sister,~~

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

4. ~~G.~~ No Town official or Town employee ~~may appoint or hire or participate in influencing the appointment or hiring of his or her spouse, child, child's spouse, parent, grandparent, brother or sister, cousin, niece, nephew, father-in-law; mother-in-law; brother-in-law; sister-in-law; or a business with which the person is associated for any type of employment with the Town, including by contract, unless the contract is competitively bid. No Town official or Town employee may directly supervise his or her family member or any business with which the person is associated. No Town official or Town employee may exercise authority or make recommendations with regard to personnel actions involving such family member or any business with which the person is associated.~~shall solicit or accept a gift from any person or business entity which is interested directly or indirectly in any business transaction or pending matter that is within the purview of such Town official or Town employee.

5. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials or property for personal convenience or profit.

6. ~~H.~~ No Town official or Town employee~~, or~~ shall disclose or use confidential information acquired in the course of and by reason of his or her official duties for financial gain or for the financial gain of a member of his or her immediate family~~, or a business with which the person is associated shall enter into a contract with the Town valued at five hundred (500) dollars or more, other than a contract of employment as a Town employee, or pursuant to a court appointment, unless the contract has been awarded through a process of public notice and competitive bidding.~~.

~~I. No persons in their capacities as Town official or Town employee shall represent anyone, other than the Town, concerning any matter before any board, commission, council, committee, or department of the Town. Nothing herein shall prohibit or restrict a Town official or Town employee from appearing before any board, commission, council, committee, or department of the Town on his or her own behalf, or on behalf of a member of his or her immediate family, or from being a party in any action, proceeding or litigation brought by or against such Town official or Town employee to which the Town is a party.~~

7. No Town official or Town employee may directly hire or supervise a member of his or her immediate family.

8. ~~J.~~ No former Town official ~~or Town employee member~~ shall represent anyone for compensation before any Town agency, board, commission, council~~,~~ or committee~~, or department~~ in which he or she was formerly ~~employed at any time within~~an elected or appointed member for a period of one (1) year ~~after termination of his or her~~following the end of such former member's service ~~with the Town~~on such agency, board, commission, council or committee.

9. ~~K.~~ No former Town ~~official or Town~~ employee shall represent anyone ~~other than the Town concerning any particular matter in~~for compensation before any Town agency or

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

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

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

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

~~Section 6.~~ ~~Disclosure of Interests Required~~

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

~~1. Contracts awarded to the lowest responsible bidder after public advertisement.~~

~~2. Unpaid appointed officials during a declared state of emergency.~~

~~3. Matters requiring disclosure to or approval by a court.~~

~~4. The Town Attorney, Town Engineer or similar Official, who is participating in or offering an opinion on behalf of said agency, and whose financial interest is merely in being paid for such services.~~

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

~~1. All real estate located within the Town of Ledyard owned by such elected official or held under a lease for a term exceeding five years, excluding, however, his or her principal residence. The foregoing shall also apply to real estate owned or leased, as aforesaid, by a corporation, trust or partnership in which any such elected official is the legal or equitable holder of at least 5% of the legal or equitable interests in said corporation, trust or partnership.~~

~~2. The names of any firm, proprietorship, partnership, or corporation of which said elected official is an employee or in which such elected official holds at least a five-percent interest, and which firm, proprietorship, partnership, corporation, or limited liability corporation has sold or supplied goods or services in excess of $10,000 per~~

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

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

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

~~1. Purpose~~

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

1. ~~2.~~ Membership

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

~~The Regular Members shall include:~~

A. ~~•~~ ~~At~~The five (5) Regular Members of the Commission shall include at least one ~~member with Legal background (~~attorney~~,~~ or paralegal (current or retired)

~~•~~ and at ~~At~~ least one member with ~~Financial~~a financial background.

~~• Three Members from the Community-at-Large~~

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

C. ~~Members and alternate members must be residents of the Town of Ledyard. No~~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

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

~~a~~A. 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 (~~4~~3) 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 Compliant 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

~~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.~~

i. Within ~~thirty~~sixty (~~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. TheIf 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 maintaineddetermines 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://cloudimanage.com/SG/22434477/1	
Modified DMS: iw://cloudimanage.com/SG/22434477/2	
Changes:	
Add	176
~~Delete~~	279
~~Move From~~	0
Move To	0
Table Insert	0
~~Table Delete~~	0
Table moves to	0
~~Table moves from~~	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	455

DRAFT: 7/14/2025

Ordinance # _____

AN ORDINANCE ESTABLISHING A TOWN OF LEDYARD CODE OF ETHICS

Be it ordained by the Town Council of the Town of Ledyard:

Section 1. Authority

In accordance with Chapter III of the Town Charter, there is hereby established a Town of Ledyard Code of Ethics.

Section 2. Declaration of Policy and Purpose

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

Section 3. Applicability

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

Section 4. Definitions

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

1. *"Complainant"* means any person who signs a complaint under penalties of false statement alleging a violation of this Code.

2. *"Confidential Information"* means information acquired by a Town official or Town employee in the course of and by reason of performing an individual's official duties and which is not a matter of public record or public knowledge.

3. *"Financial Interest"* means any interest that has a monetary value of more than one hundred dollars ($100.00) in any calendar year and is not common to the other citizens of the Town.

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

   A gift does not include:

   a. A political contribution that is otherwise reported in accordance with the law.

   b. Services provided by persons volunteering their time.

   c. A commercially reasonable loan that is made on terms not more favorable than loans made in the ordinary course of business.

   d. A gift received from a member of a person's immediate family.

   e. Goods or services which are provided to the municipality and facilitate government actions or functions.

   f. A certificate, plaque or other ceremonial award.

   g. A rebate or discount on the price of anything of value made in the ordinary course of business, without regard to that person's status.

   h. An honorary degree.

   i. Costs associated with attending a conference or business meeting and/or the registration or entrance fee to attend such conference or business meeting in which the Town official or Town employee participates in his or her official capacity.

   j. Any gift provided to a Town Official or Town Employee or to an immediate family member of a Town Official or Town Employee for the celebration of a major life event provided any such gift provided to an individual does not exceed one thousand dollars ($1,000.00) in value. A major life event shall include, but not be limited to, a ceremony commemorating an individual's induction into religious adulthood such as a confirmation or bar mitzvah; a wedding; a funeral; the birth or adoption of a child; and retirement from public service or Town employment.

5. *"Immediate family"* means spouse, fiancé, child, parent, grandchild, brother, sister, grandparent, niece, nephew, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, and brother-in-law.

6. *"Respondent"* means any person accused of violating this Code.

7. "*Town Official"* means any person holding elective or appointive office in the government of the Town, including members of the Board of Education.

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

Section 5. Conflict of Interest Provisions

1. A Town official or any member of his or her immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment or contractual services furnished to or used by the board, agency or commission of which that person is an elected or appointed member.

2. A Town employee or any member of his or her immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment or contractual services that is within the purview of such Town employee.

3. The Mayor of the Town of Ledyard and members of the Town Council of the Town of Ledyard and any members of their immediate family shall not have a financial interest in any contract or purchase order for any supplies, materials, equipment, or contractual services furnished to or used by the Town of Ledyard.

4. No Town official or Town employee shall solicit or accept a gift from any person or business entity which is interested directly or indirectly in any business transaction or pending matter that is within the purview of such Town official or Town employee.

5. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials or property for personal convenience or profit.

6. No Town official or Town employee shall disclose or use confidential information acquired in the course of and by reason of his or her official duties for financial gain or for the financial gain of a member of his or her immediate family.

7. No Town official or Town employee may directly hire or supervise a member of his or her immediate family.

8. No former Town official shall represent anyone for compensation before any Town agency, board, commission, council or committee in which he or she was formerly an elected or appointed member for a period of one (1) year following the end of such former member's service on such agency, board, commission, council or committee.

9. No former Town employee shall represent anyone for compensation before any Town agency or department for which he or she was formerly employed for a period of one (1) year following the end of such former employee's employment with the Town.

Section 6. Ethics Commission

1. Membership

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

A. The five (5) Regular Members of the Commission shall include at least one attorney or paralegal (current or retired) and at least one member with a financial background.

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

C. No Regular member or Alternate member of the Ethics Commission shall:

A. Be a Town official or Town employee of the Town of Ledyard or be a member of the immediate family of any Town official;

B. Have held any elected Town or State office for a period of one (1)-year prior to being appointed to the Ethics Commission.

C. Be a member of a town committee.

D. Serve as a member of another Town agency, board, commission, council or committee.

E. Have been employed by the Town for a period of one (1) prior to being appointed to the Ethics Commission.

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

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

2. Terms of Appointment

A. Members shall be appointed by the Town Council for a term of three (3) years and shall serve until their successor has qualified or is removed by the Town Council.

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

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

D. Any vacancy on the Ethics Commission, other than by expiration of term, shall be filled for the unexpired portion of the term by the Town Council.

E. The Town Council may remove members for cause and fill the vacancy in accordance with the Town Charter. Cause for removal shall include, but is not limited to, an unexcused absence from three (3) consecutive meetings. It shall be the responsibility of the Chairman of the Ethics Commission to notify the Town council when a member has not properly performed his/her duties.

F. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary.

3. Authority/Duties

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

A. To consult with the Town Attorney or another attorney hired by the Ethics Commission if so authorized by the Town Council.

B. To request that the Town Attorney provide advisory opinions. Advisory opinions rendered by the Town Attorney, until amended or revoked by the Ethics Commission, shall be binding and shall be deemed to be final decisions.

4. Procedures

A. Filing of Complaints

A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission and signed under penalty of false statement. The form shall be delivered to the Town Clerk who shall transmit a copy of the complaint to the Chairperson of the Ethics Commission and the respondent within five (5) days of receipt of the complaint. The Ethics Commission shall also notify the respondent that it will conduct a probable cause determination and invite the respondent to provide any information the respondent deems relevant to the Ethics Commission's determination of probable cause.

No complaint may be made under the Code of Ethics unless it is filed with the Ethics Commission within three (3) years after the violation alleged in the complaint has been committed.

The Complaint shall include:

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

B. Evaluation and Acknowledgement

i. Within sixty (60) business days of the receipt of a complaint, the Ethics Commission shall review and determine whether there is probable cause that a violation of the Code of Ethics has occurred. A finding of probable cause means that based on a review of the available information the Ethics Commission determines that reasonable grounds exist to believe that the respondent engaged in prohibited conduct by the Code of Ethics. If the Ethics Commission does not make a finding of probable cause, the complaint shall be dismissed and a copy of its decision shall be mailed to both the complainant and the respondent. Unless the Ethics Commission makes a finding of probable cause, a complaint alleging a violation of this Code of Ethics shall be confidential except upon the request of the respondent.

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

C. Hearings.

i. If the Ethics Commission decides that probable cause of a violation of the Code of Ethics exists, it will conduct a public hearing to determine whether or not a violation occurred in accordance with Uniform Administrative Procedure Act ("UAPA") (See Chapter 54 of the Connecticut General Statutes). At the hearing, the respondent will have the right to be represented by legal counsel, to present evidence and witnesses and compel attendance of witnesses and the production of books, documents, records and papers, and to examine and cross-examine witnesses and inspect and copy relevant and material records, papers and documents not in such person's possession. Hearings are not governed by the legal rules of evidence and any information relevant to the matter may be considered. The Ethics Commission will respect the rules of privilege recognized by the law. Not later than ten (10) days before the start of the hearing, the Ethics Commission will provide the respondent with a list of its intended witnesses. The Ethics Commission will make a record of the proceedings.

D. Final Decisions.

i. Decisions by the Ethics Commission that a person is in violation of the Code of Ethics must result from the concurring vote of four (4) of its members.

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

iii. Such finding and memorandum will be deemed to be the final decision of the Commission for the purposes of the UAPA. The respondent may appeal to the superior court in accordance with the provisions of Section 4-183 of the Connecticut General Statutes.

iv. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent and the Mayor and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) days after its decision. It will also advise the respondent of his or her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

E. Penalties for Violations of the Code of Ethics.

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

1. Order to cease and desist the violation.
2. Pay a civil penalty of up to the maximum amount permitted by State law.
3. Censure.
4. Suspension without pay.
5. Demotion.
6. Termination of employment.
7. Restitution of any pecuniary benefits received because of the violation committed.

Section 7. Severability

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

Adopted by the Ledyard Town Council on:_____

_____
S. Naomi Rodriguez, Chairman

Approve/Disapprove on:_____

_____
Fred B. Allyn, III, Mayor

DRAFT

Frequently Asked Questions
"An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"

Q&A as written by Jessica Buhle

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

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

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

Q: Will this result in political weaponization to attack people anyone disagrees with politically?
A: I believe this Code of Ethics is specific enough to outline what does and does not constitute a breach of the Code of Ethics, and Complaints are filed under penalty of false statement, so I do not believe frivolous complaints will be filed to weaponize the Commission against anyone politically.

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

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

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

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

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

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

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

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

DRAFT: 09/07/2025

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 1st each year, file with the Town Clerk, on a form to be prepared by the Town Attorney, a statement, under oath, containing the following information:

a. All real estate located within the Town of Ledyard owned by such elected official or held under a lease for a term exceeding five years, excluding, however, his or her principal residence. The foregoing shall also apply to real estate owned or leased, as aforesaid, by a corporation, trust or partnership in which any such elected official is the legal or equitable holder of at least 5% of the legal or equitable interest in said corporation, trust, or partnership.

b. The names of any firm, proprietorship, partnership, or corporation of which said elected official is an employee or in which such elected official holds at least a five (5) percent interest, and which firm, proprietorship, partnership, corporation, or limited liability corporation has sold or supplied goods or services in excess of ten thousand dollars ($10,000) per annum to the Town of Ledyard during the two years immediately preceding such official's election to office.

c. Any income, fees, salary, or wages directly or indirectly, received by such official from the Town of Ledyard or its political subdivisions during the two years immediate proceeding such official's election to public office.

Section 7. Establishment of an Ethics Commission

1. Membership

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

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

b. No regular member or alternate member of the Ethics Commission shall:

i. Be a Town official or Town employee of the Town of Ledyard or be a member of the immediate family of any Town official;

ii. Have held any elected Town or State office for a period of one (1) year prior to being appointed to the Ethics Commission.

iii. Be a member of a Town committee or commission.

iv. Serve as a member of another Town agency, board, commission, council, or committee.

v. Have been employed by the Town for a period of one (1) year prior to being appointed to the Ethics Commission.

vi. Have any financial interest in matters before the Town or the Board of Education;

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

2. Terms of Appointment

a. Members shall be appointed by the Town Council for a term of three (3) years and shall serve until their successor has qualified or is removed by the Town Council.

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

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

d. Any vacancy on the Ethics Commission, other than by expiration of term, shall be filled for the unexpired portion of the term by the Town Council.

e. The Town Council may remove members for cause and fill the vacancy in accordance with the Town Charter. Cause for removal shall include, but is not limited to, an unexcused absence from three (3) consecutive meetings. It shall be the responsibility of the Chairman of the Ethics Commission to notify the Town Council when a member has not properly performed his or her duties.

f. Within thirty (30) days of the appointment of the Ethics Commission, an organizational meeting shall be held at which members shall choose a Chairman, Vice-Chairman, and a Secretary.

3. Authority/Duties

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

a. To consult with the Town Attorney or another attorney hired by the Ethics Commission if so authorized by the Town Council.

b. To request that the Town Attorney provide advisory opinions.

4. Filing of Complaints

A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission and signed under penalty of false statement. The form shall be delivered to the Town Clerk who shall transmit a copy of the complaint to the Chairperson of the Ethics Commission and the respondent within five (5) days of receipt of the complaint. The Ethics Commission shall also notify the respondent that it will conduct a

probable cause determination and invite the respondent to provide any information the respondent deems relevant to the Ethics Commission's determination of probable cause.

No complaint may be made under the Code of Ethics unless it is filed with the Ethics Commission within three (3) years after the violation alleged in the complaint has been committed.

The Complaint shall include:

a. Name of the person accused (respondent)

b. Name of the person filing the complaint.

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

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

5. Evaluation and Acknowledgement

a. Within sixty (60) business days of the receipt of a complaint, the Ethics Commission shall review and determine whether there is probable cause that a violation of the Code of Ethics has occurred. A finding of probable cause means that based on a review of the available information the Ethics Commission determines that reasonable grounds exist to believe that the respondent engaged in prohibited conduct by the Code of Ethics. If the Ethics Commission does not make a finding of probable cause, the complaint shall be dismissed and a copy of its decision shall be mailed to both the complainant and the respondent. Unless the Ethics Commission makes a finding of probable cause, a complaint alleging a violation of this Code of Ethics shall be confidential except upon the request of the respondent.

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

6. Hearings

   a. If the Ethics Commission decides that probable cause of a violation of the Code of Ethics exists, it will conduct a public hearing to determine whether or not a violation occurred in accordance with Uniform Administrative Procedure Act ("UAPA") (See Chapter 54 of the Connecticut General Statutes). At the hearing, the respondent will have the right to be represented by legal counsel, to present evidence and witnesses, and compel attendance of witnesses and the production of books, documents, records, and papers, and to examine and cross-examine witnesses, and inspect and copy relevant and material records, papers, and documents not in such person's possession. Hearings are not governed by the legal rules of evidence, and any information relevant to the matter may be considered. The Ethics Commission will respect the rules of privilege recognized by the law. Not later than ten (10) days before the start of the hearing, the Ethics Commission will provide the respondent with a list of its intended witnesses. The Ethics Commission will make a record of the proceedings.

7. Final Decisions

   a. Decisions by the Ethics Commission that a person is in violation of the Code of Ethics must result from the concurring vote of four (4) of its members.

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

   c. Such finding and memorandum will be deemed to be final decision of the commission for the purposes of the UAPA. The respondent may appeal to the superior court in accordance with the provision of Section 4-183 of the Connecticut General Statutes.

   d. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) days after its decision. It will also advise the respondent of his or her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

8. Penalties for Violations of the Code of Ethics

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

a. Order to cease and desist the violation;

b. Pay a civil penalty of up to the maximum amount permitted by State law;

c. Censure;

d. Suspension without pay;

e. Demotion;

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

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

Section 8. Severability

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

Adopted by the Ledyard Town Council on: _____

_____

Gary St. Vil, Chairman

Approve/Disapprove on: _____

_____

Fred B. Allyn, III, Mayor

Roxanne Maher

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

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

Thanks, Matt

SHIPMAN

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

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

Shipman & Goodwin LLP is a 2022 Mansfield Certified Plus Firm

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

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

Good Afternoon Kristen:

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

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

Thank you,
Roxanne

****

Hello Attorney Ritter:

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

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

The Administration Committee looks forward to your comments and recommendations.

Thank you,
Roxanne

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

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

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.

DRAFT: 6/11/2025

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, 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 Communions, 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.

DRAFT

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 ~~a~~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.

DRAFT

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.

DRAFT

- 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 Compliant 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

DRAFT

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 famers 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 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 townsperson. 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

Ledyard Town Council
Administration Committee

8/6/2025

Good Evening Councellors,

Before I begin, I would like to be very clear: my comments are not intended as a personal critique of Attorney 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 Whatlehead 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

RECEIVED FOR RECORD
2014 MAY 29 AM 9:58
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

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

Roxanne Maher

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."
   - *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.
   - *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 townsperson. 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?

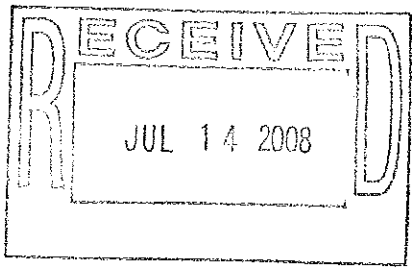
If this committee is put in place, all present and future volunteers should be made aware that anyone in town can file an ethics complaint against them. My friend was simply volunteering to make a good thing happen for the town. If the situation had been handled professionally, perhaps she wouldn’t have 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

0807-023





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** [X] 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, fiance or fiancee, (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 townsperson. What if a person on the EC knows the accused or is familiar with the situation? In a jury selection process, that person would be removed; is Council going to vet and seat a new member each time this occurs? If the EC determines that a complaint is not valid, what plans will there be to stop the accuser from making their accusations public in other ways? The accused has no protection or privacy until an attorney is involved so the simple act of filing a complaint puts the accused in a position of needing one. What if they don't have the money to hire a lawyer? You may argue that a FOIA could be requested for any proceedings under the current policies, but under the current policies situations are handled by professionals, not neighbors, and attorney-client privilege would likely be in place.

What kind of complaints have ECs in other towns received and what kinds of actions have they taken? Did they need an EC to address the issues or would the policies in place have worked just as well? I believe that it would be a good idea to reach out to other towns to see how their EC was used and to talk to the accusers and accused to see how they were affected, especially those who went through the process and were found innocent. I do not know if a formal EC in was in place for the situation I described above. Regardless, it devolved into a situation of neighbor attacking neighbor with awful consequences.

Have there been any “ethical violations" that have been identified that have not been or could not be adequately addressed by policies already in place? I understand that there have been some unpopular goings on in town (proposed blasting, proposed apartment complex) but just because a decision is unpopular does not mean it is a violation of ethics.

Some arguments for the committee included noting that Ledyard was one of the few towns in the state that didn’t have an EC. Since we have policies in place, we don’t need a committee. Other comments were directed to preparedness; there are policies in place so the town is prepared. And the last argument was that if you haven’t done anything wrong, you don’t have anything to worry about. All it will take is for someone in town to suspect you of doing wrong, filing a complaint and your life could be changed. Knowing that you haven’t done anything wrong isn’t going to protect you from an investigation. It’s like arguing that you don’t care about privacy because you have nothing to hide; do you really want people poking around in your life even if you haven’t done anything wrong?

It seems to me that what is really needed is to make everyone aware of the policies already in place to handle complaints in a professional manner with trained personnel rather than asking five townspeople to make a judgement on another. Maybe the existing policies could be updated to include information from the ordinance about the “ethical violations” that would be subject to an investigation and outline the steps to file a complaint under the current system. Such an amendment would address those who say that the current guidelines are too vague.

Is Council going to make a town wide announcement should this committee be established? If so, why not make a town wide announcement to educate folks as to the (updated) policies in place?

If this committee is put in place, all present and future volunteers should be made aware that anyone in town can file an ethics complaint against them. My friend was simply volunteering to make a good thing happen for the town. If the situation had been handled professionally, perhaps she wouldn't have been harassed so badly as to have to move away. Who would want to be a volunteer in Ledyard knowing that anyone could make a complaint against them? Volunteering should be rewarding, not a risk.

Thank you for reading,

Pam Ball

Roxanne Maher

From: barbarakil@sbcglobal.net
Sent: Monday, February 10, 2025 9:44 PM
To: Roxanne Maher
Subject: Ethics Committee

As a resident of Ledyard (50 Seabury Avenue) I would like to express my strong disapproval of the proposed Ethics Commission, as written.
I am also a member of the Ledyard Republican Town Committee, at our Monthly Meeting tonight we voted unanimously against the Proposed Ethics Commission as written.
These issues should not be voted on by a handful of people when the majority of the residents of Ledyard have no idea what is being proposed
Barbara Kil

Roxanne Maher

From: Sharon Pealer <pealerl@att.net>
Sent: Monday, February 10, 2025 10:18 PM
To: Roxanne Maher
Subject: Code of Ethics

The Ledyard Republican Town Committee opposes the code of ethics ordinance as written.

Sharon Pealer; Chair Ledyard RTC


Virus-free.www.avg.com

Roxanne Maher

From: Sharon Pealer <pealerl@att.net>
Sent: Monday, February 10, 2025 11:08 PM
To: Roxanne Maher
Subject: Ethics ordinance

I am writing to express my opposition to the proposed Ethics ordinance being presented to the administration committee of the Ledyard Town Council on Wednesday February 12 in the year 2025. I have read through the entire proposed ordinance and as written it does not serve the town or her residents well. This ordinance as proposed allows for persons with an axe to grind to use the commission to attack someone and the only chance for relief is at the extreme end of the proposed procedures where a full vote of the five commission members is required to find someone guilty. In the meantime the accused must suffer through a several months long process, the expenses and stresses all of it. In the punitive discussion portion of this ordinance it looks to be a political tool which is not something that is in the better interests of any residents of the town. This town has had to deal with uncomfortable issues in the past and has managed to resolve these issues without making political attacks. I should think that mature adults would be able to resolve issues by talking and actively listening to the parties involved, and I would hope that this would include those elected representatives now serving the towns residents.

Sharon Pealer

Roxanne Maher

From: William D. Saums <bsaums@centechsolutions.com>
Sent: Monday, February 10, 2025 5:40 PM
To: Roxanne Maher
Subject: Ethics commission

Dear Councilors:

As you know, I served on the Town Council for many years, and I've learned that the Admin Commission is once again considering forming an ethics commission.

Speaking as a citizen with experience, I do not support the formation of an ethics commission. Such a commission will waste commissioners' and Town employees' time, it could result in unnecessary legal fees for the Town, and it would duplicate controls already in place: laws, ordinances, regulations, and the Town employee code of conduct.

If Town employees break the law, they should be prosecuted. If the existing laws don't work, fix them; but don't introduce an uncontrollable element like this into our system of government.

Here is an excerpt from just one study on the effectiveness ethics commissions:

> "Even so, the raw correlations and point estimates that we present indicate that state ethics commissions have only very weak, and possibly perverse, effects on public corruption. Consequently, while we cannot rule out some small beneficial impact of state ethics commissions, our results do imply that this outcome is no more likely than a harmful effect of similar or larger magnitude. As such, it is reasonable to conclude that there is no support for claims that state ethics commissions, including bipartisan and nonpartisan commissions, serve to reduce political corruption."
> Source:
> https://capi.law.columbia.edu/sites/default/files/content/practitioner_toolkits/do_state_ethics_commissions_reduce_political_corruption_an_exploratory_investiga.pdf

In the event this proposal makes it onto the Town Council agenda, please read this statement into the minutes of the Town Council meeting.

Thank you.

Sincerely,

-Bill Saums
(O) 1-860-572-7181
(M) 1-401-225-5362

Roxanne Maher

From: Mike Cherry <mj_cherry@hotmail.com>
Sent: Wednesday, February 12, 2025 10:25 AM
To: Roxanne Maher
Subject: Comments on Code of Ethics and Ethics Commission Draft of 09/09/2024

I am ambivalent as to creating an ethics commission in Ledyard.
That being said I do have a few comments on the proposed draft:

- Section 4 Paragraph 2.A. third paragraph refers to subsection 3(a) – I don't see a paragraph 3(a) in the document
- Section 4.2.I seems to contradict CGS 8-11 with regards to Land Use Commissions dealing with Zoning. There are similar CGS sections dealing with planning and wetlands

Paragraph 4.1 seems limited to interests and transactions that would limit independent judgement in performance of Official Duties and seems too vague to be effective.
Reading other comments for this proposal leads me to believe many of those supporting creation of a commission do not realize the scope in paragraph 4.2 seems limited to financial misuse and gain.

Mike Cherry
5 Whippoorwill Dr
Gales Ferry, CT 06335
(860) 460-3546
mj.cherry@comcast.net

Roxanne Maher

From: Roxanne Maher
Sent: Wednesday, February 12, 2025 8:48 AM
To: Town Council Group
Subject: FW: Regarding the Proposed Code of Ethics

From: Daniel Pealer <danieljpealer@gmail.com>
Sent: Tuesday, February 11, 2025 9:40 PM
To: Roxanne Maher <council@ledyardct.org>
Subject: Regarding the Proposed Code of Ethics

Dear Members of the Town Council,

I am writing to express my concerns regarding the proposal to establish a code of ethics and committee and to urge the council not to adopt this measure. While the intention behind promoting ethical standards and accountability is commendable, I believe that creating such a committee could lead to significant legal and practical challenges for the town as I detail below.

Legal Implications: The introduction of a code of ethics could lead to increased litigation if breaches of the code result in legal challenges or disputes. This could place a financial and administrative burden on the town, diverting resources from other important areas.

Focusing on potential legal issues, it is important to consider the potential for conflicts of interest and bias within an ethics committee. Members of such a committee are often personally selected from within the community, which can lead to partiality and favoritism. In the Supreme Court case, *Caperton v. A.T. Massey Coal Co.* (2009), the Court ruled that due process requires recusal when there is a serious risk of actual bias or conflicts of interest. Establishing an ethics committee could create a similar risk, where personal relationships and affiliations influence the decision-making process, undermining the committee's credibility and impartiality. Any committee established to enforce a code of ethics must not just actually be fair and impartial it must also appear to be fair and impartial.

Further the proposed code of ethics focuses on the lack of a clause prohibiting retroactive application. Without such a clause prohibiting the application of this code to conduct that occurred prior to the adoption of such a code there is the risk of a person facing punishment Ex Post Facto. The punishment can be any of the following: “an order to cease and desist the violation, to pay a civil penalty of up to the maximum allowed per state law per violation, censure, reprimand, suspension without pay, termination of employment and/or removal from appointed office. Additionally, the commission may refer violators to the proper authorities for further civil or criminal“ (Page 10 of the draft ordinance)

Article I, Section 10, Clause 1 of the U.S. Constitution, One of the two Ex Post Facto Clauses, prohibits states (and by extension, municipalities) from enacting laws that apply retroactively, thus criminalizing conduct that was legal when originally performed. This clause ensures that individuals have fair notice of the laws and consequences that govern their actions. If a town were to create a code of ethics and apply

it retroactively, it would violate this constitutional prohibition by potentially punishing individuals for actions that were not considered unethical at the time they were committed. By preventing such retroactive application, the clause safeguards individuals against unjust legal changes that could undermine the principles of fairness and due process in the legal system.

Of critical note, while there are some exceptions to the Ex Post Facto Clauses they apply those apply when the law is non-punitive, which the proposed ordinance is not. (see Smith v. Doe (2003), Stogner v. California (2003), Lynce v. Mathis (1997) and Miller v. Florida (1987))

In conclusion, while I am sure that supporters of this proposal believe that it is going to produce a brighter future, the gleam of those intentions can blind us to the perils of the dark path they may lead us on. Therefore, it is crucial to thoroughly evaluate the possible drawbacks and challenges that come with adopting a new code of ethics. I strongly encourage the town council to consider alternative strategies that already exist to deal with these concerns.

Thank you for your attention to this matter. I look forward to the council's thoughtful deliberation on this important issue.

Sincerely,
Daniel Pealer

Roxanne Maher

From: Wendy Hellekson <whelleks@icloud.com>
Sent: Wednesday, February 12, 2025 7:14 AM
To: Town Council Group
Subject: Ethics Commission

Dear Councilors,

I am writing in support of an ethics commission for the Town of Ledyard. A strong and balanced government requires that there be oversight to the members of that government. I mean that from all sides, and all parties. This is not a partisan issue. Government should work for the people and not for personal gains, financial or otherwise .

I realize that this is coming from the Chair of the DTC, but I personally feel an ethics commission is important and would be advocating for it if I was not DTC Chair.

Wendy Hellekson
DTC Chair and Citizen of Ledyard

Roxanne Maher

From: Edmund Lamb <edmundlamb@sbcglobal.net>
Sent: Wednesday, February 12, 2025 11:42 AM
To: Roxanne Maher
Subject: Two Proposed Town Ordinances: Fly Additional Flags @ Town Hall & Form Ethics Committee

I am very OPPOSED to both proposed ordinances which are totally unnecessary and will certainly lead to issues later on.
The flags, signs, banners etc. that already exist on RT 117 near & adjacent to the town hall, are very distractive to drivers.
As you well know, there is a great deal of foot traffic across RT117,much of it NOT in the crosswalks..
I for one, don't feel safe driving if distracted by more roadside clutter.
The "ethics committee" is clearly a duplication of existing policies, is not necessary, and surely will lead to more legal & government turmoil and also added costs.
Sincerely; Ed Lamb
47 Lambtown Rd

Roxanne Maher

From: Angela Cassidy <acassidy1122@yahoo.com>
Sent: Tuesday, February 11, 2025 9:19 PM
To: Roxanne Maher; Town Council Group
Subject: Ledyard Ethics Committee/Code of Ethics

February 11, 2025

Administrative Commission Chair

cc: Ledyard Town Council

Ledyard, Ct

Subject: Urgent Need for an Ethics Commission and a Code of Ethics

Dear Commissioners,

I am writing to urge action on the establishment of an Ethics Commission and a comprehensive Code of Ethics for Ledyard. Despite many previous letters and discussions on this matter over the past several months, there has been little progress, and the absence of clear ethical guidelines and accountability measures remains a serious issue.

The lack of consequences for unethical behavior allows misconduct to go unchecked. Without an enforceable Code of Ethics and a dedicated Ethics Commission, there is no formal mechanism to address conflicts of interest, abuses of power, or breaches of public trust. This gap undermines transparency, weakens public confidence,

The delay in addressing this issue is concerning. Ethical governance should be welcomed and a fundamental requirement. Other municipalities and organizations have long recognized the need for such a commission and code.

Sincerely,

Angela Cassidy

62 Hurlbutt Rd

Gales Ferry, Ct 06335

860-271-1749

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.

Roxanne Maher

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 created 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 Commitee.
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.068335-1825
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 dont 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 Zeronsa <jengetter@yahoo.com>
Sent: Tuesday, April 8, 2025 1:56 PM
To: Town Council Group; Roxanne Maher
Cc: Jennifer Zeronsa
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 Zeronsa

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!'