



TOWN OF LEDYARD

Administration Committee

Meeting Minutes

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

Chairman Gary St. Vil

Special Administration Cmt Meeting

Wednesday, October 29, 2025

5:00 PM

Town Hall Annex- Hybrid Format

In -Person: Council Chambers, Town Hall Annex Building

Remote Participation: Information Noted Below:

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

<https://us06web.zoom.us/j/85404767683?pwd=wkYrD1DirOb7dvP7w9a9tvtRkKDU9.1>

Or by Audio Only: Telephone: +1 646 558 8656; Meeting ID: 854 0476 7683; Passcode: 542207

I CALL TO ORDER

the Meeting was called to order by Councilor Buhle at 5:00 p.m. at the Council Chambers Town Hall Annex Building.

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

II. ROLL CALL

Present: Jessica Buhle
April Brunelle

Excused: Kevin Dombrowski

In addition, the following were present:

Gary St. Vil Town Council Chairman
Carmen Garcia-Irizarry Town Councilor
Bill Barnes Town Councilor
Christine Diaz Director of Human Resources
Scott Johnson, Jr. Director of Parks, Recreation & Senior Citizens
Patricia Riley Town Clerk
Sharon Pealer Resident
Jay Pealer Resident
Daniel Pealer Resident
Jeff Eilenberger Resident
M. Dave Schroder, Jr. Resident
Steve Munge Resident

Gary McKeon Resident
Angela Cassidy Resident
Eric Treaster Resident
Karen Parkinson Resident
Joe Gush Resident
Roxanne Maher Administrative Assistant

III. RESIDENT & PROPERTY OWNERS (Total Time not to exceed fifteen (15) minutes)

Mr. Whit Irwin, 2 Winfield Way, Ledyard, stated from his comments at previous meeting that the Town Council knew that he was opposed the Ethics Commission, noting it was redundant; and therefore not needed. However, he stated that the Town Council's Agenda for their Special Meeting following this meeting included a *"Motion to Remove from the Table a Motion to override the Mayor's October 16, 2025 Veto of the Ordinance."*

Mr. Irwin went on to note that it appears that the Administration Committee would be discussing what looks to be a new ordinance for the same subject. He stated he did not know why this Administration Committee was so intent on adopting such an Ordinance, given that there were more important matters that needed to be addressed during the past two-years. He stated they have spent time on third-party flags, playgrounds, special interest groups, and parties. He stated that it looked like they were going to push through this *"An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* He stated that he was present this evening to once again ask that they not rush this process.

Mr. Irwin continued by noting that the new rendition of the *"An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* was plagiarized from the Town of Glastonbury. He congratulated the Administration Committee for not having to start from scratch, noting that he would have done the same thing. However, he stated that people needed more time to look this proposed draft over. He stated that Department Heads needed a chance to look it over and see how it would affect them.

Mr. Irwin went on to note that there were a couple things he saw in the original draft Ordinance that was struck out. He stated since they were going to pass the new rendition of the Ordinance, that he would like to see those things come back. He referred to the red line draft Ordinance from Glastonbury and he noted the following:

- Section 13 b (d) - *"Ethics Commission - Member and Alternate Member Qualifications"*

~~*"(d) Have campaigned for any other persons seeking town office."*~~

Mr. Irwin stated that the language noted above was struck from the draft Ordinance. He stated if they truly wanted to be nonpartisan that he would like to see that language be put back into the ordinance. He stated that someone who has campaigned had a decided opinion on one side or the other; therefore, they should not be, should not be on the Ethics Commission.

- Section 13-e (5) “*Powers and Duties*”
(5) *The Ethics Commission has the power to hold hearings concerning alleged violations of the code, may administer oaths, and may compel attendance of witnesses by subpoena to the extent permitted by law.*

Mr. Irwin noted the in the original proposed Ordinance that the Commission itself, **by majority vote, may initiate actions**. He stated that he did not see any reason why, if the Commission was going to have any teeth, they could not initiate an action. He stated if an Ethics Committee Member sees a violation and could convince the other Committee Members that there needed to be an investigation, more power to them, noting that they were a private citizen, and they should be able to have that option.

- Section 13- (4) “*Terms of Appointment*”

(4) *Inaugural members shall be eligible to serve two (2) additional three (3) years term beyond his/her initial appointment”*

Mr. Irwin noted in the current version, not the red line version, that it restricted **inaugural members** to serve only two additional terms. He stated although he did not have chance to read the entire latest version, that he did not see a term restriction for subsequent members. He stated either everybody needed to be restricted for a total of three terms, or nobody should be restricted to a total of three terms. He suggested the whole paragraph be stricken, or they make sure that the number of terms did not only apply to the inaugural members.

Mr. Irwin concluded his comments by stating that he was against the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”. He stated that he thought it has been rushed; and that if they were going to proceed with the Ordinance that it needed to have more time to percolate and get the issues worked out. He stated that he did not think the new rendition was ready to be presented to the Town Council. Thank you

Mr. Jeff Eilenberger, 2 Village Drive, Ledyard, stated that he was speaking with someone from a small town about their Ethics Ordinance. He noted that the person explained to him that once they had everything ratified, and they thought they were ready to implement the program, that they did about thirty test cases first. He stated that they went through every single step, every single procedure, and researched every single “*How to do what*”. He stated it was similar to going through an Emergency Medical Technician Course (EMT). He suggested that Ledyard do the same to work through the process and to investigate any anticipated issues, so they would be familiar with it.

Mr. Scott Johnson, Jr., Director of Parks, Recreation & Senior Citizens, stated he wanted to begin by thanking the Administration Committee for addressing some of the concerns he raised at the September 24, 2024 Public Hearing regarding the draft “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”. He stated that he felt better about the new rendition of the “An Ordinance Establishing a

Town of Ledyard Code of Ethics and Ethics Commission” relative to the Parks & Recreation instructors. However, he stated that he still had some concerns regarding Section 6 “Consultants”; because it referenced all contracts. He noted that he writes grants and contracts for the town; and he explained that it would be an incredible amount of work to make amendments in all those contracts. He stated that he also saw some potential issues with the grant funding, because every grant that the town entered into was essentially a contract with the State of Connecticut, noting that the language in the grants were provided by the State; and therefore, he did not have the ability to edit those contracts. Therefore, he stated as the new Ordinance was written that might exclude the town from being able to accept funds in the future. He went on to state in addition, for large projects, which were typically over \$500,000 or a \$1 million, that they already include a very specific set of ethical guidelines, but that those ethical guidelines were not in the contract; and that all the paperwork was done ahead of time

Mr. Johnson continued by addressing the requirements provided in Section 6 as noted below:

“Section 6. Consultants

- a. *The Code of Ethics shall be incorporated by reference into all contracts entered into by the Town of Ledyard and the Board of Education with a consultant.*
- b. *Persons or firms who are engaged by and receive compensation from other governmental entities, such as the state or federal government, and who are in a position to influence any decision of an agency, official, or employee shall be guided by the Code.”*

Mr. Johnson stated although he was not sure what the Administration Committee was trying to do, that he would recommend incorporating the following language in the Request for Proposals (RFP/Bid Process) *“Persons or firms who are engaged by and receive compensation from other governmental entities, such as the state or federal government, and who are in a position to influence any decision of an agency, official, or employee shall be guided by the Code”*. He explained that once they select the winner of the bid, that it was harder to go back and implement things unless they were included in the RFP, because those submitting Proposals would check on the town’s policies, procedures, and plans, explaining that these documents were necessary for them to qualify to bid, noting that this was mostly for large projects, because they were labor-intensive. However, he stated holding contractors and consultants to the Ethics Ordinance would actually exclude a lot of bidders from bidding, which would hurt the town.

Councilor Buhle stated that during Residents/Public Comment that they usually do not go back and forth. However, she questioned whether Mr. Johnson would be comfortable if the Ordinance stated *“The Code of Ethics shall be incorporated by reference into all contracts entered into by the Town of Ledyard, after the effective date of the ordinance*. Mr. Johnson stated making it effective going forward would help because of the backlog. Councilor Buhle stated that she thought that it made

sense in the same way that they would not be filing complaints about ethical issues that happened nine-months ago, that they would not be binding people who previously signed a contract and did not agree to the Agreement.

Mr. Johnson explained that the State Contracts had their own ethical requirements, which were very detailed, noting that they have to comply with the Commission on Human Rights & Opportunities Office (CHRO) and so they make sure the town had specific policies, procedures, and plans in-place. He stated if the town did not have the appropriate policies, etc., in-place that contractors would not even submit a bid; explaining that the contractors had to be qualified by the State to bid for projects that were being funded by Grant Funding. He asked the Administration Committee to clarify this with Attorney Ritter. Councilor Buhle questioned whether excluding state contracts from the Ordinance would help alleviate some of the issues that Mr. Johnson presented. Mr. Johnson stated that excluding state contracts from the Ordinance would help, at least on the receipt of the grant funding. However, he stated that the Ordinance as presented was also a concern for any bid that might be under a state grant because of the stipulations such as the Department of Transportation (DOT) Grants, as well as Federal DOT Grants. He stated that there were a lot of requirements, explaining that there was no leeway on anything. He stated if they missed a simple step that it would exclude the town from getting funding. He noted as an example that New London did not receive a Grant because they forgot to post it in the newspaper. He stated the newspaper posting was probably two lines and the 100-page Grant Application that they missed.

Mr. Johnson suggested because the Town Council was trying to bring contractors into the Ethics Ordinance, that it was putting the contractors into more of an employee status, and therefore, he questioned whether this could possibly open the town up to liability. He asked the Administration Committee if they could ask Attorney Ritter about this as well. He explained that Parks & Recreation typically puts language in all of their contracts to indemnify and protect the town.

Mr. Johnson went to noted the definition in the proposed “*An Ordinance Establishing a Code of Ethics and Ethics Commission*” for “*Consultant*” refers to any independent contractor, professional person or firm that is by virtue of an award of a public debt or contract engaged by and receives compensation from the town or board of education for the purpose of providing professional scientific technical or other specialized opinion, and is in a position to influence any decision of an agency, official, or employee”. Mr. Johnson stated that he had talked about this definition at previous meetings and how it would apply to some of the Parks & Recreation Consultants that provide specialized technical knowledge and guidance to the town such as their turf manager. He explained that the turf manager does testing, and then he might tell them what type of applications they need for their fields. He stated that Parks & Recreation would then typically have him do the those applications, because it was a lot cheaper for the town to have turf manger apply those additional applications such as lime, while he was doing another application explaining that they would save labor costs, and only pay for the materials.

Councilor Buhle stated that this was not a blanket situation where they were covering contractors paving a road or the Parks & Recreation's grass mowing contract, noting that was not what this Ordinance was about. She stated that it was about specialized consultants who are providing specialized technical knowledge that was guiding the town. She stated that she thought that they could see how there may be an ethical conflict in certain situations.

Mr. M. Dave Schroder, Jr., 290 Whalehead Road, Gales Ferry, stated that he was looking for some clarification regarding the following:

- The reason the Administration Committee has gone back to the Town of Glastonbury's Ethics Ordinance.
- What they liked about Glastonbury's Code of Ethics.
- What they found interesting for Glastonbury's Ethics Ordinance that would make it a good match for Ledyard

Councilor Buhle responded to Mr. Schroeder's questions explaining at the recommendation of the Town Attorney Matt Ritter the Administration Committee started with the Town of Glastonbury's Ethics Ordinance, noting that Attorney Ritter wrote Glastonbury's Ordinance. She stated the reason Glastonbury's Ordinance was appealing to her was because Attorney Ritter referenced how little liability it brought to the town of Glastonbury. She stated despite what some people think; that she was not trying to bring liability on Ledyard. Therefore, she stated that the intention was to work with Glastonbury's Code of Ethics as a starting point, and make some procedural changes, noting that the Final Decision and the Complaint Process was actually from the initial Ordinance that the Administration Committee proposed, which was the Attorney's language. She went on to explain that she stated by starting with Glastonbury's Ordinance that she figured it would also be easier for the Attorney to review and support an Ordinance that he originally wrote.

Mr. Schroeder questioned whether Councilor Buhle had any examples in which Glastonbury Ethics Code's was used. He noted his previous comments and recommendations regarding the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" that he talked about Norwich because, they could go onto their website and see that Norwich has actually used their Code of Ethics.

Mr. Schroeder went on to state in looking into Glastonbury that they established their Ethics Commission in 2013 and since 2020, which was as far as their meeting minutes back go back, that their Ethics Commission met 10 times during the past five years. He stated that the Ethics Commission would have some executive session meetings; and therefore, a lot of their meetings would not be public. He stated they meet once, and then it's over. Councilor Buhle stated that Attorney Ritter mentioned that the first few years after they adopted their Ethics Ordinance in 2013 that

Glastonbury had one Complaint filed. Therefore, she stated that she felt it was very strong; and she felt very confident with it.

Mr. Steve Munger, 12 Nutmeg Drive, Gales Ferry, stated as he says at every meeting when he speaks, that he had a lot of respect for anybody who volunteers to serve the town. He noted at the last meeting a gentleman who he believed was part of the Democratic Town Committee (DTC) said that they needed an Ethics Commission because of the Mayor they had in town. Mr. Munger stated that of course he just blew that comment off because he knew the Mayor. However, he stated at the last *Meet the Candidate Event* he mentioned that everybody was saying we need an Ethics Commission, but nobody was saying why we need one; and so he asked those who were saying that Ledyard needed an Ethics Commission to give him some examples as to why the town needed an Ethics Commission. He stated when someone came up and talked to him that their first example as to why the town needed an Ethics Commission was because of the thing with the housing and the Mayor. Therefore, he stated that this looked very partisan to him; and it looked like they were rushing the Ordinance to get it done before the November 4, 2025 General Election. He stated if they seriously thought the town need an Ethics Commission that maybe they should wait to see what the people in town think; and if they get back in as the leading party that they could move forward with their proposal. He stated that he would support whatever they decide. He stated when he served in the Navy, they could fight something, but once it was decided that they would have to support it.

Mr. Munger continued by stating according to Ms. Kelley that the Democratic Town Committee (DTC) asked all the people that were running if they were going to vote party line. Mr. Munger stated that was not heard of at least not to him; and it that made him think twice about the whole situation being really partisan. He stated that he also heard the same comments at other meetings. He stated that he has heard that the Ethics Commission was being pushed, noting that he was not accusing the two Members of the Administration Committee that were present this evening of pushing the Ordinance, but that it just looked pretty shady to him.

Mr. Munger concluded his comments by stating that if they really believed in what they were doing that they should wait till after the election, and see what happens. He stated that he would support the *"An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethic Commission"*, if you guys stay in power, He stated that he would support it 100%; even though he disagreed with it, noting that he would still have this bad feeling about it. He stated that he respect everybody on the Town Council; and if they were serious about the proposed *"An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethic Commission"*, that they prove it by waiting until after the election. Thank you.

Mrs. Patrica Riley, Town Clerk noted that she wanted to state for the record that she received the updated *"An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission"* yesterday. She stated although she had some concerns that she did not have them ready this because she did not know that she had to have her

comments ready for tonight's meeting. Therefore, she stated that she would have her comments for the Public Hearing. Councilor Buhle questioned whether she could email Mrs. Riley to set up a meeting before the next Public Hearing. Mrs. Riley responded, stating that would fine.

Mr. Whit Irwin, 2 Winfield Way, Ledyard, stated that he had one more constructive comment about the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*". He noted the language was unclear as to who had the penalization authority; questioning whether it lied with the Commission; or with the Town Council. He stated clarity of the language to make it more explicit would be beneficial. Councilor Buhle stated providing clarity regarding the penalization authority was previously brought forward; and that it would be addressed.

Ms. Angela Cassidy, 52 Hurlbutt Road, Gales Ferry, attending remotely via Zoom, stated that she agreed with Parks, Recreation & Senior Citizens Director Scott Johnson, Jr. in that she felt much better about this Ordinance. She stated that she felt that this Code of Ethics was necessary, but that she did not agree with all the versions. She stated that she was happy they started from a more comprehensive document and with the this new version. She stated that it was great that the Councilor Buhle went back to the Town Attorney as requested. She expressed concern that this Ordinance was being fought so heavily, because this effort has been completely nonpartisan, noting that it really had support from both sides.

IV. BUSINESS OF THE MEETING

1. MOTION to adopt the "An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission" as updated on or about October 29, 2025.

Councilor Buhle explained the Ordinance presented this evening was modeled after the Town of Glastonbury's Ethics Ordinance, noting that Attorney Ritter had drafted their Ordinance. She stated that she talked with Town Attorney Matt Ritter on Monday, October 27, 2025 regarding the proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" and that they worked to incorporate the comments received from the public and staff into Ledyard's Ordinance.

Councilor Buhle went on to note that since the draft Ordinance dated October 27, 2025 was provided that she received some additional comments from Police Chief John Rich, and Administrator of Emergency Services Steve Holyfield. Therefore, she would like to propose a few amendments to address their comments and concerns. She proceed as follows:

- MOTION to add the following language to Section 5a with exact language suggested by Town Attorney Matt Ritter:

“Notwithstanding anything contained in this ordinance to the contract, a Town official, employee, or consultant may enter into a contract with the Town if the contract is (i) publicly quoted or bid; or (ii) the Town official, employee, or consultant is not involved in the awarding of the contract. In addition, the provisions of this section shall not apply to any employment contracts in which a Town official, employee, or consultant is hired by the Town or the Board of Education to perform necessary services.”

Moved by Councilor Buhle, seconded by Councilor Brunelle

VOTE: 2 - 0 Approved and so declared

- MOTION to add the following language in Section 5e, with exact language suggested by Attorney Ritter:

“This section does not apply to Town-owned vehicles issued to emergency responders who are authorized by the Mayor, Fire Chief or Police Chief to take their Town-owned vehicles home, or vehicles issued to employees who are permitted to bring their Town-owned vehicles homes as part of an employment agreement or contract.”

Moved by Councilor Buhle, seconded by Councilor Brunelle

VOTE: 2 - 0 Approved and so declared

- MOTION to add the following language in Section 14. C. 4 . v., which has been reviewed and agreed upon by Attorney Ritter:

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

Moved by Councilor Buhle, seconded by Councilor Brunelle

VOTE: 2 - 0 Approved and so declared

The Administration Committee continued by reviewing the Mayor’s letter dated October 29, 2025 providing comments to the newly proposed replacement “*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” and addressed a number of his concerns with the amendments as noted below:

- MOTION to amend Section 5d to read:

“No town Official or employee may directly hire a member of his/her family. Town employee supervision of a member of his/her family may occur in temporary emergency situations, including but not limited to winter storms, tropical storms, and labor shortages.”

Moved by Councilor Buhle, seconded by Councilor Brunelle

VOTE: 2 - 0 Approved and so declared

- MOTION to amend Section 9.d.4 to read:

“To the Town department directors - to the Mayor or the Town Council”.

Moved by Councilor Buhle, seconded by Councilor Brunelle

VOTE: 2 - 0 Approved and so declared

- MOTION to amend Section 13b.b. to add the following

“Have campaigned for any other person seeking a town office”

In addition and add ***“campaign”*** to definitions to be specified by Town Attorney.

Moved by Councilor Buhle, seconded by Councilor Brunelle

VOTE: 2 - 0 Approved and so declared

- MOTION to amend Section 13.d.4. to add:

“No member may serve more than three (3) terms total.”

Moved by Councilor Buhle, seconded by Councilor Brunelle

VOTE: 2 - 0 Approved and so declared

- MOTION to correct typos and language in the following sections:

- Section 3.5. to read *“person or persons”* to correct a typo.
- Section 14.b.2 change the word ***“it”*** to ***“the form.”***
- Section 14.5.ii., change language to read ***“The Ethics Commission will meet to review the request,”*** removing the word ***“to.”***

Moved by Councilor Buhle, seconded by Councilor Brunelle

VOTE: 2 - 0 Approved and so declared

- MOTION to correct an additional typo:

Section 14.c.4.v., remove the letter A in front of Violation, so the sentence starts with Violation, and re-letter the list to start with ***a.*** instead of ***b.***

Moved by Councilor Buhle, seconded by Councilor Brunelle

VOTE: 2 - 0 Approved and so declared

MOTION to recommend the Town Council adopt the *“An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission”* as updated on or about October 29, 2025.

DRAFT: 10/~~27~~/29/2025

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, Town employees, and Town consultants 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 beneficial and/or financial interest; and that the public has confidence in the integrity of its government.

The purpose of the Town of Ledyard Code of Ethics is to:

- Identify standards of ethical conduct to guide all Town officials, including members of the Board of Education, and all Town and Board of Education officers, employees, and consultants as they conduct their public responsibilities.
- Clarify the role of the Ethics Commission.
- Outline a process that allows Town officials, including members of the Board of Education, and all Town and Board of Education employees, and consultants to seek guidance and advice about ethical issues connected with their public responsibilities, and
- Establish a process that enables citizens to report, and the Ethics Commission to investigate and respond to possible violation of the Code.

Section 3. Definitions

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

1. “*Agency*” is any board, commission, authority, or committee of the Town, including the Town Council and Board of Education.
2. “*Beneficial interest*” means any nonfinancial interest or special treatment that is not common to other citizens of the Town.
3. “*Business associate*” means a person joined together with another person through employment or to achieve a common financial and/or business-related objective.

4. “*Business day*” means a day other than a Saturday, Sunday, or other day on which the office of the Ledyard Town Clerk is closed to the public for business.
5. “*Campaigning*” - *to be defined by attorney*
6. “*Complainant*” means a person or persons who files a complaint under penalties of false statement against an official, employee, or consultant containing allegation of prohibited activities under the Code of Ethics.
7. “*Confidential Information*” means information acquired by a Town official, employee, or consultant 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.
8. “*Consultant*” means any independent contractor or professional person or firm that is by virtue of an award of a public bid or contract engaged by and receives compensation from the Town or Board of Education for the purpose of providing professional, scientific, technical, or other specialized opinion, and is in a position to influence any decision of an agency, official, or employee.
9. “*Employee*” is any person receiving a salary, wages, or stipend from the Town or Board of Education for services rendered, whether full-time or part-time.
10. “*Family*” means the spouse, domestic partner, fiancé, fiancée, parents, daughter-in-law, son-in-law, mother-in-law, father-in-law, sister-in-law, brother-in-law, grandparents, great-grandparents, lineal descendants, stepchildren, foster children, siblings, stepsiblings, foster siblings; lineal descendants of siblings, stepsiblings, and foster siblings of an official, employee, or consultant, or his/her spouse or domestic partner.
11. “*Financial Interest*” means any interest that:
 - a. has a monetary value of one hundred dollars (\$100.00) or more or generates a financial gain or loss of one hundred dollars (\$100.00) or more in a calendar year;
 - b. not common to the other citizens of the Town. An individual’s financial interests shall include the financial interests of all members of his/her family but shall not include any duly authorized compensation from the town.
12. “*Gift*” is a gift of more than one hundred dollars (\$100.00) in value. A gift includes, but is not limited to, entertainment, food, beverage, travel, and lodging to the extent that the gift value exceeds one hundred dollars (\$100.00) in any one (1) year from the same person, as well as loans that are not commercially reasonable. A gift may also include donations to a third party on behalf of an official, employee, or consultant for which she/he receives some favor, advantage, or consideration.
Gifts do not include:
 1. A political contribution that is otherwise reported in accordance with the law.

2. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.
 3. Any gift regardless of value received from: (i) any family member who resides in the same household as the recipient of the gift, or (ii) another family member unless the other family member who makes the gift is interested, directly or indirectly, in a business transaction or pending matter that is within the purview or responsibilities of (a) the recipient of the gift, or (b) another family member residing in the same household as the recipient of the gift.
 4. Certificates, plaques, or other ceremonial awards costing less than fifty dollars (\$50.00).
 5. 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.
 6. Honorary degrees.
 7. Costs associated with attending a conference or business meeting and/or registration or entrance fee to attend such conference or business meeting in which the Town official or Town employee participates in his/her official capacity.
 8. Any gift provided to a Town Official or Town Employee or to a 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.
13. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.
14. *"Official"* is any person holding elective or appointive office in the government of the town and shall include, but not limited to, the Town Council, Board of Education, Town commissions and committees, or any other agency.-
13. *Respondent* means a person who is the subject of a complaint.
- Section 4. Confidential information
- Town officials, employees, or consultants may not disclose or use any information or records that are not available to the public except in the performance of official duties or as required by law or court order.
- Section 5. Conflict of Interest Provisions
- a. A Town official, employee, or consultant has a conflict of interest when that individual engages in or participates in any contract, transaction, decision, employment, or rendering of service where the Town official, employee, or consultant has a financial or beneficial interest. **Notwithstanding anything contained in this ordinance to the contract, a Town official, employee, or consultant may enter**

into a contract with the Town if the contract is (i) publicly quoted or bid; or (ii) the Town official, employee, or consultant is not involved in the awarding of the contract. In addition, the provisions of this section shall not apply to any employment contracts in which a Town official, employee, or consultant is hired by the Town or the Board of Education to perform necessary services.

- b. A financial interest or beneficial interest presents a conflict of interest that is incompatible with the proper discharge of official responsibilities in the public interest if the Town official, employee, or consultant has reason to believe or expect that he/she or any member of his family or business associate will obtain, secure, or advance such interest by reason of his/her actions in performance or nonperformance of his/her official responsibilities.
- c. A Town official, employee, or consultant does not have a financial interest or beneficial interest that is incompatible with the proper discharge of his/her official responsibilities in the public interest if the interest accrues to such individual, his/her family members or business associate(s) as a member of a profession, occupation, or group to no greater extent that it accrues to any other member of the profession, occupation, or group with which he/she is affiliated as set forth in G.S. 7-148h(b).
- d. ~~No Town Official or employee may directly hire a member of his/her family.~~ Town employee supervision of a member of his/her family may occur in temporary emergency situations, including but not limited to winter storms, tropical storms, and labor shortages.
- e. Town officials and Town employees shall not use Town owned vehicles, equipment, facilities, materials, or property for personal convenience or profit. Personal convenience or profit refer to those matters that are not related to the individual's official duties. This section does not apply to Town-owned vehicles issued to emergency responders who are authorized by the Mayor, Fire Chief or Police Chief to take their Town-owned vehicles home, or vehicles issued to employees who are permitted to bring their Town-owned vehicles homes as part of an employment agreement or contract.
- f. No Town official, employee, or consultant may withhold information or make a dishonest or fraudulent statement with the intent to deceive or to misrepresent material facts in the performance of his or her official duties.

Section 6. Consultants

- a. The Code of Ethics shall be incorporated by reference into all contracts entered into by the Town of Ledyard and the Board of Education with a consultant.
- b. Persons or firms who are engaged by and receive compensation from other governmental entities, such as the state or federal government, and who are in a position to influence any decision of an agency, official, or employee shall be guided by the Code.

Section 7. Gifts and favors

- a. No Town official, employee, or consultant, or any business associate, or member of his/her family nor any agency, employee organization, or group of employees shall solicit or accept any gift, whether in the form of a service, a loan at a less than a commercially available rate, a material thing, or a promise, from any person or entity who or which is interested directly or indirectly in any business transaction or pending matter that is within the purview of such official, employee, consultant, agency, employee organization, or group of employees. No Town official, employee, or consultant shall accept, or knowingly seek or cause to be given to any member of his/her family, any valuable favor, treatment, consideration, or advantage beyond that which is generally available to the citizens of the Town from any person who, to the knowledge of the official, employee, or consultant, is interested directly or indirectly in any business transaction or pending matter that is within the responsibilities of the official, employee, or consultant. For purposes of this section, a pending matter includes, but is not limited to, any application to an agency, commission, committee, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment, or services.
- b. This section shall not apply to any political contribution that is reported as required by law.

Section 8. Equal treatment

Without proper authorization, no Town official, employee, or consultant shall accept, seek, grant, or cause to be granted any special consideration, treatment, or advantage to such individual, or his/her family by virtues of his/her position or business association.

Section 9. Disclosure and disqualification

Any Town official, employee, or consultant who has a conflict of interest, financial interest, or beneficial interest, direct or indirect, in any contract, transaction or decision within the purview of his/her official responsibilities shall disclose that conflict of interest

- a. in accordance with section 9(b) through 9(e). Such disclosure shall disqualify the official, employee, or consultant from participation in the matter, transaction, or decision.
- b. No Town official, employee, or consultant shall appear on behalf of any private person or party before any agency in connection with any cause, proceeding, application, or other matter in which he/she has financial interest or beneficial interest without first disclosing such interest to the agency, which shall record such disclosure in the record of the agency's proceeding.
- c. 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:
 1. All real estate located within the Town of Ledyard owned by such elected official or held under lease for a term exceeding five years, excluding, however, his/her

principal residence. The foregoing shall also apply to real estate in the Town of Ledyard 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 five (5) percent of the legal or equitable interest 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 (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 (\$10,000.00) per annum to the Town of Ledyard during the two (2) years immediately preceding such official's election to office.
 3. Any income, fees, salary, or wages directly or indirectly, received by such official from the Town of Ledyard during the two (2) years immediate proceeding such official's election to public office.
- d. If there is an uncertainty whether a Town official, employee, or consultant has a conflict of interest, financial interest, or beneficial interest that could disqualify that individual from participation in a matter, such individual shall disclose such possible conflict of interest to the following:
1. For a Town official who is a member of an elective or appointive board, commission, committee, or authority - to the particular chair of the commission or committee of which such official is a member.
 2. For Town employees and officials appointed by the appropriate authorities - the Mayor or Town Council.
 3. For Board of Education employees - to the superintendent of schools
 4. The Town department directors - to [the Mayor](#) or the Town Council.
 5. The superintendent of schools - to the Board of Education.
 6. For a consultant - to the agent executing the contract on behalf of the Town or Board of Education.

The appropriate authority to which the disclosure is made shall make an appropriate record of such disclosure and shall recommend to the Town official, employee, or consultant making the report to seek an advisory opinion from the Ethics Commission

- a. regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.
- b. Any such questions concerning a possible conflict of interest may be referred to the Ethics Commission pursuant to Section 13 for an advisory opinion.

Section 10. Incompatible activities

- a. This Code shall not prohibit any current or former Town official, employee, or consultant from appearing before any agency on his/her own behalf. To avoid an

actual or perceived conflict, Town officials are strongly discouraged from appearing before the agency on which they are a member or officer, absent extenuating circumstances, unless he/she has received a prior favorable advisory opinion by the Ethics Commission pursuant to Section 14(b) prior to appearing.

- b. Nothing in the Code shall be interpreted to authorize conduct restricted or prohibited by any provision of the Connecticut General Statutes including, but not limited to, G.S. 8-11, 8-21, and 22a-42(c) that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.
- c. To avoid even the appearance of impropriety or creation of a situation that would be contrary to the declared policy and purpose of the Code, a Town official shall exercise care when appearing before other agencies and shall disclose whether he/she is appearing in his/her official capacity or as a private citizen.

Section 11. Penalty for violation

A failure to comply with the Code shall be considered grounds for censure, reprimand, suspension, demotion, removal, or dismissal of Town officials, employees, and consultants as applicable. The remedies and procedures specified in applicable statutory and Charter provisions, personnel rules, contract grievance rules, or other work rules, policies, and procedures, shall be followed in the enforcement of this section.

Section 12. Acknowledgment form

- a. The Town Clerk shall provide a copy of the Code of Ethics to every Town official and employee within sixty (60) days of date that he/she begins his/her duties. Every Town official and employee shall sign and file with the Town Clerk an acknowledgment form indicating his/her awareness of the provisions of this Code. Current Town officials and employees shall acknowledge the Code of Ethics within one-hundred-twenty (120) days of its effective date.

Each consultant shall sign and file with the Town Clerk an acknowledgment form indicating his or her awareness of the provisions of this Code on or before being retained by the Town, Board of Education, or other agency. Current consultants shall:

- a. acknowledge the Code of Ethics within one-hundred-twenty (120) days of its effective date.
- b. The Mayor and superintendent of schools shall develop a protocol for periodic training of employees concerning the Code of Ethics. The Commission shall develop a protocol for periodic training of officials.
- c. The Town Council shall approve a procedure for monitoring compliance with this

section and approve the training protocols specified in subsection (c).

Section 13. Ethics Commission

a. Structure

1. 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
2. No more than two (2) of the regular members may be affiliated with any one political party. At all times, at least one regular member shall be unaffiliated with any political party. Both alternate members may not be affiliated with the same political party.
3. Members will not be compensated for their service on the Commission.
4. 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

b. Member and alternate member qualifications

- a. Members and alternate members must be residents of the Town of Ledyard.
- b. No member or alternate member shall:
 - a. Be employed by the Town;
 - b. Have been employed by the Town for a period of two years prior to being appointed to the Ethics Commission.
 - c. Hold or seek any Town office.
 - d. Have campaigned for any other person seeking a town office.
 - e. Have held any Town office for a period of two years prior to being appointed to the Ethics Commission.
 - f. Serve as a member of another Town agency.
 - g. Hold office in a political party or political committee.
 - h. Have been found in violation of state, local, or professional code of ethics.

c. Method of appointment: The Town Council shall appoint the Ethics Commission members in the manner provided in the Town Charter. Members of the Ethics Commission shall be appointed by a minimum of (6) affirmative votes of the Town Council.

d. Terms of appointment

1. Members will be appointed for three (3) year terms.
2. If a member is appointed to fill an unexpired term, then that member's term ends at the same time as the term of the person being replaced.
3. 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.

4. Inaugural members shall be eligible to serve two (2) additional three (3) years term beyond his/her initial appointment. **No member may serve more than three (3) terms total.**
5. 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.
 - a. Powers and duties
 1. The Ethics Commission shall be authorized to consult the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council.
 2. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.
 3. The Ethics Commission has the power to render advisory opinions to any Town official, employee, or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. Individuals seeking an advisory opinion should follow the procedures outlined in Section 14 of the Code.
 4. The Ethics Commission has the power to examine complaints and to make a determination of probable cause, pursuant to the procedures outlined in Section 14.
 5. The Ethics Commission has the power to hold hearings concerning alleged violations of the code, may administer oaths, and may compel attendance of witnesses by subpoena to the extent permitted by law.
 6. The Ethics Commission has the power to review the Code of Ethics policies and procedures on an as-needed basis and will make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures.
 7. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provision of this Code of Ethics or is otherwise prohibited by law.

The Ethics Commission will protect the personal privacy rights of any individual who is the subject of an inquiry or complaint, except as necessary to investigate and make determinations of probable cause. If there is a finding of no probable cause, the existence 1. of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.

2. The Ethics Commission may take action to increase public awareness of the Code of Ethics.

Section 14. Ethics Commission rules of procedure

- (a) These procedures shall be used by the Ethics Commission established in Section 14 hereof, and are designed to guide public officials, officers, employees, consultants, and citizens of the process to be followed if they seek advice or question the conduct of those in or affiliated with town government. Subsection (b), advisory opinions, describes a process for Town officers, officials, employees, or consultants, and other parties doing business with the Town who are seeking advice about their own conduct or the conduct of a Town office or function. Subsection (c), complaints, describes a formal, public procedure for filing complaints. Subsection (d), other communications; miscellaneous, describes the process to be followed by anyone wishing to bring something to the attention of the Ethics Commission, without requesting an advisory opinion or filing a complaint.

(b) Advisory opinions

1. Any current, former, or prospective Town of Ledyard employee, official, or consultant may request an advisory opinion from the Ethics Commission as to whether conduct by that person or entity would violate the Code of Ethics. Any current Town official also may request an advisory opinion concerning the activities of any department over which he/she has jurisdiction or board or commission on which he/she serves.
2. Individuals initiating a request for an advisory opinion must do so by completing a form available through the Ledyard Town Clerk's Office or through the Town's website www.ledyardct.org <<http://www.ledyardct.org>>. The form must contain a statement setting forth the advice requested and the relevant facts known to the individual making the request so that the Ethics Commission can reasonably be expected to understand the nature of the request. The individual making the request must sign ~~it~~ the form.
3. Requests must be addressed in a sealed envelope to the Ethics Commission, c/o The Ledyard Town Clerk, 741 Colonel Ledyard Highway, Ledyard, CT 06339-1511 who will date stamp, but not open, the envelope and forward same promptly to the chair or vice-chair of the Ethics Commission. On the day said request is received by the Town Clerk, the Town Clerk or his/her representative shall notify the chair or vice-chair of the Ethics Commission, or both, of same.
4. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions.
5. Proceedings

The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting under executive session, except upon the request of the individual i. that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics, called by the Ethics Commission chair or vice-chair.

- ii. The Ethics Commission will meet in to review the request. At that time, it may decide to (1) Seek additional information, (2) Create a subcommittee of at least two (2) commission members to make a recommendation for consideration by the full Ethics Commission, (3) Hold an informal hearing to receive comments from the individual who request the advisory opinion and/or from the public, (4) Investigate the relevant facts and issues in order to render the advisory opinion.

1. Decisions

- i. Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present.
- ii. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) days from the day it first considers the request. The Ethics Commission may extend the time for a decision for up to an additional thirty (30) days.
- iii. All advisory opinions must be in writing and communicated to the individual making the request.
- iv. The Ethics Commission may decline to render an advisory opinion if (1) the subject matter is not covered by the Code of Ethics, (2) the known facts are incomplete or incorrect, and the omission or misstatements are material to the advisory opinion requested, or (3) other reasonable grounds exist for not taking action. If the Ethics Commission decides to so act, it shall sta

2. Public Hearing- Legal Notice- November 10, 2025 at 5:00 p.m. “An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission,” as revised on or about October 29, 2025.

Moved by Councilor Buhle, seconded by Councilor Brunelle
Discussion:

In accordance with the Town Charter; Section 5

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

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

VOTE: 2 - 0 Approved and so declared

RESULT: RECOMMENDED FOR APPROVAL

MOVER: Jessica Buhle

SECONDER: April Brunelle

V. ADJOURNMENT

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

VOTE: 2 - 0 Approved and so declared, the meeting was adjourned at 5:56 p.m.

Respectfully submitted,

Jessica Buhle
Committee Chairman
Administration Committee

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