



TOWN OF LEDYARD CONNECTICUT OFFICE OF THE MAYOR

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Mayor

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Ledyard Town Council
741 Colonel Ledyard Hwy.
Ledyard, CT 06339

Councilors,

I write today to include my comments regarding the newly proposed replacement "An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission" dated 10/27/2025:

- 1) **Section 2, bullet 3:** I do not support including consultants in the proposed ordinance. It's often a challenge to get bids now- this new requirement may have a further chilling effect on bidders.
- 2) **Section 3, definition 5:** "a person or person" should likely read "a person or persons".
- 3) **Section 3, definition 7:** Again, this includes consultants. See item 1 above. It appears this will also include attorney utilized by the town.
- 4) **Section 3, definition 8:** Does "stipend" also include those providing programming for Parks and Recreation? Summer camp activities?
- 5) **Section 5, § c:** this paragraph, starting with "...that is incompatible with the proper discharge..." is not clear to the layperson- the very people that will be expected to follow this ordinance. Suggest language revisions.
- 6) **Section 5, § d:** This can occur in emergency situations, including winter storms, tropical storms, or labor shortages, primarily with Public Works and the Police Dept.
- 7) **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 receives a copy of the handbook and are required to sign and accept the obligations contained in said handbook.
- 8) **Section 6, § a:** Suggest removing all references to consultants for reasons stated above.
- 9) **Section 9, § c:** This section does not appear in the Glastonbury model ordinance. What is the intent of inclusion of this clause and how is this of benefit? I'd appreciate clarification as to why this clause is included.
- 10) **Section 9, § d, 2 and 4:** Reference is made to the conflict provision reporting with "Town employees and officials" the Mayor or Town Council, while Department Heads (Directors) are not afforded the same treatment. Please clarify why this is drafted this way.

- 11) **Section 12: Suggest removal in its entirety.** This section poses an added unreasonable, unnecessary burden on the Town Clerk and existing workload. With more than 520 employees and numerous consultants to track and report on, this poses substantial work with little to no benefit. Suggest deleting and instead require annual electronic distribution of the ordinance to all employees "during the first week of January of each year."
- 12) **Section 13, § b:** It is noted that the Glastonbury model ordinance included the following: "No member or alternate member shall...Have campaigned for any other person seeking a Town office." What is the rationale for omitting this particular line when all other "no member shall" items were included? If the Council is seeking unbiased, neutral parties to fill the commission, it would seem that someone that campaigns for another would not fall in the desired bucket.
- 13) **Section 13, § c:** to be bipartisan, suggest a minimum of seven (7) affirmative votes.
- 14) **Section 13, § e 1):** There is no budget line for this new commission. Attorney Ritter has suggested budgeting a minimum of \$20,000 annually for legal fees, with some towns spending as much as \$200,000, if the aggrieved party opts to appeal to Superior Court. Additionally, the Town is required to provide legal counsel for the respondent, with an insurance deductible between \$1,000 and \$10,000 per occurrence. Both the Town Attorney and Insurance lines will require amendment.
- 15) **Section 14 § b 2):** suggest changing last line from "must sign it" to "must sign the form".
- 16) **Section 14, § 5 ii):** typo reads "...will meet in to review..." Determine proper language intent.
- 17) **Section 14 § 4 d):** Suggest deleting this paragraph in its entirety. The charge of the Ethics Committee is to offer advisory opinions, address inquiries and handle complaints of possible ethics violations. To that end, this committee is not a sounding board for other communications, particularly where it states "...communications from the public, even if they do not fall within the categories of an advisory opinion, inquiry or complaint". The other communications should be directed to the Town Council or the Mayor.

Thank you,



Fred B. Allyn III

Mayor