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, April 8, 2026 **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://ledyardct.zoom.us/j/86819229459?pwd=i0MdzqDppHWxaLUj8vaxqql6EUPYWR.1
Audio Only: Telephone: +1 646 558 8656; Meeting ID: 868 1922 9459; Passcode: 230289

I. CALL TO ORDER

II. PLEDGE OF ALLEGIANCE

III. ROLL CALL

IV. PRESENTATIONS

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 the following Town Council Minutes:
- Public Hearing Minutes of March 25, 2026
- Regular Meeting Minutes of March 25, 2026

IX. COMMUNICATIONS

Communications List - April 8, 2026

X. REFERALS

XI. FISCAL YEAR 2026/2027 BUDGET UPDATE

Fiscal Year 2026/2027 Budget Update

Attachments: BUDGET PROCESS-CHARTER for 2026-2027
Flyer-FY 26-27-Budget Process

XII. 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

XIII. REPORT OF THE MAYOR

Mayor Report Fiscal Year 2025/2025

Attachments: Mayors Report 3-11-26

XIV. OLD BUSINESS

XV. NEW BUSINESS

Administration Committee

1. MOTION to adopt a proposed "Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission".

Attachments:
Ethics Ordinance Admin Mtg-Draft-2026-03-11-PUBLIC HEARING-2025-03-25-CLEAN COPY
Ethics Ordinance Presentation-2026-03-25
Ethics Ordinance Draft-2026-03-07carmen
Ledyard Ethics Ordinance (FEB 2026 DRAFT)-23452496-v3-CLEAN COPY
Change-Pro Redline - Ledyard Ethics Ordinance (FEB 2026 DRAFT) -23452496-v2 and Ledyard Ethics Ordinance (FEB 2026 DRAFT) -23452496-v3
Ethics Ordinance--TRACK CHANGES-2026-01-28-ADMIN MTG-WITH APPENDIX_-CARMEN
Attorney Ritter-Councilor Garicia-Email-2026-02-03-Process to Amend Ordinance- Topic- Ethics Ordinance
Attorney Ritter-Councilor Garicia-Email-2026-02-06-Languge re Manitory Persons
Ethics Ordinance-Town Attorney -Appendix-email-2026-02-03
Attorney Ritter-Councilor Garicia-Email-2026-02-03-Example Ordinances with Appendix-Topic- Ethics Ordinance
Ethics Ord-with Employee-Town Attorney and Public Feedback-TRACK CHANGES-2026-01-14-Carmen-RM-Track Changes Noted
10-29 Clean Copy with Employee and Public Feedback-TRACK CHANGES
Amendments to Ethics Ordinance
10-29 Clean Copy with Employee Feedback
BUHLE EMAIL-2025-10-28-TRANSMITTING ADDITONAL CORRESPONDENCE-REDLINE
Secondary Attorney Revisions Clean Copy 10-28
Secondary Attorney Revisions Redline 10-28
Final Draft with Attorney Revisions - Clean Copy
BUHLE-ATTORNEY-PROPOSED ETHICS ORDINANCE-EMAIL COMMUNICATION-2025-10-27
Modified Draft with Attorney Revisions
Modified Draft with Attorney Revisions-with communcations email
Redline Glastonbury to Ledyard ordinance
Ethics Ordinance DRAFT-2025-10-27
Code of Ethics Searchable Version-GLASTONBURY
Attorny Legal Oinion-Ethics Ordinance Adopted October8-2025-email-2025-10-22
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
MURRAY-PROPOSED ORDINANCE ETHICS COMMISSION-PUBIC HEARING-EMAIL-2025-10-28
Administrator of Emergency Serivces -Buhle email thread-Comments on Ethics Ordinance-2025-`0-28
Administrator of Emergency Serivces -Buhle-Mayor email thread-Comments on Ethics Ordinance-Vehicle Useage Policy-2025-`0-28
Police Chief -Buhle--email thread-Comments on Ethics Ordinance-2025-`0-29-Vehicle Usage Policy
Buhle-Attorney -email thread-Comments on Ethics Ordinance-2025-`0-29-Vehicle Usage Policy
Mayor-Comments Proposed Ethics Ordinance ltr-2025-10-29
Ethics Ordinance Draft-2026-03-07carmen-for Admin Mtg-2026-03-11-clean copy for postiing

Finance Committee

2. MOTION to authorize the purchase of Fire Apparatus in the amount of $1,173,066 from Marion Body Works, Inc with funding from Account # 21020401-54325 (Fire Apparatus).

Attachments: 13-FRM011-MBW-Contract-Terms-Chassis-STD-and-Body-Delivery-HGAC(2)
13-FRM016-MBW-Contract-Terms-Pre-Paid-100(1)
Ledyard Proposal 100% prepay 3-24-26
Ledyard Proposal Chassis at Marion 3-24-26
Official_FET_Exemption_Form-1
AES Apparatus Replacement FY27 proposed with R13

3. MOTION to appropriate $73,782.83 of proceeds received from the sale of 528 Colonel Ledyard Highway to Capital Account #21014301-53306 (Land Use - P & Z Document Updates).)

Attachments: lf#26-0432-DeChesser_Property-2026-03-24

4. MOTION to authorize the Mayor to sign a Commitment to Fund a Local Transportation Capital Improvement Program (LOTCIP) grant in the amount of $3,224,800.

   Attachments: L071-0002 - Commitment to Fund Letter Signed_.pdf

5. MOTION to adopt a proposed Fiscal Year 2026/2027 Water Operations Budget in the amount $1,860,262.

   Attachments: FY27 WPCA Water Budget Worksheet
   ORD-#300-001-ESTABLISHING WATER POLLUTION CONTROL AUTHOIRTY-2019-.docx

6. Discussion and possible action regarding the Fiscal Year 2026/2027 Budget.

   Attachments: Mayor Proposed Budget FY 26-27 AS SUBMITTED 3-2-26
   BOE FY 2026-2027-BUDGET-2026-02-10
   BOE-TC Capital Plan Presentation2026-02-11
   BUDGET PROCESS-CHARTER for 2026-2027
   Library Current Consortium Discounts-2026-03-12
   LION Preliminary Fees FY2026_2027-2026-03-12
   Education Cost Sharing(ECS) Formula-Town Council Ltr-2026-03-17
   Raised Bill 5407- Support- Veterans Tax Exemption PA 24-45-Town Council & Mayor Ltr-2026-03-17
   Ryan-Budget Work Session 2026-03-19 Comments-email-2026-03-19
   Garcia-Irizarry-Budget Fiscal Year 2026-2027 Comments-email-2026-03-31

7. MOTION to set a Public Hearing (Hybird Format - Video Conference and In-Person) date to be held on April 21, 2026 at 7:00 p.m. to be held in the Council Chambers, Town Hall Annex, 741 Colonel Ledyard Highway, Ledyard, to receive comments and recommendations on the proposed Fiscal Year 2026/2027 Budget.

   Attachments: BUDGET PROCESS-CHARTER for 2025-2026-BUDGET-2026-04
   2025-05-BUDGET CALENDAR
   2025-06-BUDGET -CALENDAR

8. MOTION to set the Annual Town Meeting (Hybrid Format -Video Conference and In-Person) date regarding the proposed Fiscal Year 2026/2027 Budget on May 18, 2026 at 7:00 p.m. to be held at the Council Chambers, Town Hall Annex, 741 Colonel Ledyard Highway, Ledyard Connecticut; and to adjourn to a Referendum to be held on May 19, 2026 between the hours of 6:00 a.m. 8:00 pm.

   Attachments: BUDGET PROCESS-CHARTER for 2026-2027
   BUDGET-2026-03
   BUDGET-2026-04
   BUDGET-2026-05
   BUDGET-2026-06

XVI. 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 #: 26-0445 **Agenda Date:** 4/8/2026 **Agenda #:**

MINUTES

Minutes:
MOTION to approve the following Town Council Minutes:

- Public Hearing Minutes of March 25, 2026
- Regular Meeting Minutes of March 25, 2026

File #: 26-0486 **Agenda Date:** 4/15/2026 **Agenda #:**

AGENDA ITEM
CORRESPONDENCE

Subject:
Communications List - April 8, 2026

Correspondence List:
(type text here)

TOWN OF LEDYARD

741 Colonel Ledyard
Highway
Ledyard, CT 06339-1511

File #: 26-0343 **Agenda Date:** 3/25/2026 **Agenda #:**

AGENDA REQUEST
GENERAL DISCUSSION ITEM

Subject:
Fiscal Year 2026/2027 Budget Update

Budget Information:

Below is the link to the Town's Website where Information regarding the Fiscal Year 2026/2027 Budget can be found:

Budget Process - FY 2026-2027 | Ledyard, CT - Official Website <https://www.ledyardct.org/777/Budget-Process---FY-2026-2027>

- Mayor's Proposed Fiscal Year 2026/2027 Budget
- Board of Education Proposed Fiscal Year 2026/2027 Budget

Key Dates:

- Budget Work Session Dates
  All Budget Work Sessions will begin at 2:00 p.m.

✓ Thursday, March 5, 2026
✓ Monday March 9, 2026
✓ Thursday, March 12 , 2026
✓ Thursday, March 12 , 2026
✓ Thursday, March 19 , 2026

- Public Hearing Date - April; 21, 2026 @ 7:00 p.m.
- Annual Town Meeting Date - Monday May 18, 2026
- Referendum Date - Tuesday May 19, 2026
- Mayor's Proposed Fiscal Year 2026/2027 Budget
- Board of Education Proposed Fiscal Year Budget.

Meeting Agendas - Including Background Information, Minutes & Videos can be found on the Town's Meeting Portal at the link below:

TOWN OF LEDYARD - Calendar <https://ledyardct.legistar.com/Calendar.aspx>

BUDGET PREPARATION
SUGGESTED SCHEDULE/GUIDE
AND
ANNUAL TOWN BUDGET PROCESS
(Suggested Schedule Guide)

(Please Note Some Dates are Subject to Change)

Key:
Purple: Suggested Date - Not Dictated by Town Charter;
Green/Blue: Dictated by Town Charter.

Reference: Town Charter Chapter VII - Pages (s) 28 – 31

October/November (**Election Year-Dec**) Town Council prepares and submits letter of Directive for Fiscal Year Budget to Mayor and Board of Education.
(This Date is NOT dictated by Charter)

December – Town Council approves Town Council Department budget to submit to Mayor's Office.
(This Date is NOT dictated by Charter)

Per Town Charter
(1/20/2026)
3rd Monday in January All Departments submit preliminary budget to Mayor's Office
(Monday 1/19/2026 is Martin Luther King Day Holiday).

Per Town Charter
(2/23/2026)
4th Monday in February the Board of Education shall file budget estimates to Mayor's Office.

Per Town Charter
(3/2/2026)
1st Monday in March the Mayor submits budget to Town Council and files with Town Clerk's Office.

March
Finance Committee conducts Departmental Budget Work Sessions. Departments review and submits budget materials to Town Council.

(4/8/2026)
Town Council finalizes budge to Present to a Public Hearing.
(This Date is NOT dictated by Charter)

(4/15/2026)
Town Council files proposed budget with Town Clerk's Office for Public Hearing.
(This Date is NOT dictated by Charter)

Per Town Charter On or Before Last Monday in April
(4/21/2026) (Tuesday)
On OR Before the last Monday in April the Town Council conducts one or more Public Hearings on the proposed budget at the Council Chambers. (School Vacation 4/13/2026 - 4/17/2026)

4/22/2026
Town Council Votes to Finalize Budget
(This Date is NOT dictated by Charter)

Per Town Charter
(5/4/2026)
1st Monday of May the Town Council files proposed budget with Town Clerk's Office for Annual Town Meeting

Per Town Charter
(5/18/2026)
3rd Monday in May Annual Town Meeting on the proposed budget to adjourn to a vote on the voting machine the following day (Tuesday)**.**

Per Town Charter
(Tuesday 5/19/2026)
Vote on Budget on voting machine

Per Town Charter
Should the Referendum does not approve the budget; the budget will be referred back to the Council, the Town Council should reconsider the budget and present it for a second vote on the voting machines three weeks following the previous referendum.

In the event the second referendum does not approve a budget, the Town Council shall adopt a final budget by the fourth Monday in June. Should both the referenda and the Town Council fail to adopt a final budget by the fourth Monday in June, the budget that was presented at the second referendum shall be deemed to have been adopted.

Per Town Charter
6/22/2026
On or before the **Fourth Monday in June**, the Town Council shall fix the tax rate in mils.

** The budget must be presented as a Resolution


Attend Budget Workshop Sessions
Listen to department presentations and follow the Town Council's review of the proposed budget.
Speak at the Public Hearing
Residents can share comments before the Town Council finalizes the proposal.
Submit Questions or Comments
Residents may email questions to: council@ledyardct.org
Attend the Annual Town Meeting
Residents gather to discuss the proposed budget before it goes to referendum.
Vote in the Town-Wide Referendum
The final decision on the town budget is made by voters.
Town of Ledyard, Connecticut — Budget Review Process

File #: 25-2156 **Agenda Date:** 4/8/2026 **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:** 4/8/2026 **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:** 4/8/2026 **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:** 4/8/2026 **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:** 4/8/2026 **Agenda #:**

REPORT

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

Mayor's Report

3-11-26

Budget submitted on 3/2 per Charter. Exclusive of Healthcare and Capital:

+2.35% General Government

+3.63% Board of Education

+13.5% Healthcare expenses (Combined BoE and Gen Gov)

+0.89 mill increase to 26.67, including 1 mill from Mill Rate Stabilization Fund. We budgeted use from this non-tax fund for each of the past four years but have not required its use, primarily because revenues came in higher than projected each of those fiscal years. Some State revenues are difficult to project, while some local revenues can be too (permit revenues). Interest income is directly dependent upon the Federal Funds Rate, which may be subject to change as many as eight times per year, based on the national economic picture. For that reason, we always err on the side of caution with interest income.

This year, Healthcare is presented as a separate line as the Town has little to no control over this necessary expense. Ledyard is part of a smaller pool of 12 towns that have better than average experience ratings, but insurance is still extremely expensive.

Next year, Capital will also be presented as a separate budget for fairness and transparency. As it is this year, Capital is on a town-wide scope.

Public Works O/T expenses were impacted again with 7 crew in overnight hours on 3/4, due to flash freezing, post rain. We treated in advance but rain negated much of the treatment. PWD Masalin has updated spending chart and trajectory which I will share with the Council. We are tracking close to FY15, our most expensive winter in the last 10 fiscal years. We did get salt from the Providence port as we neared depletion, but that salt was "dirty" and we aren't inclined to purchase again (numerous scraps of tarp in the loads clogged our spreaders).

Attended meeting w/ Mohegan Tribe, adjacent communities on 3/4 working towards long-term solution for Mohegan Pequot Bridge. It is inadequate for the redevelopment of the former Norwich State Hospital as well as the influx of EB employees.

Submitted written testimony in support of SB 388- which effectively returns the Mashantucket Pequot- Mohegan Fund to its original formulation of distributing 85% of the funds received. The municipal allocation has eroded over time and eventually flipped to about 20% distributed, with the State retaining 80%. That was not the intent of the fund when it was established.

File #: 25-2715 **Agenda Date:** 4/8/2026 **Agenda #:** 1.

ORDINANCE

Motion/Request:
MOTION to adopt a proposed "*Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*".

Background:

Administration Committee Meeting - March 11, 2026

The Administration Committee revisited the proposed Ethics Ordinance dated February 2, 2026 and updated Section 8 as noted below ***bule italic font*** and approved to forward the March 11, 2026 to the Town Council for approval (March 11, 2026 draft Attached)

Section 8. Acknowledgment forms.
a. The Town Clerk shall provide a copy of the Code of Ethics to every Town and Board of Education official. Every Town official, including members of the Board of Education, shall sign and ***file with the Town Clerk an acknowledgement form***, prepared by the Town Attorney, indicating his/her awareness of the provisions of this Code. The Superintendent of Schools shall sign and ***file with the Board of Education Human Resources Director*** an acknowledgement form, prepared by the Town attorney, indicating his/her awareness of the provisions of this Code. The Human Resources Directors of both the Town and Board of Education, respectively, shall: (i) provide current Town and Board of Education employees a copy of the Code of Ethics within one-hundred-twenty (120) business days of its effective date; and (ii) provide a copy of the Code of Ethics to every Town and Board of Education employee within sixty (60) business days of employment. Copies of the Code of Ethics may be sent to officials and employees electronically.

Administration Committee Meeting - February 11, 2026
The Administration Committee reviewed the proposed Ethics Ordinance dated February 2, 2026 which was reviewed by the Town Attorney; and approved to forward it to the Town Council.

The Administration Committee continued to work on the proposed Ordinance during the November, December, and January l, 2026 to include input provided by staff, residents and the Town Attorney.

Town Council Special Meeting - October 29, 2025: By consensus the Town Council sent the proposed *"An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission"* back to the Administration Committee.

Also, please review the following Meetings for additional information:

- September 24, 2025 Public Hearing
- October 8, 2025 Town Council Meeting
- October 22, 2025 Town Council Meting
- November 10, 2025 Public Hearing
- November 12, 2025 Town Council Meeting

Town Council Special Meeting - October 29, 2025 - The Town Council did not Remove from the Table 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.

Administration Committee Special Meeting - October 29, 2025 - The Administration Committee reviewed a *"An Ordinance Establishing a Town of Ledyard Code of Ethics And Ethics Commission"* and took actions to incorporate public feedback, staff feedback and recommendations provided by the Town Attorney.

The Administration Committee forwarded a recommendation to the Town Council to adopt a proposed "*An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*" *"* as updated on or about October 29, 2025. (Please see both a Clean Draft and a Track Changes Draft).

Town Council Meeting - October 22, 2025: Approved the following:

Tabled the following Motion to a date to be determined by the Chairman:
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.

Mayor VETO- October 16, 2025: (Please see attached Mayor's letter dated 10/16/2025)

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.*

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)

DRAFT: 03/11/2026

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 and Board of Education officials, employees and 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.

Section 3. Definitions

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

*"**Agency**"* is any board, commission, authority or committee of the Town, including the Town Council and Board of Education.

"Beneficial interest" means any nonfinancial interest or special treatment that is not common to other citizens of the Town.

*"**Business day**"* means a day other than a Saturday, Sunday or other day in which the office of the Ledyard Town Clerk is closed to the public for business.

"Complainant" means a person who files a complaint under penalties of false statement against an official, employee or consultant containing an allegation of prohibited activities under the Code of Ethics.

*"**Confidential Information**"* means information acquired by a Town or Board of Education 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.

*"**Consultant"*** means (i) an attorney hired by the Town or the Board of Education to provide legal services; (ii) any engineer, architect or construction manager hired by the Town or the Board of Education to provide professional services related to construction projects; or (iii) any professional who is hired by the Town to provide professional advice or services related to land use matters. In addition, the definition of what constitutes a consultant shall be limited to an officer or an employee of any Town or Board of Education contractor who has managerial or discretionary responsibilities with respect to a Town or Board of Education contract.

"Employee" is any person receiving a salary, wages or a stipend from the Town or Board of Education for services rendered, whether full-time or part-time.

"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, children, stepchildren, foster children, siblings and their children, stepsiblings and their children, and foster siblings and their children, of an official, employee, or consultant, or his/her spouse or domestic partner.

"Financial Interest" means any interest that has a: (i) 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; (ii) and is not common to the other citizens of the Town.

"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.

Gifts do not include:

a. A political contribution that is otherwise reported in accordance with the law.

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c. Certificates, plaques or other ceremonial awards costing less than fifty dollars ($50.00).

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e. Honorary degrees.

f. 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 or Board of Education official or Town Board of Education employee participates in his/her official capacity.

g. Any gift provided to a Town or Board of Education official or Town or Board of Education Employee or to a family member of a Town or Board of Education official or Town or Board of Education 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.

"Inquiry" means a complaint or allegation of a possible violation of the Code.

"*Managerial or discretionary responsibilities with respect to a Town or Board of Education contract*" means having direct, extensive, and substantive responsibilities with respect to the negotiation of the contract and not peripheral, clerical, or ministerial responsibilities.

"Official" is any person holding elective or appointive office in the government of the town and shall include, but not be limited to, the Town Council, Board of Education or any other agency as defined herein.

"Respondent" means a person who is the subject of a complaint.

Section 4. Confidential information and Withholding of Information.

Town and Board of Education 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. No Town or Board of Education 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 5. Conflict of Interest Provisions and Other Prohibited Activities

A. A Town or Board of Education 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 in which the Town or Board of Education official, employee or consultant or any member of his family has a financial or beneficial interest. Notwithstanding anything contained in this ordinance to the contrary, a Town or Board of Education official, employee or consultant may enter into a contract with the Town or the Board of Education if the contract is (i) publicly quoted or bid; or (ii) the Town or Board of Education 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 or consultant contracts in which a Town or Board of Education official, employee or consultant is hired by the Town or the Board of Education to perform necessary services, including, but not limited to recreational 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 or Board of Education official or employee has reason to believe or expect that he/she or any member of his family 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 or Board of Education 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 or his/her family members 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 Section 7-148h(b) of the General Statutes.

D. No Town or Board of Education official or employee may directly hire or supervise a member of his/her family except for temporary emergency situations, including, but not limited to, inclement weather and labor shortages.

E. Town officials and employees shall not use Town owned or leased vehicles, equipment, facilities, materials or property for personal convenience or profit. 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 or Board of Education official, employee or consultant shall solicit or accept any gift 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 or consultant. No Town or Board of Education 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 any agency, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment or services.

Section 6. Disclosure and disqualification.

A. Any Town or Board of Education 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 in accordance with the provisions of this ordinance. Such disclosure shall disqualify the official, employee or consultant from participation in the matter, transaction or decision.

B. No Town or Board of Education 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. This Code shall not prohibit any current or former Town or Board of Education official, employee or consultant from appearing before any agency on his/her own behalf.

C. If there is an uncertainty whether a Town or Board of Education 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 may request an advisory opinion from the Ethics Commission pursuant to this ordinance.

D. 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, Sections 8-11, 821 and 22a-42(c) of the Connecticut General Statutes that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.

Section 7. Required Filings for Certain Town and Board of Education Officials.

The Mayor and the members of the Town Council and the Board of Education 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 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, by a corporation, trust or partnership in which any such 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.

B. The names of any firm, proprietorship, partnership or corporation of which said official is an employee or in which such official holds at least a five (5) percent interest; and if applicable, whether such firm, proprietorship, partnership or 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.

C. 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.

Section 8. Acknowledgment forms

A. The Town Clerk shall provide a copy of the Code of Ethics to every Town and Board of Education official. Every Town official, including members of the Board of Education, shall sign and file with the Town Clerk an acknowledgement form, prepared by the Town Attorney, indicating his/her awareness of the provisions of this Code. The Superintendent of Schools shall sign and file with the Board of Education Human Resources Director an acknowledgement form, prepared by the Town attorney, indicating his/her awareness of the provisions of this Code. The Human Resources Directors of both the Town and Board of Education, respectively, shall: (i) provide current Town and Board of Education employees a copy of the Code of Ethics within one-hundred-twenty (120) business days of its effective date; and (ii) provide a copy of the Code of Ethics to every Town and Board of Education employee within sixty (60) business days of employment. Copies of the Code of Ethics may be sent to officials and employees electronically.

B. Within ten (10) business days of the effective date of this ordinance, the Code of Ethics shall be incorporated by reference into all prospective contracts entered into by the Town of Ledyard and the Board of Education with a consultant. The Human Resources Directors of both the Town and Board of Education, respectively, shall provide current Town and Board of Education consultants a copy of the Code of Ethics within thirty (30) business days of its effective date. Copies of the Code of Ethics may be sent to consultants electronically.

C. 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.

D. The Town Council shall approve a procedure for monitoring compliance with this section and approve the training protocols specified in subsection (c).

Section 9. Establishment and Qualifications of Ethics Commission.

A. Structure. The Ethics Commission shall be comprised of five (5) regular members and two (2) alternate members. All regular members and alternate members of the Ethics Commission shall be electors of the Town. 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.

B. Member and alternate member qualifications. No regular member or alternate members shall:

i. be currently employed by the Town or Board of Education;

ii. have been employed by the Town or Board of Education for a period of two years prior to being appointed to the Ethics Commission;

iii. hold any elective Town office or have been elected to any elective Town office for a period of two years prior to being appointed to the Ethics Commission;

iv. be a current member of the Board of Education or have been elected to the Board of Education for a period of two years prior to being appointed to the Ethics Commission;

v. serve as a member of another Town agency; vi. hold office in a political party or political committee;

vi. have been found in violation of any state, local or professional code of ethics.

If a current member of the Ethics Commission files to run for any elective Town office or for the Board of Education, such member shall resign from the Ethics Commission within seven (7) days of said filing.

A. Compensation. Members will not be compensated for their service on the Commission.

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

C. Method and Terms 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 (7) seven affirmative votes of the Town Council. Members shall be appointed for a term of three (3) years. 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. 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. 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.

D. Removal. 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.

Section 10. Powers and Duties of Ethics Commission.

A. The Ethics Commission shall be authorized to consult with the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.

B. The Ethics Commission may render advisory opinions to any Town or Board of Education official, employee or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provisions of this Code of Ethics or is otherwise prohibited by law.

C. The Ethics Commission may examine complaints and to make a determination of probable cause pursuant to the procedures outlined herein. The Ethics Commission may 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.

D. The Ethics Commission may review the Code of Ethics policies and procedures on an as needed basis and may make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures. The Ethics Commission may take action to increase public awareness of the Code of Ethics.

Section 11. Ethics Commission Rules of Procedure.

A. Advisory opinions. Any current, former or prospective Town of Ledyard or Board of Education 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 or Board of Education official also may request an advisory opinion concerning the activities of any department over which he/she has jurisdiction or agency on which he/she serves.

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. 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 and date the form. 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 the envelope and forward the sealed envelope promptly to the chair or vice-chair of the Ethics Commission. Within five (5) business days that 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. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions. The chair or vice-chair of the Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the request.

The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting at an executive session, except upon the request of the individual that is seeking the advisory opinion to present the request in open session.

Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) business 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 business (30) days. All advisory opinions must be in writing and communicated to the individual making the request.

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 state its reasons.

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B. Complaints.

i. Filing of a Complaint. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope who will date stamp the envelope and forward the sealed envelope promptly to the chair or vice-chair of the Ethics Commission. On the day the sealed envelope is received by the Town Clerk, the Town Clerk or his/her representative shall notify the chair or vice-chair of the Commission, or both, and the respondent within five (5) business days of receipt of the complaint. The chair or vice-chair of the Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the complaint. The Ethics Commission shall also notify the respondent that a complaint was received and 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 the: (i) the name of the person accused (respondent); (ii) name of the person filing the complaint; and (iii) the specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

ii. Probable Cause Determination
Within sixty (60) business days of the receipt of a complaint by the Chair or Vice-Chair, 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.

If the Ethics Commission makes a finding of probable cause, which shall require three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation.

iii. 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 the attendance of witnesses; to produce books, documents, records and papers; to examine and cross-examine witnesses; and to inspect and copy relevant and material records, papers and

documents. 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 business (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.

iv. Final Decisions

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. The Ethics Commission must render its decision within sixty business (60) days of the closing of the hearing. Such finding and memorandum will be deemed to be the final decision of the Ethics 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. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, the Ledyard Town Council and the Board of Education (if applicable) with a copy of its findings and memorandum within ten (10) business days after its decision. It will also advise the respondent of his/her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

v. 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 or contract; and
g. Restitution of any benefits received because of the violation committed.

Penalties will be determined by a majority vote of the Town Council within sixty (60) business days after receipt of the finding and memorandum of Ethics Commission.
The remedies and procedures specified in any 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. Severability.

If any part of this Code of Ethics 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.

Signed/Certified on:_____ _____
Gary St. Vil, Chairman

DRAFT

Approve/Disapprove on: _____

_____
Fred B. Allyn, III, Mayor

Published on:_____

_____
Patricia A. Riley, Town Clerk

Effective: _____

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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.

DRAFT

DRAFT: 03/07/2026 ATTORNEY MARK-UP

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:

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a. A Town or Board of Education 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 in which the Town or Board of Education official, employee or consultant or any member of his family has a financial or beneficial interest. Notwithstanding anything contained in this ordinance to the contrary, a Town or Board of Education official, employee or consultant may enter into a contract with the Town or the Board of Education if the contract is (i) publicly quoted or bid; or (ii) the Town or Board of Education 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 or consultant contracts in which a Town or Board of Education official, employee or consultant is hired by the Town or the Board of Education to perform necessary services, including, but not limited to recreational 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 or Board of Education official or employee has reason to believe or expect that he/she or any member of his family 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 or Board of Education 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 or his/her family members 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 Section 7-148h(b) of the General Statutes.

d. No Town or Board of Education official or employee may directly hire or supervise a member of his/her family except for temporary emergency situations, including, but not limited to, inclement weather and labor shortages.

e. Town officials and employees shall not use Town owned or leased vehicles, equipment, facilities, materials or property for personal convenience or profit. 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 or Board of Education official, employee or consultant shall solicit or accept any gift 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 or consultant. No Town or Board of Education 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 any agency, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment or services.

Section 6. Disclosure and disqualification.

a. Any Town or Board of Education 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 in accordance with the provisions of this ordinance. Such disclosure shall disqualify the official, employee or consultant from participation in the matter, transaction or decision.

b. No Town or Board of Education 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. This Code shall not prohibit any current or former Town or Board of Education official, employee or consultant from appearing before any agency on his/her own behalf.

c. If there is an uncertainty whether a Town or Board of Education 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 may request an advisory opinion from the Ethics Commission pursuant to this ordinance.

d. 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, Sections 8-11, 821 and 22a-42(c) of the Connecticut General Statutes that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.

Section 7. Required Filings for Certain Town and Board of Education Officials.

The Mayor and the members of the Town Council and the Board of Education 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 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, by a corporation, trust or partnership in which any such 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.

B. The names of any firm, proprietorship, partnership or corporation of which said official is an employee or in which such official holds at least a five (5) percent interest; and if applicable, whether such firm, proprietorship, partnership or 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.

C. 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.

Section 8. Acknowledgment forms.

a. The Town Clerk shall provide a copy of the Code of Ethics to every Town and Board of Education official. Every Town official, including members of the Board of Education, shall sign and file with the Town Clerk an acknowledgement form, prepared by the Town Attorney, indicating his/her awareness of the provisions of this Code. The Superintendent of Schools shall sign and file with the Board of Education Human Resources Director an acknowledgement form, prepared by the Town attorney, indicating his/her awareness of the provisions of this Code.The Human Resources Directors of both the Town and Board of Education, respectively, shall: (i) provide current Town and Board of Education employees a copy of the Code of Ethics within one-hundred-twenty (120) business days of its effective date; and (ii) provide a copy of the Code of Ethics to every Town and Board of Education employee within sixty (60) business days of employment. Copies of the Code of Ethics may be sent to officials and employees electronically.

b. Within ten (10) business days of the effective date of this ordinance, the Code of Ethics shall be incorporated by reference into all prospective contracts entered into by the Town of Ledyard and the Board of Education with a consultant. The Human Resources Directors of both the Town and Board of Education, respectively, shall provide current Town and Board of Education consultants a copy of the Code of Ethics within thirty (30) business days of its effective date. Copies of the Code of Ethics may be sent to consultants electronically.

c. 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.

d. The Town Council shall approve a procedure for monitoring compliance with this section and approve the training protocols specified in subsection (c).

Section 9. Establishment and Qualifications of Ethics Commission.

A. Structure. The Ethics Commission shall be comprised of five (5) regular members and two (2) alternate members. All regular members and alternate members of the Ethics Commission shall be electors of the Town. 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.

B. Member and alternate member qualifications. No regular member or alternate members shall:

i. be currently employed by the Town or Board of Education;

ii. have been employed by the Town or Board of Education for a period of two years prior to being appointed to the Ethics Commission;

iii. hold any elective Town office or have been elected to any elective Town office for a period of two years prior to being appointed to the Ethics Commission.

iv. be a current member of the Board of Education or have been elected to the Board of Education for a period of two years prior to being appointed to the Ethics Commission.

v. serve as a member of another Town agency; vi. hold office in a political party or political committee; vii. have been found in violation of any state, local or professional code of ethics.

If a current member of the Ethics Commission files to run for any elective Town office or for the Board of Education, such member shall resign from the Ethics Commission within seven (7) days of said filing.

C. Compensation. Members will not be compensated for their service on the Commission.

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

E. Method and Terms 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 (7) seven affirmative votes of the Town Council. Members shall be appointed for a term of three (3) years. 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. 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. 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.

F. Removal. 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.

Section 10. Powers and Duties of Ethics Commission.

A. The Ethics Commission shall be authorized to consult with the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.

B. The Ethics Commission may render advisory opinions to any Town or Board of Education official, employee or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provisions of this Code of Ethics or is otherwise prohibited by law.

C. The Ethics Commission may examine complaints and to make a determination of probable cause pursuant to the procedures outlined herein. The Ethics Commission may 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.

D. The Ethics Commission may review the Code of Ethics policies and procedures on an asneeded basis and may make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures. The Ethics Commission may take action to increase public awareness of the Code of Ethics

Section 11. Ethics Commission Rules of Procedure.

A. Advisory opinions. Any current, former or prospective Town of Ledyard or Board of Education 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 or Board of Education official also may request an advisory opinion concerning the activities of any department over which he/she has jurisdiction or agency on which he/she serves.

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. 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 and date the form. 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 the envelope and forward the sealed envelope promptly to the chair or vice-chair of the Ethics Commission. Within five (5) business days that 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. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions. The chair or vice-chair of the Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the request.

The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting at an executive session, except upon the request of the individual that is seeking the advisory opinion to present the request in open session.

Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) business 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 business (30) days. All advisory opinions must be in writing and communicated to the individual making the request.

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 state its reasons. B. Complaints.

i. Filing of a complaint. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope who will date stamp the envelope and forward the sealed envelope promptly to the chair or vice-chair of the Ethics Commission. On the day the sealed envelope is received by the Town Clerk, the Town Clerk or his/her representative shall notify the chair or vice-chair of the Commission, or both, and the respondent within five (5) business days of receipt of the complaint. The chair or vice-chair of the Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the complaint. The Ethics Commission shall also notify the respondent that a complaint was received and 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 the: (i) the name of the person accused (respondent); (ii) name of the person filing the complaint; and (iii) the specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

ii. Probable Cause Determination.

Within sixty (60) business days of the receipt of a complaint by the Chair or Vice-Chair, 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.

If the Ethics Commission makes a finding of probable cause, which shall require three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation.

iii. 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 the attendance of witnesses; to produce books, documents, records and papers; to examine and cross-examine witnesses; and to inspect and copy

relevant and material records, papers and documents. 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 business (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.

iv. Final Decisions. 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. The Ethics Commission must render its decision within sixty business (60) days of the closing of the hearing. Such finding and memorandum will be deemed to be the final decision of the Ethics 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. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, the Ledyard Town Council and the Board of Education (if applicable) with a copy of its findings and memorandum within ten (10) business days after its decision. It will also advise the respondent of his/her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

v. 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 or contract; and
g. Restitution of any benefits received because of the violation committed.

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

The remedies and procedures specified in any 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. Severability.

If any part of this Code of Ethics 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

SG-23452496v3

DRAFT: 2/9/2026 ATTORNEY MARK-UP

Ordinance # _____

AN ORDINANCE ETABLISHING 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 and Board of Education officials, employees and 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.

Section 3. **Definitions.**

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

"Agency" is any board, commission, authority or committee of the Town, including the Town Council and Board of Education.

"Beneficial interest" means any nonfinancial interest or special treatment that is not common to other citizens of the Town.

"Business day" means a day other than a Saturday, Sunday or other day in which the office of the Ledyard Town Clerk is closed to the public for business.

"Complainant" means a person who files a complaint under penalties of false statement against an official, employee or consultant containing an allegation of prohibited activities under the Code of Ethics.

"Confidential Information" means information acquired by a Town or Board of Education 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.

*"*Consultant" means (i) an attorney hired by the Town or the Board of Education to provide legal services; (ii) any engineer, architect or construction manager hired by the Town or the Board of Education to provide professional services related to construction projects; or (iii) any professional who is hired by the Town to provide professional advice or services related to land use matters. In addition, the definition of what constitutes a consultant shall be limited to an officer or an employee of any Town or Board of Education contractor who has managerial or discretionary responsibilities with respect to a Town or Board of Education contract.

"Employee" is any person receiving a salary, wages or a stipend from the Town or Board of Education for services rendered, whether full-time or part-time.

"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, children, stepchildren, foster children, siblings and their children, stepsiblings and their children, and foster siblings and their children, of an official, employee, or consultant, or his/her spouse or domestic partner.

"Financial Interest" means any interest that has a: (i) 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; (ii) and is not common to the other citizens of the Town.

"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.

Gifts do not include:

a. A political contribution that is otherwise reported in accordance with the law.

b. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.

c. Certificates, plaques or other ceremonial awards costing less than fifty dollars ($50.00).

d. 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.

e. Honorary degrees.

f. 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 or Board of Education official or Town Board of Education employee participates in his/her official capacity.

g. Any gift provided to a Town or Board of Education official or Town or Board of Education Employee or to a family member of a Town or Board of Education official or Town or Board of Education 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.

"Inquiry" means a complaint or allegation of a possible violation of the Code.

"*Managerial or discretionary responsibilities with respect to a Town or Board of Education contract*" means having direct, extensive, and substantive responsibilities with respect to the negotiation of the contract and not peripheral, clerical, or ministerial responsibilities.

"Official" is any person holding elective or appointive office in the government of the town and shall include, but not be limited to, the Town Council, Board of Education or any other agency as defined herein.

"Respondent" means a person who is the subject of a complaint.

Section 4. Confidential information and Withholding of Information.

Town and Board of Education 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. No Town or Board of Education 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 5. Conflict of Interest Provisions and Other Prohibited Activities.

a. A Town or Board of Education 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 in which the Town or Board of Education official, employee or consultant or any member of his family has a financial or beneficial interest. Notwithstanding anything contained in this ordinance to the contrary, a Town or Board of Education official, employee or consultant may enter into a contract with the Town or the Board of Education if the contract is (i) publicly quoted or bid; or (ii) the Town or Board of Education 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 or consultant contracts in which a Town or Board of Education official, employee or consultant is hired by the Town or the Board of Education to perform necessary services, including, but not limited to recreational 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 or Board of Education official or employee has reason to believe or expect that he/she or any member of his family 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 or Board of Education 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 or his/her family members 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 Section 7-148h(b) of the General Statutes.

d. No Town or Board of Education official or employee may directly hire or supervise a member of his/her family except for temporary emergency situations, including, but not limited to, inclement weather and labor shortages.

e. Town officials and employees shall not use Town owned or leased vehicles, equipment, facilities, materials or property for personal convenience or profit. 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 or Board of Education official, employee or consultant shall solicit or accept any gift 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 or consultant. No Town or Board of Education 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 any agency, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment or services.

Section 6. Disclosure and disqualification.

a. Any Town or Board of Education 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 in accordance with the provisions of this ordinance. Such disclosure shall disqualify the official, employee or consultant from participation in the matter, transaction or decision.

b. No Town or Board of Education 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. This Code shall not prohibit any current or former Town or Board of

Education official, employee or consultant from appearing before any agency on his/her own behalf.

c. If there is an uncertainty whether a Town or Board of Education 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 may request an advisory opinion from the Ethics Commission pursuant to this ordinance.

d. 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, Sections 8-11, 8-21 and 22a-42(c) of the Connecticut General Statutes that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.

Section 7. Required Filings for Certain Town and Board of Education Officials.

The Mayor and the members of the Town Council and the Board of Education 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 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, by a corporation, trust or partnership in which any such 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.

B. The names of any firm, proprietorship, partnership or corporation of which said official is an employee or in which such official holds at least a five (5) percent interest; and if applicable, whether such firm, proprietorship, partnership or 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.

C. 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.

Section 8. Acknowledgment forms.

a. The Town Clerk shall provide a copy of the Code of Ethics to every Town and Board of Education official. Every Town official shall sign and file with the Town Human Resources Director an acknowledgement form, prepared by the Town Attorney, indicating his/her awareness of the provisions of this Code. Every Board of Education official, including the Superintendent, shall sign and file with the Board of Education Human Resources Director an acknowledgement form, prepared by the Town attorney, indicating his/her awareness of the provisions of this Code. The Human Resources Directors of both the Town and Board of Education, respectively, shall: (i) provide current Town and Board of Education employees a copy of the Code of Ethics within one-hundred-twenty (120) business days of its effective date; and (ii) provide a copy of the Code of Ethics to every Town and Board of Education employee within sixty (60) business days of employment. Copies of the Code of Ethics may be sent to officials and employees electronically.

b. Within ten (10) business days of the effective date of this ordinance, the Code of Ethics shall be incorporated by reference into all prospective contracts entered into by the Town of Ledyard and the Board of Education with a consultant. The Human Resources Directors of both the Town and Board of Education, respectively, shall provide current Town and Board of Education consultants a copy of the Code of Ethics within thirty (30) business days of its effective date. Copies of the Code of Ethics may be sent to consultants electronically.

c. 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.

d. The Town Council shall approve a procedure for monitoring compliance with this section and approve the training protocols specified in subsection (c).

Section 9. Establishment and Qualifications of Ethics Commission.

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B. Member and alternate member qualifications. No regular member or alternate members shall:

i. be currently employed by the Town or Board of Education;

ii. have been employed by the Town or Board of Education for a period of two years prior to being appointed to the Ethics Commission;

iii. hold any elective Town office or have been elected to any elective Town office for a period of two years prior to being appointed to the Ethics Commission.

iv. be a current member of the Board of Education or have been elected to the Board of Education for a period of two years prior to being appointed to the Ethics Commission.

v. serve as a member of another Town agency;

vi. hold office in a political party or political committee;

vii. have been found in violation of any state, local or professional code of ethics.

If a current member of the Ethics Commission files to run for any elective Town office or for the Board of Education, such member shall resign from the Ethics Commission within seven (7) days of said filing.

C. Compensation. Members will not be compensated for their service on the Commission.

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

E. Method and Terms 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 (7) seven affirmative votes of the Town Council. Members shall be appointed for a term of three (3) years. 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. 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. 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.

F. Removal. 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.

Section 10. Powers and Duties of Ethics Commission.

A. The Ethics Commission shall be authorized to consult with the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.

B. The Ethics Commission may render advisory opinions to any Town or Board of Education official, employee or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provisions of this Code of Ethics or is otherwise prohibited by law.

C. The Ethics Commission may examine complaints and to make a determination of probable cause pursuant to the procedures outlined herein. The Ethics Commission may 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.

D. The Ethics Commission may review the Code of Ethics policies and procedures on an as-needed basis and may make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures. The Ethics Commission may take action to increase public awareness of the Code of Ethics

Section 11. Ethics Commission Rules of Procedure.

A. Advisory opinions. Any current, former or prospective Town of Ledyard or Board of Education 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 or Board of Education official also may request an advisory opinion concerning the activities of any department over which he/she has jurisdiction or agency on which he/she serves.

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. 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 and date the form. 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 the envelope and forward the sealed envelope promptly to the chair or vice-chair of the Ethics Commission. Within five (5) business days that 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. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions. The chair or vice-chair of the Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the request.

The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting at an executive session, except upon the request of the individual that is seeking the advisory opinion to present the request in open session.

Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) business 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 business (30) days. All advisory opinions must be in writing and communicated to the individual making the request.

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 state its reasons.

B. Complaints.

i. Filing of a complaint. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope who will date stamp the envelope and forward the sealed envelope promptly to the chair or vice-chair of the Ethics Commission. On the day the sealed envelope is received by the Town Clerk, the Town Clerk or his/her representative shall notify the chair or vice-chair of the Commission, or both, and the respondent within five (5) business days of receipt of the complaint. The chair or vice-chair of the Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the complaint. The Ethics Commission shall also notify the respondent that a complaint was received and 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 the: (i) the name of the person accused (respondent); (ii) name of the person filing the complaint; and (iii) the specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

ii. Probable Cause Determination.

Within sixty (60) business days of the receipt of a complaint by the Chair or Vice-Chair, 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.

If the Ethics Commission makes a finding of probable cause, which shall require three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation.

iii. 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 the attendance of witnesses; to produce books, documents, records and papers; to examine and cross-examine witnesses; and to inspect and copy relevant and material records, papers and documents. 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 business (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.

iv. Final Decisions. 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. The Ethics Commission must render its decision within sixty business (60) days of the closing of the hearing. Such finding and memorandum will be deemed to be the final decision of the Ethics 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. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, the Ledyard Town Council and the Board of Education (if applicable) with a copy of its findings and memorandum within ten (10) business days after its decision. It will also advise the respondent of his/her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

v. 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 or contract; and
g. Restitution of any benefits received because of the violation committed.

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

The remedies and procedures specified in any 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. Severability.

If any part of this Code of Ethics 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

DRAFT: 2/9/2026 ATTORNEY MARK-UP

Ordinance # _____

AN ORDINANCE ETABLISHING 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 and Board of Education 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.

Section 3. **Definitions.**

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

"Agency" is any board, commission, authority or committee of the Town, including the Town Council and Board of Education.

"Beneficial interest" means any nonfinancial interest or special treatment that is not common to other citizens of the Town.

"Business day" means a day other than a Saturday, Sunday or other day in which the office of the Ledyard Town Clerk is closed to the public for business.

"Complainant" means a person who files a complaint under penalties of false statement against an official, employee or consultant containing an allegation of prohibited activities under the Code of Ethics.

"Confidential Information" means information acquired by a Town or Board of Education 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.

*"*Consultant" means ~~any independent contractor or professional person or firm that 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.~~ (i) an attorney hired by the Town or the Board of Education to provide legal services; (ii) any engineer, architect or construction manager hired by the Town or the Board of Education to provide professional services related to construction projects; or (iii) any professional who is hired by the Town to provide professional advice or services related to land use matters. In addition, the definition of what constitutes a consultant shall be limited to an officer or an employee of any Town or Board of Education contractor who has managerial or discretionary responsibilities with respect to a Town or Board of Education contract.

"Employee" is any person receiving a salary, wages or a stipend from the Town or Board of Education for services rendered, whether full-time or part-time.

"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,~~children, stepchildren, foster children, siblings and their children, stepsiblings~~, foster siblings; lineal descendants of siblings, stepsiblings~~ and their children, and foster siblings and their children, of an official, employee, or consultant, or his/her spouse or domestic partner.

"Financial Interest" means any interest that has a: (i) 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; (ii) and is not common to the other citizens of the Town.

"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.

Gifts do not include:

a. A political contribution that is otherwise reported in accordance with the law.

b. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.

c. Certificates, plaques or other ceremonial awards costing less than fifty dollars ($50.00).

d. 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.

e. Honorary degrees.

f. 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 or Board of Education official or Town Board of Education employee participates in his/her official capacity.

g. Any gift provided to a Town ~~Official~~or Board of Education official or Town or Board of Education Employee or to a family member of a Town ~~Official~~or Board of Education official or Town or Board of Education 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.

"Inquiry" means a complaint or allegation of a possible violation of the Code.

"*Managerial or discretionary responsibilities with respect to a Town or Board of Education contract*" means having direct, extensive, and substantive responsibilities with respect to the negotiation of the contract and not peripheral, clerical, or ministerial responsibilities.

"Official" is any person holding elective or appointive office in the government of the town and shall include, but not be limited to, the Town Council, Board of Education or any other agency as defined herein.-

"Respondent" means a person who is the subject of a complaint.

Section 4. Confidential information and Withholding of Information.

Town and Board of Education 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. No Town or Board of Education 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 5. Conflict of Interest Provisions and Other Prohibited Activities.

a. A Town or Board of Education 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 in which the Town or Board of Education official, employee or consultant or any member of his family has a financial or beneficial interest. ~~Sections 5a., 5b. and 5c. shall not apply to any work performed by a~~Notwithstanding anything contained in this ordinance to the contrary, a Town or Board of Education official, employee or consultant ~~pursuant to~~may enter into a contract with the Town or the Board of Education~~.~~ if the contract is (i) publicly quoted or bid; or (ii) the Town or Board of Education 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 or consultant contracts in which a Town or Board of Education official, employee or consultant is hired by the Town or the Board of Education to perform necessary services, including, but not limited to recreational 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 or Board of Education official~~,~~ or employee ~~or consultant~~ has reason to believe or expect that he/she or any member of his family 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 or Board of Education 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 or his/her family members 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 Section 7-148h(b) of the General Statutes.

d. No Town or Board of Education official or employee may directly hire or supervise a member of his/her family except for temporary emergency situations, including, but not limited to, inclement weather and labor shortages.

e. Town officials and ~~Town~~ employees shall not use Town owned or leased vehicles, equipment, facilities, materials or property for personal convenience or profit. 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.~~

f. ~~g.~~ No Town or Board of Education official, employee or consultant shall solicit or accept any gift 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 or consultant. No Town or Board of Education 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 any agency, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment or services.

Section 6. Disclosure and disqualification.

a. Any Town or Board of Education 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 in accordance with the provisions of this ordinance. Such disclosure shall disqualify the official, employee or consultant from participation in the matter, transaction or decision.

b. No Town or Board of Education 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. This Code shall not prohibit any current or former Town or Board of Education 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.~~

c. If there is an uncertainty whether a Town or Board of Education 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 may request an advisory opinion from the Ethics Commission pursuant to this ordinance.

d. 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, Sections 8-11, 8-21 and 22a-42(c) of the Connecticut General Statutes that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.

Section 7. Required Filings for Certain Town and Board of Education Officials.

The Mayor and the members of the Town Council and the Board of Education 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.~~ A. All real estate located within the Town of Ledyard owned by such 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, by a corporation, trust or partnership in which any such 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.~~ B. The names of any firm, proprietorship, partnership or corporation of which said official is an employee or in which such official holds at least a five (5) percent interest~~:~~; and ~~which~~if applicable, whether such firm, proprietorship, partnership~~, corporation or limited liability~~ or

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.~~ C. 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.

Section 8. Acknowledgment forms.

~~a.~~ a. The Town Clerk shall provide a copy of the Code of Ethics to every Town and Board of Education 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~~Human Resources Director an acknowledgement form, prepared by the Town Attorney, indicating his/her awareness of the provisions of this Code. ~~Current Town officials and employees shall acknowledge~~ Every Board of Education official, including the Superintendent, shall sign and file with the Board of Education Human Resources Director an acknowledgement form, prepared by the Town attorney, indicating his/her awareness of the provisions of this Code. The Human Resources Directors of both the Town and Board of Education, respectively, shall: (i) provide current Town and Board of Education employees a copy of the Code of Ethics within one-hundred-twenty (120) business days of its effective date~~.~~; and (ii) provide a copy of the Code of Ethics to every Town and Board of Education employee within sixty (60) business days of employment. Copies of the Code of Ethics may be sent to officials and employees electronically.

~~b. The~~b. Within ten (10) business days of the effective date of this ordinance, the Code of Ethics shall be incorporated by reference into all prospective contracts entered into by the Town of Ledyard and the Board of Education with a consultant. ~~Each consultant shall sign and file with the Town Clerk an acknowledgment form, prepared by the Town Attorney, indicating his or her awareness of the provisions of this Code prior to being retained by the Town,~~The Human Resources Directors of both the Town and Board of Education ~~or other agency. Current~~, respectively, shall provide current Town and Board of Education consultants ~~shall acknowledge~~a copy of the Code of Ethics within ~~one-hundred-twenty~~thirty (~~120~~30) business days of its effective date. Copies of the Code of Ethics may be sent to consultants electronically.

~~c.~~ c. 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.

~~d.~~ d. The Town Council shall approve a procedure for monitoring compliance with this section and approve the training protocols specified in subsection (c).

Section 9. Establishment and Qualifications of Ethics Commission.

A. Structure. The Ethics Commission shall be comprised of five (5) regular members and two (2) alternate members. All regular members and alternate members of the Ethics Commission shall be electors of the Town. 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.

B. Member and alternate member qualifications. No regular member or alternate members shall:

i. be currently employed by the Town or Board of Education;

ii. have been employed by the Town or Board of Education for a period of two years prior to being appointed to the Ethics Commission;

iii. hold any elective Town office or have been elected to any elective Town office for a period of two years prior to being appointed to the Ethics Commission.

iv. be a current member of the Board of Education or have been elected to the Board of Education for a period of two years prior to being appointed to the Ethics Commission.

v. serve as a member of another Town agency;

vi. hold office in a political party or political committee;

vii. have been found in violation of any state, local or professional code of ethics.

If a current member of the Ethics Commission files to run for any elective Town office or for the Board of Education, such member shall resign from the Ethics Commission within seven (7) days of said filing.

C. Compensation. Members will not be compensated for their service on the Commission.

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

E. Method and Terms 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~~7) seven affirmative votes of the Town Council. Members shall be appointed for a term of three (3) years. 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. 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. 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.

F. Removal. 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.

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A. The Ethics Commission shall be authorized to consult with the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.

B. The Ethics Commission may render advisory opinions to any Town or Board of Education official, employee or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provisions of this Code of Ethics or is otherwise prohibited by law.

C. The Ethics Commission may examine complaints and to make a determination of probable cause pursuant to the procedures outlined herein. The Ethics Commission may 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.

D. The Ethics Commission may review the Code of Ethics policies and procedures on an as-needed basis and may make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures. The Ethics Commission may take action to increase public awareness of the Code of Ethics

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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. 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 and date the form. 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 the envelope and forward the sealed envelope promptly to the chair or vice-chair of the Ethics Commission. ~~On the day~~Within five (5) business days that 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. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions. The chair or vice-chair of the Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the request.

The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting at an executive session, except upon the request of the individual that is seeking the advisory opinion to present the request in open session.

Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) business 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 business (30) days. All advisory opinions must be in writing and communicated to the individual making the request.

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 state its reasons.

B. Complaints.

i. Filing of a complaint. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope who will date stamp the envelope and forward the sealed envelope promptly to the chair or vice-chair of the Ethics Commission. On the day the sealed envelope is received by the Town Clerk, the Town Clerk or his/her representative shall notify the chair or vice-chair of the Commission, or both, and the respondent within five (5) business days of receipt of the complaint. The chair or vice-chair of the Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the complaint. The Ethics Commission shall also notify the respondent that a complaint was received and 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 the: (i) the name of the person accused (respondent); (ii) name of the person filing the complaint; and (iii) the specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

ii. Probable Cause Determination.

Within sixty (60) business days of the receipt of a complaint by the Chair or Vice-Chair, 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.

If the Ethics Commission makes a finding of probable cause, which shall require three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation.

iii. 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 the attendance of witnesses; to produce books, documents, records and papers; to examine and cross-examine witnesses; and to inspect and copy relevant and material records, papers and documents. 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 business (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.

iv. Final Decisions. 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. The Ethics Commission must render its decision within sixty business (60) days of the closing of the hearing. Such finding and memorandum will be deemed to be the final decision of the Ethics 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. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor ~~and~~, the Ledyard Town Council and the Board of Education (if applicable) with a copy of its findings and memorandum within ten (10) business days after its decision. It will also advise the respondent of his/her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

v. 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 or contract; and
g. Restitution of any benefits received because of the violation committed.

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

The remedies and procedures specified in any 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. Severability.

If any part of this Code of Ethics 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

Summary report: Litera Compare for Word 11.10.1.2 Document comparison done on 2/9/2026 5:50:18 PM	
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Intelligent Table Comparison: Active	
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Embedded Excel	0
Format changes	0
Total Changes:	133

DRAFT: ~~10/29/2025~~ ~~*01/28/2026*~~ *1/28/2026*

KEY:
Admin Mtg 6/11/2025
Admin Mtg 6/11/2025
Councilor Garcia-Irizarry- Town Employee Feedback
Town Attorney Recommendations
Mr. Schroeder Recommendations
Mr. Treaster Recommendations

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.

Town and Board of Education officials, Town and Board of Education employees, and Town consultants must be guided by the principles of this Code of Ethics:

- ***Public trust – Maintain the public trust by always acting in the best interests of the community and not for personal gain.***
- ***Honesty and integrity – Always act with honesty and integrity when carrying out duties and perform all duties in a transparent way.***
- ***Responsibility – Assume responsibility for your decisions and actions.***
- ***Conflicts of Interest – Avoid actual or perceived conflicts of interests. Refrain from allowing personal or financial interests to influence your work.***
- ***Respect – Be respectful, professional, and fair in the course of all interactions with the public, colleagues, and any other stakeholders.***

- ***Public Resources – Utilize public resources responsibly. Protect and spend wisely taxpayer funds, property, and information, and only use these for official purposes***.

- Confidential Information – Never share or disclose private or sensitive information that is deemed confidential. And do not use this information for personal benefit.

- Follow all applicable laws, bylaws, policies, regulations, and procedures.

The purpose of ~~the Town of Ledyard Code of Ethics~~ ***this ordinance 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 a 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*~~

5. *"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.

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6. *"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.

7. *"Consultant"* means (i~~) 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~~ ***attorney hired by the Town or the Board of Education to provide legal services; (ii) any engineer, architect or construction manager hired by the Town or the Board of Education to provide professional services related to construction projects; or (iii) any professional who is hired by the Town to provide professional advice or services related to land use matters. In addition, the definition of what constitutes a consultant shall be limited to an officer or an employee of any Town or Board of Education contractor who has managerial or discretionary responsibilities with respect to a Town or Board of Education contract.***

8. *"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.

9. *"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, ~~greatgrandparents~~ ***great-grandparents***, ~~lineal descendants~~, ***children,*** stepchildren, foster children, siblings ***and their children***, stepsiblings ***and their children, and*** foster ***siblings and their children, of an official, employee, or consultant, or his/her spouse or domestic partner.*** ~~siblings; lineal descendants of siblings, stepsiblings, and foster siblings of an official, employee, or consultant, or his/her spouse or domestic partner~~

10. ***"Protected Person"*** means a Town or Board of Education official, employee, consultant, or volunteer who reports information that they reasonably believe constitutes fraud, waste, or abuse; a violation of law, regulation, or ordinance; conflicts with the Town Charter; or conflicts with town policy.

11. ***"Protected Disclosure"*** means any information, report, or communication made in good faith to an appropriate official that identifies suspected fraud, waste, or abuse; a violation of law, regulation, or ordinance; conflicts with the Town Charter; or conflicts with town policy.

12. ***"Reprisal"*** means the termination, demotion, harassment, discriminatory treatment, or any unlawful or unfair action against a Protected Person.

13. *"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. is 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.

14. *"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 ***of more than one hundred dollars ($100.00) in value*** 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:

a. A political contribution that is otherwise reported in accordance with the law.

b. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.

c. 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.

d. Certificates, plaques, or other ceremonial awards costing less than fifty dollars ($50.00).

e. 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.

f. Honorary degrees.

g. 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 or Board of Education*** official, or Town ***Board of Education*** employee participates in his/her official capacity.

h. Any gift provided to a Town ***or Board of Education*** official or Town ***or Board of Education*** employee or to a family member of a Town ***or Board of Education*** Official, or Town ***or Board of Education*** 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.

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15. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

16. ***"Managerial or discretionary responsibilities with respect to a Town or Board of Education contract" means having direct, extensive, and substantive responsibilities with respect to the negotiation of the contract and not peripheral, clerical, or ministerial responsibilities.***

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***, as delineated in Appendix A; as may be amended from time to time, by the approval of the Town Council, and is hereby incorporated in this Ordinance as though fully set. Officials identified as Mandatory (M) in the Appendix shall not be removed at any time from the Appendix.***

15. *"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. ***No Town official, Town or Board of Education 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 5. Conflict of Interest Provisions

a. A Town ***or Board of Education*** official, ***Town or Board of Education*** 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 ***or Board of Education*** official, employee, or consultant has a financial or beneficial interest. Notwithstanding anything contained in this ordinance to the **contrary** ~~contract~~, a Town ***or Board of Education*** 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 ***or Board of Education*** 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 ***or Board of Education*** official, employee, or consultant is hired by the Town or the Board of Education to perform necessary services***, including, but not limited to recreational 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 ***or Board of Education*** 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 ***or Board of Education*** 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 is not permitted except for 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~~. ***This Code of Ethics shall not apply to contractors hired by state or federal government mandate.***

Section 7. Gifts and favors

a. No Town ***or Board of Education*** 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 ***or Board of Education*** 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 ***or Board of Education*** 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

a. Any Town ***or Board of Education*** 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 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 ***or Board of Education*** 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 ***or Board of Education*** 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~~ ***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.

e. The appropriate authority to which the disclosure is made shall make an appropriate record of such disclosure and shall recommend to the Town ***or Board of Education*** official, employee, or consultant making the report to seek an advisory opinion from the Ethics Commission regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.

f. 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. Reprisals

(a) No Town or Board of Education official shall engage in any form of reprisal against a protected person for making a protected disclosure.

(b) Reprisals against protected persons constitute violations of this ordinance unless the respondent official demonstrates by clear and convincing evidence that his action was reasonable and proper.

(c) No agreement, including non-disclosure agreements or settlement agreements, shall waive the protections afforded to protected persons

Section ***11***~~10~~. Incompatible activities

a. This Code shall not prohibit any current or former Town official ***or Board of Education*** employee, or consultant from appearing before any agency on his/her own behalf. To avoid an actual or perceived conflict, Town ***or Board of Education*** 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 ***or Board of Education*** 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 ***12*** ~~11.~~ Penalty for violation

A failure to comply with the Code shall be considered grounds for censure, reprimand, suspension, demotion, removal, ***termination of contract***, or dismissal of Town ***or Board of Education*** 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 ***13***~~12.~~ Acknowledgment form

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

b. ~~Each~~ ***A representative of each current consultant shall acknowledge the Code of Ethics within one-hundred-twenty (120) days of the effective date of this ordinance; and prospectively, on and after the effective date of this ordinance, a*** consultant shall sign and file, ~~with the Town Clerk~~ ***on the same day that the consultant signs the contract***, an acknowledgment form indicating his or her awareness of the provisions of this Code ~~on or before~~ ***of Ethics prior*** to being retained by the Town, Board of Education, or other agency. ~~Current consultants shall acknowledge the Code of Ethics within one-hundred-twenty (120) days of its effective date.~~

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c. The Mayor and ***S***uperintendent 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.

d. The Town Council shall approve a procedure for monitoring compliance with this section and approve the training protocols specified in subsection (c).

Section ***14*** ~~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~~***1***. Members and alternate members must be residents of the Town of Ledyard.
~~b~~***2***. No member or alternate member shall:
~~c3.~~ (i)Be employed by the Town ***or Board of Education***;
~~d4.~~ (ii)Have been employed by the Town ***or Board of Education*** for a period of two years prior to being appointed to the Ethics Commission.
~~e5.~~ (iii)Hold or seek any Town ***or Board of Education*** office.
~~a. Have campaigned for any other person seeking a town office.~~
~~f6.~~ (iv) Have held any Town ***or Board of Education*** office for a period of two years prior to being appointed to the Ethics Commission.
~~g7.~~ (v) Serve as a member of another Town agency.
~~h8.~~ (vi)Hold office in a political party or political committee.
~~i9.~~ (vii)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)~~ ***seven (7)*** affirmative votes of the Town Council.

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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.

e. 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 ***or Board of Education*** 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~~ ***15***.

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.

8. 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 of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section ~~14~~ ***15***.

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

Section ***15.*** ~~14~~. Ethics Commission rules of procedure

(a) These procedures shall be used by the Ethics Commission established in Section ~~14~~***15*** 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 ***or Board of Education*** 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 ***or Board of Education*** 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 ***or Board of Education*** 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 ***or Board of Education*** 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. 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~~ ***,within five (5) business days of receiving the request***, to the chair or vicechair of the Ethics Commission. ~~On the day said request is received by the Town Clerk, t~~ The Town Clerk or his/her representative shall notify the chair or vice-chair of the Ethics Commission, or both, of same. ***The chair***

or vice-chair of** the **Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the request.

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

i. The chair will ***disclose the receipt of*** ~~present~~ the request to the Ethics Commission at its next regular meeting ~~or~~ ***and present it*** at a special meeting under executive session, except upon the request of the individual 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.

6. 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 state its reasons.

7. Confidentiality

i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.

ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

DRAFT

(c) . Complaints

A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope who will date stamp, but not open, the envelope and forward same ~~promptly~~ ***within five (5) business days*** to the chair or vice-chair of the Ethics Commission. ~~On the day said request is received by t~~ ***T***he Town Clerk ~~the Town Clerk~~ or his/her representative shall notify the chair or vice-chair of the Commission, or both, and the respondent within five (5) business days of receipt of the complaint. ***The chair or vice-chair of the Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the complaint***. The Ethics Commission shall also notify the respondent ***that the complaint was received and*** 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.

(d) . Evaluation and Acknowledgment

Within sixty (60) business days of the receipt of a complaint ***by the Chair***, 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.

If the Ethics Commission makes a finding of probable cause, which shall require three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation process.

DRAFT

(e) . 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***) business*** 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.

~~3~~.8 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) ***business*** days of the closing of the hearing.

iii. Such finding and memorandum will be deemed to be the final decision of the Ethics 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, the Mayor, the Ledyard Town Council***, and Board of Education (if applicable)*** with a copy of its findings and a memorandum within ten (10) ***business*** days after its decision. It will also advise the respondent of his/her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

v. Penalties for Violations of the Code of Ethics

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
g. Termination of employment
h. Restitution of any benefits received because of the violation committed.

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

(e). Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of 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 envelop and forward same promptly to the chair or vice chair of the Ethics Commission. ~~On the day said communication is received by the Town Clerk,~~ ***Within five (5) business days of receiving the communication,*** the Town Clerk or his/her representative shall notify the chair or vice chair of the Ethics Commission, or both, of same. The chair or vice chair shall determine whether said communication should be treated as confidential. ***Communications containing information about a potential complaint or advisory opinion, or information regarding actions of specific individuals shall be treated as confidential.*** Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-~~by case~~ ***by case*** basis and at the discretion of the Ethics Commission.

Section ***16*** ~~15.~~ Severability

If any part of this Code of Ethics 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: _____

Signed/Certified on: _____ _____
Gary St. Vil, Chairman

Approve/Disapprove on: _____ _____
Fred B. Allyn , III, Mayor

Published on: _____
Patricia Riley, Town Clerk

Effective Date:

DRAFT

Appendix A

Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission
shall include the following:

Title	M/D	Title	M/D
• Mayor	M	• Consultants	M
• School Superintendent	M	• Planning & Zoning Commission	M
• Town Council	M	• Public Safety Commission	M
• Board of Education	M	• Economic Development Commission	M
• Ledyard Beautification Committee		• Retirement Board	
• Ledyard Farmers Market Committee		• Social Services Board	
• Ledge Light Health District		• Southeastern Connecticut Tourism District	
• Library Commission		• Southeastern Regional Resource Recovery Authority	M
• Agricultural Commission		• Southeastern Connecticut Water Authority	M
• Board of Assessment Appeals	M	• Historic District Commission	
• Building Code Board of Appeals	M	• Housing Authority & Staff	
• Parks, Recreation & Senior Citizens Commission	M	• Inland Wetland & Water Courses Commission	M
• Permanent Municipal Building Committee	M	• Inland Wetlands Enforcement Officer	M
• Cable Advisory Board		• Sustainable CT Ad Hoc Committee	M
• Cemetery Committee		• Water Pollution Control Authority	M
• Conservation Commission		• Zoning Board of Appeals	M

Officials from the boards, commissions, committees, and any other agency identified as Mandatory (M) shall not be removed from this Appendix. This Appendix may be amended from time to time, by the approval of the Town Council; per Section 3. Definitions; (14) "*Officials"*

Adopted by the Town Council on: _____

_____
Gary St. Vil, Chairman

DRAFT

Roxanne Maher

From: Carmen Garcia Irizarry
Sent: Monday, February 9, 2026 6:23 PM
To: Roxanne Maher
Subject: Fwd: Ethics Ordinance - Administration Committee for the Ledyard Town Council

To be included in the agenda.

Sent from my iPad

Begin forwarded message:

> **From:** "Ritter, Matthew D." <MRitter@goodwin.com>
> **Date:** February 3, 2026 at 3:20:58 PM EST
> **To:** Carmen Garcia Irizarry <cgiri@ledyardct.org>
> **Subject: RE: Ethics Ordinance - Administration Committee for the Ledyard Town Council**
>
> Hi Carmen – thank you for your email.
>
> Any amendments to the ordinance will have to go back through the same process as the original ordinance. Creating an "appendix" to the ordinance does not allow the Town Council to avoid following the same process to amend the ordinance in the future.
>
> Please let me know if you have any additional questions related to this issue.
>
> 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

Boston | Greenwich | Hartford | Lakeville | New Haven | New York | Old Lyme | Stamford

Shipman & Goodwin LLP is a Mansfield Certified Plus Firm (2019-2024).

Disclaimer: Privileged and confidential. If received in error, please notify me by e-mail and delete the message.

From: Carmen Garcia Irizarry <CGIri@ledyardct.org>
Sent: Tuesday, February 3, 2026 2:19 PM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Ethics Ordinance - Administration Committee for the Ledyard Town Council

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Hi Matt,

I think I have exchanged communications with you in the past, but either way, I want to introduce myself. My name is Carmen N. Garcia-Irizarry and I am the current Chair of the Administration Committee.

In the last few meetings, the Administration committee took another look of the draft of the Ethics Ordinance and we incorporated the feedback that you had sent to Councilor Buhle, some of the feedback received during the public hearing and from Town employees. Before I send you the hopefully final draft of the ordinance, I would like to ask you a question.

During the last meeting, one of the councilors suggested that instead of including every single commission or committee that we have in Town to only include a subset - mainly the ones that have regulatory power and/or whose decisions affect residents directly. The two other members (including myself) of the committee would like to keep them all, but we arrived at a compromise that entails including an appendix to the ordinance that will indicate which committees and commissions have to follow the ordinance. As of right now, the ordinance will include everyone, but the purpose of the appendix is to allow the Town Council in the future to modify who is covered by the ordinance without having to go through the whole process again of modifying the ordinance and bringing it to public hearing, etc. We also agreed that there were certain groups (such as P&Z, Economic Development Commission, etc.) that were mandatory and that no future council could remove from the ordinance.

I would prefer for all officials, elected or appointed, to be included and not just the ones from a subset of commissions and committees. And if future councils would like to remove groups from the ordinance then have them follow the traditional process for modifying ordinances. In my mind this is simpler. But it's not just about what I want, but what the full committee wants and agrees on. I just would like to hear your thoughts and recommendations about this appendix idea so I can share it with the rest of the committee next Wednesday.

The Administration committee has its next meeting next Wednesday, February 11th, and I am hoping that we can agree on the final draft that will be sent to Town Council. I am planning on sending you the draft either tomorrow or Wednesday so at our next meeting the committee can discuss the draft with your feedback and recommendations. But before I send you the draft, I wanted to hear your legal opinion about this and incorporate it into it.

Thank you very much for your help and please let me know if you have any questions.

Respectfully,
Carmen
Ledyard Town Council
860-389-4644

Sent from my iPad

Disclaimer

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Roxanne Maher

From: Carmen Garcia Irizarry
Sent: Monday, February 9, 2026 6:22 PM
To: Roxanne Maher
Subject: Fwd: Ethics Ordinance Drafts and other Information

Hi Roxanne,

Can you include this email thread in the agenda? I have other email threads to send you and also the reviewed ordinance by the attorney.

Thanks,
Carmen

Sent from my iPad

Begin forwarded message:

> **From:** "Ritter, Matthew D." <MRitter@goodwin.com>
> **Date:** February 6, 2026 at 7:33:00 AM EST
> **To:** Carmen Garcia Irizarry <cgiri@ledyardct.org>
> **Subject: RE: Ethics Ordinance Drafts and other Information**
>
> Carmen – in addition to my comments on the need to amend the appendix in the same manner as you amend the ordinance, there is another issue with the appendix language that I flagged during my initial review:
>
> The language in yellow will have to be deleted. A legislative body cannot restrict a future legislative body from amending the ordinance to remove certain boards or commissions. I am flagging this now because I realize these appendix issues may require some discussions with colleagues. Thanks, Matt
>
> ."*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***, as delineated in Appendix A; as may be amended from time to time, by the approval of the Town Council, and is hereby incorporated in this Ordinance as though fully set. Officials identified as Mandatory (M) in the Appendix shall not be removed at any time from the Appendix.***

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

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Disclaimer: Privileged and confidential. If received in error, please notify me by e-mail and delete the message.

From: Carmen Garcia Irizarry <CGIri@ledyardct.org>
Sent: Thursday, February 5, 2026 8:45 PM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Fwd: Ethics Ordinance Drafts and other Information

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Hi Matt,

Below are multiple attachments with the red line changes including paragraphs that are not in the latest draft that I send you earlier.

Regarding the addition of the appendix, thank you for your explanation. I will explain to the other councilors at the meeting what you just wrote.

I asked our Admin to send me an example of an ordinance that TC passed and that included an appendix that was later modified. As soon as she sends it to me, I will forward it to you. She had mentioned to me as an example an ordinance for property tax exemptions for the elderly that contains an appendix with the income thresholds that are modified every year per the state mandate. But because it is done by state mandate, I asked her to send me an example that was closer to what we are including in the draft of the ethics one.

Thank you again and let me know if you need anything else from me.

Carmen
Sent from my iPad

Begin forwarded message:

> **From:** Jessica Buhle <Jbuh@ledyardct.org>
> **Date:** October 28, 2025 at 10:46:22 AM EDT
> **To:** Town Council Group <TownCouncil@ledyardct.org>
> **Subject: Ethics Ordinance Drafts and other Information**
>
> Good morning Councilors,
>
> I am attaching documents for your review if you would like to read them ahead of tomorrow's meeting.
>
> If you have further questions, **please do not reply all and reply only to me.**

Attached are:

1. Glastonbury's Ethics Ordinance (which the new proposed ordinance is modeled from)
2. A redline draft of Glastonbury's Ethics Ordinance to the Ledyard proposed ordinance
3. An initial redline draft showing changes from the new proposed ordinance from Attorney Ritter's recommendations.
4. A second redline draft reflecting additional proposed changes from Attorney Ritter
5. A final clean copy of the proposed ordinance

All attached documents and correspondence between Attorney Ritter and I are reflected in the meeting portal on the Administration Committee agenda for public review as well.

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

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Roxanne Maher

From: Carmen Garcia Irizarry
Sent: Tuesday, February 3, 2026 9:17 PM
To: Roxanne Maher
Subject: Fwd: Ethics Ordinance - Administration Committee for the Ledyard Town Council

Please include this email communication in the Agenda for next Wednesday's meeting.

Thanks,
Carmen

Sent from my iPad

Begin forwarded message:

> **From:** "Ritter, Matthew D." <MRitter@goodwin.com>
> **Date:** February 3, 2026 at 3:20:58 PM EST
> **To:** Carmen Garcia Irizarry <cgiri@ledyardct.org>
> **Subject: RE: Ethics Ordinance - Administration Committee for the Ledyard Town Council**
>
> Hi Carmen – thank you for your email.
>
> Any amendments to the ordinance will have to go back through the same process as the original ordinance. Creating an "appendix" to the ordinance does not allow the Town Council to avoid following the same process to amend the ordinance in the future.
>
> Please let me know if you have any additional questions related to this issue.
>
> Thanks, Matt

SHIPMAN

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From: Carmen Garcia Irizarry <CGIri@ledyardct.org>
Sent: Tuesday, February 3, 2026 2:19 PM

To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Ethics Ordinance - Administration Committee for the Ledyard Town Council

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Hi Matt,

I think I have exchanged communications with you in the past, but either way, I want to introduce myself. My name is Carmen N. Garcia-Irizarry and I am the current Chair of the Administration Committee.

In the last few meetings, the Administration committee took another look of the draft of the Ethics Ordinance and we incorporated the feedback that you had sent to Councilor Buhle, some of the feedback received during the public hearing and from Town employees. Before I send you the hopefully final draft of the ordinance, I would like to ask you a question.

During the last meeting, one of the councilors suggested that instead of including every single commission or committee that we have in Town to only include a subset - mainly the ones that have regulatory power and/or whose decisions affect residents directly. The two other members (including myself) of the committee would like to keep them all, but we arrived at a compromise that entails including an appendix to the ordinance that will indicate which committees and commissions have to follow the ordinance. As of right now, the ordinance will include everyone, but the purpose of the appendix is to allow the Town Council in the future to modify who is covered by the ordinance without having to go through the whole process again of modifying the ordinance and bringing it to public hearing, etc. We also agreed that there were certain groups (such as P&Z, Economic Development Commission, etc.) that were mandatory and that no future council could remove from the ordinance.

I would prefer for all officials, elected or appointed, to be included and not just the ones from a subset of commissions and committees. And if future councils would like to remove groups from the ordinance then have them follow the traditional process for modifying ordinances. In my mind this is simpler. But it's not just about what I want, but what the full committee wants and agrees on. I just would like to hear your thoughts and recommendations about this appendix idea so I can share it with the rest of the committee next Wednesday.

The Administration committee has its next meeting next Wednesday, February 11th, and I am hoping that we can agree on the final draft that will be sent to Town Council. I am planning on sending you the draft either tomorrow or Wednesday so at our next meeting the committee can discuss the draft with your feedback and recommendations. But before I send you the draft, I wanted to hear your legal opinion about this and incorporate it into it.

Thank you very much for your help and please let me know if you have any questions.

Respectfully,
Carmen
Ledyard Town Council

860-389-4644

Sent from my iPad

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Roxanne Maher

From: Carmen Garcia Irizarry
Sent: Monday, February 9, 2026 6:24 PM
To: Roxanne Maher
Subject: Fwd: Appendix in ordinances

Sent from my iPad

Begin forwarded message:

> **From:** "Ritter, Matthew D." <MRitter@goodwin.com>
> **Date:** February 6, 2026 at 4:44:54 PM EST
> **To:** Carmen Garcia Irizarry <cgiri@ledyardct.org>
> **Subject: Re: Appendix in ordinances**
>
> Ok - thanks. Will review with that in mind.
> Sent from my iPhone
>
> > On Feb 6, 2026, at 4:43 PM, Carmen Garcia Irizarry <CGIri@ledyardct.org> wrote:
> >
> > CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.
> >
> > Matt,
> >
> > Assume that the ordinance will apply to all Town and BOE officials (elected or appointed), employees, consultants, etc.
> >
> > Thanks,
> > Carmen
> > Sent from my iPad
> >
> > > On Feb 6, 2026, at 3:26 PM, Ritter, Matthew D. <MRitter@goodwin.com> wrote:
> > >
> > > Carmen – just to clarify:
> > >
> > > The appendix is fine BUT in order to amend the appendix (add or subtract a board or commissions) the Town Council would

have to amend the ordinance and follow the normal ordinance process.

Since the appendix is now likely out of the ordinance, which boards and commissions will the ordinance apply to? Should I wait to review the ordinance or just assume that it will apply to all of the Town's boards and commissions?

Thanks.

<image001.png>

Matthew D. Ritter
Shipman & Goodwin LLP
Partner
One Constitution Plaza
Hartford, CT 06103-1919

Tel: (860) 251-5092
Fax: (860) 251-5212
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Disclaimer: Privileged and confidential. If received in error, please notify me by e-mail and delete the message.

From: Carmen Garcia Irizarry <CGIri@ledyardct.org>
Sent: Friday, February 6, 2026 2:59 PM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Fwd: Appendix in ordinances

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

hHi Matt,

Thank you for looking at the ordinance and sending me your comments so fast!! I haven't read them yet, but I will do so tonight. Regarding what you wrote in the previous email about the appendix about one council limiting the actions of a future council - if this can't be done (I completely understand and agree to the why it can't be done) then I am going to ask at our admin meeting to get it removed. Either way, I've never been a fan of this appendix.

Below are some examples of ordinances that Roxanne sent me that have an appendix and that have been modified. Let me know what you think about the use of the appendix in the ordinances below.

Have a good weekend,
Carmen

Sent from my iPad

Begin forwarded message:

From: Roxanne Maher <council@ledyardct.org>
Date: February 6, 2026 at 1:56:37 PM EST
To: Carmen Garcia Irizarry <cgiri@ledyardct.org>
Cc: Roxanne Maher <council@ledyardct.org>
Subject: RE: Appendix in ordinances

Hi Carmen:

I have attached several examples different examples where the Town Council has included Appendix
(1) Ordnance #200-005- Tax Relief for the Elderly
(2) Ordinance #100-018- Providing Archery on Certain Lands
(3) Ordinance #300-003 Permit Fees Construction
(4) Ordinance #100-010 Establishing a Housing Authority

The language in the Ordinance provides the Town Council with the authority to update the Appendix from time to time.

Please let me know if I can be of any additional help,

Roxanne

-----Original Message-----
From: Carmen Garcia Irizarry <CGIri@ledyardct.org>
Sent: Thursday, February 5, 2026 8:18 PM
To: Roxanne Maher <council@ledyardct.org>
Subject: Appendix in ordinances

Hi Roxanne,

Can you send me an example of an ordinance in which the Town Council included an appendix that was later modified by the council without having to go to a public hearing? The attorney ask me if we could send him an example. I know

we talked about the one that included changes dictated by the state to the income thresholds, but could you send me one that doesn't include state mandated changes?

Thanks,
Carmen

Sent from my iPad

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DRAFT: ~~10/29/2025~~ ***01/14/2026***

KEY:
Admin Mtg 6/11/2025
Admin Mtg 6/11/2025
Councilor Garcia-Irizarry- Town Employee Feedback
Town Attorney Recommendations

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.

Town officials, Town employees, and Town consultants must be guided by the principles of this Code of Ethics:

- ***Public trust – Maintain the public trust by always acting in the best interests of the community and not for personal gain.***
- ***Honesty and integrity – Always act with honesty and integrity when carrying out duties and perform all duties in a transparent way.***
- ***Responsibility – Assume responsibility for your decisions and actions.***
- ***Conflicts of Interest – Avoid actual or perceived conflicts of interests. Refrain from allowing personal or financial interests to influence your work.***
- ***Respect – Be respectful, professional, and fair in the course of all interactions with the public, colleagues, and any other stakeholders.***

- ***Public Resources – Utilize public resources responsibly. Protect and spend wisely taxpayer funds, property, and information, and only use these for official purposes***.

- Confidential Information – Never share or disclose private or sensitive information that is deemed confidential. And do not use this information for personal benefit.

- Follow all applicable laws, bylaws, policies, regulations, and procedures.

The purpose of ~~the Town of Ledyard Code of Ethics~~ ***this ordinance 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*~~

5. *"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.

6. *"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.

7. *"Consultant"* means (i) 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~~ ***attorney hired by the Town or the Board of Education to provide legal services; (ii) any engineer, architect or construction manager hired by the Town or the Board of Education to provide professional services related to construction projects; or (iii) any professional who is hired by the Town to provide professional advice or services related to land use matters. In addition, the definition of what constitutes a consultant shall be limited to an officer or an employee of any Town or Board of Education contractor who has managerial or discretionary responsibilities with respect to a Town or Board of Education contract.***

8. *"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.

9. *"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, ~~greatgrandparents~~ ***great-grandparents***, ~~lineal descendants~~, ***children,*** stepchildren, foster children, siblings ***and their children***, stepsiblings ***and their children, and*** foster ***siblings and their children, of an official, employee, or consultant, or his/her spouse or domestic partner.*** ~~siblings; lineal descendants of siblings, stepsiblings, and foster siblings of an official, employee, or consultant, or his/her spouse or domestic partner~~

10. *"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. is 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.

11. *"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 ***of***

more than one hundred dollars ($100.00) in value 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:

a. A political contribution that is otherwise reported in accordance with the law.

b. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.

c. 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.

d. Certificates, plaques, or other ceremonial awards costing less than fifty dollars ($50.00).

e. 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.

f. Honorary degrees.

g. 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.

h. 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.

12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

13. ***Managerial or discretionary responsibilities with respect to a Town or Board of Education contract" means having direct, extensive, and substantive responsibilities with respect to the negotiation of the contract and not peripheral, clerical, or ministerial responsibilities.***

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14. ~~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.

15. ~~15~~ *"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. ***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 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, ***including, but not limited to recreational 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 is not permitted except for 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~~. ***This Code of Ethics shall not apply to contractors hired by state or federal government mandate.***

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

a. 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 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~~ ***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.

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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.

e. 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 regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.

f. 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, ***termination of contract***, 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. ***The Human Resources Director shall provide a copy of the Code of Ethics to every*** ~~and~~

employee within sixty (60) days of date that he/she begins his/her duties. Every Town official ***and Board of Education official*** ~~and employee~~ shall sign and file with the Town Clerk an acknowledgment form indicating his/her awareness of the provisions of this Code. ***Every Town employee shall sign and file with the Town Human Resources Director an acknowledgement form indicating his/her awareness of the provisions of this Code. Every Board of Education employee shall sign and file with the Board of Education Human Resources Director an acknowledgement form indicating his/her awareness of the provisions of this Code.*** Current Town and ***Board of Education*** officials and employees shall acknowledge the Code of Ethics within one-hundred-twenty (120) days of its effective date.

b. ~~Each~~ ***A representative of each current consultant shall acknowledge the Code of Ethics within one-hundred-twenty (120) days of the effective date of this ordinance; and prospectively, on and after the effective date of this ordinance, a*** consultant shall sign and file, ~~with the Town Clerk~~ ***on the same day that the consultant signs the contract***, an acknowledgment form indicating his or her awareness of the provisions of this Code ~~on or before~~ ***of Ethics prior*** to being retained by the Town, Board of Education, or other agency. ~~Current consultants shall acknowledge the Code of Ethics within one-hundred-twenty (120) days of its effective date.~~

c. The Mayor and ***S***uperintendent 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.

d. 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

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b. Member and alternate member qualifications

~~a~~*1*. Members and alternate members must be residents of the Town of Ledyard.

~~b~~*2*. No member or alternate member shall:

~~c~~*3.* Be employed by the Town;

~~d~~*4*. Have been employed by the Town for a period of two years prior to being appointed to the Ethics Commission.

~~e~~*5.* Hold or seek any Town office.

~~a. Have campaigned for any other person seeking a town office.~~

~~f~~*6.* Have held any Town office for a period of two years prior to being appointed to the Ethics Commission.

~~g~~*7.* Serve as a member of another Town agency.

~~h~~*8.* Hold office in a political party or political committee.

~~i~~*9.* 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)~~ ***seven (***7) 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.

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e. 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 ***or Board of Education*** 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.

8. 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 of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.

9. 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 ***or Board of Education*** 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 ***or Board of Education*** 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. 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~~ ***,within five (5) business days of receiving the request***, to the chair or vicechair of the Ethics Commission. ~~On the day said request is received by the Town Clerk, t~~ The Town Clerk or his/her representative shall notify the chair or vice-chair of the Ethics Commission, or both, of same. ***The chair or vice-chair of*** *the* ***Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the request.***

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

i. The chair will ***disclose the receipt of*** ~~present~~ he request to the Ethics Commission at its next regular meeting ~~or~~ ***and present it*** at a special meeting under executive session, except upon the request of the individual 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.

6. 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 state its reasons.

7. Confidentiality

i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.

ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

(c) . Complaints

A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope who will date stamp, but not open, the envelope and forward same ~~promptly~~ ***within five (5) business days*** to the chair or vice-chair of the Ethics Commission. ~~On the day said request is received by t~~ ***T***he Town Clerk ~~the Town Clerk~~ or his/her representative shall notify the chair or vice-chair of the Commission, or both, and the respondent within five (5) business days of receipt of the complaint. ***The chair or vice-chair of the Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the complaint***. The Ethics Commission shall also notify the respondent ***that the complaint was received and*** 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.

(d) . Evaluation and Acknowledgment

Within sixty (60) business days of the receipt of a complaint ***by the Chair***, 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.

If the Ethics Commission makes a finding of probable cause, which shall require three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation process.

(e) . 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***) business*** 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.

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3. 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) ***business*** days of the closing of the hearing.

iii. Such finding and memorandum will be deemed to be the final decision of the Ethics 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, the Mayor, and the Ledyard Town Council with a copy of its findings and memorandum within ten (10) ***business*** days after its decision. It will also advise the respondent of his/her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

v. Penalties for Violations of the Code of Ethics

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
g. Termination of employment
h. Restitution of any benefits received because of the violation committed.
i. Penalties will be determined by a majority vote of the Town Council within sixty (60) business days after receipt of the finding and memorandum of Ethics Commission.

(e). Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of 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 envelop and forward same promptly to the chair or vice chair of the Ethics Commission. ~~On the day said communication is received by the Town Clerk,~~ ***Within five (5) business days of receiving the communication,*** the Town Clerk or his/her representative shall notify the chair or vice chair of the Ethics Commission, or both, of same. The chair or vice chair shall determine

whether said communication should be treated as confidential. ***Communications containing information about a potential complaint or advisory opinion, or information regarding actions of specific individuals shall be treated as confidential.*** Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-~~by case~~ ***by case*** basis and at the discretion of the Ethics Commission.

Section 15. Severability

If any part of this Code of Ethics 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: _____

Signed/Certified on: _____ _____

Gary St. Vil, Chairman

Approve/Disapprove on: _____ _____

Fred B. Allyn , III, Mayor

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DRAFT: 10/29/2025

Ordinance # _____

AN ORDINANCE ETABLISHING 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. is 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.

15. *"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

a. 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 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.

e. 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 regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.

f. 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.

b. 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 acknowledge the Code of Ethics within one-hundred-twenty (120) days of its effective date.

c. 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.

d. 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.

e. 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.

8. 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 of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.

9. 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. 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

i. 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 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.

6. 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 state its reasons.

7. Confidentiality

i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.

ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

c. Complaints

1. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope 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 Commission, or both, 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.

1. Evaluation and Acknowledgment

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 three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation process.

2. 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.

3. Final Decisions

ii. 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.

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

iv. Such finding and memorandum will be deemed to be the final decision of the Ethics 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.

v. 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/her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

vi. Penalties for Violations of the Code of Ethics
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
g. Termination of employment
h. Restitution of any benefits received because of the violation committed.
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.

d. Other communications; miscellaneous:
The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of 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 envelop and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said

communication 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. The chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. Severability

If any part of this Code of Ethics 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: _____

Signed/Certified on: _____ _____

Gary St. Vil, Chairman

Approve/Disapprove on: _____ _____

Fred B. Allyn , III, Mayor

I make a motion to amend the proposed ordinance:

In Section 5a, I would like to add the following language, 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.

In Section 5e, I would like to add the following, 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.

In Section 14. C. 4 . v., I would like to add the following language, 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.

DRAFT: 10/29/2025

Ordinance # _____

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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. *"Complainant"* means a person or person 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.

6. *"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.

7. *"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.

8. *"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.

9. *"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.

10. *"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. is 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.

11. *"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.

12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

13. *"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.

14. *"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 or supervise a member of his/her family.

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

a. 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 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 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.
e. 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 regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.
f. 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.
b. 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 acknowledge the Code of Ethics within one-hundred-twenty (120) days of its effective date.
c. 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.
d. 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 held any Town office for a period of two years prior to being appointed to the Ethics Commission.
    e. Serve as a member of another Town agency.
    f. Hold office in a political party or political committee.
    g. 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.
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.

e. 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.
8. 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 of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.
9. 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. 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.

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

i. 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 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.

6.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.
i. All advisory opinions must be in writing and communicated to the individual making the request.
ii. 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 state its reasons.

7.Confidentiality

i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.
ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

c. Complaints

1. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope 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 Commission, or both, 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.

2.Evaluation and Acknowledgment

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 three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation process.

3.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.

4.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 Ethics 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, 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/her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

v. 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:

b. Order to cease and desist the violation
c. Pay a civil penalty of up to the maximum amount permitted by State law.
d. Censure
e. Suspension without pay
f. Demotion
g. Termination of employment
h. Restitution of any benefits received because of the violation committed.

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.

d. Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of 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 envelop and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said communication 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. The chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. Severability

If any part of this Code of Ethics 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: Jessica Buhle
Sent: Tuesday, October 28, 2025 10:35 AM
To: Roxanne Maher
Subject: Fwd: Redline version of the draft and two notes.
Attachments: Secondary Attorney Revisions Clean Copy 10-28.docx; Secondary Attorney Revisions Redline 10-28.docx

Good morning Roxanne,

Please attach this additional correspondence between Attorney Ritter and I.

I am also attaching a secondary redline draft showing these recommended changes, and a new attorney revised clean copy of the draft to attach as well.

Thank you.

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

Begin forwarded message:

From: "Ritter, Matthew D." <MRitter@goodwin.com>
Subject: Re: Redline version of the draft and two notes.
Date: October 28, 2025 at 8:59:39 AM EDT
To: Jessica Buhle <Jbuh@ledyardct.org>

Thanks. -Matt

Sent from my iPhone

On Oct 28, 2025, at 8:31 AM, Jessica Buhle <Jbuh@ledyardct.org> wrote:

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Thank you. I will incorporate those changes and send you a clean copy after the meeting as requested.

-Jessica

Sent from my iPhone

On Oct 28, 2025, at 8:29 AM, Ritter, Matthew D. <MRitter@goodwin.com> wrote:

Hood morning Jessica – some small comments below. I have no additional comments at this time. However, after the meeting tomorrow please send me a clean version just so I can proofread it one more time for typos, section ordering, etc. Thanks. -Matt

1. Gift definition. I think it should be something like this:

"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) calendar year from the same person, as well as loans that are not commercially reasonable."

Under this language, you could take someone out to dinner for $99.99 once a calendar year. Does that make sense?

2. Add the word two times to Section 9(d). 6:

1. For a consultant - to the agent executing the contract on behalf of the Town or Board of Education.

3. Section 10 – maybe re-title it since the employment language has been deleted?

4. Section 12 – not a legal issue…just concerned about the Town Clerk's ability to get all these forms signed in 60 days especially since it includes teachers, etc. And if the ordinance is adopted in November, there are a lot of holidays/vacation days in the subsequent 60 days.

Maybe use 120 days? I would just make sure the Town Clerk can handle this in whatever time period is given.

Thanks, Matt



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: Jessica Buhle <Jbuh@ledyardct.org>
Sent: Monday, October 27, 2025 7:30 PM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Re: Redline version of the draft and two notes.

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Good evening,

I am attaching a final redline draft incorporating your changes. I have made the changes from the clean draft I sent you.

Green items are the changes you've recommended adding or defended modifying; redlines are items we've deleted.

With these changes adopted, do you feel this ordinance is effective to protect the Town of Ledyard and can be defended if the need arose?

Thank you again for your assistance and prompt replies (but if you happen to read this this evening, please don't reply until tomorrow and enjoy your evening).

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

> On Oct 27, 2025, at 6:29 PM, Ritter, Matthew D. <MRitter@goodwin.com> wrote:
>
> Hi Jessica – thanks for the redline. Very helpful. Comments/suggested edits below:

1. Definition of “Gift” - I think you accidentally deleted the phrase “and one hundred dollars ($100.00) total in any one (1) year from the same person.”

2. You include the “Town Attorney” in the definition of “Official.” However, the Town Attorney is already included in the definition of consultant.

If you include Town Attorney in the definition of “Official” you will have to clarify some provisions in which the term “Official” is used. See Section 9.d., Section 12.a. and #8 of “Gifts do not include”, for example. There may be some more as well.

3. Conflicts of Interest – I fully appreciate that this language below in subsection (a) comes directly from the Glastonbury code. I will only point out that this is a subjective standard. I just note that it will be easier for the Ethics Commission to make rulings if there are objective criteria (i.e. the gift rule or financial interest rule). However, this is a policy decision for the Town Council/Mayor to determine.

“that is incompatible with the proper discharge of that individual’s official responsibilities in the public interest or would tend to impair his/her independent judgment or action in the performance of official responsibilities.”

-I think it is fine to leave in subsection (d) even though it is already in the employee handbook.

-I would delete (f) because it appears earlier in the ordinance (or vise versa…delete the earlier section).

4. Section 9(c) – I assume section 1. applies only to property in Ledyard? I would clarify that for the corporation, trust, partnerships, etc.

Section(c) 3. – delete the term “political subdivision.” Or let me know what you are trying

to capture here? This was in my prior comments as well.

Section 9(d) – I know this comes from Glastonbury but what does it mean for a Town official to report to a "particular agency?" I would recommend that these officials report to the Town Council Chair and/or Mayor maybe? Or maybe the chair of that board or commission?

For Town employees, it is hard without a Town Manager. However, the term "appropriate authorities" may not be clear enough. Again, maybe it is the Mayor and/or Town Council Chair? Or the full Town Council like with department heads?

-It may also be easier to just require anyone who is uncertain to ask for an advisory opinion? Maybe eliminate the middle step? The involvement of other individuals raises questions about FOIA, confidentiality, etc.

5. Section 10 – is almost identical to the conflicts of interest section I highlighted above. If the Town Council keeps the provision, I would just use it once in the ordinance.

-10. b. I understand subsection (c) because it relates to a matter a consultant/employee may have been involved with in their role as a consultant (and they may be privy to certain confidential information, etc). However, it does not work as well for subsection (b). What is meant by "affiliated" for a consultant? For example, if the P&Z Commission hires a consultant for advice in 2025, can that consultant advise a different applicant in 2026 if it is a completely different property and an unrelated matter?

"No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency with which he/she previously was employed or affiliated for a period of one (1) year after the termination of his/her public service or employment; provided,

however, that such an individual may be permitted to make such an appearance upon receipt of a favorable prior advisory opinion by the Ethics Commission pursuant to Section 13 following its review of the individual's written application and relevant facts."

-As noted before, I understand that Glastonbury has these revolving door provisions but I do not know if they will pass legal muster for certain consultants, unionized employees, etc. We can certainly research this issue further if requested.

-10. f. – I know this is in Glastonbury, but I still think it is a typo. I would recommend deleting this language in yellow. This was also in my earlier comments.

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, not otherwise restrained by the Code, 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.

6. Section 12. How are you going to handle existing employees/consultants as opposed to new hires/contracts? Are you going to require them to all sign the form or just new employees? The language may have to be amended to reflect this policy decision.

7. There are no legal issues with adding the training requirements.



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Disclaimer: Privileged and confidential. If received in error, please notify me by e-mail and delete the message.

From: Jessica Buhle <Jbuh@ledyardct.org>
Sent: Monday, October 27, 2025 4:09 PM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Redline version of the draft and two notes.

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Good afternoon,

I have attached the redline draft of the ordinance proposed comparing to the Glastonbury code of ethics. There are also notes in the document as well regarding some of the changes if they are visible. If they are not visible, please let me know and I can send those separately.

Before a final draft is adopted, I have two changes I would like to make to it that didn't get changed before I sent it to you.

First, I would like to change the requirements for finding probable cause to 3 votes instead of 4 while retaining 4 for a final decision.

Second, I would like to re-add section c and d from Section 2-68 about maintaining training for town employees and officials. The language as written in the Glastonbury code is sufficient removing the reference to their charter and naming the Mayor instead of the Town Manager.

Lastly, if you think the language specific to inquiries and complaints directly from the Glastonbury code is better overall, we can move forward with that language instead of the previously proposed language. All of the hearing and procedural language in the draft sent to you is directly from the previous draft.

Thank you for all the feedback and assistance you have provided to support effective legislation for Ledyard

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

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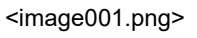
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DRAFT: 10/27/2025

Ordinance # _____

AN ORDINANCE ETABLISHING 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. *"Complainant"* means a person or person 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.

6. *"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.

7. *"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.

8. *"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.

9. *"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.

10. *"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. is 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.

11. *"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.

12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

13. *"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.

14. *"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.
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 or supervise a member of his/her family.

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.

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

a. 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 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 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.

e. 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 regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.
f. 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.
b. 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 acknowledge the Code of Ethics within one-hundred-twenty (120) days of its effective date.

c. 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.
d. 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 held any Town office for a period of two years prior to being appointed to the Ethics Commission.
    e. Serve as a member of another Town agency.
    f. Hold office in a political party or political committee.
    g. 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.
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.

e. 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.
8. 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 of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.
9. 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. 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.

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

i. 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 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.

6.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.
i. All advisory opinions must be in writing and communicated to the individual making the request.
ii. 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 state its reasons.

7.Confidentiality

i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.
ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

c. Complaints

1. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope 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 Commission, or both, 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.

2.Evaluation and Acknowledgment

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 three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation process.

3.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.

4.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 Ethics 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, 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/her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

v. Penalties for Violations of the Code of Ethics

a. A violation of the Code of Ethics may lead to any one or a combination of the following penalties:
b. Order to cease and desist the violation
c. Pay a civil penalty of up to the maximum amount permitted by State law.
d. Censure
e. Suspension without pay
f. Demotion
g. Termination of employment
h. Restitution of any benefits received because of the violation committed.

d. Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of 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 envelop and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said communication 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. The chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. Severability

If any part of this Code of Ethics 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

DRAFT: 10/27/2025

Ordinance # _____

AN ORDINANCE ETABLISHING 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. *"Complainant"* means a person or person 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.

6. *"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.

7. *"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.

8. *"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.

9. *"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.

10. *"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. is 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.

11. *"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) ~~for any one (1) occasion, and one hundred dollars ($100.00) total~~ 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.

12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

13. *"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.

14. *"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.
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 or supervise a member of his/her family.

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.

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

a. 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 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 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.

e. 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 regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.
f. 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 ~~employment and~~ 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 ~~sixty (60)~~ one-hundred-twenty (120) days of its effective date.
b. 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 acknowledge the Code of Ethics within ~~sixty (60)~~ one-hundred-twenty (120) days of its effective date.

c. 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.
d. 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 held any Town office for a period of two years prior to being appointed to the Ethics Commission.
    e. Serve as a member of another Town agency.
    f. Hold office in a political party or political committee.
    g. 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.
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.

e. 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.
8. 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 of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.
9. 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. 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.

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

i. 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 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.

6.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.
i. All advisory opinions must be in writing and communicated to the individual making the request.
ii. 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 state its reasons.

7.Confidentiality

i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.
ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

c. Complaints

1. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope 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 Commission, or both, 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.

2.Evaluation and Acknowledgment

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 three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation process.

3.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.

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Adopted by the Ledyard Town Council on: _____

_____

Gary St. Vil, Chairman

Approve/Disapprove on: _____ _____

Fred B. Allyn , III, Mayor

DRAFT: 10/27/2025

Ordinance # _____

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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. *"Complainant"* means a person or person 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.

6. *"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.

7. *"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.

8. *"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.

9. *"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.

10. *"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. is 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.

11. *"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) for any one (1) occasion, and one hundred dollars ($100.00) total 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.

12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

13. *"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.

14. *"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.
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 or supervise a member of his/her family.

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.

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

a. 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 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 Town Council.
5. The superintendent of schools - to the Board of Education.
6. For a consultant - to the agent executing contract on behalf of the Town or Board of Education.

e. 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 regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.
f. 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 employment and 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 sixty (60) days of its effective date.
b. 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 acknowledge the Code of Ethics within sixty (60) days of its effective date.

c. 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.
d. 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 held any Town office for a period of two years prior to being appointed to the Ethics Commission.
    e. Serve as a member of another Town agency.
    f. Hold office in a political party or political committee.
    g. 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.
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.

e. 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.
8. 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 of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.
9. 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. 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.

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

i. 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 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.

6.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.
i. All advisory opinions must be in writing and communicated to the individual making the request.
ii. 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 state its reasons.

7.Confidentiality

i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.
ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

c. Complaints

1. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope 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 Commission, or both, 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.

2.Evaluation and Acknowledgment

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 three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation process.

3.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.

4.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 Ethics 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, 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/her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

v. Penalties for Violations of the Code of Ethics

a. A violation of the Code of Ethics may lead to any one or a combination of the following penalties:
b. Order to cease and desist the violation
c. Pay a civil penalty of up to the maximum amount permitted by State law.
d. Censure
e. Suspension without pay
f. Demotion
g. Termination of employment
h. Restitution of any benefits received because of the violation committed.

d. Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of 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 envelop and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said communication 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. The chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. Severability

If any part of this Code of Ethics 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: Jessica Buhle
Sent: Monday, October 27, 2025 7:41 PM
To: Roxanne Maher
Subject: Forward of communication with Matt Ritter
Attachments: Modified Draft with Attorney Revisions.docx

Begin forwarded message:

From: Jessica Buhle <jessicab@ledyardct.org>
Subject: Re: Redline version of the draft and two notes.
Date: October 27, 2025 at 7:29:29 PM EDT
To: "Ritter, Matthew D." <MRitter@goodwin.com>

Good evening,

I am attaching a final redline draft incorporating your changes. I have made the changes from the clean draft I sent you.

Green items are the changes you've recommended adding or defended modifying; redlines are items we've deleted.

With these changes adopted, do you feel this ordinance is effective to protect the Town of Ledyard and can be defended if the need arose?

Thank you again for your assistance and prompt replies (but if you happen to read this this evening, please don't reply until tomorrow and enjoy your evening).

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

> On Oct 27, 2025, at 6:29 PM, Ritter, Matthew D. <MRitter@goodwin.com> wrote:
>
> Hi Jessica – thanks for the redline. Very helpful. Comments/suggested edits below:
>
> 1. Definition of "Gift" - I think you accidentally deleted the phrase "and one hundred dollars ($100.00) total in any one (1) year from the same person."

2. You include the “Town Attorney” in the definition of “Official.” However, the Town Attorney is already included in the definition of consultant.

If you include Town Attorney in the definition of “Official” you will have to clarify some provisions in which the term “Official” is used. See Section 9.d., Section 12.a. and #8 of “Gifts do not include”, for example. There may be some more as well.

3. Conflicts of Interest – I fully appreciate that this language below in subsection (a) comes directly from the Glastonbury code. I will only point out that this is a subjective standard. I just note that it will be easier for the Ethics Commission to make rulings if there are objective criteria (i.e. the gift rule or financial interest rule). However, this is a policy decision for the Town Council/Mayor to determine.

“that is incompatible with the proper discharge of that individual’s official responsibilities in the public interest or would tend to impair his/her independent judgment or action in the performance of official responsibilities.”

-I think it is fine to leave in subsection (d) even though it is already in the employee handbook.

-I would delete (f) because it appears earlier in the ordinance (or vise versa…delete the earlier section).

4. Section 9(c) – I assume section 1. applies only to property in Ledyard? I would clarify that for the corporation, trust, partnerships, etc.

Section(c) 3. – delete the term “political subdivision.” Or let me know what you are trying to capture here? This was in my prior comments as well.

Section 9(d) – I know this comes from Glastonbury but what does it mean for a Town official to report to a “particular agency?” I would recommend that these officials report to the Town Council Chair and/or Mayor maybe? Or maybe the chair of that board or commission?

For Town employees, it is hard without a Town Manager. However, the term “appropriate authorities” may not be clear enough. Again, maybe it is the Mayor and/or Town Council Chair? Or the full Town Council like with department heads?

-It may also be easier to just require anyone who is uncertain to ask for an advisory opinion? Maybe eliminate the middle step? The involvement of other individuals raises questions about FOIA, confidentiality, etc.

5. Section 10 – is almost identical to the conflicts of interest section I highlighted above. If the Town Council keeps the provision, I would just use it once in the ordinance.

-10. b. I understand subsection (c) because it relates to a matter a consultant/employee may have been involved with in their role as a consultant (and they may be privy to certain confidential information, etc). However, it does not work as well for subsection (b). What is meant by "affiliated" for a consultant? For example, if the P&Z Commission hires a consultant for advice in 2025, can that consultant advise a different applicant in 2026 if it is a completely different property and an unrelated matter?

"No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency with which he/she previously was employed or affiliated for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable prior advisory opinion by the Ethics Commission pursuant to Section 13 following its review of the individual's written application and relevant facts."

-As noted before, I understand that Glastonbury has these revolving door provisions but I do not know if they will pass legal muster for certain consultants, unionized employees, etc. We can certainly research this issue further if requested.

-10. f. – I know this is in Glastonbury, but I still think it is a typo. I would recommend deleting this language in yellow. This was also in my earlier comments.

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, not otherwise restrained by the Code, 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.

6. Section 12. How are you going to handle existing employees/consultants as opposed to new hires/contracts? Are you going to require them to all sign the form or just new employees? The language may have to be amended to reflect this policy decision.

7. There are no legal issues with adding the training requirements.



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Disclaimer: Privileged and confidential. If received in error, please notify me by e-mail and delete the message.

From: Jessica Buhle <Jbuh@ledyardct.org>
Sent: Monday, October 27, 2025 4:09 PM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Redline version of the draft and two notes.

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Good afternoon,

I have attached the redline draft of the ordinance proposed comparing to the Glastonbury code of ethics. There are also notes in the document as well regarding some of the changes if they are visible. If they are not visible, please let me know and I can send those separately.

Before a final draft is adopted, I have two changes I would like to make to it that didn't get changed before I sent it to you.

First, I would like to change the requirements for finding probable cause to 3 votes instead of 4 while retaining 4 for a final decision.

Second, I would like to re-add section c and d from Section 2-68 about maintaining training for town employees and officials. The language as written in the Glastonbury code is sufficient removing the reference to their charter and naming the Mayor instead of the Town Manager.

Lastly, if you think the language specific to inquiries and complaints directly from the Glastonbury code is better overall, we can move forward with that language instead of the previously proposed language. All of the hearing and procedural language in the draft sent to you is directly from the previous draft.

Thank you for all the feedback and assistance you have provided to support effective legislation for Ledyard

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

Disclaimer

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DRAFT: 10/27/2025

Ordinance # _____

AN ORDINANCE ETABLISHING 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. *"Complainant"* means a person or person 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.

6. *"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.

7. *"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.

8. *"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.

9. *"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.

10. *"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. is 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.

11. *"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) for any one (1) occasion, and one hundred dollars ($100.00) total 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.

12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

13. *"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, ~~Town attorney,~~ or any other agency.

14. *"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 ~~that is incompatible with the proper discharge of that individual's official responsibilities in the public interest or would tend to impair his/her independent judgment or action in the performance of official responsibilities~~ where the Town official, employee, or consultant has a financial or beneficial interest.

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 or supervise a member of his/her family.

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.

~~f. No Town official, employee, or consultant may use his/her public office or position or disclose or use confidential information, in order to obtain a financial or beneficial interest for herself, himself, or for his/her family, or for any business associate.~~

g. 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

a. 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 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 ~~or its political subdivisions~~ 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 ~~agency~~ 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 Town Council.
5. The superintendent of schools - to the Board of Education.
6. For a consultant - to the agent executing contract on behalf of the Town or Board of Education.

e. 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 ~~whether such official, employee, or consultant should abstain from participating in the transaction or decision to which the possible conflict of interest relates and whatever other appropriate~~ action should be taken to seek an advisory opinion from the Ethics Commission regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.

f. 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 employment and activities

~~a. No Town official or employee shall engage in or accept private employment or render services when the employment or services: (1) are incompatible with the proper discharge of the official duties of the official or employee; or (2) would tend to impair independence of judgment, or action by the official or employee in the performance of that individual's official duty. No consultant shall engage in employment or render services for interest other than the Town when such employment or services: (1) are incompatible with the proper discharge of his or her consulting duties on behalf of the town; or (2) would tend to impair the independence of the consultant's judgment or action on the matter for which the consultant has been engaged by the Town.~~

~~b. No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency with which he/she previously was employed or affiliated for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable prior advisory opinion by the Ethics Commission pursuant to Section 13 following its review of the individual's written application and relevant facts.~~

~~c. No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency in regard to a matter in which that individual previously participated in the course of his/her official responsibilities for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable advisory opinion by the Ethics Commission pursuant to Section 13.~~

a. ~~Subsection (a), (b), and (c) of~~ This ~~section~~ 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~~, not otherwise restrained by the Code,~~ 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 sixty (60) days of its effective date.
b. 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 acknowledge the Code of Ethics within sixty (60) days of its effective date.
c. 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.
d. 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 held any Town office for a period of two years prior to being appointed to the Ethics Commission.
    e. Serve as a member of another Town agency.
    f. Hold office in a political party or political committee.
    g. 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.
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.

e. 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.
8. 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 of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.
9. 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. 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.

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

i. 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 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.

6.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.
i. All advisory opinions must be in writing and communicated to the individual making the request.
ii. 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 state its reasons.

7.Confidentiality

i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.
ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

c. Complaints

1. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope 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 Commission, or both, 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.

2.Evaluation and Acknowledgment

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)~~ three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation process.

3.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.

4.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 Ethics 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, 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/her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

v. Penalties for Violations of the Code of Ethics

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

b. Order to cease and desist the violation
c. Pay a civil penalty of up to the maximum amount permitted by State law.
d. Censure
e. Suspension without pay
f. Demotion
g. Termination of employment
h. Restitution of any benefits received because of the violation committed.

d. Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of 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 envelop and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said communication 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. The chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. Severability

If any part of this Code of Ethics 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

DRAFT: 10/27/2025

Ordinance # _____

AN ORDINANCE ETABLISHING 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. *"Complainant"* means a person or person 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.

6. *"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.

7. *"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.

8. *"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.

9. *"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.

10. *"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. is 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.

11. *"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) for any one (1) occasion, and one hundred dollars ($100.00) total 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.

12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

13. *"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, ~~Town attorney,~~ or any other agency.

14. *"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 ~~that is incompatible with the proper discharge of that individual's official responsibilities in the public interest or would tend to impair his/her independent judgment or action in the performance of official responsibilities~~ where the Town official, employee, or consultant has a financial or beneficial interest.

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 or supervise a member of his/her family.

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.

~~f. No Town official, employee, or consultant may use his/her public office or position or disclose or use confidential information, in order to obtain a financial or beneficial interest for herself, himself, or for his/her family, or for any business associate.~~

g. 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

a. 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 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 ~~or its political subdivisions~~ 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 ~~agency~~ 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 Town Council.
5. The superintendent of schools - to the Board of Education.
6. For a consultant - to the agent executing contract on behalf of the Town or Board of Education.

e. 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 ~~whether such official, employee, or consultant should abstain from participating in the transaction or decision to which the possible conflict of interest relates and whatever other appropriate~~ action should be taken to seek an advisory opinion from the Ethics Commission regarding whether such official, employee, or consultant should abstain from participating in the transaction or decision related to the possible conflict of interest.

f. 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 employment and activities

~~a. No Town official or employee shall engage in or accept private employment or render services when the employment or services: (1) are incompatible with the proper discharge of the official duties of the official or employee; or (2) would tend to impair independence of judgment, or action by the official or employee in the performance of that individual's official duty. No consultant shall engage in employment or render services for interest other than the Town when such employment or services: (1) are incompatible with the proper discharge of his or her consulting duties on behalf of the town; or (2) would tend to impair the independence of the consultant's judgment or action on the matter for which the consultant has been engaged by the Town.~~

~~b. No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency with which he/she previously was employed or affiliated for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable prior advisory opinion by the Ethics Commission pursuant to Section 13 following its review of the individual's written application and relevant facts.~~

~~c. No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency in regard to a matter in which that individual previously participated in the course of his/her official responsibilities for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable advisory opinion by the Ethics Commission pursuant to Section 13.~~

a. ~~Subsection (a), (b), and (c) of~~ This ~~section~~ 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~~, not otherwise restrained by the Code,~~ 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 sixty (60) days of its effective date.
b. 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 acknowledge the Code of Ethics within sixty (60) days of its effective date.
c. 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.
d. 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 held any Town office for a period of two years prior to being appointed to the Ethics Commission.
    e. Serve as a member of another Town agency.
    f. Hold office in a political party or political committee.
    g. 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.
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.

e. 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.
8. 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 of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.
9. 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. 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.

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

i. 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 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.

6.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.
i. All advisory opinions must be in writing and communicated to the individual making the request.
ii. 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 state its reasons.

7.Confidentiality

i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.
ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

c. Complaints

1. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope 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 Commission, or both, 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.

2.Evaluation and Acknowledgment

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)~~ three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation process.

3.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.

4.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 Ethics 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, 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/her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

v. Penalties for Violations of the Code of Ethics

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

b. Order to cease and desist the violation
c. Pay a civil penalty of up to the maximum amount permitted by State law.
d. Censure
e. Suspension without pay
f. Demotion
g. Termination of employment
h. Restitution of any benefits received because of the violation committed.

d. Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of 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 envelop and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said communication 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. The chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. Severability

If any part of this Code of Ethics 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

DRAFT: 10/27/2025

Ordinance # _____

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

- ~~Fulfill the requirement of establishing guidelines for ethical conduct, pursuant to Section 1101 of the Town Charter~~
- 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 ~~Glastonbury~~ Town Clerk is closed to the public for business.

5. *"Complainant"* means a person or person 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.

6. *"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.

7. *"Consultant"* means ~~is~~ any independent contractor or professional person or firm that is by virtue of an award of a public bid or contract ~~as defined in Glastonbury Code of Ordinances sections 2-262 and 2-263,~~ 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.

8. *"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.

9. *"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.

10. ~~*Significant*~~ *"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. is 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.

11. ~~*Valuable*~~ *"Gift"* is a gift of more than ~~fifty dollars ($50.00)~~ one hundred dollars ($100.00) in value. A ~~valuable~~ gift includes, but is not limited to, entertainment, food, beverage, travel, and lodging to the extent that the gift value exceeds fifty dollars ($50.00) ~~one hundred dollars ($100.00)~~ for any one (1) occasion, and ~~one hundred dollars ($100.00) total~~

in any one (1) year from the same person, as well as loans that are not commercially reasonable. A ~~valuable~~ 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.

12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

13. *"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 plan & zoning commission,~~ Town commissions and committees, town attorney, or any other agency.

14. *"Respondent"* means a person who is the subject of a complaint.

Section 4. Confidential information ~~Section 2-60~~

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 ~~Section 2-61 and 2-64~~

a. A~~n~~ 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 that is incompatible with the proper discharge of that individual's official responsibilities in the public interest or would tend to impair his/her independent judgment or action in the performance of official responsibilities.

b. A ~~significant~~ 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~~n~~ 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 or supervise a member of his/her family.

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.

f. No Town official, employee, or consultant may use his/her public office or position or disclose or use confidential information, in order to obtain a financial or beneficial interest for herself, himself, or for his/her family, or for any business associate.

g. 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 ~~Section 2-59~~

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 ~~Section 2-62~~

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 ~~valuable~~ 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 ~~Section 2-63~~

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 ~~Section 2-65~~

a. Any Town official, employee, or consultant who has a conflict of interest, ~~significant~~ 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 in accordance with section 9(b) through 9(e) ~~section 2-65(c)(1) through (6)~~. 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 ~~significant~~ 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 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 or its political subdivisions 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 agency of which such official is a member.
   2. For Town employees and officials appointed by the appropriate authorities ~~the town manager to town manager~~.
   3. For Board of Education employees - to the superintendent of schools
   4. The Town department directors ~~manager~~- to the Town Council
   5. The superintendent of schools - to the Board of Education.
   6. For a consultant - to the agent executing contract on behalf of the Town or Board of Education.

e. 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 whether such official, employee, or consultant should abstain from participating in the transaction or decision to which the possible conflict of interest relates and whatever other appropriate action should be taken.

f. 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 employment and activities

a. No Town official or employee shall engage in or accept private employment or render services when the employment or services: (1) are incompatible with the proper discharge of the official duties of the official or employee; or (2) would tend to impair independence of judgment, or action by the official or employee in the performance of that individual's official duty. No consultant shall engage in employment or render services for interest other than the Town when such employment or services: (1) are incompatible with the proper discharge of his or her consulting duties on behalf of the town; or (2) would tend to impair the independence of the consultant's judgment or action on the matter for which the consultant has been engaged by the Town.

b. No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency with which he/she previously was employed or affiliated for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable prior advisory opinion by the Ethics Commission pursuant to Section 13 following its review of the individual's written application and relevant facts.
c. No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency in regard to a matter in which that individual previously participated in the course of his/her official responsibilities for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable advisory opinion by the Ethics Commission pursuant to Section 13.
d. Subsection (a), (b), and (c) of this section 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.
e. 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.
f. 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, not otherwise restrained by the Code, 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 ~~Section 2-67~~

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 ~~Section 2-68~~

a. The Town Clerk shall provide a copy of the Code ~~and Town Charter Section 1101~~ 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 ~~and of Section 1101 of the Town Charter~~.
b. Each consultant shall sign and file with the Town Clerk an acknowledgment form indicating his or her awareness of the provisions of this Code ~~and Section 1101 of the Town Charter~~ on or before being retained by the Town, Board of Education, or other agency.

~~c. The town manager and superintendent of schools shall develop a protocol for periodic training of employees concerning this division and Town Charter Section 1101. The Commission shall develop a protocol for periodic training of officials.~~

~~d. 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 ~~Section 2-58~~

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 ~~and one alternate 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 ~~Glastonbury~~ 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 six (6) ~~seven (7)~~ affirmative votes of the Town Council.

d. Terms of appointment

1. Members will be appointed for three (3) ~~four (4)~~ 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.
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.

e. 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 ~~2-69(b)~~ of the Code.
4. The Ethics Commission has the power to examine ~~inquiries or~~ complaints and to make a determination of probable cause, pursuant to the procedures outlined in Section 14 ~~2-69(c) and 2-69(d) of the Code~~.

5. ~~The Commision itself, by majority vote, may initiate an inquiry or complaint.~~

6. 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.
7. 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.
8. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provision of this Code of Ethics ~~Section 2-60~~ or is otherwise prohibited by law.
9. 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 of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14 ~~2-60~~.

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

Section 14. Ethics Commission rules of procedure ~~Section 2-69~~

(a)These procedures shall be used by the Ethics Commission established in Section 14~~-2-58~~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), inquiries, describes a process for resolving questions about specific conduct of a current town officer, official, employee or consultant, or about a town office or function.~~ Subsection (c)~~(d)~~, complaints, describes a formal, public procedure for filing complaints ~~considering matters that cannot be resolved through the processes outlined in subsection (c) for inquiries~~. Subsection (d) ~~(e)~~, 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) Initiation~~

1. Any current, former, or prospective Town of Ledyard ~~Glastonbury~~ 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. 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.

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.

(2) Proceedings

1. The chair will present the request to the Ethics Commission at its next regular meeting for ~~which no agenda has been filed yet with the Town Clerk~~ or at a special meeting under executive session, except upon the request of the individual 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.

2. 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~~, and/or (5) treat the matter as an inquiry under subsection (c) hereof~~.

(3) Decisions

1. Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present.

2. 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.

3. All advisory opinions must be in writing and communicated to the individual making the request.

4. 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 state its reasons.

(4) Confidentiality

1. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics. ~~open session unless, upon review by the Commission chair or vice chair, it is determined that the matter would be more appropriately treated as an inquiry under subsection (c) hereof and pursuant to G.S. 1-82a.~~

2. Advisory opinions ~~for matters not treated as inquiries under subsection (c) hereof~~ reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

~~(c) Inquiries:~~

(1) Initiation

a. Any member of the public may submit an inquiry asking whether a current official, consultant, or employee has failed to comply with the Code or asking about the appropriateness of conduct of a particular Town office, agency, or consultant.

b. The Commission may itself initiate an inquiry reagarding a possible violation of the Code.

c. Individuals initiating an inquiry must do so by completing a form, available through the Glastonbury Town Clerk's office or through the town's web site at www.glastonbury-ct.gov. The initiating individual must sign the form under penalty of false statement. The form must contain a description of the relevant facts in sufficient detail so that the Commission and any person who is subject of the inquiry can reasonably be expected to understand the nature of the allegations.

d. Inquiries must be addressed in a sealed envelope to the Commission, c/o the Glastonbury Town Clerk, 2155 Main Street, Town Hall, Glastonbury, Connecticut, who will date stamp but not open, the envelope and forward same promptly to the chair or vice chair of the Commission.

e. The date an inquiry is received by the Town Clerk will mark the official date of receipt for purposes of deadlines for decisions.

(2) Preliminary review.

a. The chair or vice chair of the Commission will conduct a preliminary review of all inquiries to determine whether the matter should be dismissed or reviewed by the entire Commission.

b. The chair or vice chair may dismiss a matter on any of these grounds:

i. The complainant does not allege a violation of, or does not give enough information to suggest a violation of, Sec. 2-60 through 2-66 of the Code.
ii. The person who is the subject of the inquiry is a minor.
iii. The person who is the subject of the inquiry is no longer an official, employee, or consultant of the town.
iv. The matter occurred more than (3) years earlier of before the enactment of the Code by the Town of Glastonbury.
v. The Commission has already taken action on the matter.

c. If a matter is dismissed by the chair or vice chair after a preliminary review, the chair or vice chair will notify the complainant within five (5) business days, by regular mail of the reasons for the dismissal.
d. If a matter is dismissed by the chair or vice chair after a preliminary review, no further action by the Commission, including notice to the respondent(s), is necessary.

e. Complainants may appeal a dismissal by the chair or vice chair by filing with the Town Clerk a new inquiry form that contains additional evidence that would warrant review by the entire Commission.

(3) Notice.

a. Within five (5) business days of the Town Clerk's receipt of the inquiry or initiation of an independent inquiry, the chair or vice chair will notify the respondent(s) by regular mail and will provide the person with a copy of the completed form and the Code. The Commission will confirm by regular mail to the person who initiates an inquiry that it was received by the Commission.

b. In the event that an inquiry contains allegations against multiple respondents, the chair or vice chair must notify each respondent individually. Respondents are subject to the confidentiality provisions of Sec. 2-60 and Sec. 2-69(c)(7) of the Code.

c. Respondents may file a written response with the chair of the Commission within ten (10) business days after receiving the notice. In response to allegations against multiple respondents, respondents may respond individually or collectively.

(4) Proceedings.

a. Unless the inquiry previously was dismissed by action of the chair or vice chair pursuant to Section 2-69(c)(2) above, the chair will present the inquiry and any response received from the subject to the Commission at its next regular meetingor in a special meeting held after receipt of the inquiry, the mailing of notice to the subject, and the passage of at least (10) additional business days.

b. The Commission will meet one (1) or more times in closed session from which the public is excluded to review the inquiry and to determine whether or not there exists probable cause that the Code has been violated. In those sessions, 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 Commission, (3) proceed to investigate the relevant facts and issues in order to render a decision, (4) decline to review the matter further, pursuant to subsection (c)(5) hereof, (5) endeavor to resolve the matter by convening a confidential meeting that includes the individual who is the subject of the inquiry and others relevant to the issue, (6) make a finding of probable cause and treat the matter as a complaint under subsection (d) hereof, and/or (7) make a finding of no probable cause. If the Commission proceeds under steps (1), (2), (3), or (5) above, it will establish a schedule of meetings for consideration of the inquiry, subject to the provisions of subsection (c)(4)(a) hereof.

c. A finding of probable cause means that based on a review of the available information the Commission determines that reasonable grounds exist to believe that the respondent engaged in prohibited conduct outlined in Sec. 2-60 through 2-66 of the Code.

(5) The Commission may decline to reviewa matter on any of these grounds:

a. The alleged facts do not evidence the existence of probable cause of a violation of Sec. 2-60 through 2-66 of the Code.

b. The matter is judged to be vexatious, frivolous, groundless, or brought for the purpose of harassment. A vexatious matter is one that lacks any serious purpose or value that is designed to cause disruption or annoyance.

c. The person who is the subject of the matter has already taken corrective action and the Commission believes the action taken was appropriate in the circumstances and the matter should not be pursued.

d. There are other reasonable grounds for not taking action.

(6) Decisions.

a. As expeditiously as possible but in any event within one hundred twenty (120) days after the meeting at which the Town Clerk received the inquiry form, the Commission will decide that (1) the inquiry requires no further action because it was resolved or did not require further review under subsection (c)(5) hereof, or (2) probable cause exists that a violation of the Code occurred, in which case the inquiry will be treated as a complaint under subsection (d) hereof. The Commission may extend the time for decision if circumstances justify a delay.

b. No finding of the existence of probable cause may be made except upon the vote of at least (4) members of the Commission.

c. Within five (5) business days after making a decision under this subsection (c), the Commission will inform in writing both complainants and respondents of its decision and its reasons for the decision. It shall be sufficient that the Commission cite as a reason for its decision any of the reasons enumerated in section 2-69(c)(5), above.

(7) *Confidentiality*

a. If the Commission does not make a finding of probable cause, then the inquiry and the record of the Commission's investigation shall remain confidential, except upon the request of the respondent. If the inquiry alleged violations by multiple respondents, then the request to release information must be made by all respondents.

b. The Commission may publish decisions in whole or in part if it decides that publication would serve the public interest and publication can be made in such a way as to protect the personal identity and privacy of persons who were the subject of any evaluation of a possible violation of the Code.

(c) ~~(d)~~ Complaints

1. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope 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 Commission, or both, 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.

2.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 the respondent and begin a formal investigation process.

3.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.

4.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 Ethics 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, 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/her right to appeal the decision pursuant to Secion 4-183 of the Connecticut General Statutes.

v. Penalties for Violations of the Code of Ethics
   a. A violation of the Code of Ethics may lead to any one or a combination of the following penalties:
   b. Order to cease and desist the violation
   c. Pay a civil penalty of up to the maximum amount permitted by State law.
   d. Censure
   e. Suspension without pay
   f. Demotion
   g. Termination of employment
   h. Restitution of any benefits received because of the violation committed.

(d) Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the

communication. The communication should be addressed in a sealed envelope to the chair of 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 communication 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. The chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. Severability

If any part of this Code of Ethics 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

DRAFT: 10/27/2025

Ordinance # _____

AN ORDINANCE ETABLISHING 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 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. *"Complainant"* means a person or person 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.

6. *"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.

7. *"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.

8. *"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.

9. *"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.

10. *"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. is 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.

11. *"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) for any one (1) occasion, and 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.

12. *"Inquiry"* means a complaint or allegation of a possible violation of the Code.

13. *"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, Town attorney, or any other agency.

14. *"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 that is incompatible with the proper discharge of that individual's official responsibilities in the public interest or would tend to impair his/her independent judgement or action in the performance of official responsibilities.

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 or supervise a member of his/her family.
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.
f. No Town official, employee, or consultant may use his/her public office or position or disclose or use confidential information, in order to obtain a financial or beneficial interest for herself, himself, or for his/her family, or for any business associate.
g. 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

a. 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 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 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 or its political subdivisions 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 agency of which such official is a member.

2. For Town employees and officials appointed by the appropriate authorities.
3. For Board of Education employees - to the superintendent of schools
4. The Town department directors - to the Town Council
5. The superintendent of schools - to the Board of Education.
6. For a consultant - to the agent executing contract on behalf of the Town or Board of Education.

e. 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 whether such official, employee, or consultant should abstain from participating in the transaction or decision to which the possible conflict of interest relates and whatever other appropriate action should be taken.
f. 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 employment and activities

a. No Town official or employee shall engage in or accept private employment or render services when the employment or services: (1) are incompatible with the proper discharge of the official duties of the official or employee; or (2) would tend to impair independence of judgement, or action by the official or employee in the performance of that individual's official duty. No consultant shall engage in employment or render services for interest other than the Town when such employment or services: (1) are incompatible with the proper discharge of his or her consulting duties on behalf of the town; or (2) would tend to impair the independence of the consultant's judgement or action on the matter for which the consultant has been engaged by the Town.
b. No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency with which he/she previously was employed or affiliated for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable prior advisory opinion by the Ethics Commission pursuant to Section 13 following its review of the individual's written application and relevant facts.
c. No former Town official, employee, or consultant shall appear on behalf of any person or other entity before any agency in regard to a matter in which that individual previously participated in the course of his/her official responsibilities for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable advisory opinion by the Ethics Commission pursuant to Section 13.
d. Subsection (a), (b), and (c) of this section 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.
e. 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.

f. 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, not otherwise retrained by the Code, 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. Acknowledgement 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 acknowledgement form indicating his/her awareness of the provisions of this Code.
b. Each consultant shall sign and file with the Town Clerk an acknowledgement 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.

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 held any Town office for a period of two years prior to being appointed to the Ethics Commission.

e. Serve as a member of another Town agency.
f. Hold office in a political party or political committee.
g. 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.
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.

e. 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.
8. 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 of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 14.
9. 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. 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.

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

i.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 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.

6.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.
i. All advisory opinions must be in writing and communicated to the individual making the request.
ii. 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 state its reasons.

7.Confidentiality

i. Requests for advisory opinions will be reviewed in executive session except upon the request of the individual that is seeking the advisory opinion regarding whether his/her conduct constitutes a violation of the Code of Ethics.

ii. Advisory opinions reviewed in open sessions will be made available for public inspection by delivery to the Town Clerk's office.

c. Complaints

1. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope 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 Commission, or both, 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.

2.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 the respondent and begin a formal investigation process.

3.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.

4.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 Ethics 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, 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/her right to appeal the decision pursuant to Secion 4-183 of the Connecticut General Statutes.

iii.Penalties for Violations of the Code of Ethics

a. A violation of the Code of Ethics may lead to any one or a combination of the following penalties:
b. Order to cease and desist the violation
c. Pay a civil penalty of up to the maximum amount permitted by State law.
d. Censure
e. Suspension without pay
f. Demotion
g. Termination of employment
h. Restitution of any benefits received because of the violation committed.

5.Other communications; miscellaneous:

The Ethics Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of 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 envelop and forward same promptly to the chair or vice chair of the Ethics Commission. On the day said communication 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. The chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection

by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Ethics Commission.

Section 15. Severability

If any part of this Code of Ethics 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

INTRODUCED:	**OCTOBER 8, 2, 2013**
PUBLIC HEARING:	**OCTOBER 22, 2013**
ADOPTED:	**OCTOBER 22, 2013**
PUBLISHED:	**OCTOBER 29, 2013**
EFFECTIVE DATE:	**NOVEMBER 8, 2013**

DIVISION 3. CODE OF ETHICS
REVISION DATED OCTOBER 22, 2013

Sec. 2-56. - Declaration of policy and purpose.

Sec. 2-57. - Definitions.

Sec. 2-58. - Ethics Commission.

Sec. 2-59. - Consultants.

Sec. 2-60. - Confidential information.

Sec. 2-61. - Use of influence.

Sec. 2-62. - Gifts and favors.

Sec. 2-63. - Equal treatment.

Sec. 2-64. - Conflict of interest.

Sec. 2-65. - Disclosure and disqualification.

Sec. 2-66. - Incompatible employment and activities.

Sec. 2-67. - Penalty for violation.

Sec. 2-68. - Acknowledgment form.

Sec. 2-69. - Ethics Commission rules of procedure.

Sec. 2-70. - Reserved.

Sec. 2-56. - Declaration of policy and purpose.

It is the intent of the Glastonbury Town Council that Town officials, employees, and consultants adhere to high standards of ethical conduct, that they act impartially in the performance of their duties, do not abuse their authority or influence, and do not have interests that would be incompatible with the discharge of their official responsibilities. Officials, employees, and consultants are expected to comply with the standards of ethical conduct outlined in Sections 2-60 through 2-66 of the Town of Glastonbury Code of Ethics ("Code").

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

- Fulfill the requirement of establishing guidelines for ethical conduct, pursuant to Section 1101 of the Town Charter.
- Identify standards of ethical conduct to guide officials, officers, employees, and consultants as they conduct their public responsibilities,
- Clarify the role of the Ethics Commission,
- Outline a process that allows town officials, 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 violations of the Code.

Sec. 2-57. - Definitions.

Agency is any board, commission, authority, or committee of the Town, including the Town Council and Board of Education.

Beneficial interest means any nonfinancial interest or special treatment that is not common to other citizens of the Town.

Business associate means a person joined together with another person through employment or to achieve a common financial and/or business-related objective.

Business day means a day other than a Saturday, Sunday or other day on which the office of the Glastonbury Town Clerk is closed to the public for business.

Complainant: A person or persons who files a sworn statement, pursuant to Sec. 2-69(c)(1), against an official, employee, or consultant containing allegations of prohibited activities under the Code.

Consultant is any independent contractor or professional person or firm that is by virtue of an award of a public bid or contract as defined in Glastonbury Code of Ordinances sections 2-262 and 2-263, 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.

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.

Family means the spouse, domestic partner, fiancé, fiancée, parents, grandparents, great-grandparents, lineal descendants, stepchildren, siblings, lineal descendants of siblings and stepsiblings of an official, employee, or consultant, or of his/her spouse or domestic partner.

Inquiry means a complaint or allegation of a possible violation of the Code.

Official is any person holding elective or appointive office in the government of the town and shall include, but not be limited to, the town council, board of education, board of finance, town plan & zoning commission, town attorney, or any other agency.

Respondent: A person who is the subject of an inquiry or complaint.

Significant financial interest means any interest that: (1) 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; and (2) is not common to the other citizens of the town. An individual's "significant 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.

Valuable gift is a gift of more than fifty dollars ($50.00) in value. A valuable gift includes, but is not limited to, entertainment, food, beverage, travel, and lodging to the extent that the gift value exceeds fifty dollars ($50.00) for any one (1) occasion, and one hundred dollars ($100.00) total in any one (1) year from the same person, as well as loans that are not commercially reasonable. A valuable gift may also include donations to a third party on behalf of an official, employee, or consultant for which s/he receives some favor or advantage or consideration.

Valuable 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) Honorary degrees.

(6) A meal, ticket, beverages, and lodging costing less than or equal to fifty dollars ($50.00), but only if the total of all such gifts from a particular person does not exceed one hundred dollars ($100.00) in any one (1) year.

Sec. 2-58. - Ethics Commission.

(a) Structure.

(1) The Ethics Commission shall consist of five (5) regular members and two (2) alternate members.
(2) No more than two (2) of the regular members may be affiliated with any one political party and the alternate members may not both be affiliated with the same political party. At all times, at least one regular member and one alternate member shall be unaffiliated with any political party.
(3) Members will not be compensated for their service on the Commission.
(4) The Commission shall elect a chair and vice chair/secretary who shall serve for two-year terms.

(b) Member and alternate member qualifications

(1) Members and alternate members must be residents of the Town of Glastonbury.
(2) 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 Commission.
    c. Hold or seek any Town office.
    d. Have campaigned for any other person seeking a Town office.
    e. Have held any Town or State office for a period of two years prior to being appointed to the Commission.
    f. Serve as a member of another agency.
    g. Hold office in a political party or political committee.
    h. Have been found in violation of any State, local, or professional code of ethics.

(c) Method of Appointment: The Town Council shall appoint Commission members in the manner provided in the Town Charter. Members of the Ethics Commission shall be appointed by a minimum of seven (7) affirmative votes of the Town Council.

(d) Terms of appointment.

(1) Members will be appointed for four (4) -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.

(e) Powers and duties.

(1) The Commission has the power to render advisory opinions to any official, employee, or consultant on whether conduct by that person would constitute a violation of the Code. Individuals seeking an advisory opinion should follow the procedures outlined in Section 2-69(b) of the Code.

(2) The Commission has the power to examine inquiries or complaints and to make a determination of probable cause, pursuant to the procedures outlined in Sections 2-69(c) and 2-69(d) of the Code.
(3) The Commission itself, by majority vote, may initiate an inquiry or complaint.
(4) The Commission has the power to hold hearings concerning alleged violations of the Code, may administer oaths, and may compel the attendance of witnesses by subpoena to the extent permitted by law.
(5) The Commission has the power to review Code policies and procedures on an as-needed basis and will make recommendations to the Town Council regarding changes to the Code policies and procedures.
(6) The Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provision of this Code, Section 2-60, or is otherwise prohibited by law.
(7) The 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 of an inquiry or complaint and any records relating to that inquiry or complaint shall remain confidential pursuant to Section 2-60.
(8) The Commission may take action to increase public awareness of the Code.

Sec. 2-59. - Consultants.

The Code shall be incorporated by reference into all contracts entered into by the Town and Board of Education with a consultant.

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, and the Commission may make recommendations to the entity employing such persons.

Sec. 2-60. - Confidential information.

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.

Sec. 2-61. - Use of influence and/or intentional misrepresentation

(a) No official, employee, or consultant may seek, demand, or obtain a significant financial interest or a beneficial interest in his/her favor or the favor of any member of his/her family or business associate.
(b) No official, employee, or consultant may use her or his public office or position or disclose or use confidential information, in order to obtain a significant financial or beneficial interest for herself, himself, or for her or his immediate family, or for any business associate.
(c) No official, employee, or consultant, except for police officers in the course of the police investigative process, may intentionally commit or omit any material fact designed to deceive others in the performance of his or her official duties.

(d) No 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.

Sec. 2-62. - Gifts and favors.

(a)No 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 valuable 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 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 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, 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.

Sec. 2-63. - Equal treatment.

Without proper authorization, no 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 virtue of his/her position or business association.

Sec. 2-64. - Conflict of interest.

An 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 that is incompatible with the proper discharge of that individual's official responsibilities in the public interest or would tend to impair his/her independent judgment or action in the performance of official responsibilities.

A significant 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 official, employee or consultant has reason to believe or expect that he/she will obtain, secure or advance such interest by reason of his/her actions in performance or nonperformance of his/her official responsibilities.

An official, employee or consultant does not have a significant 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 as a member of a profession, occupation, or group to no greater extent than 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).

Sec. 2-65. - Disclosure and disqualification.

(a)Any official, employee or consultant who has a conflict of interest, significant 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 in accordance with section 2-65(c)(1) through (6). Such disclosure shall disqualify the official, employee or consultant from participation in the matter, transaction, or decision.

(b)No 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 a significant 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)If there is an uncertainty whether an official, employee or consultant has a conflict of interest, significant 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 an official who is a member of an elective or appointive board, commission, committee, or authority to the particular agency of which such official is a member.

(2)For town employees and officials appointed by the town manager to town manager.

(3)For board of education employees to the superintendent of schools.

(4)The town manager to town council.

(5)The superintendent of schools to the board of education.

(6)For a consultant to the agent executing contract on behalf of the town or board of education.

(d)The appropriate authority to which the disclosure is made shall make an appropriate record of such disclosure and shall recommend to the official, employee or consultant making the report whether such official, employee or consultant should abstain from participating in the transaction or decision to which the possible conflict of interest relates and whatever other appropriate action should be taken.

(e)Any such questions concerning a possible conflict of interest may be referred to the Commission for an advisory opinion.

Sec. 2-66. - Incompatible employment and activities.

(a)No official or employee shall engage in or accept private employment or render services when the employment or services: (1) are incompatible with the proper discharge of the official duties of the official or employee; or (2) would tend to impair independence of judgment or action by the official or employee in the performance of that individual's official duty. No consultant shall

engage in employment or render services for interests other than the town when such employment or services: (1) are incompatible with the proper discharge of his/her consulting duties on behalf of the town; or (2) would tend to impair the independence of the consultant's judgment or action on the matter for which the consultant has been engaged by the town.

(b)No former official, employee or consultant shall appear on behalf of any person or other entity before any agency with which he/she previously was employed or affiliated for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable prior advisory opinion by the Ethics Commission following its review of the individual's written application and relevant facts.

(c)No former official, employee or consultant shall appear on behalf of any person or other entity before any agency in regard to a matter in which that individual previously participated in the course of his/her official responsibilities for a period of one (1) year after the termination of his/her public service or employment; provided, however, that such an individual may be permitted to make such an appearance upon receipt of a favorable advisory opinion by the Ethics Commission.

(d)Subsections (a), (b) and (c) of this section shall not prohibit any current or former official, employee or consultant from appearing before any agency on his/her own behalf. To avoid an actual or perceived conflict, officials are strongly discouraged from appearing before the agency on which they are a member or officer, absent extenuating circumstances, unless s/he has received a prior favorable advisory opinion by the Ethics Commission prior to appearing.

(e)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 wetlands and watercourses boards or commissions.

(f)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, an official, not otherwise restrained by the Code, shall exercise care when appearing before other agencies and shall disclose whether s/he is appearing in his/her official capacity or as a private citizen.

Sec. 2-67. - Penalty for violation.

A failure to comply with the Code shall be considered grounds for censure, reprimand, suspension, demotion, removal, or dismissal of 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.

Sec. 2-68. - Acknowledgment form.

(a)The Town Clerk shall provide a copy of the Code and Town Charter Section 1101 to every official consultant within sixty (60) days of date that s/he begins his/her official duties. Every

town official shall sign and file with the Town Clerk an acknowledgment form indicating his/her awareness of the provisions of this Code and of Section 1101 of the Town Charter.

(b)Each consultant shall sign and file with the Town Clerk an acknowledgment form indicating his/her awareness of the provisions of this Code, and Section 1101 of the Town Charter on or before being retained by the town, board of education, or other agency.

(c)The town manager and superintendent of schools shall develop a protocol for periodic training of employees concerning this division and Town Charter Section 1101. The Commission shall develop a protocol for periodic training of officials.

(d)The Town Council shall approve a procedure for monitoring compliance with this section and approve the training protocols specified in subsection (c).

Sec. 2-69. - Ethics Commission rules of procedure.

(a)These procedures shall be used by the Ethics Commission established in section 2-58 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), inquiries, describes a process for resolving questions about specific conduct of a current town officer, official, employee or consultant, or about a town office or function. Subsection (d), complaints, describes a formal, public procedure for considering matters that cannot be resolved through the processes outlined in subsection (c) for inquiries. Subsection (e), other communications; miscellaneous, describes the process to be followed by anyone wishing to bring something to the attention of the Commission, without requesting an advisory opinion or filing an inquiry.

(b)Advisory opinions

(1)Initiation.

a.Any current, former or prospective Town of Glastonbury employee, official, or consultant may request an advisory opinion from the Commission as to whether conduct by that person or entity would violate the Code. Any current town official also may request an advisory opinion concerning the activities of any department over which he or she has jurisdiction or board or Commission on which he or she serves.

b.Individuals initiating a request for an advisory opinion must do so by completing a form available through the Glastonbury Town Clerk's Office or through the town's web site www.glastonbury-ct.gov. 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 Commission can reasonably be expected to understand the nature of the request. The individual making the request must sign it.

c.Requests must be addressed in a sealed envelope to the Commission, c/o the Glastonbury Town Clerk, 2155 Main Street, Town Hall, Glastonbury, Connecticut, who will date stamp, but not open, the envelope and forward same promptly to the chair or vice chair of the Commission. On the day said request is received by the Town Clerk, the Town Clerk or his or her representative shall notify the chair or vice chair of the Commission, or both, of same.

d.The date the request is received by the Town Clerk will mark the official date of receipt for purposes of deadlines for decisions.

(2)Proceedings.

a.The chair will present the request to the Commission at its next regular meeting for which no agenda has been filed yet with the town clerk or at a special meeting called by the Commission chair or vice chair.

b.The Commission will meet 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 Commission, (3) hold an informal hearing to receive comments from the individual who requested the advisory opinion and/or from the public, (4) investigate the relevant facts and issues in order to render the advisory opinion, and/or (5) treat the matter as an inquiry under subsection (c) hereof.

(3)Decisions.

a.Advisory opinions will be made by a majority of Commission members voting at a meeting at which a quorum is present.

b.The 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 Commission may extend the time for decision for up to an additional thirty (30) days.

c.All advisory opinions must be in writing and communicated to the individual making the request.

d.The Commission may decline to render an advisory opinion if (1) the subject matter is not covered by the Code, (2) the known facts are incomplete or incorrect and the omissions or misstatements are material to the advisory opinion requested, or (3) other reasonable grounds exist for not taking action. If the Commission decides to so act, it shall state its reasons.

(4)Confidentiality.

a.Requests for advisory opinions will be reviewed in open session unless, upon review by the Commission chair or vice chair, it is determined that the matter

would be more appropriately treated as an inquiry under subsection (c) hereof and pursuant to G.S. § 1-82a.

b.Requests for advisory opinions that are treated as inquiries under subsection (c) hereof will be reviewed in closed session, except upon the request of the person who is the subject of the inquiry.

c.Advisory opinions for matters not treated as inquiries under subsection (c) hereof will be made available for public inspection by delivery to the town clerk's office.

(c)Inquiries:

(1)Initiation.

a.Any member of the public may submit an inquiry asking whether a current official, consultant or employee has failed to comply with the Code or asking about the appropriateness of conduct of a particular Town office,agency, or consultant.

b.The Commission may itself initiate an inquiry regarding a possible violation of the Code.

c.Individuals initiating an inquiry must do so by completing a form, available through the Glastonbury Town Clerk's office or through the town's web site at www.glastonbury-ct.gov. The initiating individual must sign the form under penalty of false statement. The form must contain a description of the relevant facts in sufficient detail so that the Commission and any person who is the subject of the inquiry can reasonably be expected to understand the nature of the allegations.

d.Inquiries must be addressed in a sealed envelope to the Commission, c/o the Glastonbury Town Clerk, 2155 Main Street, Town Hall, Glastonbury, Connecticut, who will date stamp, but not open, the envelope and forward same promptly to the chair or vice chair of the Commission.

e. The date an inquiry is received by the Town Clerk will mark the official date of receipt for purposes of deadlines for decisions.

(2)Preliminary review.

a. The chair or vice chair of the Commission will conduct a preliminary review of all inquiries to determine whether the matter should be dismissed or reviewed by the entire Commission.

b. The chair or vice chair may dismiss a matter on any of these grounds:

i. The complainant does not allege a violation of, or does not give enough information to suggest a violation of, Sec. 2-60 through 2-66 of the Code.

ii. The person who is the subject of the inquiry is a minor.

iii. The person who is the subject of the inquiry is no longer an official, employee, or consultant of the town.

iv. The matter occurred more than three (3) years earlier or before the enactment of the Code by the Town of Glastonbury.

v. The Commission has already taken action on the matter.

c. If a matter is dismissed by the chair or vice chair after a preliminary review, the chair or vice chair will notify the complainant within five (5) business days, by regular mail, of the reasons for the dismissal.

d. If a matter is dismissed by the chair or vice chair after a preliminary review, no further action by the Commission, including notice to the respondent(s), is necessary.

e. Complainants may appeal a dismissal by the chair or vice chair by filing with the Town Clerk a new inquiry form that contains additional evidence that would warrant review by the entire Commission.

(3) Notice.

a.Within five (5) business days of the Town Clerk's receipt of the inquiry or initiation of an independent inquiry, the chair or vice chair will notify the respondent(s) by regular mail and will provide the person with a copy of the completed form and the Code. The Commission will confirm by regular mail to the person who initiates an inquiry that it was received by the Commission.

b. In the event that an inquiry contains allegations against multiple respondents, the chair or vice chair must notify each respondent individually. Respondents are subject to the confidentiality provisions of Sec. 2-60 and Sec. 2-69(c)(7) of the Code.

c.Respondents may file a written response with the chair of the Commission within ten (10) business days after receiving the notice. In response to allegations against multiple respondents, respondents may respond individually or collectively.

(4)Proceedings.

a.Unless the inquiry previously was dismissed by action of the chair or vice chair pursuant to Section 2-69(c)(2) above, the chair will present the inquiry and any response received from the subject to the Commission at its next regular meeting

or in a special meeting held after receipt of the inquiry, the mailing of notice to the subject, and the passage of at least ten (10) additional business days.

b.The Commission will meet one (1) or more times in closed session from which the public is excluded to review the inquiry and to determine whether or not there exists probable cause that the Code has been violated. In those sessions, 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 Commission, (3) proceed to investigate the relevant facts and issues in order to render a decision, (4) decline to review the matter further, pursuant to subsection (c)(5) hereof, (5) endeavor to resolve the matter by convening a confidential meeting that includes the individual who is the subject of the inquiry and others relevant to the issue, (6) make a finding of probable cause and treat the matter as a complaint under subsection (d) hereof, and/or (7) make a finding of no probable cause. If the Commission proceeds under steps (1), (2), (3), or (5) above, it will establish a schedule of meetings for consideration of the inquiry, subject to the provisions of subsection (c)(4)(a) hereof.

c.A finding of probable cause means that based on a review of the available information the Commission determines that reasonable grounds exist to believe that the respondent engaged in prohibited conduct outlined in Sec. 2-60 through 2-66 of the Code.

(5) The Commission may decline to continue to reviewa matter on any of these grounds:

a.The alleged facts do not evidence the existence of probable cause of a violation of Sec. 2-60 through 2-66 of the Code.

b. The matter is judged to be vexatious, frivolous, groundless, or brought for the purpose of harassment. A vexatious matter is one that lacks any serious purpose or value or that is designed to cause disruption or annoyance.

c. The person who is the subject of the matter has already taken corrective action and the Commission believes the action taken was appropriate in the circumstances and the matter should not be pursued.

d. There are other reasonable grounds for not taking action.

(6)Decisions.

a.As expeditiously as possible but in any event within one hundred twenty (120) days after the meeting at which the Town Clerk received the inquiry form, the Commission will decide that (1) the inquiry requires no further action because it was resolved or did not require further review under subsection (c)(5) hereof, or (2) probable cause exists that a violation of the Code occurred, in which case the inquiry will be treated as a complaint under subsection (d) hereof. The Commission may extend the time for decision if circumstances justify a delay.

b.No finding of the existence of probable cause may be made except upon the vote of at least four (4) members of the Commission.

c.Within five (5) business days after making a decision under this subsection (c), the Commission will inform in writing both complainants and respondents of its decision and its reasons for the decision. It shall be sufficient that the Commission cite as a reason for its decision any of the reasons enumerated in section 2-69(c)(5), above.

(7)*Confidentiality.*

a. If the Commission does not make a finding of probable cause, then the inquiry and the record of the Commission's investigation shall remain confidential, except upon the request of the respondent. If the inquiry alleged violations by multiple respondents, then the request to release information must be made by all respondents.

b. The Commission may publish decisions in whole or in part if it decides that publication would serve the public interest and publication can be made in such a way as to protect the personal identity and privacy of persons who were the subject of any evaluation of a possible violation of the Code.

(d)Complaints:

(1)*Initiation.*

a.After conducting an investigation of any inquiry under subsection (c) hereof, if the Commission finds probable cause exists, then it will make public by providing to the Town Clerk its findings and its record of the investigation not later than five (5) business days after its decision, except it may postpone public release of the record for up to fourteen (14) days for the purpose of resolving the matter with the person who is the subject of the inquiry. If no resolution is reached, the Commission will proceed in the manner described in this subsection (d).

b.The findings and record of the investigation shall include: (1) the inquiry; (2) evidence received or considered; (3) a reference to the particular section of the Code involved; and (4) a short and plain statement of the Commission's reason for finding probable cause.

c.Any member of the public who desires to file a complaint against a current officer, official, consultant or employee for allegedly violating the Code must first pursue the matter as an inquiry under subsection (c) hereof.

(2)*Public hearings.*

If the Commission decides, after its investigation under subsection (c) hereof, that probable cause of a violation of the Code exists, it will conduct a public hearing to determine whether or not a violation occurred. At the hearing, the person who is the subject of the hearing 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. Not later than ten (10) days before the start of the hearing, the Commission will provide the person with a list of its intended witnesses. The Commission will make a record of the proceedings.

(3)*Powers and conduct of hearings.*

a.For the hearing, the Commission will have the power to administer oaths, question witnesses, consider oral and documentary evidence, subpoena witnesses under procedural rules adopted by the Commission as regulations in accordance with the provisions of G.S. Chapter 54 (Uniform Administrative Procedure Act) to compel attendance before the Commission, and require the production for examination by the Commission of any books and papers which it deems relevant in any matter under investigation or in question.

b.The Commission may require witnesses to testify under oath administered by the presiding officer or any other duly qualified person. The hearings shall be recorded and/or transcribed.

c.Hearings are not governed by the legal rules of evidence and any information relevant to the matter may be considered. The Commission will respect the rules of privilege recognized by the law. When a hearing will be expedited and the interests of the parties will not be prejudiced substantially, any part of the evidence may be received in written form. Documentary evidence may be received in the form of copies or excerpts, if the original is not readily available, and, upon request, parties and the Commission will be given an opportunity to compare the copy with the original.

(4)*Decisions.*

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

b.The 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 the final decision of the Commission for the purposes of G.S. Chapter 54. The person who was the subject of the hearing may appeal to the superior court in accordance with the provisions of G.S. § 4-183.

d.If the Commission finds that the Code was violated, it will provide the party who was the subject of the hearing and the Glastonbury Town Council with a copy of its findings and memorandum within ten (10) days after its decision. It will also advise the party of the right of appeal under G.S. § 4-183. At the same time, it will provide a copy of its findings and memorandum to the Glastonbury Town Manager, if such party is an employee, consultant or official appointed or under the jurisdiction of the town manager,

or the superintendent of schools and the board of education of the Town of Glastonbury if such person is an employee, consultant or official appointed or under the jurisdiction of the superintendent or such board.

e. Other communications; miscellaneous:

The Commission welcomes communications from the public even if they do not fall within the categories of an advisory opinion, inquiry, or complaint. These should be in writing and should include the name and address of the individual making the communication. The communication should be addressed in a sealed envelope to the chair of the Commission, c/o the Glastonbury Town Clerk, 2155 Main Street, Town Hall, Glastonbury, Connecticut, who will date stamp, but not open, the envelope and forward same promptly to the chair or vice chair of the Commission. On the day said communication is received by the Town Clerk, the Town Clerk or his or her representative shall notify the chair or vice chair of the Commission, or both, of same. The chair or vice chair shall determine whether said communication should be treated as confidential. Requests that are not treated as confidential will be made available for public inspection by delivery to the Town Clerk's office. Communications will be handled on a case-by-case basis and at the discretion of the Commission.

Sec. 2-70. - Reserved.

Roxanne Maher

From: Roxanne Maher
Sent: Wednesday, October 22, 2025 10:54 AM
To: Town Council Group
Cc: Roxanne Maher
Subject: FW: Request for Legal Opinion – October 8, 2025 Town Council Vote on Ethics Ordinance

Tracking:

Recipient	Read
Town Council Group	
Roxanne Maher	
Jessica Buhle	Read: 10/22/2025 10:59 AM
Adrienne L. Parad	Read: 10/22/2025 11:01 AM
Timothy Ryan	Read: 10/22/2025 11:44 AM
Carmen Garcia Irizarry	Read: 10/22/2025 4:52 PM

From: Fred Allyn, III <mayor@ledyardct.org>
Sent: Wednesday, October 22, 2025 10:40 AM
To: Roxanne Maher <council@ledyardct.org>
Subject: FW: Request for Legal Opinion – October 8, 2025 Town Council Vote on Ethics Ordinance

Roxanne,

I don't know if Chairman St. Vil provided the legal opinion from the Town Attorney or not, so I've included it below. This opinion was rendered based on a written request from Chairman St. Vil on October 20, 2025. Given the content (a legal opinion on a pending matter), I thought it appropriate to provide to the Councilors as a whole.

Best,

Fred B. Allyn III

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

From: Fred Allyn, III
Sent: Tuesday, October 21, 2025 12:12 PM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: RE: Request for Legal Opinion – October 8, 2025 Town Council Vote on Ethics Ordinance

Thank you Matt,

Fred

Fred B. Allyn III

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

From: Ritter, Matthew D. <MRitter@goodwin.com>
Sent: Tuesday, October 21, 2025 8:12 AM
To: Fred Allyn, III <mayor@ledyardct.org>
Subject: FW: Request for Legal Opinion – October 8, 2025 Town Council Vote on Ethics Ordinance

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: Ritter, Matthew D.
Sent: Tuesday, October 21, 2025 7:24 AM
To: Gary St. Vil <GSVil@ledyardct.org>
Subject: RE: Request for Legal Opinion – October 8, 2025 Town Council Vote on Ethics Ordinance

Gary – The Freedom of Information Commission has consistently held that a meeting agenda "must fairly apprise the public of the action proposed" and "of the matters to be taken up at the meeting in order to [permit the public] to properly prepare and be present to express their views." See Zoning Board of Appeals of the Town of Plainfield v. Freedom of Information Commission (Docket No. CV 99-047917-S, 2000 WL 765186 (superior court, judicial district of New Britain, May 3, 2000).

On October 8, 2025, the agenda item on the Town Council agenda was as follows:

"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."

A plain reading of the agenda item indicates that the Town Council planned to discuss and possibly take action on "text amendments" to the ordinance and that these text amendments were to be made "in preparation to present at a Public Hearing." That language indicates that the Town Council was planning on having an additional public hearing after the text amendments were adopted. It calls into question whether the public was fairly apprised of the action taken that night to adopt the ordinance in full.

Section 1-225(c) of the General Statutes does authorize a legislative body to add items to a regular meeting agenda " [u]pon the affirmative vote of two-thirds of the members of a public agency present and voting." However, the minutes do not indicate that a motion was made to add an item to the agenda to formally adopt the ordinance. In addition, the final vote was 5-3-1 so the 2/3 vote threshold was not met even if the minutes are incomplete and do not properly reflect a motion to add an item to the agenda.

It is also worth nothing that the motion in the meeting minutes (See Page 14 of 25) does not mirror the agenda item. The motion that was made and seconded is 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, 2025." The motion is then amended it appears to change the date from September 10, 2025 to October 8, 2025. The motion differs from the agenda item in that it adopts the ordinance as opposed to text amendments and there is no mention of the language "in preparation to present at a Public Hearing." The motion also changes the date of the draft under review which provides further concern that the public was not properly informed of the action to be taken at the meeting.

Based upon my review above, I believe that Section 1-225(c) was violated and the Town Council should consider that the Freedom of Information Commission ("FOIC"), if a complaint were filed, may hold that the October 8, 2025 action is null and void.

The FOIC has an ombudsman who is very helpful in advising municipalities in situations like this. With the Town Council's permission, I can reach out to the ombudsman and get his feedback.

Thanks, Matt

Partner
One Constitution Plaza
Hartford, CT 06103-1919

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: Gary St. Vil <GSVil@ledyardct.org>
Sent: Monday, October 20, 2025 11:05 PM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Request for Legal Opinion – October 8, 2025 Town Council Vote on Ethics Ordinance

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Dear Attorney Ritter,

I am requesting your formal legal opinion regarding the procedure followed by the Town Council during its October 8, 2025 meeting when it voted on the proposed *"An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission."*

Please review whether the Council's actions that evening were consistent with the requirements of **Connecticut General Statute** (including § 1-225(c), which governs agenda posting and amendments) as well as any applicable provisions of the **Ledyard Town Charter** and the **Town Council's Rules of Procedure**. Specifically, your opinion should address:

1. Whether the October 8, 2025 Town Council agenda and subsequent vote to adopt the ordinance complied with the statutory and charter requirements for agenda content and posting.

2. Whether the procedure used to introduce and act upon the motion was consistent with accepted statutory practice for municipal legislative bodies.

For your convenience, I am attaching:

- The October 8, 2025 Town Council Meeting Agenda (which was posted online on October 2, 2025)
- The Draft Minutes of that meeting (TC-MIN-2025-10-08.pdf)
- Town Council's Rules of Procedure

Please provide your written opinion **no later than Tuesday, October 22, 2025, by 5:00 p.m.**, so it may be available for reference at that evening's regular meeting.

Respectfully,
Gary A. St. Vil
Chairman, Ledyard Town Council

860-980-0656

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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: _____

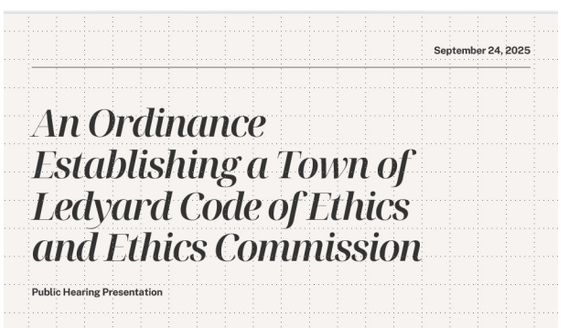
Effective Date:_____

_____
Patricia A. Riley, Town Clerk

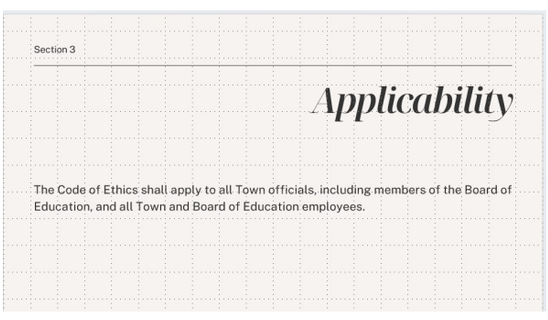
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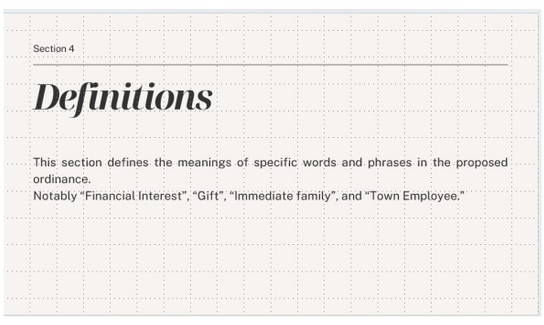
History: Based on the public's interest to establish standards of ethical conduct for all town officials, employees, and for those who serve or conduct business with the Town of Ledyard, this Code of Ethics and Ethics Commission was developed to establish guidelines for the conduct of those in public 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.

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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: 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.

DRAFT

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.

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
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Hartford, CT 06103-1919

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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

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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
FRAUD POLICY

1. Purpose:

This fraud policy is established to facilitate the development of controls that will aid in the detection and prevention of fraud against the Town of Ledyard. It is the intent of the Town of Ledyard to promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of controls and conduct of investigations.

2. Scope of Policy:

This policy applies to any irregularity, or suspected irregularity, involving employees as well as volunteers, vendors, consultants, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with the Town of Ledyard. Any required investigative activity will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to the Town of Ledyard.

3. Policy:

Management is responsible for the detection and prevention of fraud, misappropriations, and other irregularities. Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. Each member of the management team will be familiar with the types of improprieties that might occur within his or her area of responsibility, and be alert for any indication of irregularity. Any irregularity that is detected or suspected must be reported immediately to the Mayor, who coordinates all investigations with the Town's legal counsel, and other affected areas, both internal and external.

4. Actions That Constitute Fraud

The terms defalcation, misappropriation, and other fiscal irregularities refer to, but are not limited to:

- Any dishonest or fraudulent act
- Misappropriation of funds, securities, supplies, or other assets
- Impropriety in the handling or reporting of money or financial transactions
- Profiteering as a result of insider knowledge of Town activities
- Disclosing confidential information to outside parties
- Accepting or seeking anything of material value from contractors, vendors, consultants, or person providing services/materials to the Town of Ledyard. Exception: Gifts less than $25 in value.
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or
- Any similar or related irregularity

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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

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?

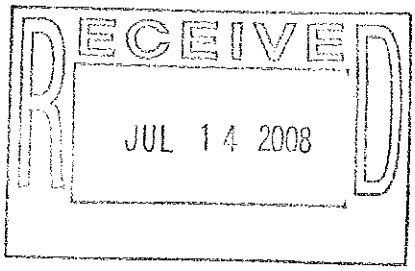
If this committee is put in place, all present and future volunteers should be made aware that anyone in town can file an ethics complaint against them. My friend was simply volunteering to make a good thing happen for the town. If the situation had been handled professionally, perhaps she wouldn’t have 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.

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)

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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!'

To: Gary St. Vil, Chairman of Town Council
Members of Town Council

A Code of Ethics provides us with a clear descriptions of what we, as residents, can expect from those who serve the town as employees and volunteers.

By formalizing these essential values it will make clear the expected behaviors of all those who take a responsible position in our town.

Included in the Code is the requirement to establish an Ethics Commission the purpose of which is to serves as administrator of the code.

It is surprising that our town, with its educated and informed leaders, has not adopted a Code of Ethics when 87% of the towns and municipalities throughout Connecticut have already done so.

Corporations, organizations, all levels of government live by the code they have adopted. They are essential to their way of functioning. They are the public announcement of their values.

Ledyard deserves a Code of Ethics. The draft currently under review is a valiant effort but does not fulfill the expected purpose. Interested and caring residents have identified weaknesses and have provided options to improve the areas of concern.

I hope these recommendations will be seriously considered by the Town Council.

This process has taken approximately 18 months to reach this point, and it as had limited input and the public has not received adequate notice for something this important.

I am also surprised that the Town Council allotted only two hours for a public hearing. Again, that is hardly any time at all for something this important to our town.

I was also under the impression that the approved version was to be presented to the electorate in a YES or NO ballot question. Why was that changed?

The council did approve this version to become the town code. Predictably, it was vetoed by the Mayor.

I believe the residents deserve better than this. I believe we need their collective wisdom to assist in creating this document.

To this end, I ask the Council to let the veto stand and change the motion to establish an Ad hoc committee to develop a Code of Ethics. This should be bipartisan.

Contrary to arguments otherwise, there is no downside to establishing a Code of Ethics, if it is done with sincerity, honesty and a commitment to fairness and confidentiality.

A code establishes values and behaviors for employees and volunteers to follow and be held accountable to the residents for whom they serve. To be accountable is the least our residents should expect.

Let’s take the time to create an Ethics Code that will serve Ledyard well.

Respectfully submitted,

Ed Murray
26 Devonshire

Roxanne Maher

From: Steve Holyfield
Sent: Tuesday, October 28, 2025 10:50 AM
To: Jessica Buhle; Roxanne Maher
Subject: Re: AES Comments on Ethics Ordinance

Jessica -

Thank you for the response. I hadn't applied 5.c to my comments on 5.a, as I found the wording on 5.c to be tough to understand absent a law degree.

When I say "conduct business with the town", we have some members of the fire departments that own things such as septic companies, lawn care businesses, fire training businesses, entertainment businesses. I'm not aware of any being awarded a "contract" with the Town, however Section 5.a as a standalone would preclude them from any business with the Town. As long as the intent is to follow existing purchasing policies and procedures, then my concerns are addressed. We already do have a review of expenditures and all of the fire department purchase orders are reviewed by myself and the finance office. I just wanted to ensure that "employees" (including volunteers that receive stipends) were able to continue their business ventures in accordance with existing Town policies. My greater concern was this Ordinance reducing the number of volunteer members by forcing them to choose between helping the community and running their businesses.

As for the vehicles, we do have an existing vehicle use policy in town. Perhaps a carve out that specifically addresses the fire department vehicles would be prudent. I'm happy to work on that through my office and town hall.

Thank you for the conversation and feedback!

Steve

Stephen C. Holyfield
Administrator of Emergency Services
Deputy Emergency Management Director
Public Safety Commission, Chair
Phone 860-449-3364
E-mail - admin.emergency@ledyardct.org
Office Location -741 Colonel Ledyard Highway, Basement (Room 8), Ledyard, CT 06339-1511
Mailing Address - 741 Colonel Ledyard Highway, Ledyard, CT 06339-1511

From: Jessica Buhle <Jbuh@ledyardct.org>
Sent: Tuesday, October 28, 2025 10:24 AM
To: Roxanne Maher <council@ledyardct.org>
Cc: Steve Holyfield <admin.emergency@ledyardct.org>
Subject: Re: AES Comments on Ethics Ordinance

Good morning Steve,

Regarding Section 5.a., *"A Town official, employee, consultant has a conflict of interest when... the Town official, employee, or consultant has a financial or beneficial interest."* Section 5.b. clarifies that a financial or beneficial interest presents a conflict of 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."* This statement is further clarified by 5.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)."* Therefore, this Ordinance does not prohibit volunteer firefighters or Town employees from owning their own businesses.

When you say "conduct business with the Town," are you referring to firefighters who are engaging in contracts with the Town?

During my conversations with the attorney, we discussed Town employees who own businesses which provide services and goods to the Town, and potential conflicts with the Ordinance. I expressed the intent to continue past practice in allowing those opportunities to continue. I would personally interpret 5.c. to allow a business owned by a Town employee to engage in a contract with the Town as long as the contract was awarded without preference specific to that person, but toward the contract process set forth in An Ordinance for Purchasing, and conflict is disclosed per Section 9.a. I will forward your concerns to the Attorney to verify my interpretation.

To address your second concern regarding Town owned vehicles, I defer to the Attorney's recommendation in this regard. We certainly have no intention of creating a requirement that increases emergency response times in our community.

Best,

Jessica Buhle
Ledyard Town Council
Chair - Administration Committee
jessicab@ledyardct.org

On Oct 28, 2025, at 9:49 AM, Roxanne Maher <council@ledyardct.org> wrote:

From: Steve Holyfield <admin.emergency@ledyardct.org>
Sent: Tuesday, October 28, 2025 9:47 AM
To: Roxanne Maher <council@ledyardct.org>
Cc: Jon Mann <lfd.chief@ledyardct.org>; Jeff Erhart <Chief@gffc.org>
Subject: AES Comments on Ethics Ordinance

Good morning, Roxanne -

Attached is a document with some comments I have on the proposed Ethics Ordinance. Could you please share it with the council and the admin committee?

I have copied the fire chiefs on this email for their awareness since this directly effects their membership.

Thanks and have a good day!

Steve

Stephen C. Holyfield
Administrator of Emergency Services
Deputy Emergency Management Director
Public Safety Commission, Chair
Phone 860-449-3364
E-mail - admin.emergency@ledyardct.org
Office Location -741 Colonel Ledyard Highway, Basement (Room 8), Ledyard, CT 06339-1511
Mailing Address - 741 Colonel Ledyard Highway, Ledyard, CT 06339-1511

TOWN OF LEDYARD
CONNECTICUT

741 Colonel Ledyard Highway
Ledyard, CT 06339-1551
(860) 464-3226
FAX (860) 464-1126

Date: October 28, 2025

To: Ledyard Town Council, Ledyard Town Council Administrative Committee

From: Stephen C Holyfield, Administrator of Emergency Services

Subject: *An Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*

Councilors,

I understand that the Ordinance has been a topic of debate at recent council meetings and is scheduled for additional debate and possible revision at your upcoming Administrative Committee meeting as well as a Special Meeting of the Council.

I wanted to offer some feedback regarding impacts that this draft will have on Emergency Services and to encourage you to consider these impacts as you craft your Ordinance language.

Section 3, Item 8 defines "*Employee is any person receiving salary, wages, or stipend from the Town of Board of Education for services rendered...* ".

The town currently issues a stipend to both Fire Chiefs and to active town volunteers for consideration of their involvement in the fire department. For the scope of workers compensation insurance, the volunteer firefighters are considered employees and receive comp coverage following a workplace injury. For purposes of tax code, the volunteers receive an IRS 1099 form at the end of the year and are considered independent subcontractors when completing their income taxes.

While this may seem to be splitting hairs, it does create issue when Section 5, Item a. ("*A town official, employee... has a financial or beneficial interest*"). We have several volunteer fire department members who are also small business owners and who do business with the Town. I have concerns that the business owners will be forced to make a choice of either continuing to be volunteer firefighters in Town or continue to conduct business with the Town, but will be precluded from doing both based upon the current language.

Additionally, Section 5, item e states "*Town officials and town employees shall not use Town owned vehicles... for personal convenience or profit*". It is important to note that

the Fire Chiefs have historically been issued Town vehicles for use as Chief. Furthermore, the Chiefs have always been allowed full off-duty use of those vehicles without restriction. The theory behind this allowance is that while the Chief may be conducting personal business in town, he or she is readily available to respond and take command and control of an incident. Passage of this wording in the Ordinance will limit the use of these vehicles. Limiting the use of these vehicles will lead to increased emergency response times and an adverse effect on our emergency services customers.

I hope that this feedback is beneficial to your committee and to the Council as a whole. I sincerely hope that you will consider these impending issues and their impacts as you revise the ordinance.

Regards,



Stephen Holyfield
Administrator of Emergency Services
Admin.emergency@ledyardct.org
(860) 449-3364

Roxanne Maher

From: Fred Allyn, III
Sent: Tuesday, October 28, 2025 2:12 PM
To: Jessica Buhle
Cc: Roxanne Maher
Subject: RE: Town Owned Vehicles Question

Good afternoon Councilor,

A good question for clarification. The Fire Chiefs have had town owned vehicles and sometimes not- as the case with Chief Erhart now who prefers to use his own vehicle, so currently only one Fire Chief vehicle in the fleet. They do have the ability to use these vehicles for some (not all) non-emergency use, generally back and forth to the fire companies, fire house meetings, parades, public engagement, etc. The Fire Marshal also has a "take home" vehicle assigned directly to him. This pickup truck is essentially his office on wheels. It contains his fire marshal needs like cameras, lights, batteries, and whatnot that he takes in the middle of the night when disaster strikes in the form of a fire.

The Police Chief and Captain both have take home cars as well. Those are written into their employment agreements. I am also told (though never authorized) that the LT also has a take home cruiser. I'm not a fan of "mission creep" as it pertains to fleet vehicles going back and forth on a daily basis-outside of those previously authorized.

I believe the BoE also permits Wayne Donaldson to drive his truck back and forth on a daily basis too. I am not privy to the terms of that agreement. You will need to reach out to Supt. Hartling on that one, as well as if there are any others on the BoE side.

Best,

Fred B. Allyn III

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

From: Jessica Buhle <Jbuh@ledyardct.org>
Sent: Tuesday, October 28, 2025 1:07 PM
To: Fred Allyn, III <mayor@ledyardct.org>

Cc: Roxanne Maher <council@ledyardct.org>
Subject: Town Owned Vehicles Question

Good afternoon Mayor

In reviewing feedback received from Administrator of Emergency Services Steve Holyfield regarding the proposed ethics ordinance, I have a question that I think you are best suited to answer.

Mr. Holyfield mentioned the town owned vehicles provision listed in the Conflict of Interest Provisions, and I referenced the town vehicle use poilcy available on the town website.

The usage described by Mr. Holyfield contradicts the policy available on the town website. The vehicle use policy states that it is applicable to Town Hall / Library / Senior Center - Parks and Recreation Employees, and Section 4.a. states "Municipal vehicles shall only be used for legitimate municipal business," which contradicts the statement of "It is important to note that the Fire Chiefs have historically been issued Town vehicles for use as Chief. Furthermore, the Chiefs have always been allowed full off-duty use of those vehicles without restriction."

I plan to modify the ordinance in order to protect our emergency responders, but are there any other town owned vehicles that are being used in a manner outside of the vehicle use policy that should be included in an exemption?

Is there an alternate vehicle use policy that applies to emergency vehicles or different departments?

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

Roxanne Maher

From: Jessica Buhle
Sent: Wednesday, October 29, 2025 11:52 AM
To: Roxanne Maher; John Rich
Subject: Re: An Ordinance Establising a Town of Ledyard Code of Ethics

Good morning,

Thank you for asking such a thoughtful and great question.

Section 7 states “No Town official, employee, or consultant… or group of employees shall solicit or accept any gift… 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.”

If a person is giving a gift for the sake of giving a gift or donation, I do not see a conflict with the ordinance.

If a person is giving a gift for preferential treatment or preferential consideration on any business transaction or matter (someone asking for increased patrols near their home in exchange for donating to the ACO, a donation to the department in exchange for looking the other way when someone speeds through town, etc…), that would be a violation of the ordinance.

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

On Oct 28, 2025, at 2:14 PM, Roxanne Maher <council@ledyardct.org> wrote:

From: John Rich <chief.rich@ledyardct.org>
Sent: Tuesday, October 28, 2025 2:10 PM
To: Roxanne Maher <council@ledyardct.org>
Subject: FW: An Ordinance Establising a Town of Ledyard Code of Ethics

Roxanne,

Please see below, I just had a question regarding the Ethics Ordinance and donations to town departments.

Thanks,

John

From: Kristen Chapman <mayoral.asst@ledyardct.org>
Sent: Tuesday, October 28, 2025 1:57 PM
To: John Rich <chief.rich@ledyardct.org>
Cc: Fred Allyn, III <mayor@ledyardct.org>
Subject: RE: An Ordinance Establising a Town of Ledyard Code of Ethics

Chief Rich,

I would suggest sending your concerns to Roxanne as the ordinance is currently with the Administration Committee.

Best,
Kristen

From: John Rich <chief.rich@ledyardct.org>
Sent: Tuesday, October 28, 2025 1:40 PM
To: Kristen Chapman <mayoral.asst@ledyardct.org>
Cc: Fred Allyn, III <mayor@ledyardct.org>
Subject: RE: An Ordinance Establising a Town of Ledyard Code of Ethics

Kristen,

At this point, I'm particularly interested in the question of whether the police department, dispatch, or animal control can accept a donation from a citizen or organization to benefit that department, of if such donations would meet the definition of a "gift", as they don't appear to be excluded under Section 7.

As you may know, ACO gets many community donations, dispatch receives an annual donation from America's Styrenics, and LPD receives donations for our employee wellness programs.

Who's the right person to ask?

Chief

From: Kristen Chapman <mayoral.asst@ledyardct.org>
Sent: Tuesday, October 28, 2025 8:38 AM
To: John Rich <chief.rich@ledyardct.org>; James Mann <fire.marshal@ledyardct.org>; Steve Holyfield <admin.emergency@ledyardct.org>; Elizabeth Burdick <planner@ledyardct.org>; Scott Johnson <Scott@ledyardrec.org>; Patricia A. Riley <town.clerk@ledyardct.org>; Matthew Bonin <finance.director@ledyardct.org>; Stephen Banks <wpca.supervisor@ledyardct.org>; Justin Dube <mis.director@ledyardct.org>; Christine Dias <hr.director@ledyardct.org>
Cc: Fred Allyn, III <mayor@ledyardct.org>
Subject: FW: An Ordinance Establising a Town of Ledyard Code of Ethics

Good morning,

Attached, please find an updated draft posted to the agenda this morning.

Best,
Kristen

From: Kristen Chapman
Sent: Monday, October 27, 2025 4:32 PM
To: John Rich <chief.rich@ledyardct.org>; James Mann <fire.marshal@ledyardct.org>; Steve Holyfield <admin.emergency@ledyardct.org>; Elizabeth Burdick <planner@ledyardct.org>; Scott Johnson <Scott@ledyardrec.org>; Patricia A. Riley <town.clerk@ledyardct.org>; Matthew Bonin <finance.director@ledyardct.org>; Stephen Banks <wpca.supervisor@ledyardct.org>; Justin Dube <mis.director@ledyardct.org>
Subject: An Ordinance Establising a Town of Ledyard Code of Ethics

Good afternoon,

Please be advised the attached draft "An Ordinance Establishing a Town of Ledyard Code of Ethics" dated 10/27/2025 is on the agenda for the 10/29 Administration Committee special meeting. This ordinance may have implications for your department.

Best,
Kristen

Kristen Chapman

Executive Assistant to the Mayor/
Social Services Coordinator
Town of Ledyard
741 Colonel Ledyard Highway
Ledyard, CT 06339
860-464-3222
mayoral.asst@ledyardct.org

Town Hall Hours:
Monday – Thursday 7:30 a.m. to 4:45 p.m.
CLOSED FRIDAYS

Roxanne Maher

From: Jessica Buhle
Sent: Wednesday, October 29, 2025 2:02 PM
To: Ritter, Matthew D.
Cc: Roxanne Maher
Subject: Re: Ethics Ordinance Clarifying Question - Administrator of Emergency Services

Matt,

Thank you again for your prompt reply. I will move forward with the language you have suggested and will send you a redline and clean copy tomorrow morning.

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

On Oct 29, 2025, at 1:47 PM, Ritter, Matthew D. <MRitter@goodwin.com> wrote:

Jessica – my suggestion would be to say:

1. 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.

-Does the Mayor get a car? Just curious. If so, I would include that position as well.

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

I am OK with this language.

3. Good luck this evening and please remember to send me a final clean and redline copy if you can so I can do one final review with all of these edits. Thanks, Matt



Matthew D. Ritter
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Partner
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From: Jessica Buhle <Jbuh@ledyardct.org>
Sent: Wednesday, October 29, 2025 12:07 PM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Cc: Roxanne Maher <council@ledyardct.org>
Subject: Re: Ethics Ordinance Clarifying Question - Administrator of Emergency Services

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Good afternoon,

I am sending you language for consideration to confirm legality and that it does not conflict with our ordinance.

In regards to the Town owned vehicles, I would like to add this language:

This does not apply to Town owned vehicles issued to emergency responders as "take home" vehicles, or vehicles issued to employees as part of an employment agreement or contract.

I have also received feedback to clarify who determines the penalty for an Ethics Violation. I would like to add the following language after the Penalties (Section 14.c.4.v.)

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

Again, thank you for your concise feedback and assistance in drafting this ordinance. I appreciate your time and effort.

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

> On Oct 28, 2025, at 1:32 PM, Ritter, Matthew D. <MRitter@goodwin.com> wrote:
>
> I would add one more thing… we can certainly be clearer to avoid these questions.
>
> "Notwithstanding anything contained in this ordinance to the contrary, 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."



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From: Jessica Buhle <Jbuh@ledyardct.org>
Sent: Tuesday, October 28, 2025 1:23 PM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Re: Ethics Ordinance Clarifying Question - Administrator of Emergency Services

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Thank you. I will move forward with that language.

To confirm, this exemption in 5.a. would also cover town employees or Board of Education employees who are also entering into a contract as an instructor or camp counselor for Parks and Recreation, correct?

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

On Oct 28, 2025, at 12:46 PM, Ritter, Matthew D. <MRitter@goodwin.com> wrote:

Hi Jessica – with respect to 5a. -- see suggested revisions below:

"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."

If you say "and" will that cover the tshirt example? Maybe they get a public quote? I would delete the part about disclosing the "conflict" because it is no longer a conflict if that makes sense….

For the vehicles, maybe confirm with the Mayor if there are other vehicles in a similar situation? Probably good to exempt them all?

Thanks.



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Disclaimer: Privileged and confidential. If received in error, please notify me by e-mail and delete the message.

From: Jessica Buhle <Jbuh@ledyardct.org>
Sent: Tuesday, October 28, 2025 11:39 AM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Re: Ethics Ordinance Clarifying Question - Administrator of Emergency Services

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Hi Matt,

I had interpreted b. and c. to be clarifying portions of a, as they read as such, defining what is and what is not a conflict.

However, in order to address the concerns you and I had discussed yesterday regarding the fire training and Parks and Recreation shirts and other services small business owned by town employees provide to our town, I am proposing the following addition:

Under section 5.a., add "A Town official, employee, or consultant may engage in a contract, transaction, decision, or rendering of service to the Town where the contract is publicly quoted or bid and the Town official, employee, or consultant is not involved in awarding the contract, and conflict is disclosed."

Under Section 5.e., add "This does not apply to vehicles assigned to Town vehicles issued to members of Ledyard Fire Department and Gales Ferry Fire Company."

Please let me know if either of these additions cause legal issues or invalidate portions of our ordinance.

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

On Oct 28, 2025, at 11:19 AM, Ritter, Matthew D. <MRitter@goodwin.com> wrote:

Hi Jessica - no need to apologize 😊

1. Under the revised Code as currently drafted, Section 5(a) may prohibit a firefighter from having a contract with the Town because it generally prohibits Town employees from having contracts with the Town. However, Section 5(b) would not be an issue (unless it was a contract with the volunteer fire department) because it specifically requires the employee to be involved in the awarding of the contract somehow.

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**.

Maybe you could look at amending Section 5(a) by exempting any contracts that are publicly bid and that the individual employee has no involvement in the contract award process? Or maybe you merge Sections (a) and (b)?

Here is a hypothetical – can a teacher who owns a cleaning company have a contract with the Town to provide cleaning services at Town Hall?

Under 5(a), maybe not…with the revisions discussed above, it probably is OK. However, I think a Town Council member could not because they are involved in the awarding of the contract.

2. With respect to the Town vehicles, this is a policy decision. However, if you want to continue to allow the Chief or any other Town official to use the vehicle for personal business you will need to amend the ordinance.

Thanks, Matt



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From: Jessica Buhle <Jbuh@ledyardct.org>
Sent: Tuesday, October 28, 2025 10:29 AM
To: Ritter, Matthew D. <MRitter@goodwin.com>
Subject: Ethics Ordinance Clarifying Question - Administrator of Emergency Services

CAUTION: EXTERNAL EMAIL: Please be cautious of links and attachments.

Good morning,

Sincerest apologies for monopolizing your time on this Ordinance recently, but working hard to address feedback.

I received a letter from the Administrator of Emergency Services.

His concerns regard Section 5.a-c, and 5.e. and his letter is attached. I have attached my feedback and interpretation, so I will look for your feedback to confirm or refute my interpretation, or any further comments you may have.

If his concerns are correct and are prohibited in the proposed ordinance, can you propose language to modify the ordinance to correct?

Best,

Jessica Buhle
Ledyard Town Council
jessicab@ledyardct.org

Begin forwarded message:

From: Jessica Buhle <jessicab@ledyardct.org>
Subject: Re: AES Comments on Ethics Ordinance
Date: October 28, 2025 at 10:24:45 AM EDT
To: Roxanne Maher <council@ledyardct.org>
Cc: Steve Holyfield <admin.emergency@ledyardct.org>

Good morning Steve,

Regarding Section 5.a., *" A Town official, employee, consultant has a conflict of interest when... the Town official, employee, or consultant has a financial or beneficial interest."* Section 5.b. clarifies that a financial or beneficial interest presents a conflict of 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." This statement is further clarified by 5.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)."* Therefore, this Ordinance does not prohibit volunteer firefighters or Town employees from owning their own businesses.

When you say "conduct business with the Town," are you referring to firefighters who are engaging in contracts with the Town?

During my conversations with the attorney, we discussed Town employees who own businesses which provide services and goods to the Town, and potential conflicts with the Ordinance. I expressed the intent to continue past practice in allowing those opportunities to continue. I would personally interpret 5.c. to allow a business owned by a Town employee to engage in a contract

with the Town as long as the contract was awarded without preference specific to that person, but toward the contract process set forth in An Ordinance for Purchasing, and conflict is disclosed per Section 9.a. I will forward your concerns to the Attorney to verify my interpretation.

To address your second concern regarding Town owned vehicles, I defer to the Attorney's recommendation in this regard. We certainly have no intention of creating a requirement that increases emergency response times in our community.

Best,

Jessica Buhle
Ledyard Town Council
Chair - Administration Committee
jessicab@ledyardct.org

On Oct 28, 2025, at 9:49 AM, Roxanne Maher <council@ledyardct.org> wrote:

From: Steve Holyfield <admin.emergency@ledyardct.org>
Sent: Tuesday, October 28, 2025 9:47 AM
To: Roxanne Maher <council@ledyardct.org>

Cc: Jon Mann <lfd.chief@ledyardct.org>; Jeff Erhart <Chief@gffc.org>
Subject: AES Comments on Ethics Ordinance

Good morning, Roxanne -

Attached is a document with some comments I have on the proposed Ethics Ordinance. Could you please share it with the council and the admin committee?

I have copied the fire chiefs on this email for their awareness since this directly effects their membership.

Thanks and have a good day!

Steve

Stephen C. Holyfield

Administrator of Emergency Services

Deputy Emergency Management Director

Public Safety Commission, Chair

Phone 860-449-3364

E-mail
- admin.emergency@ledyardct.org

Office Location -741
Colonel Ledyard Highway,
Basement (Room 8),
Ledyard, CT 06339-1511

Mailing Address - 741
Colonel Ledyard Highway,
Ledyard, CT 06339-1511

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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 29, 2025

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

DRAFT: 03/07/2026

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 and Board of Education officials, employees and 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.

Section 3. **Definitions.**

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

*"**Agency**"* is any board, commission, authority or committee of the Town, including the Town Council and Board of Education.

"Beneficial interest" means any nonfinancial interest or special treatment that is not common to other citizens of the Town.

*"**Business day**"* means a day other than a Saturday, Sunday or other day in which the office of the Ledyard Town Clerk is closed to the public for business.

"Complainant" means a person who files a complaint under penalties of false statement against an official, employee or consultant containing an allegation of prohibited activities under the Code of Ethics.

*"**Confidential Information**"* means information acquired by a Town or Board of Education 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.

*"**Consultant"*** means (i) an attorney hired by the Town or the Board of Education to provide legal services; (ii) any engineer, architect or construction manager hired by the Town or the Board of Education to provide professional services related to construction projects; or (iii) any professional who is hired by the Town to provide professional advice or services related to land use matters. In addition, the definition of what constitutes a consultant shall be limited to an officer or an employee of any Town or Board of Education contractor who has managerial or discretionary responsibilities with respect to a Town or Board of Education contract.

"Employee" is any person receiving a salary, wages or a stipend from the Town or Board of Education for services rendered, whether full-time or part-time.

"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, children, stepchildren, foster children, siblings and their children, stepsiblings and their children, and foster siblings and their children, of an official, employee, or consultant, or his/her spouse or domestic partner.

"Financial Interest" means any interest that has a: (i) 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; (ii) and is not common to the other citizens of the Town.

"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.

Gifts do not include:

a. A political contribution that is otherwise reported in accordance with the law.

b. A loan made on terms that are commercially reasonable and not more favorable than loans made in the ordinary course of business.

c. Certificates, plaques or other ceremonial awards costing less than fifty dollars ($50.00).

d. 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.

e. Honorary degrees.

f. 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 or Board of Education official or Town Board of Education employee participates in his/her official capacity.

g. Any gift provided to a Town or Board of Education official or Town or Board of Education Employee or to a family member of a Town or Board of Education official or Town or Board of Education 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.

"Inquiry" means a complaint or allegation of a possible violation of the Code.

"*Managerial or discretionary responsibilities with respect to a Town or Board of Education contract*" means having direct, extensive, and substantive responsibilities with respect to the negotiation of the contract and not peripheral, clerical, or ministerial responsibilities.

"Official" is any person holding elective or appointive office in the government of the town and shall include, but not be limited to, the Town Council, Board of Education or any other agency as defined herein. *"Respondent"* means a person who is the subject of a complaint.

Section 4. Confidential information and Withholding of Information.

Town and Board of Education 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. No Town or Board of Education 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 5. Conflict of Interest Provisions and Other Prohibited Activities

A. A Town or Board of Education 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 in which the Town or Board of Education official, employee or consultant or any member of his family has a financial or beneficial interest. Notwithstanding anything contained in this ordinance to the contrary, a Town or Board of Education official, employee or consultant may enter into a contract with the Town or the Board of Education if the contract is (i) publicly quoted or bid; or (ii) the Town or Board of Education 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 or consultant contracts in which a Town or Board of Education official, employee or consultant is hired by the Town or the Board of Education to perform necessary services, including, but not limited to recreational 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 or Board of Education official or employee has reason to believe or expect that he/she or any member of his family 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 or Board of Education 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 or his/her family members 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 Section 7-148h(b) of the General Statutes.

DRAFT

D. No Town or Board of Education official or employee may directly hire or supervise a member of his/her family except for temporary emergency situations, including, but not limited to, inclement weather and labor shortages.

E. Town officials and employees shall not use Town owned or leased vehicles, equipment, facilities, materials or property for personal convenience or profit. 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 or Board of Education official, employee or consultant shall solicit or accept any gift 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 or consultant. No Town or Board of Education 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 any agency, a bid for work to be performed, an application for employment, and any bid for the furnishing of supplies, equipment or services.

Section 6. Disclosure and disqualification.

A. Any Town or Board of Education 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 in accordance with the provisions of this ordinance. Such disclosure shall disqualify the official, employee or consultant from participation in the matter, transaction or decision.

B. No Town or Board of Education 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. This Code shall not prohibit any current or former Town or Board of Education official, employee or consultant from appearing before any agency on his/her own behalf.

C. If there is an uncertainty whether a Town or Board of Education 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 may request an advisory opinion from the Ethics Commission pursuant to this ordinance.

D. 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, Sections 8-11, 821 and 22a-42(c) of the Connecticut General Statutes that restrict conduct of members of municipal zoning and planning authorities and members of Inland, Wetlands and Watercourses commissions.

Section 7. Required Filings for Certain Town and Board of Education Officials.

The Mayor and the members of the Town Council and the Board of Education 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 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, by a corporation, trust or partnership in which any such 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.

B. The names of any firm, proprietorship, partnership or corporation of which said official is an employee or in which such official holds at least a five (5) percent interest; and if applicable, whether such firm, proprietorship, partnership or 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.

C. 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.

Section 8. Acknowledgment forms.

A. The Town Clerk shall provide a copy of the Code of Ethics to every Town and Board of Education official. Every Town official, including members of the Board of Education, shall sign and file with the Town Clerk an acknowledgement form, prepared by the Town Attorney, indicating his/her awareness of the provisions of this Code. The Superintendent of Schools shall sign and file with the Board of Education Human Resources Director an acknowledgement form, prepared by the Town attorney, indicating his/her awareness of the provisions of this Code. The Human Resources Directors of both the Town and Board of Education, respectively, shall: (i) provide current Town and Board of Education employees a copy of the Code of Ethics within one-hundred-twenty (120) business days of its effective date; and (ii) provide a copy of the Code of Ethics to every Town and Board of Education employee within sixty (60) business days of employment. Copies of the Code of Ethics may be sent to officials and employees electronically.

B. Within ten (10) business days of the effective date of this ordinance, the Code of Ethics shall be incorporated by reference into all prospective contracts entered into by the Town of Ledyard and the Board of Education with a consultant. The Human Resources Directors of both the Town and Board of Education, respectively, shall provide current Town and Board of

Education consultants a copy of the Code of Ethics within thirty (30) business days of its effective date. Copies of the Code of Ethics may be sent to consultants electronically.

C. 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.

D. The Town Council shall approve a procedure for monitoring compliance with this section and approve the training protocols specified in subsection (c).

Section 9. Establishment and Qualifications of Ethics Commission.

A. Structure. The Ethics Commission shall be comprised of five (5) regular members and two (2) alternate members. All regular members and alternate members of the Ethics Commission shall be electors of the Town. 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.

B. Member and alternate member qualifications. No regular member or alternate members shall:
   i. be currently employed by the Town or Board of Education;

   ii. have been employed by the Town or Board of Education for a period of two years prior to being appointed to the Ethics Commission;

   iii. hold any elective Town office or have been elected to any elective Town office for a period of two years prior to being appointed to the Ethics Commission;

   iv. be a current member of the Board of Education or have been elected to the Board of Education for a period of two years prior to being appointed to the Ethics Commission;

   v. serve as a member of another Town agency; vi. hold office in a political party or political committee; vii. have been found in violation of any state, local or professional code of ethics.

   If a current member of the Ethics Commission files to run for any elective Town office or for the Board of Education, such member shall resign from the Ethics Commission within seven (7) days of said filing.

   a. Compensation. Members will not be compensated for their service on the Commission.

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

   c. Method and Terms 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 (7) seven affirmative votes of the Town Council. Members shall be appointed for a term of three (3) years. 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. 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. 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.

d. Removal. 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.

Section 10. Powers and Duties of Ethics Commission.

A. The Ethics Commission shall be authorized to consult with the Town Attorney or another attorney hired by the Commission if so authorized by the Town Council. The Ethics Commission shall be authorized to request that the Town Attorney provide advisory opinions.

B. The Ethics Commission may render advisory opinions to any Town or Board of Education official, employee or consultant on whether conduct by that person would constitute a violation of the Code of Ethics. The Ethics Commission will make advisory opinions available to the public unless doing so would violate the confidentiality provisions of this Code of Ethics or is otherwise prohibited by law.

C. The Ethics Commission may examine complaints and to make a determination of probable cause pursuant to the procedures outlined herein. The Ethics Commission may 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.

D. The Ethics Commission may review the Code of Ethics policies and procedures on an as needed basis and may make recommendations to the Town Council regarding changes to the Code of Ethics policies and procedures. The Ethics Commission may take action to increase public awareness of the Code of Ethics

Section 11. Ethics Commission Rules of Procedure.

A. Advisory opinions. Any current, former or prospective Town of Ledyard or Board of Education 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 or Board of Education official also may request an advisory opinion concerning the activities of any department over which he/she has jurisdiction or agency on which he/she serves.

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. 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 and date the form. 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 the envelope and forward the sealed envelope promptly to the chair or vice-chair of the Ethics Commission. Within five (5) business days that 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. The date the request is received by the Town Clerk will mark the official date of receipt for purpose of deadlines for decisions. The chair or vice-chair of the Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the request.

The chair will present the request to the Ethics Commission at its next regular meeting or at a special meeting at an executive session, except upon the request of the individual that is seeking the advisory opinion to present the request in open session.

Advisory opinions will be made by a majority of the Ethics Commission members voting at a meeting at which a quorum is present. The Ethics Commission will issue an advisory opinion as expeditiously as possible but in any event within ninety (90) business 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 business (30) days. All advisory opinions must be in writing and communicated to the individual making the request.

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 state its reasons.

B. Complaints.

i. Filing of a complaint. A complaint alleging any violation of the Code of Ethics shall be made on a form prescribed by the Ethics Commission available at the Town's website www.ledyardct.org or through the Town's Clerk office, and signed under penalty of false statement. The form shall be delivered to the Town Clerk in a sealed envelope who will date stamp the envelope and forward the sealed envelope promptly to the chair or vice-chair of the Ethics Commission. On the day the sealed envelope is received by the Town Clerk,

the Town Clerk or his/her representative shall notify the chair or vice-chair of the Commission, or both, and the respondent within five (5) business days of receipt of the complaint. The chair or vice-chair of the Ethics Commission shall sign a form, provided by the Town Clerk, acknowledging the receipt of the complaint. The Ethics Commission shall also notify the respondent that a complaint was received and 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 the: (i) the name of the person accused (respondent); (ii) name of the person filing the complaint; and (iii) the specific acts alleged to constitute a violation of the Code of Ethics and when said actions occurred.

ii. Probable Cause Determination.

Within sixty (60) business days of the receipt of a complaint by the Chair or Vice-Chair, 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.

If the Ethics Commission makes a finding of probable cause, which shall require three (3) affirmative votes, it shall so advise both the complainant and the respondent and begin a formal investigation.

iii. 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 the attendance of witnesses; to produce books, documents, records and papers; to examine and cross-examine witnesses; and to inspect and copy relevant and material records, papers and documents. 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 business (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.

iv. Final Decisions. 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. The Ethics Commission must render its decision within sixty business (60) days of the closing of the hearing. Such finding and memorandum will be deemed to be the final decision of the Ethics 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. If the Ethics Commission determines that the Code of Ethics was violated, it will provide the respondent, the Mayor, the Ledyard Town Council and the Board of Education

(if applicable) with a copy of its findings and memorandum within ten (10) business days after its decision. It will also advise the respondent of his/her right to appeal the decision pursuant to Section 4-183 of the Connecticut General Statutes.

v. 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 or contract; and
g. Restitution of any benefits received because of the violation committed.

Penalties will be determined by a majority vote of the Town Council within sixty (60) business days after receipt of the finding and memorandum of Ethics Commission.
The remedies and procedures specified in any 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. Severability.

If any part of this Code of Ethics 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.

Signed/Certified on:_____ _____
Gary St. Vil, Chairman

Approve/Disapprove on: _____ _____
Fred B. Allyn, III, Mayor

Published on: _____
Patricia A. Riley, Town Clerk

Effective Date:

**********H
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

DRAFT

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.

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TOWN OF LEDYARD

741 Colonel Ledyard Highway
Ledyard, CT 06339-1511

File #: 26-0433 **Agenda Date:** 4/8/2026 **Agenda #:** 2.

FINANCIAL BUSINESS REQUEST (FBR)

Motion/Request:
MOTION to authorize the purchase of Fire Apparatus in the amount of $1,173,066 from Marion Body Works, Inc with funding from Account # 21020401-54325 (Fire Apparatus).

Background:
This purchase is to replace Ledyard Fire Co's ''R-13'', which is a 2003 American LaFrance pumper. The replacement is on schedule with the vehicle replacement plan maintained by the AES. Ledyard Fire Co has been working in committee and with the AES to develop a bid specification for the replacement. Initial discussions with manufacturers were coming back with estimates in the $1.2-1.3M range. The committee identified a suitable apparatus through the Houston Galveston Area Council (HGAC Buy) bid collective. This bid collective is in compliance with the Town's purchasing policies.

Department Comment/Recommendation:
I worked closely with Ledyard Fire to ensure that this apparatus meets the needs of the mission. The planned apparatus is efficient and effective in meeting those needs without any lavish or unnecessary add-ons.

I support the purchase through HGAC Buy. Apparatus manufacturers will have a quarterly increase in pricing effective 4/1/26; Marion agreed to hold back on that price increase for this apparatus. Additionally, I anticipate an additional 3-5% increase July 1 2026.

I asked the Finance Director to review 2 proposals, which were pay in full at time of contract signing or pay in installments (see the proposals in the agenda packet). It was his recommendation to pay in full at the start of the contract given the current interest rate climate. Additionally, our purchase is protected with a performance bond at time of signing.

Finance Director Comment/Recommendation:
Account # 21020401-54325-54325 (Fire Apparatus) has a current unencumbered balance of $1,393,093.

Mayor Comment/Recommendation:
(type text here)

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EMERGENCY VEHICLE SALES CONTRACT

BUYER: Town of Ledyard
741 Colonel Ledyard Highway
Ledyard CT 06339-1511

SELLER:
Marion Body Works, Inc.
211 W. Ramsdell Street
Marion, WI 54950

1. **AGREEMENT TO SELL AND TO PURCHASE**

The seller (referred to as MARION) agrees to sell and buyer (referred to as BUYER) agree to purchase the following apparatus and equipment according to the attached specifications which are a part of this contract under the conditions that the vehicle description and final price is approved by HGAC Buy program (Houston Galveston Area Council):

****CHASSIS DISCLAIMER****

All contracts that involve a commercial chassis (non-Spartan custom chassis) are subject to a surcharge on both the chassis and the body at the time of completed unit delivery. Due to the lead-times on these chassis, Marion will be assessing current material charges when that unit enters our build schedule, based on the arrival of the chassis. By signing this contract, you are agreeing to these chassis and material surcharges. **Marion will also not be held liable to an engine surcharge involving a Spartan chassis. If the engine specification on this order is not available at the time of the build, and results in an upcharge to swap to a new engine model, the added cost will be charged to the department ordering the apparatus. The customer/department that is signing this contract will be solely responsible for any additional cost that is involved with a changed engine model by Spartan.**

DESCRIPTION OF APPARATUS AND EQUIPMENT	**PRICE**
One (1) 2027 Spartan- Marion Pumper 2-23-26 Revised	$1,228,153.00
Performance Bond	$4,913.00
Total Price, F.O.B. Marion Body Works, excluding all Federal, State and Local Taxes	**$1,233,066.00**

In case of any conflict between BUYER'S specifications used for all bidders and SELLER'S proposal specifications, SELLER'S specifications will apply. Any sales representative supplied items included above are detailed on Appendix A which is a part of this contract.

2. **CONFORMANCE TO NFPA STANDARDS**

It is the policy of SELLER to manufacture in accordance with all applicable NFPA standards. This contract conforms to all known such standards as of the date of acceptance by SELLER. Any increased costs incurred by SELLER because of future NFPA standards issued during the manufacture of this emergency vehicle will be passed on to BUYER as an addition to the price set forth in #1 above.

3. **COMPLETION ESTIMATE** **CALENDAR DAYS**

Estimated total calendar days for completion after Marion acceptance of signed contract: 730 Days

Above estimate based on timely (usually 30 days) approval by you of submitted drawings and specifications, timely receipt of the chassis, and any events beyond the reasonable control of Marion.

4. **WARRANTY**

The standard Marion Emergency Vehicle Warranties shall be in effect upon delivery of this apparatus as outlined below:

- A two (2) year material and workmanship.
- A twenty (20) year structural warranty.
- A ten (10) year paint warranty.
- A seven (7) year electrical warranty.
- A ten (10) year stainless steel plumbing warranty.

5. **CONSEQUENTIAL DAMAGES AND OTHER LIABILITY**

MARION shall not be liable for and disclaims all consequential, incidental and contingent damages and liability whatsoever. See also the standard MARION warranty.

6. **CANCELLATION**

In the event of cancellation by BUYER, MARION shall be entitled to payment of 10% of the contract price for orders not yet begun in production and for orders for which production has begun, the full contract price less the amount of expenses saved by MARION by reason of the cancellation.

7. **PAYMENT**

The chassis ($553,717.00) shall be paid for by BUYER in full upon its receipt at Marion. The remainder of the contract price shall be paid in full upon completion by Marion and delivery to BUYER. This Emergency Vehicle shall remain the property of Marion until payment in full has been received. A finance charge of 1% per month (annual percentage rate of 12%) will be added to all accounts over 30-days.

8. **ENTIRE AGREEMENT**

This contract including its appendices is the entire understanding between the parties and merges all prior discussion and agreements between them. Any changes to this contract, including appendices, must be in writing and signed by an authorized representative of the BUYER and MARION.

AGREEMENT BY BUYER:

_____ By:_____

Buyer's Registered Name

Date Signed_____



ACCEPTANCE BY SELLER:

Date Signed_____ By:_____
Marion Body Works, Inc

EMERGENCY VEHICLE SALES CONTRACT

BUYER: Town of Ledyard
741 Colonel Ledyard Highway
Ledyard CT 06339-1511

SELLER:
Marion Body Works, Inc.
211 W. Ramsdell Street
Marion, WI 54950

1. **AGREEMENT TO SELL AND TO PURCHASE**
The seller (referred to as MARION) agrees to sell and buyer (referred to as BUYER) agree to purchase the following apparatus and equipment according to the attached specifications which are a part of this contract under the conditions that the vehicle description and final price is approved by HGAC Buy program (Houston Galveston Area Council):

****CHASSIS DISCLAIMER****
All contracts that involve a commercial chassis (non-Spartan custom chassis) are subject to a surcharge on both the chassis and the body at the time of completed unit delivery. Due to the lead-times on these chassis, Marion will be assessing current material charges when that unit enters our build schedule, based on the arrival of the chassis. By signing this contract, you are agreeing to these chassis and material surcharges. **Marion will also not be held liable to an engine surcharge involving a Spartan chassis. If the engine specification on this order is not available at the time of the build, and results in an upcharge to swap to a new engine model, the added cost will be charged to the department ordering the apparatus. The customer/department that is signing this contract will be solely responsible for any additional cost that is involved with a changed engine model by Spartan.**

DESCRIPTION OF APPARATUS AND EQUIPMENT	**PRICE**
One (1) 2027 Spartan- Marion Pumper 2-23-26 Revised	$1,228,153.00
Performance Bond	$4,913.00
100% Prepay Discount	($60,000.00)
Total Price, F.O.B. Marion Body Works, excluding all Federal, State and Local Taxes	**$1,173.066.00**

In case of any conflict between BUYER'S specifications used for all bidders and SELLER'S proposal specifications, SELLER'S specifications will apply. Any sales representative supplied items included above are detailed on Appendix A which is a part of this contract.

2. **CONFORMANCE TO NFPA STANDARDS**
It is the policy of SELLER to manufacture in accordance with all applicable NFPA standards. This contract conforms to all known such standards as of the date of acceptance by SELLER. Any increased costs incurred by SELLER because of future NFPA standards issued during the manufacture of this emergency vehicle will be passed on to BUYER as an addition to the price set forth in #1 above.

A Tradition of Quality. Since 1905

3. **COMPLETION ESTIMATE** **CALENDAR DAYS**

Estimated total calendar days for completion after Marion acceptance of signed contract: 730 Days

Above estimate based on timely (usually 30 days) approval by you of submitted drawings and specifications, timely receipt of the chassis, and any events beyond the reasonable control of Marion.

4. **WARRANTY**

The standard Marion Emergency Vehicle Warranties shall be in effect upon delivery of this apparatus as outlined below:

- A two (2) year material and workmanship.
- A twenty (20) year structural warranty.
- A ten (10) year paint warranty.
- A seven (7) year electrical warranty.
- A ten (10) year stainless steel plumbing warranty.

5. **CONSEQUENTIAL DAMAGES AND OTHER LIABILITY**

MARION shall not be liable for and disclaims all consequential, incidental and contingent damages and liability whatsoever. See also the standard MARION warranty.

6. **CANCELLATION**

In the event of cancellation by BUYER, MARION shall be entitled to payment of 10% of the contract price for orders not yet begun in production and for orders for which production has begun, the full contract price less the amount of expenses saved by MARION by reason of the cancellation.

7. **PAYMENT**

Contract payment shall be made in full within 30 days from contract signing. Any changes to the contract totals as approved by both parties shall be paid or refunded upon completion and acceptance of the vehicle at Marion Body Works. This Emergency Vehicle shall remain the property of Marion until final payment in full and/or acceptance has been received. A finance charge of 1% per month (annual percentage rate of 12%) will be added to all accounts over 30-days.

8. **ENTIRE AGREEMENT**

This contract including its appendices is the entire understanding between the parties, and merges all prior discussion and agreements between them. Any changes to this contract, including appendices, must be in writing and signed by an authorized representative of the BUYER and MARION.

AGREEMENT BY BUYER:

_____ By:_____

Buyer's Registered Name

Date Signed_____

ACCEPTANCE BY SELLER:

Date Signed_____ By:_____

Marion Body Works, Inc.

A Tradition of Quality. Since 1905

EMERGENCY VEHICLE PROPOSAL

To: Ledyard Fire Company. **Date:3/24/2026**
11 Fairway Dr.
Ledyard CT 06339.

It is a pleasure to propose the following apparatus and equipment to you, with the intent of having an order placed by you for final acceptance by Marion Body Works, Inc. at its office in Marion, WI.

DESCRIPTION OF APPARATUS AND EQUIPMENT		**PRICE**
One (1) 2027 Spartan- Marion Pumper HGAC Buy.		$1,228,153.00
Performance Bond Option		$4,913.00
100% Prepay discount option		($60,000.00)
	TOTAL	**$1,173,066.00**

Total Price, F.O.B. Marion, WI Excluding All Federal, State and Local Taxes
Delivery included.

COMPLETION

This apparatus and equipment is estimated to be completed at Marion, WI approximately **24 months**. This estimate assumes timely approval by you of the Marion detailed submittal, timely receipt of the chassis, and no events beyond the reasonable control of Marion.

PAYMENT TERMS

The remainder of the contract price shall be paid in full upon delivery to the Fire Station.

LENGTH OF THIS PROPOSAL

This proposal is good for 20 days from date.
After 30 days OEM increases, and surcharges may apply!

Alan Harris

_____
Authorized Marion Representative

Marion Representative: Alan Harris
128 Blacks Road Cheshire CT 06410
Phone: 203-417-3821
Halligan4@aol.com

A Tradition of Quality. Since 1905

EMERGENCY VEHICLE PROPOSAL

To: Ledyard Fire Company. **Date: 3/24 /2026**
11 Fairway Dr.
Ledyard CT 06339.

It is a pleasure to propose the following apparatus and equipment to you, with the intent of having an order placed by you for final acceptance by Marion Body Works, Inc. at its office in Marion, WI.

DESCRIPTION OF APPARATUS AND EQUIPMENT		**PRICE**
One (1) 2027 Spartan- Marion Pumper HGAC Buy.		$1,228,153.00
Performance Bond Option		$4,913.00
	TOTAL	**$1,233,066.00**

Total Price, F.O.B. Marion, WI Excluding All Federal, State and Local Taxes
Delivery included.

COMPLETION

This apparatus and equipment is estimated to be completed at Marion, WI approximately **22-24 months.** This estimate assumes timely approval by you of the Marion detailed submittal, timely receipt of the chassis, and no events beyond the reasonable control of Marion.

PAYMENT TERMS

The chassis shall be paid in full {$553,717.00} upon its receipt at Marion. The remainder of the contract price shall be paid in full upon delivery to the Fire Station.

LENGTH OF THIS PROPOSAL

This proposal is good for 20 days from date.
After 30 days OEM increases, and surcharges may apply!

Alan Harris

_____
Authorized Marion Representative

Marion Representative: Alan Harris
128 Blacks Road Cheshire CT 06410
Phone: 203-417-3821
Halligan4@aol.com

FEDERAL EXCISE TAX
EXEMPTION CERTIFICATE

I hereby certify that, under penalty of perjury, I am _____
(Title of Officer)

of _____ ,
(Name of Purchaser)

that I am authorized to execute this certificate; that we are purchasing _____
(describe item(s)

_____ from Marion; and that;
being purchased)

(Check appropriate line)

_____ We are a governmental entity or non-profit organization and that the article(s) specified above are being purchased for the exclusive use of _____**(governmental unit)** of _____ _____**(state or local government).** I understand that the exemption from tax in case of sales of articles under this exemption certificate to a State, etc., is limited to the sale of articles purchased for its exclusive use. **or**

_____ the article(s) specified above, or in the accompanying order are purchased either for resale or for lease on a long-term basis and are Federal Excise Tax exempt, **or**

_____ all orders placed by the purchaser with Marion Body Works, Inc. are purchased either for resale or for lease on a long-term basis and are Federal Excise Tax exempt, **or**

_____ We are subject to Federal Excise Tax on our purchase(s).

I understand that the fraudulent use of this certificate to secure exemption will subject me and all parties making such fraudulent use to a fine of not more than $10,000, or to imprisonment for not more than 5 years, or both, together with costs of prosecution.

X_____ _____
(Signature) **(Date)**

_____
(Street)

_____
(City)

_____
(State) **(Zip Code)**

_____
(Telephone)

_____
(email)

Marion Body Works, Inc. 211 W. Ramsdell - PO Box 500 - Marion, WI 54950-0500
Phone: 715-754-5261 Fax: 715-754-5776 www.marionbody.com

Current through FY 27

		Inflation Rate
4.5%	% Increase in Value	1.045
3.5%	% Increase in Value	1.035
3.2%	% Increase in Value	1.0325
3.7%	% Increase in Value	1.0375
	% Increase in Value	1.05
	% Increase in Value	1.08

	% Increase to reserve	1.04
5%	% Increase to reserve	1.055
	% Increase to reserve	1.06
4.5%	% Increase to reserve	1.045
	% Increase to reserve	1.03
	% Increase to reserve	1.08

	Item	Price New	Notes	FY25	FY26	FY27	FY28	FY29	FY30	FY31	FY32	FY33	FY34	FY35	FY36	FY37	FY38	FY39	FY40	FY41
	Vehicles in Fleet			10	10	10	10	9	9	9	9	9	9	9	9	9	9	9	9	9
	Starting Reserve Balance			**1,043,576**	**1,085,648**	**220,026**	**639,331**	**1,046,694**	**208,109**	**707,859**	**347,349**	**889,408**	**(46,328)**	**380,808**	**977,410**	**1,446,844**	**2,037,344**	**2,645,558**	**-15,674.76**	**629,580.10**
	Add to Reserve			362,552	307,444	384,305	407,363	439,952	459,750	480,439	502,059	524,651	540,391	556,603	573,301	590,500	608,215	626,461	645,255	664,613
	Additional CIP																			
	Trade in Values					35,000			40,000		40,000	40,000		40,000						
R11	Engine (Ledyard)	560,000										(1,410,664)								
R13	Engine (Ledyard)	560,000			(1,173,066)															
R14	Tanker (Ledyard)	640,412																		
R17	Heavy Rescue (Ledyard)	620,000																		
R25	Ladder 25 (Gales Ferry)	800,000																(3,287,694)		
R27	Rescue (Gales Ferry)	400,000	Combine																	
R24	Tanker (Gales Ferry)	340,000								(840,949)										
R21	Engine (Gales Ferry)	560,000						(1,378,537)												
R22	Forestry (Gales Ferry)	148,000		(320,480)																
R26	Utility											(89,724)								
R16	Utility														(103,867)					
R1	Chief's Vehicle	Used											(113,255)							
R2	Chief's Vehicle	Used																		
	Year end Balance			**1,085,648**	**220,026**	**639,331**	**1,046,694**	**208,109**	**707,859**	**347,349**	**889,408**	**(46,328)**	**380,808**	**977,410**	**1,446,844**	**2,037,344**	**2,645,558**	**(15,675)**	**629,580**	**1,294,193**

				Yr old	Replacement Yr															
R12	Reserve Engine (Ledyard)	10000	old	NA																
R11	Engine (Ledyard)	560000	2013	2033	997,428	1,077,223	1,131,084	1,173,500	1,217,506	1,263,162	1,310,531	1,359,676	1,410,664	1,481,197	1,555,257	1,633,019	1,714,670	1,800,404	1,890,424	1,984,945	2,084,193
R25	Ladder (Gales Ferry)	787000	2018	2039	1,734,658	1,873,431	1,967,102	2,040,869	2,117,401	2,196,804	2,279,184	2,364,653	2,453,328	2,575,994	2,704,794	2,840,034	2,982,035	3,131,137	3,287,694	3,452,079	3,624,683
R27	Rescue (Gales Ferry)	400000	1999	Combine	689,537	744,700	781,935	811,258	841,680							Combined with Engine 21					
R24	Tanker (Gales Ferry)	340000	2003	2024	640,043	691,247	725,809	753,027	781,265	810,563	840,959	872,495	905,213	950,474	997,998	1,047,898	1,100,293	1,155,307	1,213,073	1,273,726	1,343,781
R13	Engine (Ledyard)	560000	2003	2027	1,047,428	1,131,223	1,187,784	1,232,326	1,278,538	1,326,483	1,376,226	1,427,835	1,481,379	1,555,447	1,633,220	1,714,881	1,800,625	1,890,656	1,985,189	2,084,448	2,209,515
R21	Engine (Gales Ferry)	560,000	2009	2029	1,047,428	1,131,222	1,187,783	1,232,325	1,278,537	1,326,483	1,376,226	1,427,834	1,481,378	1,555,447	1,633,219	1,714,880	1,800,624	1,890,655	1,985,188	2,084,448	2,178,248
R22	Forestry (Gales Ferry)	148,000	2004	2025	286,701	309,638	325,119	337,315	349,961	361,084	376,700	390,826	405,442	425,756	447,044	469,396	492,866	517,509	543,385	570,554	587,670
R17	Heavy Rescue (Ledyard)	620,000	1997	2023	1,072,247	1,158,027	1,215,928	1,261,526	1,308,833	1,357,914	1,408,836	1,461,667	1,516,480	1,592,304	1,671,919	1,755,515	1,843,290	1,935,455	2,032,228	2,133,839	2,240,531
R-14	Engine Tanker (Ledyard)	646000	1991	Elim	746977	806735	847071	878837	$911,793	$945,985	$981,460	$1,018,264	$1,056,449	1105072	1164735	1222972	1284121	1348327	1415743	1486530	1560857
R-16	Pickup	32000	2016	2036	62,685	67,700	71,085	73751	$76,516	$79,386	$82,363	$85,451	$88,656	93,089	97,743	102,630	107,762	113,150	118,807	124,748	130,985
R-26	Pickup	32000	2013	2033	62,685	67,700	71,085	74639	$77,418	$80,342	$83,355	$86,481	$89,724	94,210	98,921	103,867	107,762	113,150	118,807	124,748	130,985
R2	Chief	60000	2011		75,000	79125	83081	89728	$93,093	$96,584	$100,205	$103,963	$107,862	113,255	118,918	124,863	131,107	137,662	144,545	151,772	159,361
R1	Chief	30000		2034	75,000	79,125	83,081	89728	$93,093	$96,584	$100,205	$103,961	$107,862	113,255	118,918	124,863	131,107	137,662	144,545	151,772	159,361
	Todays Fleet Value				6,991,305	7,507,410	7,882,780	8,179,273	8,485,996	9,943,373	10,316,249	10,703,109	11,104,475	11,659,699	12,242,684	12,854,818	13,496,261	14,171,074	14,879,628	15,623,609	16,410,169
	Value /20			Value / 2	347,565	375,370	394,139	408,964	424,300	497,169	515,812	535,155	555,224	582,985	612,134	642,741	674,813	708,554	743,981	781,180	820,508

File #: 26-0432 **Agenda Date:** 4/8/2026 **Agenda #:** 3.

FINANCIAL BUSINESS REQUEST (FBR)

Motion/Request:
MOTION to appropriate $73,782.83 of proceeds received from the sale of 528 Colonel Ledyard Highway to Capital Account #21014301-53306 (Land Use - P & Z Document Updates).)

Background:
Net proceeds of $84,011.13 were realized upon the sale of 528 Colonel Ledyard Highway. Legal fees of $10,228.30 were incurred and paid out of the Land Use legal budget during FY 25/26. These will be reimbursed and restored to the Land Use legal line from the net proceeds leaving a balance of $73,782.83.

By appropriating the balance to the aforementioned capital line, it allows the current year capital request of $75,000 to be reduced thereby lessening the impact to the tax levy on the FY 26/27 proposed budget.

Department Comment/Recommendation:
(type text here)

Finance Director Comment/Recommendation:
I support this action.

Mayor Comment/Recommendation:
This action closes out the longest standing blight issue in Ledyard and applies the funds directly to the department that oversaw the enforcement action. I support this request.

TOWN OF LEDYARD

741 Colonel Ledyard Highway
Ledyard, CT 06339-1511

File #: 26-0432 **Agenda Date:** 4/1/2026 **Agenda #:**

FINANCIAL BUSINESS REQUEST (FBR)

Motion/Request:
MOTION to appropriate $73,000 of proceeds received from the DeChesser Property Sale to Capital Account #21014301-53306 (POCD).)

Background:
(type text here)

Department Comment/Recommendation:
(type text here)

Finance Director Comment/Recommendation:
(type text here)

Mayor Comment/Recommendation:
(type text here)

TOWN OF LEDYARD

741 Colonel Ledyard Highway
Ledyard, CT 06339-1511

File #: 26-0458 **Agenda Date:** 4/8/2026 **Agenda #:** 4.

GRANT REQUEST

Type Motion/Request here and complete the Grant Request Form Below:
MOTION to authorize the Mayor to sign a Commitment to Fund a Local Transportation Capital Improvement Program (LOTCIP) grant in the amount of $3,224,800.

Background:

As part of the broader scope of infrastructure improvement projects in the Whitford Brook watershed that are also the target of the $3 million dollar special grant acquired through efforts of Senator Osten and the Lantern Hill Valley Alliance, the Town applied through Southeastern Connecticut Council of Governments (SCCOG) for consideration of a LOTCIP grant for the replacement of the Lantern Hill Bridge over Whitford Brook just below Long Pond. This is north of the bridge that is currently under construction at the Stonington line.

This LOTCIP application was given competitive consideration among a number of submittals from member towns and was among those selected submission to CTDOT for funding. The attached Commitment to Fund letter represents the consummation of this commitment by the State to this project.

These funds cover the entire construction cost for this project and the design engineering costs that are the Town's responsibility are already covered by the $3M aforementioned grant. This represents the second successful LOTCIP grant secured by the Town in the last few years, the recently completed Multi-Use Pathway being the other.

Department Comments/Recommendation:
The design of this bridge is substantially advanced and could possibly support construction in 2027. This action is necessary to secure the LOTCIP funding, and thus I recommend approval.

Finance Director Comments/Recommendation:
(Type text here)

Mayor Comments/Recommendation:
(Type text here)

CONNECTICUT

CTDOT CONNECTICUT TRANSPORTATION

March 30, 2026

The Honorable Fred Allyn, III
Mayor
Town of Ledyard
741 Colonel Ledyard Highway
Ledyard, Connecticut 06339-1511
Mayor@ledyardct.org

Dear Mayor Allyn:

Subject: **Commitment to Fund**
Local Transportation Capital Improvement Program (LOTCIP)
State Project No. L071-0002
Replacement of Bridge No. 71009
Lantern Hill Road Over Whitford Brook
Town of Ledyard

The Connecticut Department of Transportation (CTDOT) has received the LOTCIP application prepared by the Town of Ledyard (Municipality) and submitted through the Southeastern Connecticut Council of Governments (COG), relative to the subject project. The CTDOT has reviewed the application materials, along with the cost estimate provided by the Municipality and endorsed by the COG.

The LOTCIP application for this project has been approved. The CTDOT hereby commits to fund eligible project costs as follows:

Contract Items:	$ 2,679,000
Contingencies (10% of Contract Items):	$ 267,900
Incidentals to Construction (10% of Contract Items):	$ 267,900
Rights of Way:	$ 10,000
Eligible Utilities:	$ 0
Total Funding Commitment:	**$ 3,224,800**

This Commitment to Fund is subject to funding availability and general conditions including, but not limited to the following:

1. The project is to be administered by the Municipality in accordance with the *Local Transportation Capital Improvement Program Guidelines,* dated November 2021, as may be revised. The guidelines are available on the CTDOT's LOTCIP web page at Highway Design-Local Roads - LOTCIP.

2800 Berlin Turnpike
P.O. Box 317546
Newington, CT 06131-7546
860-594-2075

2. The project costs identified in this Commitment to Fund letter are based on estimates provided by the Municipality and endorsed by the COG. These costs are to be considered capped until adjustment, based on low bid or otherwise revised, in accordance with the LOTCIP guidelines.

3. Any scope revisions and/or twenty percent (20%) changes in cost identified during the design phase must be approved by the COG and the CTDOT, as specified in the LOTCIP guidelines.

4. Upon completion of project design activities, the Municipality must forward to the CTDOT through the COG, a Final Design Submission, along with supporting documentation and certifications, as defined in the LOTCIP guidelines.

5. The Municipality must execute and deliver a Project Authorization Letter (PAL) issued pursuant to the Master Municipal Agreement for Construction Projects and comply with its terms. The PAL will be forwarded to the Municipality for execution, subsequent to review of the Final Design Submission package by the CTDOT.

This commitment is further subject to the following project-specific conditions:

1. This project will require environmental permits. In accordance with the LOTCIP guidelines, the Municipality will be responsible for the acquisition of all environmental permits that will be required. Please be advised that any project that involves work within waters or wetlands may require State and/or Federal environmental permits. **It is critical that the Municipality or their consultant contact the Connecticut Department of Energy and Environmental Protection (DEEP) - Inland Water Resources Division early in the design process** to discuss permitting requirements, and to identify specific environmental concerns and design considerations. Failure to establish early coordination with DEEP may result in significant time delays in the permitting process, due to the need for design changes and/or denial of permit applications. Please note, the CTDOT hosts a monthly Interagency Coordination (Municipal) meeting where Municipalities (and their consultants) can discuss municipal projects with the various regulatory agencies relative to permitting requirements, identification of specific environmental concerns, and design considerations. Due to the nature of this project and the potential for significant permit involvement, **it is recommended that the Municipality attend a future Interagency Coordination meeting to discuss the project.** Attendance at the meeting can be arranged through the CTDOT's Environmental Permit Coordination Unit:

   Ms. Michelle Roise
   Transportation Engineer III
   (860) 594-3223
   DOT-EPC@ct.gov

2. This project is anticipated to require right of way acquisitions. The application materials indicate that Municipal Staff will be responsible for all right of way acquisition activities for this project, and that the Municipality will seek reimbursement for costs associated with the acquisitions. All right of way acquisitions are to be performed in accordance with LOTCIP guidelines, even if reimbursement will not be requested. All matters relative to right of way for this project are to be coordinated through the following CTDOT contact:

Mr. Matthew P. Geanacopoulos
Supervising Property Agent
(860) 594-2459
Matthew.Geanacopoulos@ct.gov

3. This project is anticipated to require utility relocations. Coordination with utility companies that have facilities in the project area, as well as with any utilities that currently do not have facilities present but may have plans to expand service to the area, should begin early in the design process. Costs for relocation of privately-owned utility facilities on municipally-owned roadways, including adjustment of utility gates, are the responsibility of the affected utility and are ineligible for LOTCIP participation. Utility coordination will be the responsibility of the Municipality.

   In accordance with applicable statutes, the LOTCIP guidelines, and as determined through discussions with the CTDOT's Utilities Section, participation in utility relocation costs for this project will be as follows:

Utility Owner	Activity	Cost Participation
Private	Relocation Design/Engineering	100% Utility
	Relocation Construction	100% Utility
Municipal	Relocation Design/Engineering	100% Municipal
	Relocation Construction	100% LOTCIP

   All necessary utility agreements relative to the relocations will be executed between the Municipality and the affected utility(ies). In accordance with the LOTCIP guidelines, costs associated with any utility betterments/upgrades that are not necessary to accommodate the proposed transportation improvement are ineligible for LOTCIP participation.

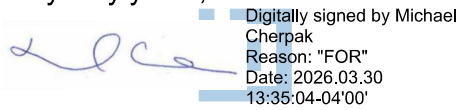
4. This project involves replacement of a structure. Since the CTDOT maintains a structure inventory and performs routine bridge inspections on both State and Municipally-owned structures, load rating and bridge scour information (as applicable) is required as part of the Final Design submission to the CTDOT, in accordance with the LOTCIP guidelines, as may be revised. Additional submission and formatting requirements for load ratings can be found at: https://portal.ct.gov/dot/bureaus/engineering-and-construction/engineering/bridges/state-design/load-rating. Please direct all questions to DOT.BridgeRating@ct.gov.

Please be informed that in accordance with the LOTCIP guidelines, the CTDOT will initiate an Environmental Screening Review for this project to assist the Municipality in identifying items relative to natural resources, historic/archaeological resources, etc., that may need to be investigated or addressed during the design phase. The Environmental Screening Review is expected to be completed within approximately ninety (90) days. The results will be forwarded to the Municipality and the COG, when received.

If the Municipality accepts this Commitment to Fund, please sign below and return a copy of this letter to this office within thirty (30) days. Transmission via e-mail is acceptable.

If you have any questions, please contact the Project Manager, Mr. Vitalij V. Staroverov, P.E., at (860) 594-2582 or Vitalij.Staroverov@ct.gov.

Very truly yours,



Michael N. Calabrese, P.E.
Division Chief of Highway Design
Bureau of Engineering and Construction

Enclosures

Accepted By: _____ Date: _____
The Honorable Fred Allyn, III
Mayor, Town of Ledyard

cc: Mr. Steve Masalin, P.E., Director of Public Works, Town of Ledyard, pwd@ledyardct.org
Ms. Amanda Kennedy, Executive Director, Southeastern Connecticut Council of Governments, akennedy@secogct.gov
Ms. Kate Rattan, Director of Transportation, Southeastern Connecticut Council of Governments, krattan@secogct.gov
Mr. Tyler Frost, Transportation Planner, Southeastern Connecticut Council of Governments, tfrost@secogct.gov

Location Map



TOWN OF LEDYARD

741 Colonel Ledyard Highway
Ledyard, CT 06339-1511

File #: 26-0351 **Agenda Date:** 4/8/2026 **Agenda #:** 5.

FINANCIAL BUSINESS REQUEST (FBR)

Motion/Request:
MOTION to adopt a proposed Fiscal Year 2026/2027 Water Operations Budget in the amount $1,860,262.

Background:
In accordance with Section 4 of Ordinance #400-001 "*An Ordinance Establishing a Water Pollution Control Authority"* which states: "*The WPCA shall provide, by the fourth Monday in April, a budget of estimated revenues, expenditures and capital improvements for the ensuing fiscal year for inclusion as an appendix in the Town annual budget.* ***The Town Council shall approve the water system budget".*** (see attached Ordinance)

Water Operations Proposed Fiscal Year 2026/2027 Budget:

Water Operations: **$**1,860.262. an increase of $97,468.20 over the Fiscal Year 2025/2026 Budget.

Account Name	Increase	Decrease
✓ GU Operating Agreement	$ 9,455.00	
✓ GU Customer Service	$ 3,159.15	
✓ Route 12 Water Purchased Used	$50,000.00	
✓ Finance Department Services	$ $7,000.00	
✓ Retirement	$ 5,738.50	
✓ General Obligation Bond Interest		$ 832.00
✓ CWF/DWSFR Loan Principle		$34,355.00
✓ Contingency		$ 476.45
✓ Auditing Services		$ $2,738

New Position:
✓ Technical Administrator (New Position) $63,750

Department Comment/Recommendation:
(type text here)

Finance Director Comment/Recommendation:
(type text here)

Mayor Comment/Recommendation:

(type text here)

FY2027 Water Budget

Report As of: 12/1/2025

ORG	OBJ	ACCOUNT DESCRIPTION	FY24 ACTUAL	FY25 ACTUAL	FY26 BUDGET	FY26 YTD ACTUAL	FY26 ENCUMBRANCE/REQ	FY26 AVAILABLE BUDGET	% USED	FY27 Proposed Budget	Changes
50590991	59305	CONTRIBUTION TO CNR	130,000.00	130,000.00	130,000.00	0.00	0.00	130,000.00	0%	130,000.00	0.00
50591603	58100	DUES & FEES	1,805.25	759.68	3,100.00	567.64	135.00	2,397.36	23%	3,100.00	0.00
50591620	51625	TECHNICAL ADMINISTRATOR	0.00	0.00	0.00	0.00	0.00	0.00	#DIV/0!	63,750.00	0.00
50591623	56225	POWER PURCHASED	9,761.81	14,469.04	10,000.00	3,061.25	6,938.75	0.00	100%	10,000.00	0.00
50591626	53720	GU OPERATING--EMERGENCY	24,363.50	22,224.57	9,000.00	866.55	3,593.77	4,539.68	50%	9,033.00	33.00
50591627	53725	GU OPERATING AGREEMENT ANNUAL	298,119.96	305,572.92	330,986.00	137,910.85	162,089.15	30,986.00	91%	340,441.00	9,455.00
50591627	53726	GU CUSTOMER SERVICE	96,642.47	98,280.16	105,319.85	43,883.38	41,116.62	20,319.85	81%	108,479.00	3,159.15
50591663	54110	RTE 12 WATER PURCHASED USED	340,211.81	385,013.47	350,000.00	105,263.37	244,736.63	0.00	100%	400,000.00	50,000.00
50591663	54115	ROUTE 117 WATER PURCHASED USED	386,558.85	387,934.88	400,000.00	97,292.66	252,707.34	50,000.00	88%	400,000.00	0.00
50591663	54120	METER EQUIPMENT	6,215.00	14,788.33	16,000.00	1,016.96	3,983.04	11,000.00	31%	16,000.00	0.00
50591921	53601	INTEREST EXPENSE	22.00	22.00	0.00	0.00	0.00	0.00	0%	0.00	0.00
50591921	54420	FINANCE DEPT SERVICES	26,000.00	26,000.00	26,000.00	0.00	0.00	26,000.00	0%	33,000.00	7,000.00
50591921	54506	FIRE HYDRANT MAINTENANCE	-8,175.00	-8,175.00	14,400.00	0.00	0.00	14,400.00	0%	14,400.00	0.00
50591921	58810	GEN OBLIGATION BOND PRINCIPAL	0.00	0.00	20,799.00	0.00	0.00	20,799.00	0%	20,799.00	0.00
50591921	58811	GEN OBLIGATION BOND INTEREST	4,076.54	3,244.60	2,829.00	0.00	0.00	2,829.00	0%	1,997.00	-832.00
50591921	58820	CWF/DWSRF LOAN PRINCIPAL	0.00	0.00	260,920.00	0.00	0.00	260,920.00	0%	226,565.00	-34,355.00
50591921	58821	CWF/DWSRF LOAN INTEREST	46,978.07	41,891.83	36,702.00	12,815.89	0.00	23,886.11	35%	30,698.00	-6,004.00
50591921	58822	LOAN PAYMENT TO SEWER DEP	0.00	0.00	0.00	0.00	0.00	0.00	#DIV/0!	0.00	0.00
50591921	59300	TRANSFERRED FUNDS	187,500.00	187,500.00	0.00	0.00	0.00	0.00	0%	0.00	0.00
50591923	53600	ACCOUNTING SERVICES/AUDIT	6,821.25	8,245.00	9,738.00	1,275.00	7,225.00	1,238.00	87%	9,738.00	0.00
50591926	52300	RETIREMENT	-1,949.00	-6,689.00	4,261.50	0.00	0.00	4,261.50	0%	10,000.00	5,738.50
50591991	58910	CONTINGENCY	0.00	0.00	20,476.45	0.00	0.00	20,476.45	0%	20,000.00	-476.45
50591991	58911	LEAK TEST	0.00	0.00	15,000.00	0.00	0.00	15,000.00		15,000.00	0.00
50591991	59500	DEPRECIATION EXPENSE	312,364.00	312,364.00	0.00	0.00	0.00	0.00	0%	0.00	0.00
50591999	59000	WRITE-OFF EXPENSE	-	0.00	0.00	312,364.00	0.00	-312,364.00	0%	0.00	0.00
5059801	46044	WPCA REV NON CUSI	0.00	0.00	0.00	0.00	0.00	0.00	0%	0.00	0.00
5059801	46045	NEW METER CHARGE	0.00	0.00	-5,000.00	0.00	0.00	-5,000.00	0%	-5,000.00	0.00
5059801	46046	WATER MISC	33.15	-3,405.00	-3,000.00	-3,726.45	0.00	726.45	124%	-3,000.00	0.00
5059801	46048	NEW CONNECTION REVENUE	-3,995.00	-4,710.00	-5,000.00	-1,940.00	0.00	-3,060.00	39%	-5,000.00	0.00
5059801	46049	TRANSMISSION FEE MONTVILLE WAT	-14,709.82	-10,869.37	-21,000.00	-4,818.39	0.00	-16,181.61	23%	-21,000.00	0.00
5059801	46050	WATER USAGE CHARGE	-1,142,202.49	-1,248,547.83	-1,395,881.80	-444,409.19	0.00	-951,472.61	32%	-1,534,541.00	-138,659.20
5059801	46051	WATER LATE FEE	-1,683.29	-1,078.78	0.00	-406.03	0.00	406.03	0%	0.00	0.00
5059801	46053	WATER ASSESSMENT	-15,107.31	-13,010.82	0.00	-1,637.35	0.00	1,637.35	0%	0.00	0.00
5059801	46054	HYDRANT MAINTENANCE	0.00	0.00	-14,400.00	0.00	0.00	-14,400.00	0%	-14,400.00	0.00
5059001	47009	MISCELLANEOUS	0.00	0.00	0.00	0.00	0.00	0.00	0%	0.00	0.00
5059801	48001	INTEREST ON DEPOSITS	0.00	0.00	0.00	0.00	0.00	0.00	0%	0.00	0.00
5059001	49002	TRANSERS IN:	-388,678.26	-388,677.26	-321,250.00	-121,628.21	0.00	-199,621.79	0.38	-280,059.00	41,191.00
		Total 0505 WATER FUND	300,973.49	253,147.42	0.00	137,751.93	722,525.30	-860,277.23		0.00	
		Revenue Total	-1,566,343.02	-1,670,299.06	-1,765,531.80	-578,565.62	0.00	-1,186,966.18		-1,863,000.00	-97,468.20
		Expense Total	1,867,316.51	1,923,446.48	1,765,531.80	716,317.55	722,525.30	639,052.95		1,863,000.00	97,468.20

***Amounts are tentative to agreements being finalized**

File #: 26-0353 **Agenda Date:** 4/8/2026 **Agenda #:** 6.

FINANCIAL BUSINESS REQUEST (FBR)

Motion/Request:
Discussion and possible action regarding the Fiscal Year 2026/2027 Budget.

Background:

MOTION to recommend the Town Council adopt the Fiscal Year 2026/2027 Budget in the amount of **$_____** comprised of:

- General Government: ***$_____***
- Board of Education***: $_____***

This will be the proposed Fiscal Year 2026/2027 Budget to present at the April 21, 2026 Public Hearing

Department Comment/Recommendation:
(type text here)

Finance Director Comment/Recommendation:
(type text here)

Mayor Comment/Recommendation:
(type text here)

TOWN OF LEDYARD BUDGET

FISCAL YEAR 2026-2027

MARCH 3, 2026

1 Mayor's Letter

2 Budget Summary

3 Town Government Organizational Chart

4 Expenditure Summary

5 Expenditure Detail

6 Revenues

7 Capital Improvement Plan

8 Contingency Plan

AVERY

600297

TOWN OF LEDYARD
CONNECTICUT
OFFICE OF THE MAYOR
741 Colonel Ledyard Hwy.
Ledyard, CT 06339
(860) 464-3222

March 2, 2026

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

Chairman St. Vil,

Enclosed you will find the proposed FY 26-27 (FY27) budget which has been prepared by my office in accordance with the Ledyard Town Charter. The proposed budget includes both governmental divisions (General Government and Board of Education). That total is $73,810,669 and calls for a **Mill Rate of 26.67,** which represents a $3,434,407 dollar increase and a 0.89 mill increase over the equalized FY26 mill rate of 25.78 (after revaluation). The overall increase is a blended rate of 4.88% increase. The FY27 budget includes use of one full mill of value from the Mill Rate Stabilization Fund. Increases are driven by the following, in order of dollar value magnitude: Healthcare (BoE and Gen. Gov) $891,210 Capital $609,208; Police overtime $95,350 and Salary Benefit Adjustments (4 bargaining units in contract negotiations in FY27) $84,341. Excluding Capital and Healthcare, *General Government increases by a meager 2.35%, and the Board of Education increases by 3.63%.*

When factoring in "In-Kind" expenses (costs on the General Government side paid on behalf of the Board of Education), the **actual budgetary breakdown is $52,996,688 Board of Education (71.80% of total budget) and $20,813,981 Gen. Government (28.20% of total budget).**

I've chosen to present Healthcare as a separate line item this year as it is not reflective of the tight budgeting and represents a cost outside our control. Effective FY28, Capital will also be presented as a standalone. At this time last year, I expressed concern for a substantial tax increase in FY26 as it precedes a revaluation year effective FY27. I carry that concern of affordability forward this year, as the revaluation has increased residential values dramatically (though in-line with the market and on the conservative side), while commercial and industrial values have fallen flat since COVID. This equates to a "built-in" tax increase for our residents, as residential property owners will absorb the reduction in values from the commercial/industrial segment. Our current median property tax in Ledyard is $6,100 or more than $508 per month.

The United Way 2025 "The State of ALICE"[1] shows Ledyard now with 29% of our residents below the ALICE Threshold[1], down from the prior 31%. While that seems like positive news, the United Way data trails by two years, so the 2025 report uses 2023 data. Another issue with their data is the monthly housing cost for a family of four is stated at $1,701- however this figure presumes to include ALL utilities. If this singular figure were updated to reflect existing housing and utility costs, the ALICE report would be worse than it is. The "ALICE" acronym stands for "**A**sset **L**imited **I**ncome **C**onstrained and **E**mployed". Facing substantial tax increases, these vulnerable residents will be making difficult decisions regarding mortgages/rents, heating, electricity and food, among other necessities.

On the revenue side, one key driver to this challenging budget is a tax collection *decrease* as the result of the State of CT's Veterans Exemption Bill. While a well-intentioned piece of legislation, it came in the form of another unfunded mandate (one of more than 1,400 in CT) and amounts to a net tax revenue loss of more than $1,000,000, based on **$28,312,300 in currently exempt assessed value** (based on prior revaluation).

The Grand List increased a collective 42.21% after revaluation. While residential real estate segments increased dramatically with overall real estate valuations up 50.74%, exemptions also increased substantially by 107.71%. Further, Commercial and Industrial valuations remained flat, further impacting taxation as the loss will be absorbed by the other segments. Motor Vehicles saw values increase by 6.13%, while exemptions for the same increased by 43.66%. Our total net Grand List value now sits at $1.86B, still substantially lower than our peers of East Lyme at $2.81B, Stonington at $4.2B, Waterford at $4.44B. Grand List value, yet with a 10% higher median household income than Ledyard (ability to pay). Montville data is not included as Montville has received an extension of time from the State to complete their revaluation. Colchester is also not included as they are starting their revaluation shortly.

General Government includes 24 segments with increases of 2% or less. 5 segments include increases between 10% and 44.3%. It should be noted however that large percentage increases are not the whole story: Increasing a low impact such as the Historic District with a 19.4% increase, but the dollar value for the same is $3,439, so please review percentage increases for context. The balance of budgetary segments lies between 2.1% and 9.8% increases. **Primary cost drivers in the General Government budget:** Employee Expenses, up 8.9% or $996,268. Key lines are Healthcare for Board of Ed and Gen Gov (up a combined $891,210) and Salary Benefit Adjustment (up $84,341- 4 bargaining units in negotiations in FY27) Capital up 51.7% or $609,208. Key lines are Fire Apparatus ($384,305), Heavy Equipment / Lg trucks ($275,000), Building Capital needs ($100,000) and Technology upgrades ($139,675). Town Council, up 33.2% or $72,840. Key lines are Added Grant Writer (new $30,000), increased special counsel (up $30,000 Federal Indian matters) and Audit Services ($10,000 contract increase). Additionally, I have asked that the Mayor's salary be increased by 8.2% (effectively a 2% annualized increase). Per a Connecticut Constitutional Amendment of 1982, it states "Legislative bodies may authorize a salary increase once during the term of an elected official if (a) the term is four years or longer and (b) the official has served at least two years of that term." If approved, the Mayor's salary would increase, then remain fixed for the first two years of the next Mayor's term as well, before that individual could seek an increase. There are no annual increases, cost of living adjustments or other compensation.

Town Hall staffing remains very lean, with most departments operating with 1.85 FTE's, the exceptions being Finance and Land Use. Cloudpermit™, the online building and zoning permit platform to make the permitting process more streamlined for the consumer, completing applications remotely at any hour/day, while streamlining the permit tracking for Town staff has launched and continues to be fine-tuned as well. Outside Town Hall, the Police Department employs 35, including dispatchers and ACO, followed by the Public Works Department with 18 full-time employees, including the Town Engineer.

School nurses and aides are once again included in the General Government budget for the final year of the contract. With the closure of Ledyard VNA, Ledyard will no longer be in the nursing business at which time, nurses/ aides will be included in the Board of Education budget for FY28. This department represents roughly $600,000 in annual expense that currently resides within the General Government books.

The Capital plan includes a tax levy of $1,786,987. This is the second highest Capital set-aside in the last nine years. With every building, piece of equipment, fields, etc., Capital budgeting is required to be prepared for replacements and major renovations.

The proposed budget also includes use of the Mill Rate Stabilization Fund ($1,854,535) to partially offset some of these increases.

We often benchmark ourselves relative to our Southeastern CT peers. By population, per 2020 US Census are: Colchester (15,505), Stonington (18,347), Montville (18,385), East Lyme (18,693) and Waterford (19,603). When taking into consideration each municipality Grand List (The tax base) compared to Ledyard, Stonington +226%, East Lyme +51.6% and finally Waterford at +241%. Montville and Colchester are not included as they are in the process of revaluation and figures

are not yet available. Grand List growth lags in Ledyard and has for many years. Growth stagnation is and has been our Achilles heel for many decades- since large scale growth in the 1960's as the result of shipbuilding. Grand List growth allows a more even distribution of tax burden, as taxes are spread across Industrial, Commercial and Residential segments. Each of the noted towns have a far greater proportion of their Grand List composed of Commercial/Industrial valuations, lessening the tax burden on their residential homeowners.

For FY27, Debt Service decreases by 4.8% or $183,209. Current Debt Service represents 1.33 mills (Interest only is an additional 0.44 mills of the mill rate) in taxation and the percentage of current debt to tax levy now sits at 7.66%.

General Government continues tight management of expenses and seeks reductions where possible, adding regional collaborations as well. Currently, this service is in place for the Tax Assessor (shared with Preston) as well as one Public Works FTE (shared with Preston). We also purchased a new street sweeper with our neighbors in Preston to save money and share the expense of a less used machine. We continue to seek additional regional opportunities, while also recognizing few new opportunities exist for continued General Government consolidation and savings, short of a return to some level of County Government. The Connecticut taxation model is outdated, unsustainable and regressive and proves overly burdensome to taxpayers. Per US News & World Report "Best States Rankings 2025", Connecticut ranks as the 10th most expensive state to live, after Arizona and Oregon. In New England, only Massachusetts was cited to be more expensive[2].

In reviewing the Town's retirement plan, Ledyard's 90.07% funded rate is one of the highest funded rates in the State. This is continued positive news for both our retirees and our taxpayers and a clear indication that the town is managing legacy costs properly and allocated funds are managed well by contracted private sector consultants. For perspective, the State of *CT has $33.6 Billion* of unfunded pension and retiree healthcare obligations outstanding[5] (highest per capita liability in nation), while Ledyard has $4.2M outstanding and a conservative assumed rate of return of 6.25%. Ledyard is expected to be fully funded in the next 5-7 fiscal years, while the State expects the same in FY48. CT remains in the bottom five states in the Nation in terms of funded pension levels.[3]

The Road Surface Rating (RSR) as provided by BETA Engineering[4] currently sits at 85.96 (on a 100-point scale)[6]. This represents Ledyard's highest road rating ever. I do expect this figure to fall a bit this year as the result of a harsh winter. The BETA Plan seeks an annual investment of approximately $1,000,000 in road restoration to maintain our rating. Substantial decreased funding to road resurfacing costs far more when roadbeds fail as opposed to continued preventative maintenance as we do now. This budget funds road restoration again at $900,000 – funding at the same level as the current fiscal year. Determining Ledyard's comfort level in a road rating range is important, with the underlying premise that 90 -100 is neither feasible, nor financially practical. In consulting with Public Works Director Masalin, the recommendation is to continue the current trajectory, with an annual rating of 83-85, which we believe represents the ideal combination of rating and affordability for the Town of Ledyard. According to BETA Engineering, Ledyard boasts one of the best road ratings in New England.

The Capital Plan for FY27 recommends a scheduled replacement of one police cruiser, down from the two requested. The police currently have a fleet of 12 cruisers and four administrative vehicles. An internal policy added several years ago increased the service cycle to a minimum of 130,000 miles (previously, we disposed of cruisers at or near 100,000 miles) and one cruiser still has a year of service. While we sometimes experience increased maintenance costs associated with the longer service cycle, the cost-benefit analysis proves this out. The total cost to acquire and upfit each new cruiser today is slightly more than $46,360.

Notable Board of Education Capital projects included for funding are: LMS Cafeteria expansion ($600,000); JWL Classroom renovations ($140,000); District-wide HVAC Maintenance ($140,000); and a replacement pickup truck for Central Office ($70,000). Please review the Capital Improvement Plan contained in the FY27 budget book for a list of all projects and projected expenditures.

FY27 will be the final year of the State's biennial budget. Mid-cycle budget adjustments may occur in the legislature but its too soon to know the effect. Fiscal guardrails prevent additional funding to municipalities without removal of other programs. Municipalities have been level funded six straight years- despite continued inflationary pressures (though inflation is easing). We continue to track legislation and how it may impact Ledyard, particularly unfunded mandates. Recent examples of such mandates include the 100% permanently and totally disabled veterans' exemption, early voting and MS-4 stormwater monitoring. Collectively, these three mandates cost Ledyard roughly $1,250,000.

In seeking our most efficient local government, I continually ask *"What is the role of local government?" What must we provide, what could we provide and what should be provided by others?* In doing so, I continue to refine what local government must provide our residents in an effort to mitigate some of the cost burden to all. Town-wide trash /recycling collection is a continuing example of what purchasing power can do for our residents.

Sincerely,



Fred B. Allyn III, Mayor

Endnotes:

1.) https://www.uwsect.org/ALICE
2.) https://www.usnews.com/news/best-states/rankings/opportunity/affordability
3.) https://reason.org/data-visualization/state-pension-debt/
4.) https://www.beta-inc.com/client/ledyard-ct/

Town of Ledyard

Proposed Budget Overview

TOWN OF LEDYARD AND BOARD OF EDUCATION

FISCAL YEAR 2026-2027

Budget Process

The annual budget process commences in November-December and prioritizes spending based on limited resources and staffing.

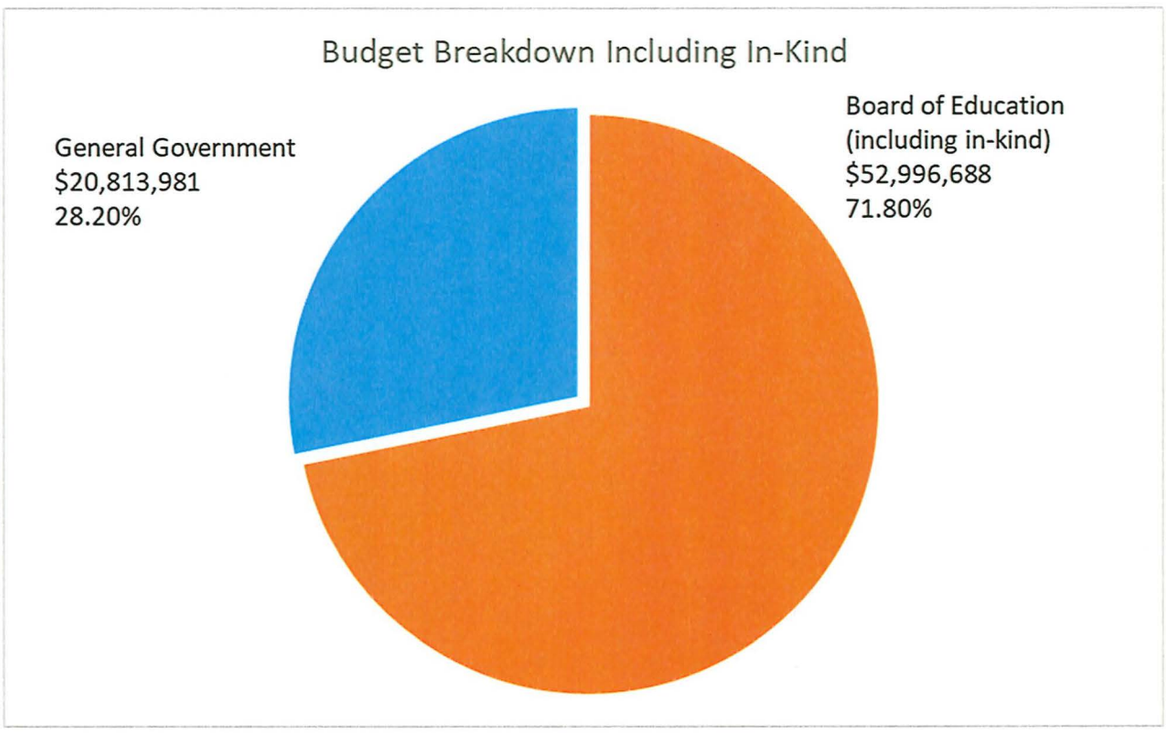
The proposed budget offers a set of priorities for the taxpayers to consider.

The budget contains the best revenue and expenditure data that is available at the time of budget development. Since 1971, Ledyard voters have the opportunity to vote on their budget.

Budget Pressures

The Budget compiles revenues from tax levy, State funding and grants as well as expenditures by Department, including borrowed monies for Capital projects and finally the Capital Improvement Plan, which identifies needs based on studies, estimates and consultant input. The greater the governmental "footprint", the greater the need for present and future capital outlays (more buildings, more equipment equals greater short-term and long-term costs).

Budget Breakdown after accounting for BoE expenses in the General Government Budget:



BOE In-Kinds Paid by General Government
FY 2026-27 Projected

Description	Gross Expense	BOE Share %	Total BOE Amount
Director of Finance	$ 136,990	20.00%	$ 27,398
Assistant Finance Director	75,755	20.00%	15,151
Treasurer	20,138	20.00%	4,028
School Nurses Salary	342,080	100.00%	342,080
School Nurses Aides	84,895	100.00%	84,895
School Nurse - Admin Wages	50,801	100.00%	50,801
School Nurse - Other Wages	23,100	100.00%	23,100
School Nurses Operating	300	100.00%	300
School Nurses - Training	1,200	100.00%	1,200
Defined Contribution Employer Contr School Nurses	18,680	100.00%	18,680
Employer Contr to Health Ins--School Nurses	99,704	100.00%	99,704
In-lieu of healthcare payment for school nurses	9,000	100.00%	9,000
Police Officer -- DARE Program	10,000	100.00%	10,000
Employer Contr Health Ins--BOE	6,696,500	100.00%	6,696,500
Retiree Health - BOE	525,000	100.00%	525,000
Workers' Compensation, BOE	313,200	100.00%	313,200
Social Security for in-kind salaries	557,453	7.65%	42,645
Property Insurance, BOE	90,150	100.00%	90,150
School Leaders Liability Insurance	16,200	100.00%	16,200
General Liability	174,000	50.00%	87,000
Public Officials Liability	44,000	50.00%	22,000
Cyber Coverage	35,100	50.00%	17,550
Defined Contribution Employer Contr BOE Employees	55,000	100.00%	55,000
Financial Software	70,000	50.00%	35,000
Debt P&I on School Buildings	2,171,271	100.00%	2,171,271
Capital	306,500	100.00%	306,500
Total In-Kind Education Expenses included in the General Government Budget			**$ 11,064,353**

Budget Highlights

Board of Education Expenditures as proposed increased by 3.63%, or $1,470,093 (0.79 mills)

General Government Operating Expenditures as proposed (less Healthcare) increased by 2.35%, or $475,181 (0.25 mills)

Overall Healthcare costs increased by 10.43%, or $891,210 (0.48 mills)

The proposed contribution to fund town-wide capital increased by 51.73% or $609,208 (0.22 mills).

Total expenditures as proposed are $73,811,669 or a combined 4.88% increase.

	Revised Budget FY 26	Proposed Budget FY 27	Increase (Decrease) Dollars	Increase (Decrease) Percentage
General Government	$ 14,745,171	$ 15,876,497	$ 1,131,326	7.67%
Public Safety	4,948,901	5,141,010	192,109	3.88%
Public Works	3,371,286	3,516,761	145,475	4.32%
Health & Welfare	512,490	550,188	37,698	7.36%
Library	641,958	652,651	10,693	1.67%
Parks & Recreation	668,985	689,999	21,014	3.14%
Education	40,462,242	41,932,335	1,470,093	3.63%
Debt Service	3,847,450	3,664,241	(183,209)	(4.76%)
Capital	1,177,779	1,786,987	609,208	51.73%
	$ 70,376,262	$ 73,810,669	$ 3,434,407	4.88%

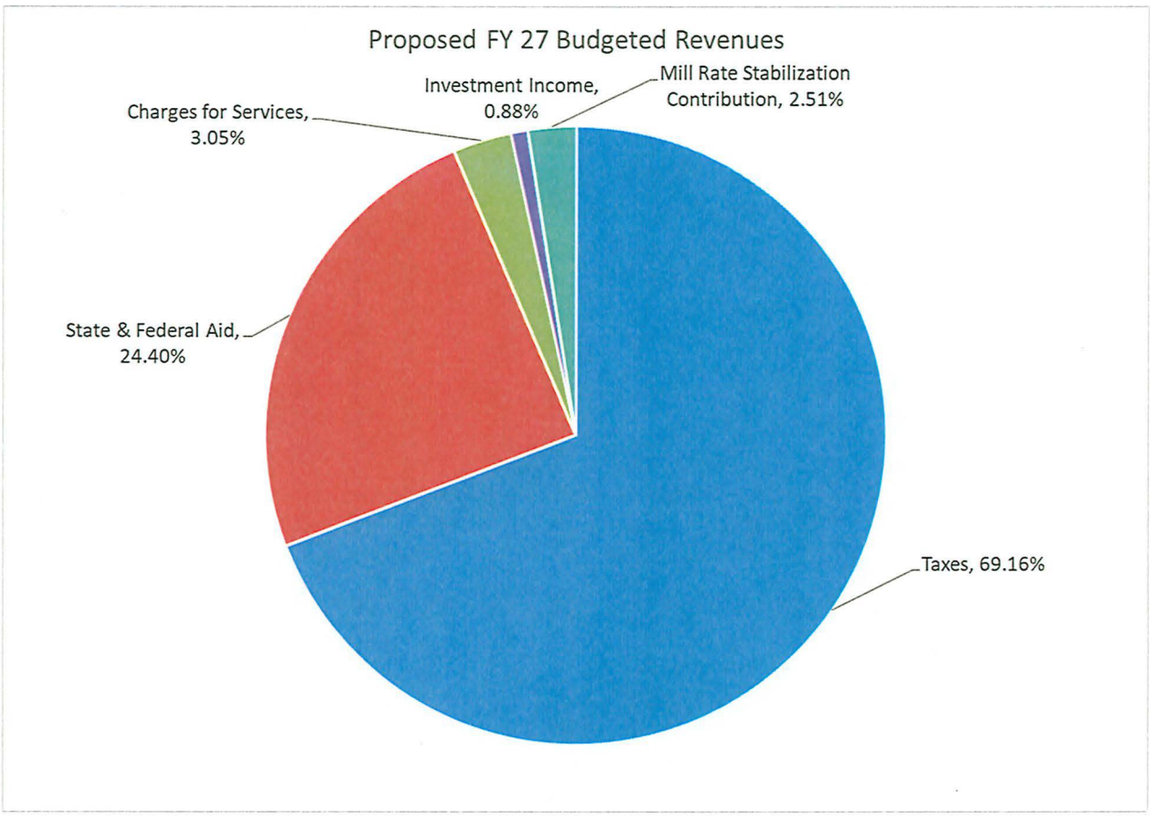
Funding of the Budget

The State of CT model is a regressive, tax heavy funding model. Property and Motor Vehicle Tax is the largest source of revenue to support municipal functions.

Our second largest revenue source is Federal and State Aid (primarily for education).

FY27 is the second year of the State biennial budget. The State budget is in negotiations now but early indications point to another year of level funding, which translates as a reduction in funding, due to inflationary pressures and increased costs for fuels, insurance, wages and electricity.

Investment income from Reserve Accounts continues generating positive income due to the current interest rate environment. This of course is subject to change. Interest funds are used to help mitigate cost increases.



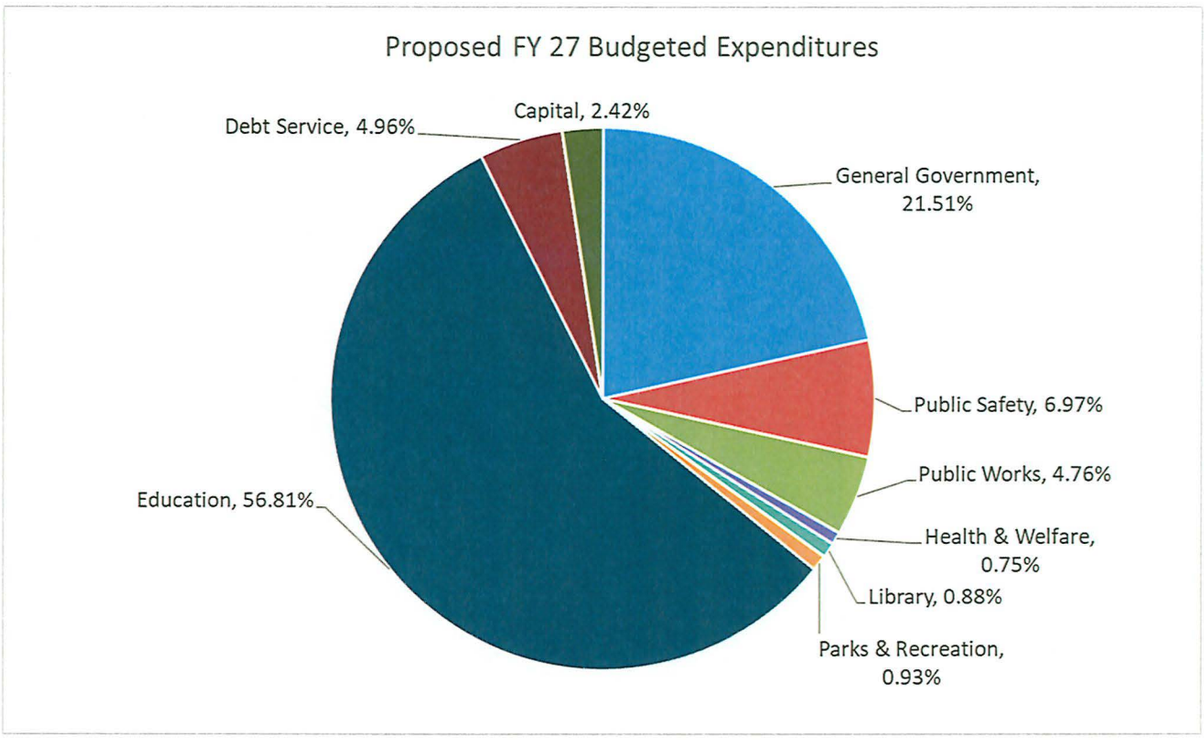
Fund Balance

Over time, Ledyard has maintained a lean Fund Balance (aka "Rainy Day Fund"). Fund Balance currently sits at 7.43% of our total annual projected operating expenses. We do not utilize Fund Balance in this budget and have a May 23, 2018, policy that calls for an increase in Fund Balance to 10% by FY37. Fund Balance is a key determinant in long-term borrowing (Capital projects like schools, roofs, police dept.)

Expenditure Summary- General Government

Proposed General Government spending (excluding Healthcare costs and capital) is projected to increase by $475,181 to $20,813,981- a 2.35% increase. "In-Kind" expenses, which are expenses under the Gen. Gov budget but for school purposes is $11,064353. In-Kind includes BoE Healthcare, school nurses/aides, workers comp and insurance and Principal and Interest on school projects.

Key drivers of the General Government increases include: Wages, Insurance, Health Care, MIS Dept. (aging tech, increased software costs) and energy expenses.



Top Departments by Expense (excluding fringe)

Police /ACO/ Dispatch: $4,135,251 (2.21 mills)

Public Works (including trash contract): $3,516,761 (1.89 mills)

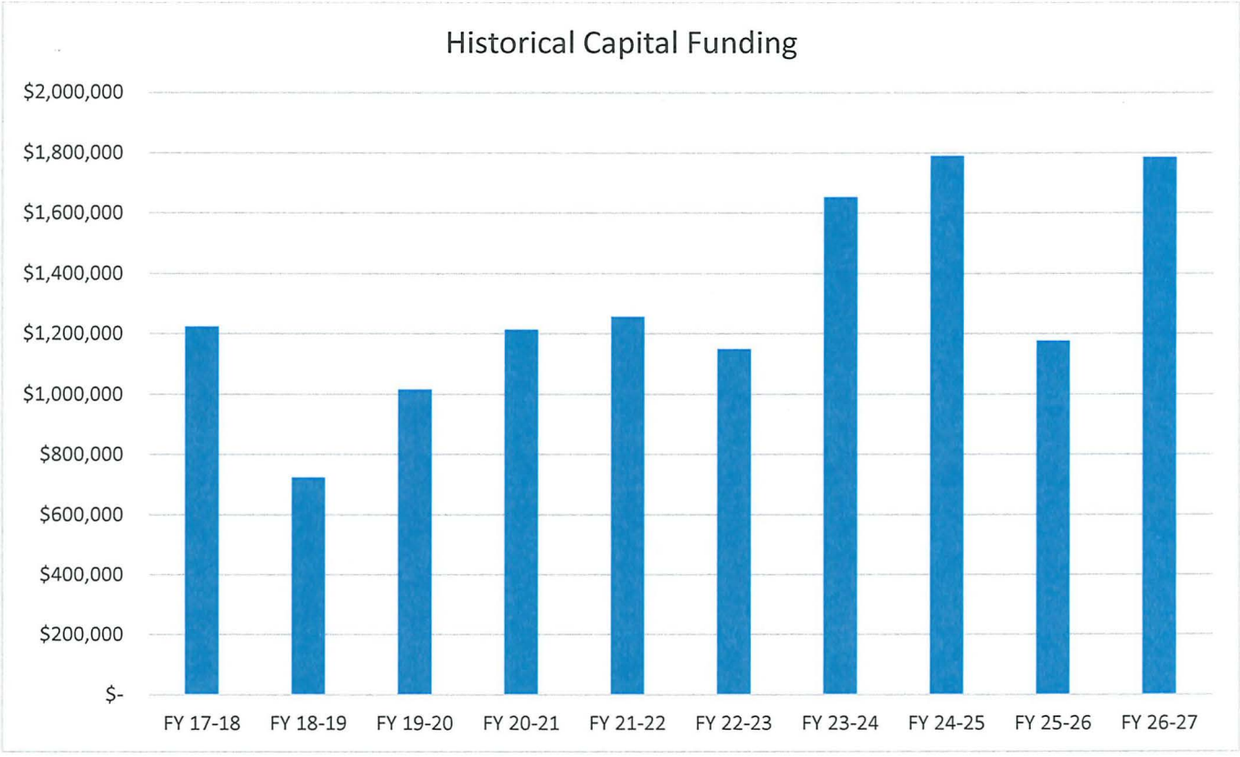
Fire/Ambulance Services: $1,005,759 (0.54 mills)

Parks and Rec / Sr. Center: $689,999 (0.37 mills)

Libraries: $652,651 (0.35 mills)

Capital Improvement Plan

The FY27 Capital Improvement Plan (CIP) funds at $1,786,987 of the tax levy- 2nd highest in last 9 years.



Key CIP Funding includes the following:

LMS Cafeteria expansion: $600,000

Fire apparatus replacement program $384,305

Road Maintenance (not major resurfacing): $197,141

Public Works Lg. trucks $190,000

JWL Classroom upgrades $140,000

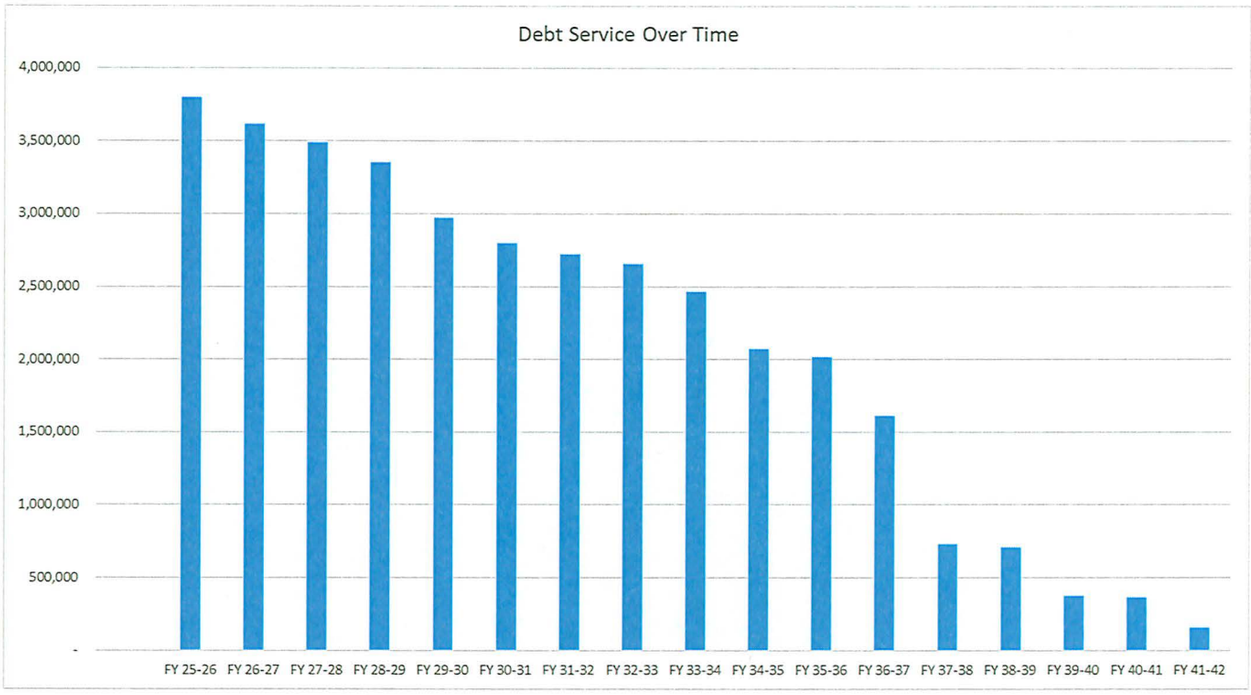
BoE district wide HVAC maintenance: $140,000

Gen Gov. Bldg. reserve fund: $100,000

Debt Service

Debt Service repays borrowed funds (debt issued). Current outstanding debt includes Ledyard Middle School, Gallup Hill School, Ledyard Police Station and Clean Water Funds for water main extensions.

Total Debt Service requires $3,664,241 which represents a decrease of ($183,209) from FY26. It is noted that $816,322 of the aforementioned total is interest expense, or 0.44 mills in the FY27 budget.



The Value of a Mil of Taxes

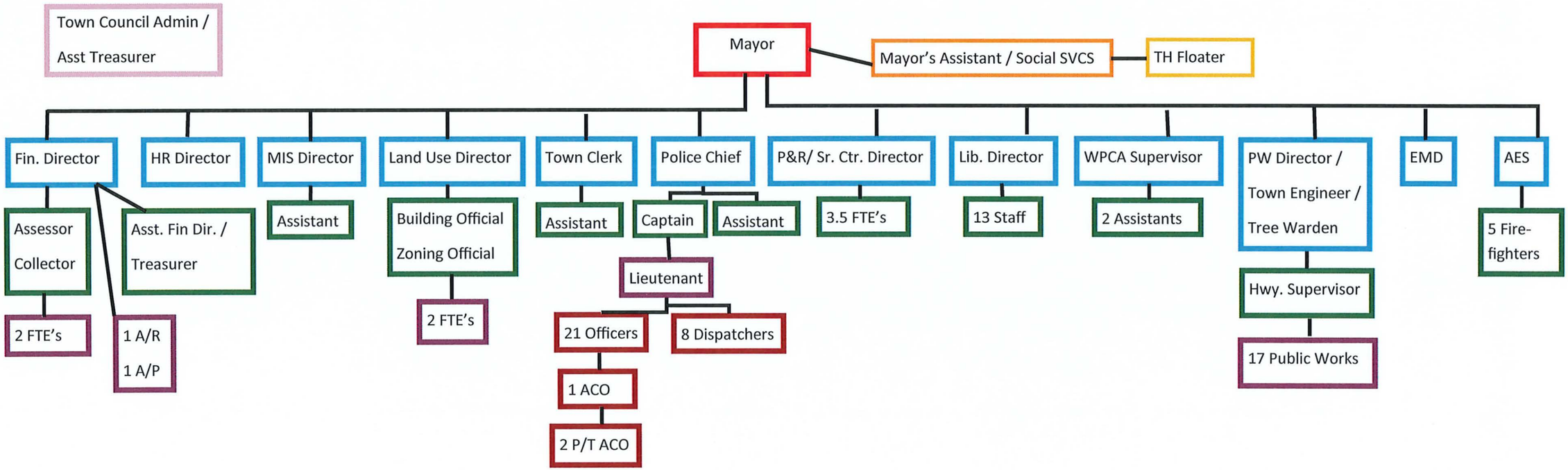
One Mil of taxes = $1,854,535

To increase or decrease the mil rate by ***one tenth of a mil*** (0.10) requires *EITHER* new revenue of $185,436 *OR* reduced spending of $185,436

To a taxpayer with an assessed value of $200,000, 1/10th of a mil of taxes equates to $20 annually or $1.67 per month.

Town of Ledyard

General Government Organizational Chart



TOWN OF LEDYARD
FISCAL YEAR 2027 TOWN COUNCIL PROPOSED BUDGET
EXPENDITURE SUMMARY

	FY 2023	FY 2024	FY 2025	FY 2026				FY 2027			
DEPARTMENT	ACTUAL	ACTUAL	ACTUAL	ADOPTED	REVISED	YTD	% OF REVISED	DEPT PROPOSED	Diff vs FY26 Revised	MAYOR PROPOSED	Diff vs FY26 Revised
TOWN COUNCIL	132,422	242,615	143,702	219,256	219,256	115,124	52.51%	292,096	72,840	292,096	72,840
HISTORIC DISTRICTS	23,549	30,159	16,269	17,771	17,771	3,177	17.88%	21,210	3,439	21,210	3,439
CEMETERY COMMITTEE	1,990	6,200	1,978	2,000	2,000	-	0.00%	5,000	3,000	4,000	2,000
MAYOR'S OFFICE	176,123	183,572	199,378	212,630	212,630	119,258	56.09%	213,503	873	214,952	2,322
ADMINISTRATIVE SUPPORT	132,032	137,524	126,889	126,500	126,500	73,454	58.07%	127,300	800	127,300	800
LEGAL SERVICES	89,899	100,621	31,560	20,000	20,000	4,484	22.42%	20,000	-	20,000	-
PROBATE	8,287	8,630	9,000	10,000	10,000	3,527	100.00%	10,000	-	10,000	-
PROPERTY INSURANCE	446,465	490,227	509,397	581,125	581,125	412,814	71.04%	572,250	(8,875)	572,250	(8,875)
HEALTH DISTRICT	117,038	116,400	116,400	120,890	120,890	120,889	0.00%	125,451	4,561	125,451	4,561
CONSERVATION COMMISSION	60	481	2,000	3,575	3,575	13	0.00%	3,575	-	3,575	-
HUMAN RESOURCES STAFF	117,175	91,754	115,822	139,800	139,800	66,815	47.79%	132,736	(7,064)	132,736	(7,064)
EMPLOYEE EXPENSES	9,826,512	10,003,389	10,274,116	11,243,173	11,218,832	5,429,011	48.39%	12,297,600	1,078,768	12,215,100	996,268
REGISTRARS	40,230	45,210	48,000	53,820	53,820	43,818	81.42%	56,160	2,340	55,435	1,615
ELECTIONS	26,922	37,005	53,966	63,062	63,062	23,341	37.01%	90,983	27,921	90,983	27,921
TOWN CLERK	153,699	152,495	159,186	173,645	173,645	81,759	47.08%	176,915	3,270	176,915	3,270
FINANCE	475,639	454,555	505,647	561,100	561,100	275,439	49.09%	556,795	(4,305)	556,795	(4,305)
ASSESSOR	169,393	173,218	167,143	184,834	186,963	110,751	59.24%	189,508	2,545	189,508	2,545
TAX COLLECTOR	244,517	300,474	273,508	159,519	161,303	125,338	77.70%	163,222	1,919	163,222	1,919
MGMT INFORMATION SYSTEMS	335,502	350,973	393,996	396,458	400,618	283,841	70.85%	428,315	27,697	428,315	27,697
LAND USE	279,231	348,012	433,699	446,067	462,141	220,658	47.75%	476,484	14,343	466,484	4,343
PLANNING COMM	1,280	1,928	2,610	1,000	1,000	55	5.50%	1,000	-	1,000	-
EDC	5,731	7,236	7,654	8,140	8,140	7,251	89.08%	8,140	-	8,140	-
IWWC	323	443	245	500	500	-	0.00%	500	-	500	-
ZONING BOARD OF APPEALS	368	375	370	500	500	-	0.00%	530	30	530	30
POLICE	2,992,126	2,976,894	3,159,258	3,166,025	3,166,025	2,012,945	63.58%	3,498,200	332,175	3,311,243	145,218
DISPATCH	707,978	671,058	710,251	713,900	713,900	420,971	58.97%	716,413	2,513	711,165	(2,735)
ANIMAL CONTROL	86,725	104,968	95,642	101,125	102,308	61,580	60.19%	112,843	10,535	112,843	10,535
FIRE MARSHAL	93,252	87,391	91,523	102,690	102,690	52,412	51.04%	102,690	-	102,690	-
ADMINISTRATOR EMERGENCEY SERVICES	426,082	436,865	463,391	487,934	487,934	294,999	60.46%	519,692	31,758	519,692	31,758
LEDYARD FIRE	116,242	116,891	127,791	129,500	129,500	86,628	66.89%	137,000	7,500	132,000	2,500
GALES FERRY FIRE	198,033	197,186	210,833	226,094	226,094	123,087	54.44%	230,927	4,833	230,927	4,833
EMERGENCY MANAGEMENT	17,388	18,063	15,820	20,450	20,450	7,800	0.00%	20,450	-	20,450	-
VISITING NURSES	654,968	205,003	10,000	10,000	10,000	6,000	60.00%	-	(10,000)	-	(10,000)
SCHOOL NURSES	333,507	358,174	443,851	502,490	502,490	251,576	50.07%	-	(502,490)	517,876	15,386
SOCIAL SERVICES	101,285	77,190	-	-	-	-	0.00%	32,312	32,312	32,312	32,312
SENIOR CENTER	101,205	-	-	-	-	-		-	-	-	-
PUBLIC WORKS ADMIN	169,787	196,309	190,470	214,000	214,000	144,844	67.68%	223,701	9,701	223,701	9,701
PUBLIC WORKS HIGHWAY	1,036,119	1,132,926	1,143,170	1,267,371	1,269,534	726,585	57.23%	1,310,089	40,555	1,310,089	40,555
PUBLIC WORKS VEHICLE MAINTENANCE	357,279	334,420	380,122	370,294	370,294	223,969	60.48%	380,471	10,177	380,471	10,177
PUBLIC WORKS ROAD UPKEEP	174,390	146,664	221,310	155,108	155,108	65,682	42.35%	179,800	24,692	169,800	14,692
PUBLIC WORKS DRAINAGE	-	-	-	-	-	-		-	-	-	-
PUBLIC WORKS PROPERTY MAINTENANCE	99,705	84,615	96,221	88,550	88,550	40,482	45.72%	89,500	950	89,500	950
PUBLIC WORKS SANITATION	1,032,009	1,079,510	1,117,000	1,273,800	1,273,800	669,660	52.57%	1,343,200	69,400	1,343,200	69,400
LIBRARY	543,199	564,866	581,262	635,260	641,958	322,314	50.21%	667,174	25,216	652,651	10,693
PARKS AND RECREATION	470,617	588,720	582,533	667,550	668,985	402,074	60.10%	694,949	25,964	689,999	21,014
BOARD OF EDUCATION	34,337,932	35,815,724	38,157,522	40,462,242	40,462,242	-	0.00%	41,872,335	1,410,093	41,932,335	1,470,093
DEBT SERVICE	4,476,232	4,355,473	3,906,653	3,847,450	3,847,450	2,554,048	66.38%	3,664,241	(183,209)	3,664,241	(183,209)
CONTRIBUTION TO CNR	1,150,285	1,653,735	1,791,098	1,177,779	1,177,779	158,708	13.48%	2,132,304	954,525	1,786,987	609,208
TRANSFERRED FUNDS	664,060	504,131	412,392	-	-	-	0.00%	-	-		-
											-
TOTAL GENERAL GOVERNMENT	27,329,068	26,832,750	27,038,406	29,902,735	29,914,020	16,147,181	53.98%	32,025,229	2,111,209	31,878,334	1,964,314
TOTAL BOARD OF EDUCATION	35,815,724	38,157,522	40,462,242	40,462,242	40,462,242	-	0.00%	41,872,335	1,410,093	41,932,335	1,470,093
TOTAL EXPENDITURES	**63,144,792**	**64,990,272**	**67,500,648**	**70,364,977**	**70,376,262**	**16,147,181**	**22.94%**	**73,897,564**	**3,521,302**	**73,810,669**	**3,434,407**

TOWN OF LEDYARD
FISCAL YEAR 2027 MAYOR'S PROPOSED BUDGET
EXPENDITURE DETAIL

DEPARTMENT / ACCOUNT #	ACCOUNT DESCRIPTION	FY 2023 ACTUAL	FY 2024 ACTUAL	FY 2025 ACTUAL	FY 2026 ADOPTED	FY 2026 REVISED	FY 2026 YTD-1/31/26	FY 2026 % of REVISED	FY 2027 DEPT PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chg Revised	FY 2027 MAYOR PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chge Revised
TOWN COUNCIL														
10110101 51601	TREASURER	17,924	18,550	19,082	19,551	19,551	11,279		20,138	587	3.0%	20,138	587	3.0%
10110101 51602	ADMIN TOWN COUNCIL	66,862	68,730	79,543	82,624	82,624	47,668		85,103	2,479	3.0%	85,103	2,479	3.0%
10110101 53300	PROFESSIONAL/TECH SERVICES								30,000	30,000	N/A	30,000	30,000	N/A
10110101 53600	ACCOUNTING SERVICES/AUDIT	35,875	36,385	38,200	40,110	40,110	21,000		50,110	10,000	24.9%	50,110	10,000	24.9%
10110101 53610	LEGAL SERVICES	10,357	117,305	5,919	70,000	70,000	34,855		100,000	30,000	42.9%	100,000	30,000	42.9%
10110101 56100	OPERATING EXPENSES	1,404	1,645	958	3,971	3,971	322		3,745	(226)	-5.7%	3,745	(226)	-5.7%
10110101 58790	CONTINGENCY	-	-	-	3,000	3,000	-		3,000	-	0.0%	3,000	-	0.0%
		132,422	**242,615**	**143,702**	**219,256**	**219,256**	**115,124**	**52.51%**	**292,096**	**72,840**	**33.2%**	**292,096**	**72,840**	**33.2%**
HISTORIC DISTRICTS														
10110103 52205	CONTRACTUAL EXPENSES	10,333	15,500	1,292	-	-	-		-	-	N/A	-	-	N/A
10110103 54500	HISTORIC BUILDINGS MAINT	5,205	6,123	7,407	7,500	7,500	1,280		6,000	(1,500)	-20.0%	6,000	(1,500)	-20.0%
10110103 54501	SAW MILL MAINTENANCE	3,626	3,814	3,578	3,151	4,015	-		5,500	1,485	37.0%	5,500	1,485	37.0%
10110103 56100	LESTER/RESEARCH OPERATING	1,862	1,845	2,022	4,015	3,151	1,269		6,060	2,909	92.3%	6,060	2,909	92.3%
10110103 56101	SAW MILL OPERATING	1,348	1,377	1,778	1,605	1,605	628		2,150	545	34.0%	2,150	545	34.0%
10110103 58790	MISCELLANEOUS EXPENSES	1,175	1,500	192	1,500	1,500	-		1,500	-	0.0%	1,500	-	0.0%
		23,549	**30,159**	**16,269**	**17,771**	**17,771**	**3,177**	**17.88%**	**21,210**	**3,439**	**19.4%**	**21,210**	**3,439**	**19.4%**
CEMETERY COMMITTEE														
10110107 56100	OPERATING EXPENSES	1,990	6,200	1,978	2,000	2,000	-		5,000	3,000	150.0%	4,000	2,000	100.0%
		1,990	**6,200**	**1,978**	**2,000**	**2,000**	**-**		**5,000**	**3,000**		**4,000**	**2,000**	**100.0%**
MAYOR'S OFFICE														
10110201 51160	CUSTODIAN SALARIES	-	-	-	-	-	-		-	-		-	-	
10110201 51305	TOWN HALL FLOATER	18,156	18,940	19,780	28,692	28,692	15,010		28,692	-	0.0%	28,692	-	0.0%
10110201 51604	MAYOR	99,519	107,000	107,000	107,000	107,000	61,731		107,000	-	0.0%	115,820	8,820	8.2%
10110201 51607	MAYORAL ASST	45,285	45,532	57,951	68,438	68,438	39,107		65,611	(2,827)	-4.1%	58,240	(10,198)	-14.9%
10110201 51700	ADMINISTRATIVE WAGES	-	-	-	-	-	-		-	-		-	-	
10110201 55301	TOWN NEWSLETTER	4,448	3,499	5,148	5,000	5,000	2,964		5,200	200	4.0%	5,200	200	4.0%
10110201 56100	OPERATING EXPENSES	1,704	957	780	2,500	2,500	106		2,000	(500)	-20.0%	2,000	(500)	-20.0%
10110201 58790	CONTINGENCY	7,011	7,644	8,719	1,000	1,000	340		5,000	4,000	400.0%	5,000	4,000	400.0%
		176,123	**183,572**	**199,378**	**212,630**	**212,630**	**119,258**	**56.09%**	**213,503**	**873**	**0.4%**	**214,952**	**2,322**	**1.1%**
ADMINISTRATIVE SUPPORT														
10110203 53700	CONTRACT MAINT/LEASES	58,956	62,702	57,784	57,700	57,700	32,126		58,000	300	0.5%	58,000	300	0.5%
10110203 54311	FIRE HYDRANT MAINTENANCE	10,900	10,900	10,900	10,900	10,900	0		10,900	-	0.0%	10,900	-	0.0%
10110203 55247	ADA COMPLIANCE	896	174	244	500	500	219		500	-	0.0%	500	-	0.0%
10110203 55410	ADVERTISING/LEGAL NOTICES	16,365	16,139	6,759	10,000	10,000	2,725		10,000	-	0.0%	10,000	-	0.0%
10110203 56205	WATER	4,000	3,940	3,817	4,500	4,500	2,124		4,000	(500)	-11.1%	4,000	(500)	-11.1%
10110203 56900	OTHER SUPPLIES	5,952	9,742	9,223	6,500	6,500	2,848		6,500	-	0.0%	6,500	-	0.0%
10110203 56910	POSTAGE	16,268	14,602	17,957	16,000	16,000	13,299		16,500	500	3.1%	16,500	500	3.1%
10110203 58100	DUES & FEES	8,477	8,477	8,477	8,900	8,900	8,966		9,100	200	2.2%	9,100	200	2.2%
10110203 58105	MISC DUES&FEES	10,218	10,848	11,728	11,500	11,500	11,147		11,800	300	2.6%	11,800	300	2.6%
		132,032	**137,524**	**126,889**	**126,500**	**126,500**	**73,454**	**58.07%**	**127,300**	**800**	**0.6%**	**127,300**	**800**	**0.6%**
LEGAL SERVICES														
10110205 53610	SPECIALLY APPROVED COUNSEL	73,522	84,531	-	-	-	4,484		-	-		-	-	
10110205 53615	TOWN ATTORNEY	16,377	16,090	31,560	20,000	20,000	-		20,000	-	0.0%	20,000	-	0.0%
		89,899	**100,621**	**31,560**	**20,000**	**20,000**	**4,484**	**22.42%**	**20,000**	**-**	**0.0%**	**20,000**	**-**	**0.0%**
PROBATE														
10110207 54900	PURCHASED SERVICES	8,287	8,630	9,000	10,000	10,000	3,527		10,000	-	0.0%	10,000	-	0.0%
		8,287	**8,630**	**9,000**	**10,000**	**10,000**	**3,527**		**10,000**	**-**	**0.0%**	**10,000**	**-**	**0.0%**
PROPERTY INSURANCE														
10110209 55210	AUTO INSURANCE	70,425	70,511	75,591	82,675	82,675	57,679		80,750	(1,925)	-2.3%	80,750	(1,925)	-2.3%
10110209 55220	BOILER & MACHINERY INSURANCE	7,350	7,340	7,810	8,635	8,635	6,024		8,450	(185)	-2.1%	8,450	(185)	-2.1%
10110209 55231	POLICE PROFESS LIABILITY	16,180	16,150	17,188	19,000	19,000	13,256		18,600	(400)	-2.1%	18,600	(400)	-2.1%
10110209 55232	GEN LIAB / EXCESS LIAB	151,528	151,456	165,031	177,870	177,870	125,354		174,000	(3,870)	-2.2%	174,000	(3,870)	-2.2%
10110209 55233	PUBLIC OFFICIALS LIAB	38,280	38,210	40,646	44,945	44,945	31,356		44,000	(945)	-2.1%	44,000	(945)	-2.1%
10110209 55234	SCHOOL OFFICIALS LIAB	14,100	14,080	14,975	16,555	16,555	11,550		16,200	(355)	-2.1%	16,200	(355)	-2.1%
10110209 55235	VNA LIABILITY	7,110	7,090	-	-	-	-		-	-		-	-	
10110209 55241	PROPERTY INSURANCE--BOE	78,570	78,420	83,426	92,250	92,250	64,358		90,150	(2,100)	-2.3%	90,150	(2,100)	-2.3%
10110209 55242	AMBULANCE & FIRE	56,166	58,806	66,867	72,715	72,715	70,204		75,000	2,285	3.1%	75,000	2,285	3.1%
10110209 55245	INSURANCE DEDUCTIBLE	6,646	15,665	3,127	20,000	20,000	-		20,000	-	0.0%	20,000	-	0.0%
10110209 55246	RISK MANAGEMENT	110	-	-	10,000	10,000	-		10,000	-	0.0%	10,000	-	0.0%
10110209 55249	CYBER COVERAGE	-	32,499	34,736	36,480	36,480	33,033		35,100	(1,380)	-3.8%	35,100	(1,380)	-3.8%
		446,465	**490,227**	**509,397**	**581,125**	**581,125**	**412,814**	**71.04%**	**572,250**	**(8,875)**	**-1.5%**	**572,250**	**(8,875)**	**-1.5%**
HEALTH DISTRICT														
10110211 58790	HEALTH DISTRICT	117,038	116,400	116,400	120,890	120,890	120,889		125,451	4,561		125,451	4,561	3.8%
		117,038	**116,400**	**116,400**	**120,890**	**120,890**	**120,889**	**100.00%**	**125,451**	**4,561**	**3.8%**	**125,451**	**4,561**	**3.8%**

TOWN OF LEDYARD
FISCAL YEAR 2027 MAYOR'S PROPOSED BUDGET
EXPENDITURE DETAIL

DEPARTMENT / ACCOUNT #		ACCOUNT DESCRIPTION	FY 2023 ACTUAL	FY 2024 ACTUAL	FY 2025 ACTUAL	FY 2026 ADOPTED	FY 2026 REVISED	FY 2026 YTD-1/31/26	FY 2026 % of REVISED	FY 2027 DEPT PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chg Revised	FY 2027 MAYOR PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chge Revised
CONSERVATION COMMISSION															
10110213	56100	OPERATING EXPENSES	60	481	1,075	1,150	1,150	13		1,150	-	0.0%	1,150	-	0.0%
10110213	57300	NEW EQUIPMENT	-	-	-	1,500	1,500	-		1,500	-	0.0%	1,500	-	0.0%
10110213	58790	MISCELLANEOUS EXPENSES	-	-	925	925	925	-		925	-	0.0%	925	-	0.0%
			60	**481**	**2,000**	**3,575**	**3,575**	**13**	**0.36%**	**3,575**	**-**	**0.0%**	**3,575**	**-**	**0.0%**
HUMAN RESOURCES STAFF															
10110251	51606	HUMAN RESOURCES DIRECTOR	115,083	90,019	92,427	97,850	97,850	56,452		100,786	2,936	3.0%	100,786	2,936	3.0%
10110251	53610	LEGAL SERVICES	-	-	22,831	40,000	40,000	9,517		30,000	(10,000)		30,000	(10,000)	
10110251	58110	TRAINING/MTGS/DUES/SUBSCRIP	2,092	1,735	564	1,950	1,950	846		1,950	-	0.0%	1,950	-	0.0%
			117,175	**91,754**	**115,822**	**139,800**	**139,800**	**66,815**	**47.79%**	**132,736**	**(7,064)**	**-5.1%**	**132,736**	**(7,064)**	**-5.1%**
EMPLOYEE EXPENSES															
10110253	52000	HEALTH CARE GEN GOV	943,154	890,261	922,439	1,122,900	1,122,900	643,259		1,423,100	300,200	26.7%	1,405,500	282,600	25.2%
10110253	52100	HEALTH CARE BOE	4,920,692	5,700,111	5,403,215	6,069,790	6,069,790	3,196,516		6,781,400	711,610	11.7%	6,696,500	626,710	10.3%
10110253	52101	HEALTHCARE WAIVERS	225,531	223,743	237,710	275,000	275,000	122,440		275,000	-	0.0%	275,000	-	0.0%
10110253	52102	BENEFITS CONSULTANT	2,500	-	-	-	-	-		-	-	N/A	-	-	N/A
10110253	52105	HEALTHCARE-FIREFIGHTERS	85,217	102,576	124,449	133,100	133,100	61,914		106,000	(27,100)	-20.4%	106,000	(27,100)	-20.4%
10110253	52106	BOE RETIREE HEALTHCARE	488,934	41,905	470,868	525,000	525,000	4,300		525,000	-	0.0%	525,000	-	0.0%
10110253	52201	HEALTH CARE TEAMSTERS	360,894	347,190	427,740	418,000	418,000	204,706		427,000	9,000	2.2%	427,000	9,000	2.2%
10110253	52203	MISC EMPLOYEE EXPENSES	4,616	3,523	3,762	7,000	7,000	1,385		7,000	-	0.0%	7,000	-	0.0%
10110253	52204	PRE-EMPLOYMENT TESTING	3,919	3,796	5,696	5,000	5,000	1,371		5,500	500	10.0%	5,500	500	10.0%
10110253	52205	CONTRACTUAL ALLOWANCES	35,891	53,801	43,323	65,000	65,000	30,970		65,000	-	0.0%	65,000	-	0.0%
10110253	52206	RETIREMENT CASHOUT	62,741	76,660	95,115	75,000	75,000	34,475		75,000	-	0.0%	75,000	-	0.0%
10110253	52207	PAYROLL EXPENSES	11,334	11,008	11,558	12,000	12,000	6,907		12,000	-	0.0%	12,000	-	0.0%
10110253	52300	RETIREMENT	1,163,197	950,000	850,000	740,000	740,000	-		750,000	10,000	1.4%	750,000	10,000	1.4%
10110253	52310	DEFINED CONTR PLAN	363,253	488,339	578,058	615,000	615,000	375,050		630,000	15,000	2.4%	630,000	15,000	2.4%
10110253	52400	SALARY BENEFIT ADJUSTMENT	103,792	63,994	20,367	50,000	25,659	587		110,000	84,341	328.7%	110,000	84,341	328.7%
10110253	52500	SOCIAL SECURITY	630,590	626,116	646,957	680,000	680,000	431,260		660,000	(20,000)	-2.9%	680,000	-	0.0%
10110253	52600	UNEMPLOYMENT COMP	2,829	9,265	12,956	10,000	10,000	973		5,000	(5,000)	-50.0%	5,000	(5,000)	-50.0%
10110253	52900	WORKER'S COMP GEN GOV	101,085	99,428	99,423	104,400	104,400	74,565		104,400	-	0.0%	104,400	-	0.0%
10110253	52910	WORKERS COMP BOE	303,254	298,282	298,271	313,183	313,183	223,694		313,200	17	0.0%	313,200	17	0.0%
10110253	52915	LIFE/LTD/AD&D INSURANCE	13,089	13,391	22,209	22,800	22,800	14,639		23,000	200	0.9%	23,000	200	0.9%
			9,826,512	**10,003,389**	**10,274,116**	**11,243,173**	**11,218,832**	**5,429,011**	**48.39%**	**12,297,600**	**1,078,768**	**9.6%**	**12,215,100**	**996,268**	**8.9%**
REGISTRARS															
10110301	51700	ADMINISTRATIVE WAGES	39,191	45,210	48,000	53,820	53,820	43,818		56,160	2,340	4.3%	55,435	1,615	3.0%
10110301	56100	OPERATING EXPENSES	1,039	-	-	-	-	-		-	-		-	-	
			40,230	**45,210**	**48,000**	**53,820**	**53,820**	**43,818**	**81.42%**	**56,160**	**2,340**	**4.3%**	**55,435**	**1,615**	**3.0%**
ELECTIONS															
10110303	51710	OTHER WAGES	-	11,862	34,487	36,042	36,042	20,002		56,363	20,321	56.4%	56,363	20,321	56.4%
10110303	51720	STIPENDS	12,615	-	-	-	-	0		-	-		-	-	
10110303	53645	TRAINING	-	2,452	3,550	3,620	3,620	170		8,520	4,900	135.4%	8,520	4,900	135.4%
10110303	54310	EQUIPMENT MAINTENANCE	2,250	2,250	1,236	3,800	3,800	1,800		4,000	200	5.3%	4,000	200	5.3%
10110303	55300	COMMUNICATIONS	-	1,579	60	1,600	1,600	-		1,600	-	0.0%	1,600	-	0.0%
10110303	56900	OTHER SUPPLIES	12,057	18,710	14,440	17,750	17,750	1,369		20,250	2,500	14.1%	20,250	2,500	14.1%
10110303	58300	EMPLOYEE REIMBURSEMENT	-	152	193	250	250	-		250	-	0.0%	250	-	0.0%
			26,922	**37,005**	**53,966**	**63,062**	**63,062**	**23,341**	**37.01%**	**90,983**	**27,921**	**44.3%**	**90,983**	**27,921**	**44.3%**
TOWN CLERK															
10110311	51600	DEPARTMENT HEAD WAGES	63,869	65,680	67,558	77,400	77,400	44,654		79,722	2,322	3.0%	79,722	2,322	3.0%
10110311	51615	ASSISTANT WAGES	46,913	50,013	54,496	55,320	55,320	31,968		55,328	8	0.0%	55,328	8	0.0%
10110311	53600	ACCOUNTING SERVICES/AUDIT	4,000	4,000	4,000	4,000	4,000	1,000		4,000	-	0.0%	4,000	-	0.0%
10110311	56100	OPERATING EXPENSES	29,039	27,402	27,161	30,100	30,100	2,417		31,040	940	3.1%	31,040	940	3.1%
10110311	56135	RECORDINGS/LICENSING SUPPLIES	8,550	4,198	4,426	5,475	5,475	920		5,475	-	0.0%	5,475	-	0.0%
10110311	58110	TRAINING/MTGS/DUES/SUBSCRIP	1,328	1,202	1,545	1,350	1,350	800		1,350	-	0.0%	1,350	-	0.0%
			153,699	**152,495**	**159,186**	**173,645**	**173,645**	**81,759**	**47.08%**	**176,915**	**3,270**	**1.9%**	**176,915**	**3,270**	**1.9%**
FINANCE															
10112101	51600	DEPARTMENT HEAD WAGES	106,021	108,817	111,939	133,000	133,000	76,731		136,990	3,990	3.0%	136,990	3,990	3.0%
10112101	51603	ASST FINANCE DIR	67,958	69,784	71,784	73,548	73,548	42,432		75,755	2,207	3.0%	75,755	2,207	3.0%
10112101	51615	ASSISTANT WAGES	87,876	86,115	98,839	100,902	100,902	56,494		98,900	(2,002)	-2.0%	98,900	(2,002)	-2.0%
10112101	56100	OPERATING EXPENSES	2,457	1,526	1,645	2,650	2,650	1,025		2,650	-	0.0%	2,650	-	0.0%
10112101	56200	HEATING OIL/PROPANE	71,010	47,957	56,631	68,000	68,000	24,702		65,000	(3,000)	-4.4%	65,000	(3,000)	-4.4%
10112101	56220	ELECTRICITY	138,998	138,519	162,780	180,000	180,000	74,015		175,000	(5,000)	-2.8%	175,000	(5,000)	-2.8%
10112101	58110	TRAINING/MTGS/DUES/SUBSCRIP	1,319	1,837	2,029	3,000	3,000	40		2,500	(500)	-16.7%	2,500	(500)	-16.7%
			475,639	**454,555**	**505,647**	**561,100**	**561,100**	**275,439**	**49.09%**	**556,795**	**(4,305)**	**-0.8%**	**556,795**	**(4,305)**	**-0.8%**

TOWN OF LEDYARD
FISCAL YEAR 2027 MAYOR'S PROPOSED BUDGET
EXPENDITURE DETAIL

DEPARTMENT	ACCOUNT #		ACCOUNT DESCRIPTION	FY 2023 ACTUAL	FY 2024 ACTUAL	FY 2025 ACTUAL	FY 2026 ADOPTED	FY 2026 REVISED	FY 2026 YTD-1/31/26	FY 2026 % of REVISED	FY 2027 DEPT PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chg Revised	FY 2027 MAYOR PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chge Revised
ASSESSOR																
	10112111	51610	SUPERVISORS	111,071	108,429	85,522	85,522	87,651	50,664		89,843	2,192	2.5%	89,843	2,192	2.5%
	10112111	51615	ASSISTANT WAGES	41,447	44,201	43,045	47,612	47,612	26,118		46,665	(947)	-2.0%	46,665	(947)	-2.0%
	10112111	51710	OTHER WAGES	-	-	25,000	25,000	25,000	12,500		25,000	-	0.0%	25,000	-	0.0%
	10112111	53610	LEGAL SERVICES (NEW)					-	-		1,000	1,000	N/A	1,000	1,000	N/A
	10112111	53700	CONTRACT MAINTENANCE/LEASES	14,461	16,246	9,916	21,000	21,000	19,508		21,000	-	0.0%	21,000	-	0.0%
	10112111	56100	OPERATING EXPENSES	1,070	1,068	1,391	3,000	3,000	1,401		3,000	-	0.0%	3,000	-	0.0%
	10112111	58110	TRAINING/MTGS/DUES/SUBSCRIP	1,344	3,274	2,269	2,700	2,700	560		3,000	300	11.1%	3,000	300	11.1%
				169,393	173,218	167,143	184,834	186,963	110,751	59.24%	189,508	2,545	1.4%	189,508	2,545	1.4%
TAX COLLECTOR																
	10112131	51300	SEASONAL HELP	3,304	7,398	6,700	6,400	6,400	5,260		6,400	-	0.0%	6,400	-	0.0%
	10112131	51610	SUPERVISORS	67,541	69,269	71,017	71,017	72,801	41,789		74,620	1,819	2.5%	74,620	1,819	2.5%
	10112131	51615	ASSISTANT WAGES	42,366	45,369	46,804	51,452	51,452	29,684		51,452	-	0.0%	51,452	-	0.0%
	10112131	53610	LEGAL SERVICES (NEW)	-	-	179	500	500	-		500	-		500	-	
	10112131	53700	CONTRACT MAINTENANCE/LEASES	2,105	2,650	2,650	2,800	2,800	1,200		2,800	-	0.0%	2,800	-	0.0%
	10112131	54421	TAX REFUNDS	104,439	151,811	119,591	-	-	39,435		-	-		-	-	
	10112131	56100	OPERATING EXPENSES	23,029	22,416	24,184	24,800	24,800	7,342		24,800	-	0.0%	24,800	-	0.0%
	10112131	58110	TRAINING/MTGS/DUES/SUBSCRIP	1,733	1,561	2,383	2,400	2,400	628		2,500	100	4.2%	2,500	100	4.2%
	10112131	58506	TAX UNDERPAYMENT	-	-	-	150	150	-		150	-	0.0%	150	-	0.0%
				244,517	300,474	273,508	159,519	161,303	125,338	77.70%	163,222	1,919	1.2%	163,222	1,919	1.2%
MIS																
	10112151	51130	OVERTIME	-	-	-	1,250	1,250	798		1,250	-		1,250	-	
	10112151	51610	SUPERVISORS	80,604	79,020	84,212	91,604	95,764	53,801		98,156	2,392	2.5%	98,156	2,392	2.5%
	10112151	51700	ADMINISTRATIVE WAGES	39,674	46,661	49,987	57,658	57,658	32,789		57,658	-	0.0%	57,658	-	0.0%
	10112151	53655	MEETING MANAGEMENT SYSTEM	15,952	23,263	24,912	20,910	20,910	-		23,001	2,091	10.0%	23,001	2,091	10.0%
	10112151	53657	WEBSITE UPGRADE/SUPPORT	6,853	8,332	9,455	9,970	9,970	9,968		10,297	327	3.3%	10,297	327	3.3%
	10112151	53690	SOFTWARE SUPPORT & MAINT	113,622	100,775	88,124	90,111	90,111	90,065		92,134	2,023	2.2%	92,134	2,023	2.2%
	10112151	53695	FINANCIAL SOFTWARE HOSTING	22,000	21,000	22,050	23,153	23,153	23,153		23,732	579	2.5%	23,732	579	2.5%
	10112151	53696	LAND USE SOFTWARE LICENSING	10,500	11,532	39,157	26,700	26,700	24,000		24,000	(2,700)	-10.1%	24,000	(2,700)	-10.1%
	10112151	54300	REPAIRS & MAINTENANCE	4,842	6,355	16,057	16,920	16,920	6,759		17,346	426	2.5%	17,346	426	2.5%
	10112151	55330	TELEPHONE & FAX SERVICE	12,734	12,827	11,775	10,968	10,968	4,453		11,275	307	2.8%	11,275	307	2.8%
	10112151	55340	INTERNET SERVICE	7,500	8,832	9,000	9,000	9,000	2,711		9,000	-	0.0%	9,000	-	0.0%
	10112151	56900	OTHER SUPPLIES	6,215	6,239	5,992	6,000	6,000	5,991		6,000	-	0.0%	6,000	-	0.0%
	10112151	57400	COMPUTER EQUIPMENT	3,965	11,275	-	-	-	-		-	-		-	-	
	10112151	57410	COMPUTER SOFTWARE	10,065	14,027	32,266	31,204	31,204	29,353		53,556	22,352	71.6%	53,556	22,352	71.6%
	10112151	58110	TRAINING/MTGS/DUES/SUBSCRIP	976	835	1,009	1,010	1,010	-		910	(100)	-9.9%	910	(100)	-9.9%
				335,502	350,973	393,996	396,458	400,618	283,841	70.85%	428,315	27,697	6.9%	428,315	27,697	6.9%
LAND USE																
	10114301	51130	OVERTIME	-	-	-	5,450	5,450	1,403		5,450	-		5,450	-	
	10114301	51600	DEPARTMENT HEAD WAGES	95,274	113,220	108,665	108,150	108,150	62,394		111,395	3,245	3.0%	111,395	3,245	3.0%
	10114301	51610	SUPERVISORS	116,962	145,738	148,436	143,215	148,004	84,243		150,472	2,468	1.7%	150,472	2,468	1.7%
	10114301	51615	ASSISTANT WAGES	59,647	81,167	77,695	80,632	91,917	45,461		99,807	7,890	8.6%	99,807	7,890	8.6%
	10114301	51800	PART-TIME WAGES	308	-	-	400	400	-		400	-	0.0%	400	-	0.0%
	10114301	53300	PROFESSIONAL/TECH SERVICES	-	-	13,448	50,000	50,000	-		50,000	-	0.0%	40,000	(10,000)	-20.0%
	10114301	53610	LEGAL SERVICES (NEW)	-	-	75,635	40,000	40,000	21,436		40,000	-	0.0%	40,000	-	0.0%
	10114301	55410	ADVERTISING/LEGAL NOTICES	-	-	5,014	6,500	6,500	2,478		6,500	-	0.0%	6,500	-	0.0%
	10114301	56100	OPERATING EXPENSES	5,474	5,129	2,494	6,000	6,000	1,919		6,000	-	0.0%	6,000	-	0.0%
	10114301	58110	TRAINING/MTGS/DUES/SUBSCRIP	1,566	2,758	2,312	5,720	5,720	1,324		6,460	740	12.9%	6,460	740	12.9%
				279,231	348,012	433,699	446,067	462,141	220,658	47.75%	476,484	14,343	3.1%	466,484	4,343	0.9%
PLANNING COMMISSION																
	10114303	53400	OTHER PROFESS/TECH SERVICES	850	1,711	2,400	-	-	-		-	-	#DIV/0!	-	-	#DIV/0!
	10114303	56100	OPERATING EXPENSES	430	217	210	1,000	1,000	55		1,000	-	N/A	1,000	-	N/A
				1,280	1,928	2,610	1,000	1,000	55	5.50%	1,000	-	0.0%	1,000	-	0.0%
EDC																
	10114305	56100	OPERATING EXPENSES	36	-	94	500	500	-		500	-	0.0%	500	-	0.0%
	10114305	58100	DUES & FEES	5,695	7,236	7,560	7,640	7,640	7,251		7,640	-	0.0%	7,640	-	0.0%
				5,731	7,236	7,654	8,140	8,140	7,251	89.08%	8,140	-	0.0%	8,140	-	0.0%
IWWC																
	10114501	56100	OPERATING EXPENSES	323	443	245	500	500	-		500	-	0.0%	500	-	0.0%
				323	443	245	500	500	-	0.00%	500	-	0.0%	500	-	0.0%
ZONING BOARD OF APPEALS																
	10114507	56100	OPERATING EXPENSES	368	375	370	500	500	-		530	30	6.0%	530	30	6.0%
				368	375	370	500	500	-	0.00%	530	30	6.0%	530	30	6.0%

TOWN OF LEDYARD
FISCAL YEAR 2027 MAYOR'S PROPOSED BUDGET
EXPENDITURE DETAIL

DEPARTMENT	ACCOUNT #	ACCOUNT DESCRIPTION	FY 2023 ACTUAL	FY 2024 ACTUAL	FY 2025 ACTUAL	FY 2026 ADOPTED	FY 2026 REVISED	FY 2026 YTD-1/31/26	FY 2026 % of REVISED	FY 2027 DEPT PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chg Revised	FY 2027 MAYOR PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chge Revised
POLICE															
10120101	51130	OVERTIME	434,703	396,803	397,192	345,050	345,050	297,856		549,800	204,750	59.3%	440,400	95,350	27.6%
10120101	51608	DEPARTMENT HEAD - CHIEF	132,819	135,835	139,748	143,941	143,941	83,043		148,260	4,319	3.0%	148,260	4,319	3.0%
10120101	51609	CAPTAIN (LIEUTENANT)	107,388	111,255	114,461	117,894	117,894	67,884		121,431	3,537	3.0%	121,431	3,537	3.0%
10120101	51630	PUBLIC SAFETY EMPLOYEES	1,658,908	1,757,063	1,886,492	1,909,791	1,909,791	1,146,713		1,981,508	71,717	3.8%	1,909,791	-	0.0%
10120101	51700	ADMINISTRATIVE WAGES	49,307	52,054	53,458	55,495	55,495	31,803		55,495	-	0.0%	55,495	-	0.0%
10120101	51715	HOLIDAY PAY	41,050	48,218	45,555	60,000	60,000	44,964		77,000	17,000	28.3%	67,000	7,000	11.7%
10120101	51716	DUI GRANT PAYROLL	435	6,584	2,878	12,000	12,000	-		8,000	(4,000)	-33.3%	8,000	(4,000)	-33.3%
10120101	51717	OT OUTSIDE ASSIGNMENTS	207,476	70,698	111,024	120,000	120,000	103,685		150,000	30,000	25.0%	150,000	30,000	25.0%
10120101	51720	STIPEND-MEALS	11,719	24,685	20,640	14,400	14,400	9,420		15,400	1,000	6.9%	15,400	1,000	6.9%
10120101	51730	DEGREE INCENTIVE	1,950	6,150	5,250	9,500	9,500	1,650		8,150	(1,350)	-14.2%	8,150	(1,350)	-14.2%
10120101	51900	COMP-TIME LIABILITY	18,477	11,393	19,387	15,000	15,000	22,154		16,300	1,300	8.7%	16,300	1,300	8.7%
10120101	53645	TRAINING SALARY	59,067	83,067	83,006	80,500	80,500	54,036		80,500	-	0.0%	84,660	4,160	5.2%
10120101	53646	TRAINING SUPPORT	26,638	25,445	28,374	27,746	27,746	17,208		31,781	4,035	14.5%	31,781	4,035	14.5%
10120101	53700	CONTRACT MAINTENANCE/LEASES	31,838	34,711	29,730	37,864	37,864	26,077		39,455	1,591	4.2%	39,455	1,591	4.2%
10120101	54226	PRISONER EXPENSES	3,460	5,435	3,913	4,050	4,050	1,342		4,050	-	0.0%	4,050	-	0.0%
10120101	54300	REPAIRS & MAINTENANCE	5,215	10,629	10,542	9,500	9,500	3,293		10,000	500	5.3%	10,000	500	5.3%
10120101	54310	EQUIPMENT MAINTENANCE	35,698	34,481	33,632	33,000	33,000	13,721		36,200	3,200	9.7%	36,200	3,200	9.7%
10120101	55330	TELEPHONE & FAX SERVICE	3,216	2,010	2,580	2,920	2,920	612		2,920	-	0.0%	2,920	-	0.0%
10120101	55335	MOBILE DATA SERVICE	10,610	8,398	9,058	12,054	12,054	4,012		9,940	(2,114)	-17.5%	9,940	(2,114)	-17.5%
10120101	56100	OPERATING EXPENSES	20,387	17,034	20,310	18,000	18,000	8,660		19,250	1,250	6.9%	19,250	1,250	6.9%
10120101	56205	WATER	2,955	2,974	3,739	3,000	3,000	1,345		3,360	360	12.0%	3,360	360	12.0%
10120101	56260	DIESEL/GASOLINE	66,550	66,129	62,989	62,000	62,000	29,452		62,000	-	0.0%	62,000	-	0.0%
10120101	56730	UNIFORMS	39,664	41,190	42,637	38,500	38,500	22,842		38,500	-	0.0%	38,500	-	0.0%
10120101	56900	OTHER SUPPLIES	18,556	18,633	18,632	19,900	19,900	14,657		19,900	-	0.0%	19,900	-	0.0%
10120101	57300	NEW EQUIPMENT	2,390	2,400	7,920	7,920	7,920	6,270		3,000	(4,920)	-62.1%	3,000	(4,920)	-62.1%
10120101	58110	TRAINING/MTGS/DUES/SUBSCRIP	1,650	3,620	6,111	6,000	6,000	250		6,000	-	0.0%	6,000	-	0.0%
10120101	58791	CANINE UPKEEP	-	-	-	-	-	-		-	-		-	-	
			2,992,126	2,976,894	3,159,258	3,166,025	3,166,025	2,012,945	63.58%	3,498,200	332,175	10.5%	3,311,243	145,218	4.6%
DISPATCH															
10120103	51130	OVERTIME	136,142	127,908	127,946	92,975	92,975	69,757		95,300	2,325	2.5%	95,300	2,325	2.5%
10120103	51299	PER DIEM WAGES	6,350	15,588	13,080	16,000	16,000	6,716		16,000	-	0.0%	16,000	-	0.0%
10120103	51630	PUBLIC SAFETY EMPLOYEES	473,617	451,353	470,781	499,354	499,354	273,927		493,428	(5,926)	-1.2%	493,428	(5,926)	-1.2%
10120103	51715	HOLIDAY PAY	31,391	7,382	22,514	14,997	14,997	11,780		22,495	7,498	50.0%	17,247	2,250	15.0%
10120103	51720	MEAL STIPENDS	1,245	905	600	1,500	1,500	-		1,500	-	0.0%	1,500	-	0.0%
10120103	53700	CONTRACT MAINTENANCE/LEASES	38,382	43,345	42,028	54,214	54,214	43,945		51,930	(2,284)	-4.2%	51,930	(2,284)	-4.2%
10120103	55330	TELEPHONE & FAX SERVICE	12,405	14,974	16,715	15,600	15,600	8,644		16,500	900	5.8%	16,500	900	5.8%
10120103	56100	OPERATING EXPENSES	4,667	5,144	5,481	5,500	5,500	596		5,500	-	0.0%	5,500	-	0.0%
10120103	56730	UNIFORMS	977	1,547	7,347	9,760	9,760	2,820		9,760	-	0.0%	9,760	-	0.0%
10120103	58110	TRAINING/MTGS/DUES/SUBSCRIP	2,802	2,912	3,759	4,000	4,000	2,786		4,000	-	0.0%	4,000	-	0.0%
			707,978	671,058	710,251	713,900	713,900	420,971	58.97%	716,413	2,513	0.4%	711,165	(2,735)	-0.4%
ANIMAL CONTROL															
10120105	51130	OVERTIME	1,380	1,700	1,137	2,100	2,100	2,049		2,500	400	19.0%	2,500	400	19.0%
10120105	51205	ANIMAL CONTROL OFFICER	38,626	44,229	42,859	52,917	54,100	27,821		50,596	(3,504)	-6.5%	50,596	(3,504)	-6.5%
10120105	51800	PART-TIME WAGES	30,480	39,406	33,752	26,208	26,208	20,294		39,347	13,139	50.1%	39,347	13,139	50.1%
10120105	53310	VETERINARIAN	1,825	2,163	1,428	2,500	2,500	-		2,500	-	0.0%	2,500	-	0.0%
10120105	53645	TRAINING	305	-	-	400	400	-		400	-	0.0%	400	-	0.0%
10120105	56100	OPERATING EXPENSES	7,563	9,560	6,962	7,500	7,500	5,110		8,000	500	6.7%	8,000	500	6.7%
10120105	57305	ACO EQUIPMENT	323	-	881	1,000	1,000	-		1,000	-	0.0%	1,000	-	0.0%
10120105	58000	SPAY/NEUTER PROGRAM	1,392	1,509	1,717	1,500	1,500	45		1,500	-	0.0%	1,500	-	0.0%
10120105	58790	MISCELLANEOUS EXPENSES	4,831	6,401	6,906	7,000	7,000	6,261		7,000	-	0.0%	7,000	-	0.0%
			86,725	104,968	95,642	101,125	102,308	61,580	60.19%	112,843	10,535	10.3%	112,843	10,535	10.3%
FIRE MARSHAL															
10120301	51130	OVERTIME	-	-	-	100	100	-		100	-	0.0%	100	-	0.0%
10120301	51630	PUBLIC SAFETY EMPLOYEES	77,686	80,064	82,466	84,940	84,940	49,004		84,940	-	0.0%	84,940	-	0.0%
10120301	55330	TELEPHONE & FAX SERVICE	4,250	3,061	3,223	5,500	5,500	1,676		5,500	-	0.0%	5,500	-	0.0%
10120301	56100	OPERATING EXPENSES	6,518	3,091	5,609	6,800	6,800	979		6,800	-	0.0%	6,800	-	0.0%
10120301	56450	CODE AND REFERENCE BOOKS	2,882	-	225	3,000	3,000	225		3,000	-	0.0%	3,000	-	0.0%
10120301	56730	UNIFORMS	972	1,000	-	850	850	528		850	-	0.0%	850	-	0.0%
10120301	58110	TRAINING/MTGS/DUES/SUBSCRIP	944	175	-	1,500	1,500	-		1,500	-	0.0%	1,500	-	0.0%
			93,252	87,391	91,523	102,690	102,690	52,412	51.04%	102,690	-	0.0%	102,690	-	0.0%

TOWN OF LEDYARD
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EXPENDITURE DETAIL

DEPARTMENT ACCOUNT #		ACCOUNT DESCRIPTION	FY 2023 ACTUAL	FY 2024 ACTUAL	FY 2025 ACTUAL	FY 2026 ADOPTED	FY 2026 REVISED	FY 2026 YTD-1/31/26	FY 2026 % of REVISED	FY 2027 DEPT PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chg Revised	FY 2027 MAYOR PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chge Revised
ADMIN EMERGENCY SERVICES															
10120401	51130	OVERTIME	6,637	9,027	9,292	12,000	12,000	3,644		12,000	-	0.0%	12,000	-	0.0%
10120401	51600	DEPARTMENT HEAD WAGES	21,351	21,972	22,608	23,284	23,284	13,433		23,982	698	3.0%	23,982	698	3.0%
10120401	51630	PUBLIC SAFETY EMPLOYEES	306,930	306,533	341,956	341,250	341,250	188,478		367,310	26,060	7.6%	367,310	26,060	7.6%
10120401	56100	OPERATING EXPENSES	16,164	24,333	14,535	36,400	36,400	14,444		36,400	-	0.0%	36,400	-	0.0%
10120401	56730	UNIFORMS	-	-	-	-	-	-		5,000	5,000	N/A	5,000	5,000	N/A
10120401	57307	THIRD PARTY AMBULANCE SERVICES	75,000	75,000	75,000	75,000	75,000	75,000		75,000	-	0.0%	75,000	-	0.0%
			426,082	**436,865**	**463,391**	**487,934**	**487,934**	**294,999**	**60.46%**	**519,692**	**31,758**	**6.5%**	**519,692**	**31,758**	**6.5%**
LEDYARD FIRE COMPANY															
10120501	51720	INCENTIVE	5,000	5,000	5,000	5,000	5,000	2,500		5,000	-	0.0%	5,000	-	0.0%
10120501	53645	TRAINING	13,123	13,035	12,209	14,000	14,000	7,975		14,000	-	0.0%	14,000	-	0.0%
10120501	53685	FIRE HOSE TESTING	1,081	-	600	3,000	3,000	-		3,000	-	0.0%	3,000	-	0.0%
10120501	54300	REPAIRS & MAINTENANCE	31,901	32,743	45,542	34,000	34,000	20,055		37,000	3,000	8.8%	37,000	3,000	8.8%
10120501	55320	CELL PHONE SERVICE	1,875	1,909	1,909	2,000	2,000	-		2,000	-	0.0%	2,000	-	0.0%
10120501	56100	OPERATING EXPENSES	13,265	13,757	13,007	16,000	16,000	10,550		16,000	-	0.0%	16,000	-	0.0%
10120501	56730	UNIFORMS	12,221	11,586	11,332	12,000	12,000	11,798		17,000	5,000	41.7%	12,000	-	0.0%
10120501	57017	FIRE POLICE	200	600	-	5,000	5,000	-		3,000	(2,000)	-40.0%	3,000	(2,000)	-40.0%
10120501	57300	NEW EQUIPMENT	9,076	9,761	9,692	10,000	10,000	5,250		10,000	-	0.0%	10,000	-	0.0%
10120501	58790	INCENTIVE	28,500	28,500	28,500	28,500	28,500	28,500		30,000	1,500	5.3%	30,000	1,500	5.3%
			116,242	**116,891**	**127,791**	**129,500**	**129,500**	**86,628**	**66.89%**	**137,000**	**7,500**	**5.8%**	**132,000**	**2,500**	**1.9%**
GALES FERRY FIRE COMPANY															
10120551	51720	INCENTIVE	4,542	5,000	5,000	6,500	6,500	-		6,500	-	0.0%	6,500	-	0.0%
10120551	53645	TRAINING	14,781	18,365	16,639	18,000	18,000	8,802		18,000	-	0.0%	18,000	-	0.0%
10120551	53685	FIRE HOSE TESTING	-	-	-	3,000	3,000	-		3,000	-	0.0%	3,000	-	0.0%
10120551	55330	TELEPHONE & FAX SERVICE	1,937	2,263	2,928	3,000	3,000	1,501		3,000	-	0.0%	3,000	-	0.0%
10120551	56100	OPERATING EXPENSES	28,587	25,283	26,286	38,000	38,000	21,213		38,000	-	0.0%	38,000	-	0.0%
10120551	56106	TRUCK GARAGING	59,874	61,094	61,094	61,094	61,094	45,821		62,927	1,833	3.0%	62,927	1,833	3.0%
10120551	56700	VEHICLE EQUIPMENT/PARTS	43,681	44,601	55,254	45,000	45,000	35,180		48,000	3,000	6.7%	48,000	3,000	6.7%
10120551	56730	UNIFORMS	9,980	11,882	10,734	13,500	13,500	5,336		13,500	-	0.0%	13,500	-	0.0%
10120551	57017	FIRE POLICE	480	198	780	2,500	2,500	-		1,000	(1,500)	-60.0%	1,000	(1,500)	-60.0%
10120551	57300	NEW EQUIPMENT	5,671	-	3,618	7,000	7,000	5,234		7,000	-	0.0%	7,000	-	0.0%
10120551	58790	MISCELLANEOUS EXPENSES	28,500	28,500	28,500	28,500	28,500	-		30,000	1,500	5.3%	30,000	1,500	5.3%
			198,033	**197,186**	**210,833**	**226,094**	**226,094**	**123,087**	**54.44%**	**230,927**	**4,833**	**2.1%**	**230,927**	**4,833**	**2.1%**
EMERGENCY MANAGEMENT															
10120701	51630	PUBLIC SAFETY EMPLOYEES	15,730	15,600	15,600	15,600	15,600	7,800		15,600	-	0.0%	15,600	-	0.0%
10120701	56100	OPERATING EXPENSES	1,658	2,463	220	4,850	4,850	-		4,850	-	0.0%	4,850	-	0.0%
			17,388	**18,063**	**15,820**	**20,450**	**20,450**	**7,800**	**38.14%**	**20,450**	**-**	**0.0%**	**20,450**	**-**	**0.0%**
VISITING NURSE ASSOCIATION															
10130101	51600	DEPARTMENT HEAD WAGES	95,721	98,462	-	[redacted]	[redacted]	-		[redacted]	-		[redacted]	-	
10130101	51610	SUPERVISORS	80,147	-	-			-			-			-	
10130101	51615	ASSISTANT WAGES	76,105	31,725	-			-			-			-	
10130101	51645	NURSES SALARY	190,042	-	-			-			-			-	
10130101	51646	NURSE AIDES	19,927	-	-			-			-			-	
10130101	51710	PER DIEM NURSES	7,192	-	-			-			-			-	
10130101	51720	STIPENDS	10,040	10,400	10,000	10,000	10,000	6,000			(10,000)			(10,000)	-100.0%
10130101	52610	CLOTHING ALLOWANCE	2,070	-	-			-			-			-	
10130101	53300	PROFESSIONAL/TECH SERVICES	85,030	-	-			-			-			-	
10130101	53400	OTHER PROFESS/TECH SERVICES	650	-	-			-			-			-	
10130101	53600	ACCOUNTING SERVICES/AUDIT	2,375	-	-			-			-			-	
10130101	53635	PATIENT SATISFACTION SURVEY	1,800	-	-			-			-			-	
10130101	53636	ICD CODING	9,750	-	-			-			-			-	
10130101	53700	CONTRACT MAINTENANCE/LEASES	11,076	-	-			-			-			-	
10130101	54300	REPAIRS & MAINTENANCE	28,640	-	-			-			-			-	
10130101	56100	OPERATING EXPENSES	9,860	64,416	-			-			-			-	
10130101	56900	OTHER SUPPLIES	6,756	-	-			-			-			-	
10130101	58100	DUES & FEES	-	-	-			-			-			-	
10130101	58110	TRAINING/MTGS/DUES/SUBSCRIP	7,613	-	-			-			-			-	
10130101	58300	EMPLOYEE REIMBURSEMENT	8,160	-	-			-			-			-	
10130101	58775	COMMUNITY HEALTH PROGRAM	866	-	-			-			-			-	
10130101	58790	MISCELLANEOUS EXPENSES	1,148	-	-			-			-			-	
			654,968	**205,003**	**10,000**	**10,000**	**10,000**	**6,000**	**60.00%**	**-**	**(10,000)**	**-100.0%**	**-**	**(10,000)**	**-100.0%**

TOWN OF LEDYARD
FISCAL YEAR 2027 MAYOR'S PROPOSED BUDGET
EXPENDITURE DETAIL

DEPARTMENT ACCOUNT #		ACCOUNT DESCRIPTION	FY 2023 ACTUAL	FY 2024 ACTUAL	FY 2025 ACTUAL	FY 2026 ADOPTED	FY 2026 REVISED	FY 2026 YTD-1/31/26	FY 2026 % of REVISED	FY 2027 DEPT PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chg Revised	FY 2027 MAYOR PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chge Revised
SCHOOL NURSING															
10130103	51130	OVERTIME	-	-	(36)	500	500	72			(500)		500	-	0.0%
10130103	51645	NURSES SALARY	263,023	273,301	289,586	332,940	332,940	162,944			(332,940)	-100.0%	342,080	9,140	2.7%
10130103	51646	NURSE AIDES	57,673	53,906	67,806	80,129	80,129	37,091			(80,129)	-100.0%	84,895	4,766	5.9%
10130103	51700	ADMINISTRATIVE WAGES	-	-	55,438	49,321	49,321	28,454			(49,321)		50,801	1,480	3.0%
10130103	51710	OTHER WAGES	10,967	28,473	29,739	38,100	38,100	22,746			(38,100)	-100.0%	23,100	(15,000)	-39.4%
10130103	52610	CLOTHING ALLOWANCE	1,500	1,500	-	-	-	-			-	N/A	-	-	N/A
10130103	53300	PROFESSIONAL/TECH SERVICES	-	-	-	-	-	-			-	N/A	15,000	15,000	N/A
10130103	56100	OPERATING EXPENSES	-	362	258	-	-	160			-	N/A	300	300	N/A
10130103	58110	TRAINING/MTGS/DUES/SUBSCRIP	344	632	1,060	1,500	1,500	109			(1,500)	-100.0%	1,200	(300)	-20.0%
			333,507	**358,174**	**443,851**	**502,490**	**502,490**	**251,576**	**50.07%**		**(502,490)**	**-100.0%**	**517,876**	**15,386**	**3.1%**
SOCIAL SERVICES															
10130301	51610	SUPERVISORS	90,125	72,109	-	-	-	-		-	-	N/A	-	-	N/A
10130301	51700	COUNSELOR	3,607	3,257	-	-	-	-		-	-	N/A	-	-	N/A
10130301	51720	STIPENDS	-	-	-	-	-	-		10,000	10,000	N/A	10,000	10,000	N/A
10130301	51800	PART-TIME WAGES	-	-	-	-	-	-		21,200	21,200	N/A	21,200	21,200	N/A
10130301	54401	FOOD PANTRY EXPENSES	3,500	-	-	-	-	-		-	-	N/A	-	-	N/A
10130301	56100	OPERATING EXPENSES	4,053	1,824	-	-	-	-		612	612	N/A	612	612	N/A
10130101	58110	TRAINING/MTGS/DUES/SUBSCRIP	-	-	-	-	-			500	500	N/A	500	500	N/A
			101,285	**77,190**	**-**	**-**	-	**-**		**32,312**	**32,312**	N/A	**32,312**	**32,312**	**N/A**
SENIOR CENTER															
10130501	51610	SUPERVISORS	-	[redacted]	[redacted]	[redacted]	[redacted]	-		[redacted]	-		[redacted]	-	
10130501	51615	ASSISTANT WAGES	36,771					-			-			-	
10130501	51700	ADMINISTRATIVE WAGES	9,489					-			-				
10130501	51800	VAN DRIVER WAGES	27,475					-			-			-	
10130501	53658	REGIONAL SENIOR WEBSITE	3,600					-			-				
10130501	53700	CONTRACT MAINTENANCE/LEASES	3,934					-			-			-	
10130501	54310	EQUIPMENT MAINTENANCE	2,025					-			-			-	
10130501	56100	OPERATING EXPENSES	2,150					-			-			-	
10130501	58775	COMMUNITY HEALTH PROGRAM	15,761					-			-			-	
			101,205	-	-	-	-	-		-	-		-	-	
PW-ADMINSTRATION															
10140101	51600	DEPARTMENT HEAD WAGES	126,024	129,722	133,460	140,000	140,000	80,769		144,201	4,201	3.0%	144,201	4,201	3.0%
10140101	53300	PROFESSIONAL/TECH SERVICES	39,182	61,758	52,682	70,000	70,000	61,549		75,000	5,000	7.1%	75,000	5,000	7.1%
10140101	58110	TRAINING/MTGS/DUES/SUBSCRIP	4,581	4,829	4,328	4,000	4,000	2,526		4,500	500	12.5%	4,500	500	12.5%
			169,787	**196,309**	**190,470**	**214,000**	**214,000**	**144,844**	**67.68%**	**223,701**	**9,701**	**4.5%**	**223,701**	**9,701**	**4.5%**
PW-HIGHWAY															
10140103	51130	OVERTIME	12,573	15,862	18,639	15,000	15,000	9,105		15,500	500	3.3%	15,500	500	3.3%
10140103	51301	SEASONAL HELP SUMMER	5,586	1,020	1,644	7,500	7,500	8,032		7,500	-	0.0%	7,500	-	0.0%
10140103	51610	SUPERVISORS	90,140	92,348	94,526	94,527	96,690	55,933		99,315	2,625	2.7%	99,315	2,625	2.7%
10140103	51620	PUBLIC WORKS EMPLOYEES	788,429	839,091	849,349	899,744	899,744	501,804		926,674	26,930	3.0%	926,674	26,930	3.0%
10140103	51710	POSITION UPGRADE PAY	5,026	4,775	4,745	7,500	7,500	3,507		7,500	-	0.0%	7,500	-	0.0%
10140103	51805	PT SNOWPLOW DRIVERS	334	612	-	5,000	5,000	-		5,000	-	0.0%	5,000	-	0.0%
10140103	51815	OVERTIME SNOW PLOWING	36,510	49,168	76,964	102,000	102,000	80,642		105,000	3,000	2.9%	105,000	3,000	2.9%
10140103	53645	TRAINING	2,945	3,360	5,680	1,800	1,800	400		1,800	-	0.0%	1,800	-	0.0%
10140103	53700	CONTRACT MAINTENANCE/LEASES	4,032	4,113	4,937	5,000	5,000	2,750		5,000	-	0.0%	5,000	-	0.0%
10140103	55300	TELEPHONE/CABLE	4,062	4,387	4,241	5,000	5,000	2,193		5,000	-	0.0%	5,000	-	0.0%
10140103	56260	GASOLINE/OIL	27,546	39,243	47,524	37,500	37,500	19,245		40,000	2,500	6.7%	40,000	2,500	6.7%
10140103	56265	DIESEL FUEL	40,699	54,992	12,952	60,000	60,000	28,172		65,000	5,000	8.3%	65,000	5,000	8.3%
10140103	56730	UNIFORMS	12,430	12,311	13,557	14,500	14,500	8,608		14,500	-	0.0%	14,500	-	0.0%
10140103	56900	OTHER SUPPLIES	2,898	7,240	2,949	3,000	3,000	1,014		3,000	-	0.0%	3,000	-	0.0%
10140103	57300	NEW EQUIPMENT	1,433	1,254	1,043	1,800	1,800	815		1,800	-	0.0%	1,800	-	0.0%
10140103	58300	EMPLOYEE REIMBURSEMENT	1,476	3,150	4,420	7,500	7,500	4,365		7,500	-	0.0%	7,500	-	0.0%
			1,036,119	**1,132,926**	**1,143,170**	**1,267,371**	**1,269,534**	**726,585**	**57.23%**	**1,310,089**	**40,555**	**3.2%**	**1,310,089**	**40,555**	**3.2%**
PW-VEHICLE MAINTENANCE															
10140105	51620	PUBLIC WORKS EMPLOYEES	129,003	130,176	191,044	199,394	199,394	114,845		205,371	5,977	3.0%	205,371	5,977	3.0%
10140105	56100	OPERATING EXPENSES	2,324	4,369	1,953	2,300	2,300	1,878		2,500	200	8.7%	2,500	200	8.7%
10140105	56300	SNOW PLOW BLADES	3,250	5,856	3,600	5,500	5,500	3,010		5,500	-	0.0%	5,500	-	0.0%
10140105	56700	VEHICLE/EQUIP PARTS	200,842	181,602	170,388	150,000	150,000	80,316		150,000	-	0.0%	150,000	-	0.0%
10140105	56705	OXYGEN & WELDING	1,494	1,035	909	1,100	1,100	606		1,100	-	0.0%	1,100	-	0.0%
10140105	56715	TIRES	20,366	11,382	12,228	12,000	12,000	23,314		16,000	4,000	33.3%	16,000	4,000	33.3%
			357,279	**334,420**	**380,122**	**370,294**	**370,294**	**223,969**	**60.48%**	**380,471**	**10,177**	**2.7%**	**380,471**	**10,177**	**2.7%**

TOWN OF LEDYARD
FISCAL YEAR 2027 MAYOR'S PROPOSED BUDGET
EXPENDITURE DETAIL

DEPARTMENT ACCOUNT #		ACCOUNT DESCRIPTION	FY 2023 ACTUAL	FY 2024 ACTUAL	FY 2025 ACTUAL	FY 2026 ADOPTED	FY 2026 REVISED	FY 2026 YTD-1/31/26	FY 2026 % of REVISED	FY 2027 DEPT PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chg Revised	FY 2027 MAYOR PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chge Revised
PW-ROAD UPKEEP															
10140107	56301	SALT AND SAND	73,148	83,284	134,276	115,308	115,308	44,965		140,000	24,692	21.4%	130,000	14,692	12.7%
10140107	56302	SNOW DAMAGE	9	26	103	300	300	-		300	-	0.0%	300	-	0.0%
10140107	56303	BITUMINOUS CONCRETE	18,313	5,096	19,117	5,000	5,000	5,000		5,000	-	0.0%	5,000	-	0.0%
10140107	56304	STREETS SIGNS & MARKINGS	4,010	5,159	10,615	4,000	4,000	2,421		4,000	-	0.0%	4,000	-	0.0%
10140107	56305	GUIDE RAILS	3,063	3,000	4,119	3,000	3,000	3,000		3,000	-	0.0%	3,000	-	0.0%
10140107	56306	TREE REMOVAL	62,720	43,312	40,000	18,000	18,000	3,500		18,000	-	0.0%	18,000	-	0.0%
10140107	56307	GRAVEL	3,000	3,000	3,000	3,000	3,000	3,000		3,000	-	0.0%	3,000	-	0.0%
10140107	56308	DRAINAGE IMPROVEMENT	4,016	3,518	3,681	3,000	3,000	1,186		3,000	-	0.0%	3,000	-	0.0%
10140107	56312	STREETLIGHT MAINTENANCE	1,002	-	4,636	1,500	1,500	1,322		1,500	-	0.0%	1,500	-	0.0%
10140107	57301	EQUIPMENT RENTAL	5,109	269	1,763	2,000	2,000	1,288		2,000	-	0.0%	2,000	-	0.0%
			174,390	**146,664**	**221,310**	**155,108**	**155,108**	**65,682**	**42.35%**	**179,800**	**24,692**	**15.9%**	**169,800**	**14,692**	**9.5%**
PW-DRAINAGE IMPROVEMENT															
10140109	56307	GRAVEL						-			-			-	
10140109	56308	DRAINAGE IMPROVEMENT						-			-			-	
			-	-	-	-	-	-		-	-		-		
PW-PROPERTY MAINTENANCE															
10140111	58200	TOWN HALL AND ANNEX	10,667	10,170	13,968	15,000	15,000	6,436		15,000	-	0.0%	15,000	-	0.0%
10140111	58210	PW FACILITIES	33,924	26,063	31,287	26,000	26,000	11,115		26,000	-	0.0%	26,000	-	0.0%
10140111	58220	POLICE STATION	8,593	20,455	16,673	16,000	16,000	6,474		17,000	1,000	6.3%	17,000	1,000	6.3%
10140111	58225	EMERGENCY SERVICES BUILDING	25,088	16,592	9,545	12,500	12,500	5,719		13,500	1,000	8.0%	13,500	1,000	8.0%
10140111	58230	LIBRARY FACILITY	7,455	6,896	12,735	7,050	7,050	6,114		8,000	950	13.5%	8,000	950	13.5%
10140111	58235	SENIOR CENTER FACILITY	5,730	3,322	9,944	8,000	8,000	4,130		8,000	-	0.0%	8,000	-	0.0%
10140111	58236	TOWN GREEN	8,248	1,117	2,069	4,000	4,000	494		2,000	(2,000)	-50.0%	2,000	(2,000)	-50.0%
			99,705	**84,615**	**96,221**	**88,550**	**88,550**	**40,482**	**45.72%**	**89,500**	**950**	**1.1%**	**89,500**	**950**	**1.1%**
PW-SANITATION															
10140113	51620	PUBLIC WORKS EMPLOYEES	615	-	709	2,000	2,000	699		2,000	-	0.0%	2,000	-	0.0%
10140113	54210	DISPOSAL SERVICE	609,703	628,178	646,332	706,300	706,300	406,554		725,700	19,400	2.7%	725,700	19,400	2.7%
10140113	54224	TIPPING FEES	348,736	366,101	390,501	470,000	470,000	217,524		520,000	50,000	10.6%	520,000	50,000	10.6%
10140113	56100	OPERATING EXPENSES	4,510	8,693	4,984	5,500	5,500	3,362		5,500	-	0.0%	5,500	-	0.0%
10140113	58790	BULKY WASTE	68,445	76,538	74,474	90,000	90,000	41,521		90,000	-	0.0%	90,000	-	0.0%
			1,032,009	**1,079,510**	**1,117,000**	**1,273,800**	**1,273,800**	**669,660**	**52.57%**	**1,343,200**	**69,400**	**5.4%**	**1,343,200**	**69,400**	**5.4%**
LIBRARY															
10150101	51160	CUSTODIAN SALARIES	24,807	25,688	26,083	26,839	26,839	15,484		26,839	-	0.0%	26,839	-	0.0%
10150101	51600	DEPARTMENT HEAD WAGES	78,950	81,192	76,690	85,529	85,529	29,644		82,400	(3,129)	-3.7%	82,400	(3,129)	-3.7%
10150101	51610	SUPERVISORS	149,358	159,613	160,680	175,823	182,521	102,880		184,726	2,205	1.2%	184,726	2,205	1.2%
10150101	51615	ASSISTANT WAGES	111,141	119,208	124,024	128,004	128,004	68,270		130,177	2,173	1.7%	130,177	2,173	1.7%
10150101	51800	PART-TIME WAGES	54,907	59,733	67,157	76,841	76,841	36,413		77,659	818	1.1%	77,659	818	1.1%
10150101	53645	TRAINING	-	-	720	2,500	1,500	150		2,500	1,000	66.7%	2,500	1,000	66.7%
10150101	53700	CONTRACT MAINTENANCE/LEASES	5,179	1,480	6,069	7,852	7,352	3,666		8,152	800	10.9%	8,152	800	10.9%
10150101	54310	EQUIPMENT MAINTENANCE	-	1,534	1,645	1,800	677	-		1,800	1,123	165.9%	1,800	1,123	165.9%
10150101	55330	TELEPHONE & FAX SERVICE	3,647	2,467	2,481	4,200	2,200	1,239		4,200	2,000	90.9%	4,200	2,000	90.9%
10150101	56100	OPERATING EXPENSES	18,084	11,650	11,367	14,523	12,523	4,653		29,658	17,135	136.8%	15,135	2,612	20.9%
10150101	56140	LION REG NETWORK	42,727	51,265	53,789	55,349	61,972	42,153		56,563	(5,409)	-8.7%	56,563	(5,409)	-8.7%
10150101	56420	LIBRARY BOOKS	54,399	51,036	50,557	56,000	56,000	17,762		62,500	6,500	11.6%	62,500	6,500	11.6%
			543,199	**564,866**	**581,262**	**635,260**	**641,958**	**322,314**	**50.21%**	**667,174**	**25,216**	**3.9%**	**652,651**	**10,693**	**1.7%**
PARKS AND RECREATION															
10160101	51600	DEPARTMENT HEAD WAGES	79,974	82,236	84,598	87,484	87,484	50,472		90,109	2,625	3.0%	90,109	2,625	3.0%
10160101	51610	SUPERVISORS	58,231	42,523	56,590	57,325	58,760	33,900		60,829	2,069	3.5%	60,829	2,069	3.5%
10160101	51615	ASSISTANT WAGES	69,200	122,233	108,786	121,940	121,940	64,273		121,122	(818)	-0.7%	121,122	(818)	-0.7%
10160101	51700	ADMINISTRATIVE WAGES	-	17,298	8,478	11,000	11,000	5,553		11,000	-	0.0%	11,000	-	0.0%
10160101	51710	PLAYGROUND & CUSTODIAN	16,328	11,910	16,330	17,300	17,300	-		17,300	-	0.0%	17,300	-	0.0%
10160101	51800	PART-TIME WAGES	-	42,617	26,485	33,000	33,000	21,735		39,538	6,538	19.8%	39,538	6,538	19.8%
10160101	53303	COMM CTR UTILITIES	-	11,416	14,151	20,363	20,363	8,113		19,157	(1,206)	-5.9%	19,157	(1,206)	-5.9%
10160101	53658	REGIONAL SENIOR WEBSITE	-	3,600	3,000	-	-	-		-	-	N/A	-	-	N/A
10160101	53700	CONTRACT MAINTENANCE/LEASES	161,462	161,462	161,462	200,000	200,000	149,075		209,250	9,250	4.6%	209,250	9,250	4.6%
10160101	54300	REPAIRS & MAINTENANCE	29,936	33,653	39,019	45,394	45,394	35,637		50,820	5,426	12.0%	47,820	2,426	5.3%
10160101	54310	EQUIPMENT MAINTENANCE	-	2,661	396	2,268	2,268	1,302		2,268	-	0.0%	2,268	-	0.0%
10160101	56100	OPERATING EXPENSES	18,898	22,162	30,553	33,926	33,926	14,063		36,556	2,630	7.8%	34,606	680	2.0%
10160101	56220	ELECTRICITY	36,588	34,949	32,685	37,550	37,550	17,951		37,000	(550)	-1.5%	37,000	(550)	-1.5%
			470,617	**588,720**	**582,533**	**667,550**	**668,985**	**402,074**	**60.10%**	**694,949**	**25,964**	**3.9%**	**689,999**	**21,014**	**3.1%**

TOWN OF LEDYARD
FISCAL YEAR 2027 MAYOR'S PROPOSED BUDGET
EXPENDITURE DETAIL

DEPARTMENT ACCOUNT #		ACCOUNT DESCRIPTION	FY 2023 ACTUAL	FY 2024 ACTUAL	FY 2025 ACTUAL	FY 2026 ADOPTED	FY 2026 REVISED	FY 2026 YTD-1/31/26	FY 2026 % of REVISED	FY 2027 DEPT PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chg Revised	FY 2027 MAYOR PROPOSED	FY 2027 Diff vs FY26 Revised	FY 2027 % Chge Revised
BOE EXPENDITURES															
10170101	58790	BOARD OF ED EXPENSES	34,337,932	35,815,724	38,157,522	40,462,242	40,462,242	-		41,872,335	1,410,093	3.5%	41,932,335	1,470,093	3.63%
			34,337,932	**35,815,724**	**38,157,522**	**40,462,242**	**40,462,242**	-		**41,872,335**	**1,410,093**	**3.5%**	**41,932,335**	**1,470,093**	
DEBT SERVICE															
10180101	58810	GEN OBLIGATION BOND PRINCIPAL	2,602,337	2,587,337	2,361,519	2,361,519	2,361,519	1,546,519		2,331,519	(30,000)	-1.3%	2,331,519	(30,000)	-1.3%
10180101	58811	GEN OBLIGATION BOND INTEREST	1,231,494	1,126,378	1,019,180	916,040	916,040	644,305		809,629	(106,411)	-11.6%	809,629	(106,411)	-11.6%
10180101	58820	CWF/DWSRF LOAN PRINCIPAL	77,296	85,966	87,701	89,472	89,472	59,449		91,278	1,806	2.0%	91,278	1,806	2.0%
10180101	58821	CWF/DWSRF LOAN INTEREST	12,510	12,004	10,269	8,499	8,499	5,865		6,693	(1,806)	-21.2%	6,693	(1,806)	-21.2%
10180101	58823	DEBT TRANSFER TO WPCA	550,970	542,163	426,359	421,920	421,920	297,910		375,122	(46,798)	-11.1%	375,122	(46,798)	-11.1%
10180101	58830	PROJECTS IN PROGRESS	1,625	1,625	1,625	50,000	50,000	-		50,000	-	0.0%	50,000	-	0.0%
			4,476,232	**4,355,473**	**3,906,653**	**3,847,450**	**3,847,450**	**2,554,048**	**66.38%**	**3,664,241**	**(183,209)**	**-4.8%**	**3,664,241**	**(183,209)**	**-4.8%**
CONTRIBUTION TO CNR															
10185101	58790	CONTRIBUTION TO CAPITAL	1,150,285	1,653,735	1,791,098	1,177,779	1,177,779	158,708		2,132,304	954,525		1,786,987	609,208	51.7%
			1,150,285	**1,653,735**	**1,791,098**	**1,177,779**	**1,177,779**	**158,708**	**13.48%**	**2,132,304**	**954,525**	**81.0%**	**1,786,987**	**609,208**	**51.7%**
TRANSFERRED FUNDS															
10188210	59300	TRANSFERRED FUNDS	664,060	504,131	412,392	-	-	-		-	-		-	-	
			664,060	**504,131**	**412,392**	-	-	-		-	-		-	-	
TOTAL GENERAL GOVERNMENT			**28,806,860**	**29,174,548**	**29,343,126**	**29,902,735**	**29,914,020**	**16,147,181**	**53.98%**	**32,025,229**	**2,111,209**	**7.1%**	**31,878,334**	**1,964,314**	**6.57%**
TOTAL BOARD OF EDUCATION			**34,337,932**	**35,815,724**	**38,157,522**	**40,462,242**	**40,462,242**	-	**0.00%**	**41,872,335**	**1,410,093**	**3.5%**	**41,932,335**	**1,470,093**	**3.63%**
TOTAL EXPENDITURES			**63,144,792**	**64,990,272**	**67,500,648**	**70,364,977**	**70,376,262**	**16,147,181**	**22.94%**	**73,897,564**	**3,521,302**	**5.0%**	**73,810,669**	**3,434,407**	**4.88%**

TOWN OF LEDYARD
FISCAL YEAR 2027 MAYOR'S PROPOSED BUDGET REVENUES

ACCOUNT		DESCRIPTION	2023 ACTUAL	2024 ACTUAL	2025 ACTUAL	2026 ADOPTED	2026 YTD-1/31/26	2027 PROPOSED	DIFF VS 2026 ORIGINAL BUDGET	% Chg over PY
GENERAL GOVERNMENT -- CHARGES FOR SERVICES										
1011401	42046	ANIMAL CONTROL OFFICER FEES	1,355	645	565	800	195	700	(100)	-12.5%
1011401	47009	MISCELLANEOUS	131,614	56,701	386,344	50,000	138,959	50,000	-	0.0%
1011401	47019	RED WOLF ANTENNAE LEASE	69,894	71,856	74,810	70,000	14,703	70,000	-	0.0%
1011401	47022	TOWN CLERK FEES	110,617	110,230	112,312	111,500	66,231	112,000	500	0.4%
1011401	47023	ZONING/WETLANDS/ZBA FEES	10,285	7,915	11,409	10,000	5,520	12,000	2,000	20.0%
1011401	47024	ASSESSOR'S FEES	414	497	199	300	116	200	(100)	-33.3%
1011401	47025	PLANNING	13,658	4,467	1,706	5,000	900	-	(5,000)	-100.0%
1011401	47036	OTHER LICENSE/PERMIT FEE	2,782	1,779	1,629	750	1,709	1,500	750	100.0%
1011401	47037	DOG LICENSE FEES	10,329	10,155	10,541	10,000	2,948	10,100	100	1.0%
1011401	47040	BUILDING PERMIT FEES	233,016	241,455	361,327	275,000	195,681	330,000	55,000	20.0%
1011401	47041	EMPLOYEE HEALTH CO-PREMIUMS	469,516	536,856	478,229	525,000	259,408	525,000	-	0.0%
1011401	47045	ASSESSMENTS RECEIVABLE	250,000	250,000	250,000	250,000	-	100,000	(150,000)	-60.0%
1011401	47051	LVES CONTR TO EMS BLDG	100,000	59,980	-		-	-	-	
1011401	47053	LVES CONTR TO MED EQUIPMENT	20,000	-	-		-	-	-	
1012001	47055	SHARED SERVICES - ASSESSOR	33,024	29,401	30,133	36,800	22,825	36,800	-	
1011401	49006	WPCA CONTR TO FINANCE OFC	40,000	40,000	40,000	50,000	-	50,000	-	0.0%
1011401	49051	LESTER HOUSE RENT	10,333	15,500	-		-	-	-	#DIV/0!
			1,506,837	**1,437,437**	**1,759,204**	**1,395,150**	**709,196**	**1,298,300**	**(96,850)**	**-6.9%**
GENERAL GOVERNMENT -- GRANTS										
1011402	41005	TELEPHONE LINE GRANTS	25,170	37,062	37,643	25,000	-	35,000	10,000	40.0%
1011402	42001	PILOT: STATE PROPERTY	925,100	1,000,994	1,022,896	931,157	1,045,214	1,099,360	168,203	18.1%
1011402	42007	DISABLED REIMBURSEMENT	972	940	1,185	1,000	1,402	1,000	-	0.0%
1011402	42010	EMERGENCY MANAGEMENT	11,413	10,850	17,550	15,600	5,850	15,600	-	0.0%
1011402	42011	ADDITIONAL VETERANS GRANT	4,360	4,281	3,163	4,300	3,788	3,700	(600)	-14.0%
1011402	42012	MISCELLANEOUS STATE GRANTS	-	-	9,233		-	-	-	
1011402	42014	PEQUOT FUND	1,391,000	1,391,000	1,390,000	1,391,000	463,667	2,191,000	800,000	57.5%
1011402	42044	MUNIC REV SHARING -- SALES TAX	291,322	390,170	-	-	2,468	-	-	
			2,649,337	**2,835,297**	**2,481,670**	**2,368,057**	**1,522,390**	**3,345,660**	**977,603**	**41.3%**
PUBLIC SAFETY -- CHARGES FOR SERVICES										
1012001	47005	LEDYARD FIRE POLICE CHARGES	-	-	-	500	-	3,000	2,500	500.0%
1012001	47007	DISPATCH REGIONALIZATION	70,325	95,036	103,671	95,000	78,190	104,000	9,000	9.5%
1012001	47017	GALES FERRY FIRE POLICE CHARGES	-	1,127	975	500	-	1,000	500	100.0%
1012001	47018	POLICE OUTSIDE OT	230,800	106,403	156,036	135,000	162,283	175,000	40,000	29.6%
1012001	47038	PERMIT FEES	4,325	4,375	4,195	4,900	2,975	4,700	(200)	-4.1%
1012001	47039	RECORDS FEES	2,210	2,076	2,133	2,000	984	2,000	-	0.0%
			307,660	**209,017**	**267,010**	**237,900**	**244,432**	**289,700**	**49,300**	**20.7%**
PUBLIC SAFETY -- GRANTS										
1012002	42034	DUI GRANT REIMBURSEMENT	-	-	-	12,000	-	12,000	-	0.0%
1012002	47049	DISPATCH PRESTON	25,000	30,500	30,500	30,500	30,500	30,500	-	0.0%
			25,000	**30,500**	**30,500**	**42,500**	**30,500**	**42,500**	**-**	**0.0%**
HEALTH & WELFARE -- CHARGES FOR SERVICES										
1013001	47021	SENIOR CENTER FEES	13,565	1,557	1,346	-	573	900	900	
1013001	47034	PUBLIC HEALTH NURSING FEES	539,462	18,032	-		-	-	-	

TOWN OF LEDYARD
FISCAL YEAR 2027 MAYOR'S PROPOSED BUDGET REVENUES

ACCOUNT	DESCRIPTION	2023 ACTUAL	2024 ACTUAL	2025 ACTUAL	2026 ADOPTED	2026 YTD-1/31/26	2027 PROPOSED	DIFF VS 2026 ORIGINAL BUDGET	% Chg over PY
		553,027	19,589	1,346	-	573	900	900	
HEALTH & WELFARE -- GRANTS									
1013002 42003	YOUTH SERVICES	33,515	31,022	-		-	-	-	
1013002 42032	PILOT: SR HOUSING AUTHORITY	9,673	7,810	8,653	8,200	11,278	10,000	1,800	22.0%
		43,188	38,832	8,653	8,200	11,278	10,000	1,800	22.0%
PUBLIC WORKS -- CHARGES FOR SERVICES									
1014001 47020	TIPPING FEES	47,862	42,013	36,049	35,000	28,919	50,000	15,000	42.9%
1014001 47056	SHARED SERVICES - MECHANIC	-	8,000	96,000	96,000	56,000	96,000	-	
		47,862	50,013	132,049	131,000	84,919	146,000	15,000	11.5%
LIBRARIES -- CHARGES FOR SERVICES									
1015001 47032	LIBRARY FEES	587	6,470	7,250	6,000	3,809	6,500	500	8.3%
		587	6,470	7,250	6,000	3,809	6,500	500	8.3%
PARKS & RECREATION -- CHARGES FOR SERVICES									
1016001 47033	PROGRAM REGISTRATION FEES	3,713	2,940	3,066	3,000	1,025	3,000	-	0.0%
		3,713	2,940	3,066	3,000	1,025	3,000	-	0.0%
EDUCATION -- CHARGES FOR SERVICES									
1017001 47010	VO AG TUITION	728,355	829,361	403,649	411,563	301,258	411,563	-	0.0%
1017001 47011	SPECIAL EDUCATION TUTION	126,736	60,559	54,010	25,500	6,728	26,775	1,275	5.0%
1017001 47012	NON RESIDENT TUITION	43,470	71,867	62,680	62,680	-	65,814	3,134	5.0%
		898,561	961,787	520,339	499,743	307,986	504,152	4,409	
EDUCATION -- GRANTS									
1017002 42016	FEDERAL PUBLIC LAW 874	1,558,206	1,804,635	1,207,133	1,164,441	514,771	1,178,414	13,973	1.2%
1017002 42018	VOAG GRANT	1,051,239	1,019,200	1,508,652	1,400,000	1,088,711	1,400,000	-	0.0%
1017002 42020	EDUCATION COST SHARING	11,475,245	11,547,735	11,949,448	12,016,278	6,016,310	12,032,619	16,341	0.1%
		14,084,690	14,371,570	14,665,233	14,580,719	7,619,792	14,611,033	30,314	0.2%
TAXES									
1019501 41000	PROPERTY TAXES, CURRENT	41,803,461	43,281,054	45,892,340	48,100,971	46,137,967	49,756,337	1,655,366	3.4%
1019501 41001	ARREARS	366,922	408,251	263,530	320,000	176,821	320,000	-	0.0%
1019501 41002	INTEREST	262,415	255,299	232,610	205,000	116,611	205,000	-	0.0%
1019501 41003	SUSPENSE TAX COLLECTIONS	10,251	10,066	35,972	13,000	8,333	13,000	-	0.0%
1019501 41004	LIENS	21,106	14,211	11,464	13,000	6,136	13,000	-	0.0%
1019501 41008	MV PROPERTY TAX GRANT	143,385	213,782	352,343	411,062	445,888	741,052	329,990	80.3%
		42,607,540	44,182,663	46,788,259	49,063,033	46,891,756	51,048,389	1,985,356	4.0%
OTHER REVENUE									
1019502 49002	TRANSFER IN: BOND PREMIUM	-	-	-	-	-	-	-	
1019502 49002	TRANSFER IN: OTHER	210,517	3,500	-	1,504,675	-	1,854,535	349,860	23.3%
1019503 48001	INTEREST ON DEPOSITS	576,150	1,010,972	1,031,324	525,000	554,764	650,000	125,000	23.8%
		786,667	1,014,472	1,031,324	2,029,675	554,764	2,504,535	474,860	23.4%
	TOTAL	63,514,669	65,160,587	67,695,903	70,364,977	57,982,420	73,810,669	3,445,692	4.9%

TOWN OF LEDYARD
FISCAL YEAR 2027 MAYOR'S PROPOSED BUDGET
CAPITAL IMPROVEMENT PLAN SUMMARY

Department	Account #	Account Name	Project Description	2026 Appropr	Current Account Balance	FY2027 REQUESTS Dept Request	Mayor	Council	Preliminary Tax Levy	*Source of Non-Tax Funding* LoCIP	Town Aid Road Grant	Municipal Aid Grant	Convey-ance	BOE CNR	Other
General Government															
Town Council	21010101-57300	New Equipment	Laptop Reserve Fund	1,500	893	1,500	1,500	-	1,500	-	-	-	-	-	-
Historic Districts	21010103-54300/54500	R & M /Bldg Maintenance	Sawmill Damn Remediation	10,000	48,818	25,000	25,000	-	25,000	-	-	-	-	-	-
Assessor	21012103-53305	Revaluation	Revaluation Reserve	50,000	48,500	50,000	50,000	-	50,000	-	-	-	-	-	-
MIS	21012151-57310	Equip Replacement	Technology Upgrades	71,500	390	77,175	77,175	-	77,175	-	-	-	-	-	-
MIS	TBD	TBD	Meeting Room Replacements	-	-	125,000	62,500	-	62,500	-	-	-	-	-	-
Land Use	TBD	TBD	Design and Engineering Gales Ferry RT 12 Sidewalks	-	-	65,000	65,000	-	65,000						
Land Use	21014301-53306	POCD	Planning & Zoning Document Updates	-	17,500	75,000	75,000	-	75,000	-	-	-	-	-	-
Public Safety															
Police	21020101-56378	CALEA Accreditation	CALEA Accreditation	6,500	7,269	-	-	-	-	-	-	-	-	-	-
Police	21020101-56379	Psych Exam Reserve	Psychological Exam Reserve	1,375	1,125	1,000	1,000	-	1,000	-	-	-	-	-	-
Police	21020101-57300	New Equipment	Flock Safety Cameras	12,750	1,040	12,000	12,000	-	12,000	-	-	-	-	-	-
Police	21020101-57510	Vehicle	Police Vehicles	54,326	24,458	92,720	46,360	-	46,360	-	-	-	-	-	-
Police	21020101-58692	In Car Video	In Car Video	1,800	13,502	40,000	40,000	-	40,000	-	-	-	-	-	-
Police	21020101-58693	Firearm Replacement Reserve	Firearm Reserve Fund	4,200	6,085	12,600	12,600	-	12,600						
Police	21020101-58695	Body Cameras	Body Worn Cameras	7,050	8,749	7,020	7,020	-	7,020	-	-	-	-	-	-
Police	TBD	TBD	Body Armor Replacement	7,050	-	8,375	8,375	-	8,375						
Dispatch	21020103-57300	New Equipment	Radio Base Station Reserve Fund	9,500	50,557	8,500	8,500	-	8,500	-	-	-	-	-	-
ACO	21020105-57300	New Equipment	ACO Vehicle Reserve Fund	2,000	5,828	2,000	2,000	-	2,000	-	-	-	-	-	-
Admin Emerg Serv	21020401-54325	Fire Apparatus	Fire Apparatus Replacement	307,444	1,393,093	384,305	384,305	-	384,305	-	-	-	-	-	-
Admin Emerg Serv	21020401-57306	New Equipment	AED Reserve	9,175	52,843	9,450	9,450	-	9,450	-	-	-	-	-	-
Ledyard Fire	21020501-56215	Clothing Emerg. Serv.	Fire Fighter Personal Protective Equip.	15,000	18,984	15,000	15,000	-	15,000	-	-	-	-	-	-
Ledyard Fire	21020501-57300	New Equipment	Fire Hose			3,000	3,000	-	3,000	-	-	-	-	-	-
Ledyard Fire	21020501-57300	New Equipment	SCBA Replacement			12,000	12,000	-	12,000						
Ledyard Fire	21020501-57300	New Equipment	Thermal Imaging Camera	39,000	89,878	3,000	3,000	-	3,000						
Ledyard Fire	21020501-57301	New Equipment	Portable Radios and Pagers			7,000	7,000		7,000						
Ledyard Fire	21020501-57300	New Equipment	R-13 New Engine Equipment			5,000	5,000	-	5,000						
Ledyard Fire	21020501-57300	New Equipment	Hurst Battery Tools			12,000	12,000	-	12,000						
Gales Ferry Fire	21020551-52615	Clothing Emerg. Serv.	Fire Fighter Personal Protective Equip.	16,000	26,180	16,000	16,000	-	16,000	-	-	-	-	-	-
Gales Ferry Fire	21020551-57300	New Equipment	Communication Equipment			-	-	-	-	-	-	-	-	-	-
Gales Ferry Fire	21020551-57300	New Equipment	Firefighting Equipment			-	-	-	-						
Gales Ferry Fire	21020551-57300	New Equipment	Air Bottles			-	-	-	-						
Gales Ferry Fire	21020551-57300	New Equipment	SCBA Replacement			-	-	-	-						
Gales Ferry Fire	21020551-57300	New Equipment	Breathing Air Compressor	44,000	246,767	-	-	-	-						
Gales Ferry Fire	21020551-57300	New Equipment	Rescue Tools Replacement			-	-	-	-						
Gales Ferry Fire	21020551-57300	New Equipment	Fire Station Generator Replacement			-	-	-	-						
Gales Ferry Fire	21020551-57300	New Equipment	Station Exhaust Removal System Replacement			-	-	-	-						
Gales Ferry Fire	21020551-57300	New Equipment	Fire Hose Replacement			-	-	-	-						

TOWN OF LEDYARD
FISCAL YEAR 2027 MAYOR'S PROPOSED BUDGET
CAPITAL IMPROVEMENT PLAN SUMMARY

Department	Account #	Account Name	Project Description	2026 Appropr	Current Account Balance	FY2027 REQUESTS Dept Request	Mayor	Council	Preliminary Tax Levy	*Source of Non-Tax Funding* LoCIP	Town Aid Road Grant	Municipal Aid Grant	Convey-ance	BOE CNR	Other	
Public Works																
PW	21040101-57311	Heavy Equipment	Heavy Equipment	80,000	4,800	85,000	85,000	-	40,000	-	-	-	45,000	-	-	
PW	21040101-57312	Large Trucks	Large Trucks	165,000	32,833	190,000	190,000	-	190,000	-	-	-	-	-	-	
PW	21040101-57313	Small Trucks	Small Trucks	40,000	11,827	42,500	42,500	-	42,500	-	-	-	-	-	-	
PW	21040101-57314	Light Equipment	Light Equipment	16,000	9,772	16,000	16,000	-	16,000	-	-	-	-	-	-	
PW	21040101-57315	Pooled Vehicles	Pooled Vehicles	15,000	46,825	15,000	15,000	-	15,000	-	-	-	-	-	-	
PW	21040101-57316	Beverage Container Surcharges	Sweeper	-	-	12,000	12,000	-	12,000							
PW	21040107-54005	Road Restoration	Road Restoration	890,000	7,655	1,065,000	900,000	-	99,202	182,572	197,141	421,085	-	-	-	
PW	21040107-54006	Road Maintenance	Road Maintenance	147,889	83,647	197,141	197,141	-	-	-	197,141	-	-	-	-	
PW	21040111-58240	Building Reserve Fund	Municipal Building Reserve Fund	100,000	140,910	100,000	100,000	-	100,000	-	-	-	-	-	-	
PW	21040107-54017-G0015	Whitford Brook Watershed	Whitford Brook Watershed Infrastructure	2,250,000	-	2,800,000	2,800,000	-	-	-	-	-	-	-	2,800,000	
Library																
Library	21050101-57300	New Equipment	Technology Upgrades	-	110	5,000	5,000	-	5,000							
Parks & Recreation																
PR	Fund 0203	Site Improvements	*See CIP Backup for Details*	-	-	92,000	92,000	-	-	-	-	-	92,000	-	-	
Schools																
Capital / CNR	CNR TOTAL		*See CIP Backup for Details*	-	-	391,500	306,500	-	306,500	-	-	-	-	-	-	**
Operating	OPERATING TOTAL		*See CIP Backup for Details*	-	-	156,500	156,500	-	-						156,500	***
	TOTAL					**6,237,286**	**5,878,426**	**-**	**1,786,987**	**182,572**	**394,282**	**421,085**	**137,000**	**-**	**2,956,500**	

*** BOE Operating Budget

TOWN OF LEDYARD
FISCAL YEAR 2027 TOWN COUNCIL PROPOSED BUDGET
CAPITAL IMPROVEMENT PLAN DETAILS

FY27 CAPITAL IMPROVEMENT PLAN REQUESTS

DEPARTMENT	DESCRIPTION	Priority	Total 2027 Request	Dept. Request	Mayor	FY27 COUNCIL	FY28	FY29	FY30	FY31	FY32	FY33	FY34	FY35	FY36
Town Council			1,500												
	Laptop Reserve Fund	SR		1,500	1,500	-	1,500	1,500	1,500	1,500	1,500	-			
Historic District Comm			25,000												
	Sawmill Damn Remediation	DF		25,000	25,000	-	25,000	50,000	250,000	100,000	-	-			
Assessor's Office			50,000												
	Revaluation	SR		50,000	50,000	-	50,000	50,000	-	-	-	-	-		-
MIS			202,175												
	Computer & Server Replacement Reserve Fund	SR		77,175	77,175	-	81,034	85,085	89,340	93,807	96,621	101,452			
	Meeting Room Replacements	SR		125,000	62,500	-	62,500	-	-	-	-	-			
Land Use			140,000												
	Design and Engineering Gales Ferry RT 12 Sidewalks	SR		65,000	65,000	-	65,000	-	-	-	-	-	-		
	Planning & Zoning Document Updates	SR		75,000	75,000	-	75,000	-	-	-	-	-	-		-
Police Department			184,215												
	CALEA Addreditation			-	-	-	-	-	-	-	-	-			
	Psychological Exam Reserve	SR(5)		1,000	1,000	-	1,000	1,000	1,000	1,000	1,000	1,000			
	Flock Safety Cameras	SR(2)		12,000	12,000	-	12,000	12,000	12,000	12,000	12,000	12,000			
	Police Vehicles	SR(1)		92,720	46,360	-	92,720	48,000	96,000	96,000	98,000	99,000			
	In Car Video	SR(5)		40,000	40,000	-	40,000	40,000	1,800	1,800	1,800	1,800			
	Firearm Reserve Fund	SR(3)		12,600	12,600	-	8,400	500	500	500	500	500			
	Body Worn Cameras	SR(6)		7,020	7,020	-	7,020	7,020	7,020	7,020	7,020	7,020			
	Body Armor Replacement	SR(7)		8,375	8,375	-	8,375	8,375	8,375	8,375	8,500	8,500			
	Radio Base Station Reserve Fund	SR (2)		8,500	8,500	-	8,500	8,500	8,500	8,500	8,500	8,500			
	ACO Vehicle Reserve Fund	SR(1)		2,000	2,000	-	2,000	2,000	2,000	5,000	5,000	5,000			
Ledyard Fire Company			57,000												
	Fire Fighter Personal Protective Equip.	RPH (1)		15,000	15,000	-	15,000	15,000	15,000	15,000	15,000	15,000			
	Fire Hose	RPH (3)		3,000	3,000	-	3,000	2,000	2,000	1,500	1,500	1,500			
	SCBA Replacement	SR (2)		12,000	12,000	-	12,000	12,000	12,000	12,000	12,000	12,000			
	Thermal Imaging Camera	IOE (6)		3,000	3,000	-	3,000	-	-	-	-	-			
	Portable Radios and Pagers	IOE(6)		7,000	7,000	-	7,000	7,000	5,000	-	-	-			
	R-13 New Engine Equipment	RPH (4)		5,000	5,000	-	5,000	5,000	5,000	5,000	-	-			
	Hurst Battery Tools	SR(5)		12,000	12,000	-	-	-	-	-	-	-			
Gales Ferry Fire District			16,000												
	Fire Fighter Personal Protective Equip.	RPH (1)		16,000	16,000	-	17,000	17,000	17,000	18,000	18,000	18,000			
	Communication Equipment	SR (2)		-	-	-	5,000	5,000	5,000	5,000	5,000	5,000			
	Firefighting Equipment	RPH (2)		-	-	-	3,000	3,000	3,000	3,000	3,000	3,000			
	Air Bottles	RPH (1)		-	-	-	5,000	6,000	6,000	7,500	7,500	-			
	SCBA Replacement	RPH (2)		-	-	-	15,000	15,000	18,000	18,000	20,000	20,000			
	Breathing Air Compressor	RPH (2)		-	-	-	-	-	-	-	-	-			
	Rescue Tools Replacement	RPH (2)		-	-	-	4,000	4,000	4,000	4,000	4,000	4,000			
	Fire Station Generator Replacement	RPH (2)		-	-	-	-	-	-	-	-	-			
	Station Exhaust Removal System Replacement	RPH (2)		-	-	-	-	-	-	-	-	-			
	Fire Hose Replacement	RPH (2)		-	-	-	4,000	4,000	4,000	4,000	4,000	4,000			
Admin Emerg Serv			393,755												
	AED Reserve	RPH		9,450	9,450	-	9,575	9,950	10,205	10,468	10,782	11,106			
	Fire Apparatus Replacement	SR		384,305	384,305	-	407,363	439,952	459,750	480,439	502,059	524,651			

TOWN OF LEDYARD
FISCAL YEAR 2027 TOWN COUNCIL PROPOSED BUDGET
CAPITAL IMPROVEMENT PLAN DETAILS

FY27 CAPITAL IMPROVEMENT PLAN REQUESTS

DEPARTMENT	DESCRIPTION		Priority	Total 2027 Request	Dept. Request	Mayor	FY27 COUNCIL	FY28	FY29	FY30	FY31	FY32	FY33	FY34	FY35	FY36
Public Works																
Equipment				360,500												
	Heavy Equipment		SR(H)		85,000	85,000	-	85,000	85,000	85,000	90,000	90,000	90,000			
	Large Trucks		SR(H)		190,000	190,000	-	190,000	190,000	200,000	200,000	200,000	200,000			
	Small Trucks		SR(H)		42,500	42,500	-	42,500	45,000	45,000	47,500	47,500	50,000			
	Light Equipment		SR, IOE(M)		16,000	16,000	-	17,000	17,000	17,000	18,000	18,000	18,000			
	Pooled Vehicles		SR(H)		15,000	15,000	-	17,500	17,500	20,000	20,000	22,500	22,500			
	Sweeper		SR(H)		12,000	12,000	-	12,000	12,000	12,000	12,000	12,000	12,000			
Roads				1,262,141												
	Road Restoration		DF,SR,C (H)		1,065,000	900,000	-	1,065,000	1,065,000	1,115,000	1,115,000	1,115,000	1,165,000			
	Road Maintenance				197,141	197,141	-	-	-	-	-	-	-			
Buildings				100,000												
	Municipal Building Reserve Fund		SR(H)		100,000	100,000	-	110,000	110,000	120,000	120,000	130,000	130,000			
Other				2,800,000												
	Whitford Brook Watershed Infrastructure		DF,SR,C (H)		2,800,000	2,800,000	-	2,800,000	2,800,000	1,150,000	-	-	-			
Library				5,000												
	Technology Upgrades		SR		5,000	5,000	-	5,000	5,000	5,000	5,000	5,000	5,000			
Parks & Recreation				92,000												
	Tree Trimming / Removal		DF		15,000	15,000	-	-	-	-	-	-	-			
	Security Camera		RPH		15,000	15,000	-	-	-	-	-	-	-			
	Park Amenities		IOE		20,000	20,000	-	-	-	-	-	-	-			
	Blonders Upgrades		IOE		25,000	25,000	-									
	AED's and Climate Controlled Boxes		RPH		17,000	17,000	-	-	-	-	-	-	-			
Board of Education																
Bondable				600,000												
	LHS - Boiler System Re[placement & BMS System	20	DF		-	-	-	20,000,000	-	-	-	-	-	-		
	LHS - Parking Lot	36	DF		-	-	-	-	-	1,500,000	-	-	-	-		
	LHS - Window Replacement	18	DF		-	-	-	3,500,000	-	-	-	-	-	-		
	LHS - Add Elavator to Lower Level	34	NEF		-	-	-	-	-	-	-	350,000	-	-		
	LHS - Classroom Ventilation and Air Conditioning	23	DF		-	-	-	21,250,000	-	-	-	-	-	-		
	LHS - Roof Replacement	33	SR		-	-	-	-	-	-	-	8,000,000	-	-		
	LHS - Replace Media Center Roof	24	DF		-	-	-	525,000	-	-	-	-	-	-		
	LHS - Auditorium Air Conditioning	22	NEF		-	-	-	500,000	-	-	-	-	-	-		
	LMS - Expand Cafeteria	21	NEF		600,000	600,000	-	-	-	-	-	-	-	-		
	JWL - Window Replacement	35	IOE		-	-	-	-	-	-	1,200,000	-				
	JWL - Parking Lot	37	DF		-	-	-	-	500,000	-	-	-				

TOWN OF LEDYARD
FISCAL YEAR 2027 TOWN COUNCIL PROPOSED BUDGET
CAPITAL IMPROVEMENT PLAN DETAILS

FY27 CAPITAL IMPROVEMENT PLAN REQUESTS

DEPARTMENT	DESCRIPTION		Priority	Total 2027 Request	Dept. Request	Mayor	FY27 COUNCIL	FY28	FY29	FY30	FY31	FY32	FY33	FY34	FY35	FY36
Capital / Non-Recurring				391,500												
	LHS - Needs study (BOE is paying from FY 26 capital)	1	DF		75,000	-	-	-	-	-	-	-	-	-		-
	LHS - Lower Level Restrooms	25	DF		-	-	-	-	85,000	-	-	-	-	-	-	-
	LHS - Lower Level Locker Rooms	26	DF		-	-	-	-	-	125,000	-	-	-	-		-
	LHS - Boiler System Repairs	2	DF/SR		22,500	22,500	-	-	-	-	-	-	-	-		-
	LHS - Electrostatic Locker Painting	30	DF		-	-	-	-	-	-	-	-	-	50,000	-	-
	LHS - Science Lab Upgrades	6	DF/EPS		-	-	-	138,000	142,000	145,000	-	-	-	-		-
	LHS - Culinary Room Renovations	38	IOE/C		-	-	-	-	75,000	-	-	-	-	-		-
	LHS - Resurface Tennis Courts	28	IOE		-	-	-	50,000	-	-	-	-	-	-		-
	LHS - Outdoor Athletics Lavs / Storage	29	NEF/IOE		-	-	-	-	-	-	-	-	-	-	200,000	-
	LHS - Replace Turf Field Scoreboard	16	NEF/IOE		-	-	-	70,000	-	-	-	-	-	-		-
	LHS - Varisty Lockerroom Renovation	19	DF		-	-	-	-	150,000	-	-	-	-	-		-
	LHS - Athletic Lockerroom Renovation	10	DF		-	-	-	-	150,000	-	-	-	-	-		-
	LHS - Replacement Field Lights	27	DF/IOE		-	-	-	-	-	125,000	-	-	-	-		-
	LHS - Replacement PA System	5	DF/SR		10,000	10,000	-	-	-	-	-	-	-	-		-
	LHS - Gym Bleachers	31	DF/C		-	-	-	200,000	-	-	-	-	-	-		-
	LHS - Gym Dividing Wall	17	DF/C		-	-	-	35,000	-	-	-	-	-	-		-
	LHS - Aux Gym Padding	32	DF/C		-	-	-	30,000	-	-	-	-	-	-		-
	LHS - Replace sewer piping	15	DF/RPH		-	-	-	-	70,000	-						
	LHS - Softball field renovation	11	DF/SR		-	-	-	45,000								
	JWL - Classroom Renovations	7	DF/IOE/C		140,000	140,000	-	143,000	146,000	-	-	-	-	-		-
	JWL - Basketball Court Pavement	12	DF		-	-	-	70,000	-	-	-	-	-	-		-
	JWL - Replace PA System	3	DF/SR		6,000	6,000	-	-	-	-						
	CO - Replacement Truck	8	IOE		80,000	70,000	-	-	-	-	-	-	-	-		-
	District - Trailer	9	SR		5,000	5,000	-									
	GFS - Playground Surface	13	DF		-	-	-	50,000								
	GFS - Replace PA System	4	DF/SR		6,000	6,000	-	-	-	-	-	-	-	-		-
	GHS - Turf Playground	14	DF		47,000	47,000	-									
Operating				156,500												
	LHS - Parking Lot Repairs		DF		4,000	4,000	-	4,000	4,000	4,000	-	-	-			
	LHS - Athletic Field Repairs		SR		7,500	7,500	-	7,500	7,500	7,500	-	-	-			
	LHS - Masonry Repairs		DF		5,000	5,000	-	5,000	5,000	5,000	-	-	-			
	Districtwide - HVAC Maintenance		IOE		140,000	140,000	-	140,000	140,000	140,000	-	-	-			
PRIORITY KEY							-									
RPH	Risk to Public Health															
DF	Deteriorated Facility															
SR	Systematic Replacement															
IOE	Improvement of Operating Efficiency															

TOWN OF LEDYARD
CONNECTICUT

Fred B. Allyn III
Mayor

Jessica Michaud
Executive Assistant to the Mayor

741 Colonel Ledyard Highway
Ledyard, CT 06339-1551
Telephone (860) 464-3222
FAX (860) 464-1126

Re: Contingency Plan

Pursuant to Chapter VII, Section 1 of the Town Charter, revised 12/3/2018, the Mayor is required to include in the budget submittal "plans for dealing with additional reductions in State funding that might occur after the General Government and Board of Education budgets are approved at referendum."
P
The following outlines possible General Government reductions/ increases for FY27 that could cover up to $580,799 if the State of Connecticut reduced funding to the Town of Ledyard after budget passage:

- **Utilize Mil Rate Stabilization Fund to offset reductions: $300,000**
- **Reduce MIS capital Meeting Room upgrades: $62,500**
- **Eliminate tax levy portion of capital road restoration: $155,659**
- **Eliminate memberships for EDC (#10114305-58100): $7,640**
- **Utilize Surplus to budget shortfall: $55,000**

The General Government budget is lean in both expenses and staffing, so each of the aforementioned items will have its own impact on the taxpayer- in the form of poorer road conditions, reduced online services, reduced economic development opportunities, a lower bond rating (utilizing surplus) or a combination of the above.

Ledyard Board of Education
2026-2027

Board of Education Approved Budget

February 10, 2026

Total BOE Budget: $41,932,335

BOE Budget Increase: $1,470,093 (3.63%)

Town Allocated Health Insurance Budget: $TBD*

Town Allocated Health Insurance Increase: $TBD*

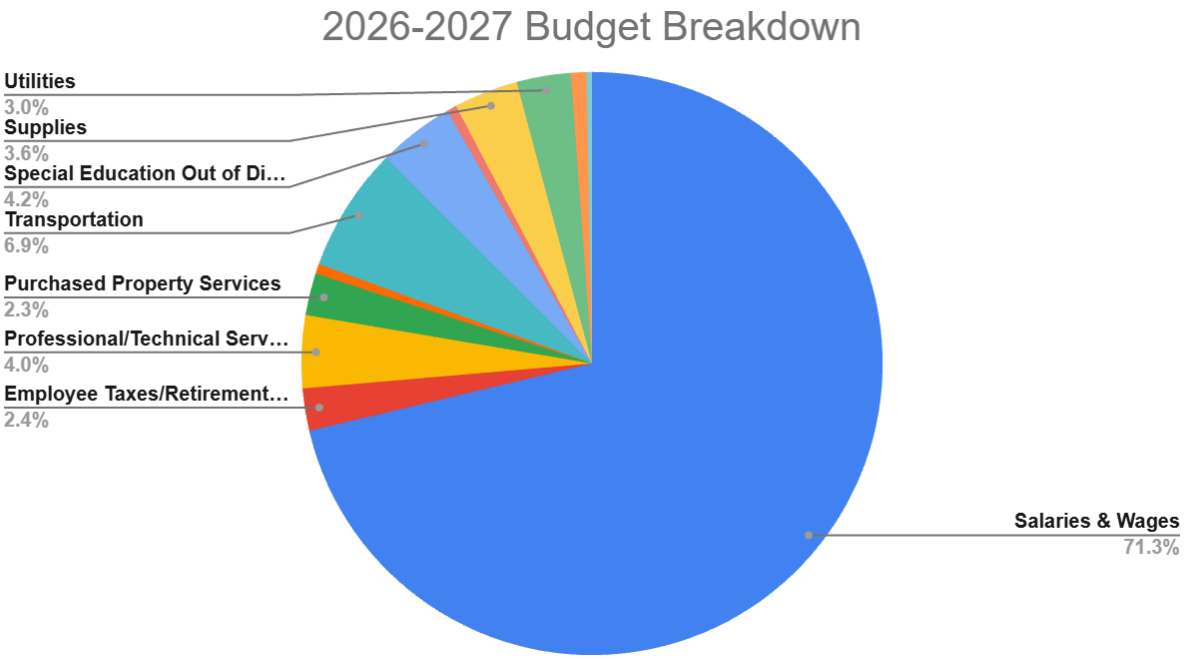
Total Budget with Town Allocated Health Insurance: $TBD*

Budget increase with Town Allocated Health Insurance: $TBD*

*** The Town of Ledyard has maintained sole authority over insurance plan design, selection of carriers and other decisions related to the cost of employee health insurance.**

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Salaries and Wages (object codes 51010-51300) – Increase $1,202,233 (4.19%)

Teacher salaries support regular education activities, library media services, the special education program, pre-kindergarten program, guidance and career services, intervention, social workers, and school psychologists. Teacher Salaries (51030-51050) increased overall by $888,924. This increase includes the contractual gross wage increase, plus step increases of $791,044 and one known teacher retirement. In addition, the 2026-2027 budget includes a request for 1.0 FTE Math Instructional Coach at the elementary level to support curricular implementation and excellence aligned with our strategic plan's commitment to supporting staff in engaging our students in rigorous learning experiences. This budget also adds 5 Class F stipends for a marching band program at the high school.

School Administration is involved in activities associated with directing and managing individual schools' operations following system-wide policies and standards. The administration is responsible for the supervision of all school operations, including oversight of curriculum and instruction, students' academic and extracurricular activities, assignment of duties, evaluation of staff members and maintenance of educational records. School-based administration includes 4.0 FTE Principals, 5.0 FTE Assistant Principals, and 5.0 FTE Special Education

Administrators. The Ledyard Administrators Association (LAA) contract calls for a gross wage increase of 3.0% over the 2025-26 year plus associated step increases.

This budget includes the addition of 1.0 FTE non-bargaining unit position in Facilities to support the activities of that department.

The AFSCME Information Technology bargaining unit agreement is yet to be negotiated for the next fiscal year. Funds are allocated for the AFSCME Paraprofessional, AFSCME Secretarial and the AFSCME Custodian/Maintenance bargaining units based on ratified contracts. All of the aforementioned staff members are responsible for the oversight of critical district tasks that include, but are not limited to: administrative tasks for offices, data management, attendance data, purchasing, maintenance and cleaning of building sites, maintenance of grounds, maintenance of equipment, student information systems, information technology hardware used by staff and students, and assistance in oversight of students.

The substitute teacher rate remains at $130/day.

Employee Benefits (object codes 52200-52800) – Increase $55,983 (6.02%)

Unemployment Expense (52600), District Tuition Reimbursement (52350), and Social Security/Medicare Expense (52200) have been adjusted based on trends, previous fiscal year expenditures and anticipated increases.

The Town managed budget includes funds for school district personnel medical/dental/vision insurance. The Ledyard Education Association, our largest bargaining unit, will increase from a 24.25% premium share in the 2025-2026 fiscal year to a 24.50% premium share in the 2026-2027 school year. In 2026-2027, the LAA Group will continue to have a 21% premium share, no change from 2025-2026; the AFSCME Paraprofessional group will have a 20% premium share (unchanged from 2025-26); and the AFSCME Custodian/Maintenance group has a 18.75% premium share, an increase 0.50% from the previous year; and the AFSCME Secretarial unit will go from 19.25% in 2025-2026 to 19.50% in 2026-2027. The AFSCME IT unit currently has a 18.55% premium share in 2025-2026 and will enter into negotiations during this budget year.

Insurance costs typically increase annually; assuming a 10% increase to insurance rates and flat employee healthcare participation, the above premium share changes, negotiated by the Board, represents an increase in estimated employee insurance cost share of $186,703 to offset town government expenses.

Professional/Technical Services (object codes 53210-53740) – Increase $37,578 (2.27%)
The increases in this line are related to an increase of $18,000 (2082320 53400), attributable to services related to data dashboard engagement as well as costs due for work towards NEASC district accreditation. In addition, we are anticipating increased cost due to inflation of a combined $44,578 in special education behavior service costs (2091260 53400), other special education services (2092190 53400), as well as occupational therapy (2092190 53440) and physical therapy expenses (2092190 53460).

These increases are partially offset by a decrease in the use of Ignite Education tutoring services in our literacy intervention programming and Multi Tiered System of Support (MTSS) of $25,000 (2081000 53210).

Purchased Property Services (object codes 54100-54900) – Increase $3,968 (0.41%)
We estimate an inflationary increase to water and sewer (2112600 54100) and disposal services (2112600 54210) of $3,968, but otherwise anticipate this line to be flat to the current year.

Other Purchased Services (object codes 55100-55900) – Increase $186,257 (3.77%)
The budget for transportation (55100) is based on a contractual increase of 4.98%; $429.23 per day for a full-size bus. Pupil Transportation services include conveying students to and from school as required by state and federal laws. In addition, the district provides transportation to school sponsored activities. Ledyard currently contracts for twenty-two (22) regular buses and eight (8) special education buses. Ledyard also contracts for five (5) special education vans to transport students to out of district locations. Other providers are utilized for specialized transportation for students, including but not limited to homelessness, DCF placement, IEP or 504 determination, or out of district placement.

Tuition costs are related to three areas: special education out-of-district programs, magnet schools, and adult education. Special Education outplaced tuition is highly volatile and is an area of ongoing risk. Due to escalating student need, enrollment and inflationary cost, special education tuition costs (55600/55700) are forecasted to increase by $133,052, this amount is partially offset by an estimated decrease in general education magnet tuition costs (2086110 56110) of $62,473.

Ledyard Public Schools participates in the Norwich Collaborative Adult Education Consortium. The consortium provides mandated courses in citizenship, English for those with limited proficiency, and courses leading to a graduate equivalency diploma (GED). A state grant partially funds this program, and Ledyard Public Schools is required to fund the balance. The adult education line (55900) is budgeted at $32,725.

Supplies (object codes 56110-56900) – Increase $15,921 (0.58%)
We are anticipating some inflationary increase in overall supplies totaling $5,106. In addition, we are expecting an increase in electricity cost of $23,371.

Textbook expenses (56400) are adjusted annually based on specific requirements, approved revisions and licensed renewals aligned with the curriculum cycle. The budget for textbooks increased by a net $24,243 based on the requirements for the upcoming school year. Testing supplies, ELA and Math consumables - instructional technology (56800) is anticipated to decrease a net $41,999 primarily due to the implementation of new assessment tools. The budget for instructional supplies for Mathematics (2081011 56110) is increased by $15,200 to accommodate the purchase of new graphing calculators.

Athletic supplies at the middle school (2053200 56900) are reduced $10,000 due to a one-time purchase last fiscal year.

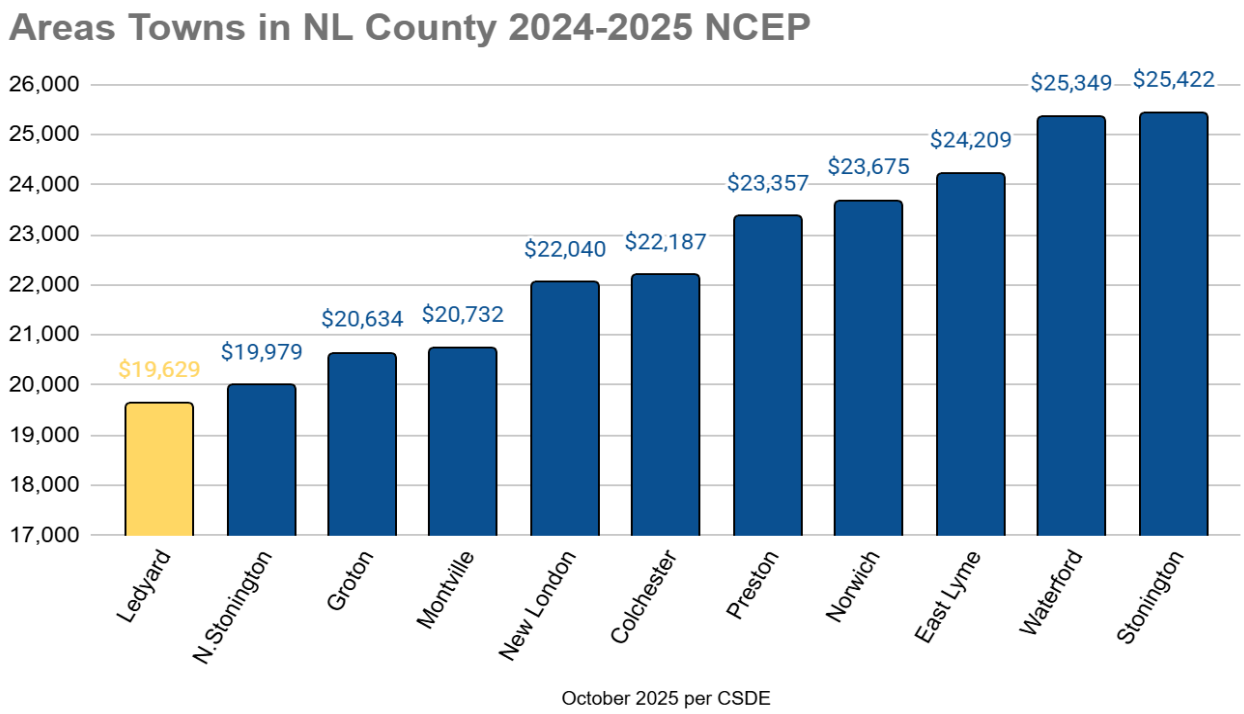
Maintenance supplies (2112600 56900) are flat funded in this budget based on yearly estimates, but continue to present an area of risk due to the increasing issues and part costs for the HVAC systems at GHS and LMS.

Equipment (object codes 57300-57350) – Decrease $31,847 (-8.07%)
Districtwide equipment has been reduced $52,000 for one-time purchase of security enhancements at all the schools, this is partially offset by an increase of $40,802 for the implementation of a districtwide timekeeping system for staff (2082400 57300), resulting in a net decrease of $11,198.

Curriculum software (2161601 57350) is estimated to decrease a net $20,649 due to the discontinued use of Dreambox software platform.

SECTION II:
NET CURRENT EXPENDITURES PER PUPIL

Connecticut State Department of Education Net Current Expenditures per Pupil (NCEP)					
	2020-2021	**2021-2022**	**2022-2023**	**2023-2024**	**2024-2025**
State Average	$20,707	$21,438	$19,716	$20,722	$22,029
Ledyard	$15,739	$16,496	$16,871	$17,880	$19,629
Ledyard Rank	160	159	153	153	144



Net Current Expenditures per Pupil

Net Current Expenditures per Pupil (NCEP) has been a primary measure of per-pupil spending in Connecticut for more than three decades. NCEP measures all education expenditures with a couple of adjustments (as explained below) for all the students for which a town is fiscally responsible, regardless of whether the town operates its own school or tuitions its resident students to other districts/regions, magnet or private schools.

ADM

Under C.G.S. Section 10-261(a)(2), average daily membership (ADM) is calculated from the October Public School Information System (PSIS) and the Education Financial System (EFS).

ADM represents resident students educated in and out of the district, adjusted for school sessions in excess of the 180-day/900-hour minimum, tuition-free summer school, and Open Choice participation. Prekindergarten students are counted on a full-time equivalency basis.

NCE

Net current expenditures (NCE) are calculated as defined in Connecticut General Statutes (C.G.S.) Section 10-261(a)(3). **NCE includes all current public elementary and secondary expenditures from all sources, excluding reimbursable regular education transportation, tuition revenue, capital expenditures for land, buildings, equipment, and debt service.** The information for determining NCE is provided from the Education Financial System (EFS).

NCEP

Net current expenditures per pupil (NCEP) represent NCE divided by ADM.

NCEP Rank

Each town is ranked between 1 (highest) and 165 (lowest) in NCEP.

Rank	District Code	District	NCEP
1	125	SHARON	$46,587.15
2	212	DISTRICT NO. 12	$43,682.04
3	31	CORNWALL	$41,009.38
4	21	CANAAN	$40,210.10
5	68	KENT	$38,549.96
6	98	NORFOLK	$38,465.42
7	201	DISTRICT NO. 1	$35,536.57
8	209	DISTRICT NO. 9	$34,345.50
9	154	WESTBROOK	$34,207.37
10	204	DISTRICT NO. 4	$33,215.15
11	211	DISTRICT NO. 11	$32,793.74
12	50	ESSEX	$32,736.58
13	122	SALISBURY	$32,548.50
14	117	REDDING	$31,257.03
15	123	SCOTLAND	$30,934.39
16	36	DEEP RIVER	$30,816.21
17	29	COLEBROOK	$30,812.19
18	63	HAMPTON	$30,485.28
19	26	CHESTER	$30,473.11
20	65	HARTLAND	$30,315.63
21	24	CHAPLIN	$29,840.49

Rank	District Code	District	NCEP
22	207	DISTRICT NO. 7	$29,661.81
23	213	DISTRICT NO. 13	$29,557.20
24	127	SHERMAN	$29,218.22
25	100	NORTH CANAAN	$29,178.43
26	214	DISTRICT NO. 14	$28,979.83
27	157	WESTON	$28,973.01
28	57	GREENWICH	$28,970.50
29	220	DISTRICT NO. 20	$28,177.23
30	106	OLD SAYBROOK	$28,164.85
31	158	WESTPORT	$27,714.71
32	47	EAST WINDSOR	$27,386.20
33	160	WILLINGTON	$27,013.28
34	208	DISTRICT NO. 8	$27,001.22
35	71	LEBANON	$26,965.74
36	11	BLOOMFIELD	$26,946.92
37	92	NEW HARTFORD	$26,815.15
38	217	DISTRICT NO. 17	$26,564.41
39	141	THOMPSON	$26,475.57
40	46	EASTON	$26,373.90
41	90	NEW CANAAN	$26,344.87
42	3	ASHFORD	$26,284.76
43	35	DARIEN	$26,241.62
44	27	CLINTON	$26,023.62
45	84	MILFORD	$25,993.43
46	78	MANSFIELD	$25,808.01
47	147	VOLUNTOWN	$25,772.80
48	14	BRANFORD	$25,737.16
49	219	DISTRICT NO. 19	$25,447.18
50	137	STONINGTON	$25,421.63
51	152	WATERFORD	$25,348.51
52	118	RIDGEFIELD	$25,332.01
53	5	BARKHAMSTED	$25,221.82
54	76	MADISON	$25,211.46
55	218	DISTRICT NO. 18	$25,141.64
56	145	UNION	$25,101.34
57	83	MIDDLETOWN	$25,070.14
58	41	EAST HADDAM	$25,050.50

Rank	District Code	District	NCEP
59	161	WILTON	$24,986.74
60	51	FAIRFIELD	$24,944.22
61	64	HARTFORD	$24,901.20
62	215	DISTRICT NO. 15	$24,837.72
63	67	HEBRON	$24,722.31
64	1	ANDOVER	$24,642.72
65	13	BOZRAH	$24,586.86
66	165	WINDSOR LOCKS	$24,298.64
67	45	EAST LYME	$24,209.18
68	62	HAMDEN	$24,160.13
69	37	DERBY	$24,104.59
70	134	STAFFORD	$24,000.76
71	23	CANTON	$23,946.98
72	163	WINDHAM	$23,781.07
73	91	NEW FAIRFIELD	$23,704.52
74	104	NORWICH	$23,674.65
75	135	STAMFORD	$23,640.89
76	148	WALLINGFORD	$23,597.94
77	7	BERLIN	$23,448.68
78	40	EAST GRANBY	$23,425.54
79	12	BOLTON	$23,410.96
80	69	KILLINGLY	$23,386.88
81	114	PRESTON	$23,357.45
82	42	EAST HAMPTON	$23,221.55
83	39	EASTFORD	$23,113.48
84	164	WINDSOR	$23,085.67
85	60	GUILFORD	$23,082.97
86	53	FRANKLIN	$22,803.52
87	94	NEWINGTON	$22,803.10
88	162	WINCHESTER	$22,789.52
89	205	DISTRICT NO. 5	$22,775.11
90	103	NORWALK	$22,701.78
91	79	MARLBOROUGH	$22,561.90
92	155	WEST HARTFORD	$22,442.38
93	97	NEWTOWN	$22,359.53
94	112	POMFRET	$22,352.62
95	30	COLUMBIA	$22,284.86

Rank	District Code	District	NCEP
96	28	COLCHESTER	$22,186.77
97	153	WATERTOWN	$22,075.74
98	95	NEW LONDON	$22,039.93
99	54	GLASTONBURY	$21,935.52
100	93	NEW HAVEN	$21,926.18
101	110	PLAINVILLE	$21,799.74
102	128	SIMSBURY	$21,750.84
103	56	GRANBY	$21,747.98
104	129	SOMERS	$21,729.26
105	4	AVON	$21,636.50
106	33	CROMWELL	$21,630.05
107	140	THOMASTON	$21,578.12
108	107	ORANGE	$21,529.30
109	113	PORTLAND	$21,505.10
110	138	STRATFORD	$21,441.41
111	167	WOODBRIDGE	$21,341.34
112	108	OXFORD	$21,306.50
113	139	SUFFIELD	$21,170.95
114	99	NORTH BRANFORD	$21,110.00
115	133	SPRAGUE	$21,041.13
116	116	PUTNAM	$20,922.50
117	96	NEW MILFORD	$20,893.23
118	18	BROOKFIELD	$20,892.78
119	159	WETHERSFIELD	$20,855.78
120	216	DISTRICT NO. 16	$20,833.65
121	8	BETHANY	$20,823.59
122	25	CHESHIRE	$20,815.54
123	121	SALEM	$20,810.91
124	52	FARMINGTON	$20,808.81
125	86	MONTVILLE	$20,732.23
126	119	ROCKY HILL	$20,652.77
127	59	GROTON	$20,634.39
128	143	TORRINGTON	$20,565.57
129	111	PLYMOUTH	$20,547.70
130	85	MONROE	$20,518.34
131	109	PLAINFIELD	$20,486.11
132	73	LISBON	$20,484.40

Rank	District Code	District	NCEP
133	77	MANCHESTER	$20,438.07
134	101	NORTH HAVEN	$20,381.26
135	17	BRISTOL	$20,340.35
136	210	DISTRICT NO. 10	$20,075.65
137	102	NORTH STONINGTON	$19,979.49
138	131	SOUTHINGTON	$19,930.35
139	144	TRUMBULL	$19,923.55
140	19	BROOKLYN	$19,711.37
141	169	WOODSTOCK	$19,706.55
142	142	TOLLAND	$19,697.09
143	44	EAST HAVEN	$19,684.76
144	72	LEDYARD	$19,629.22
145	136	STERLING	$19,617.09
146	146	VERNON	$19,572.82
147	2	ANSONIA	$19,536.15
148	32	COVENTRY	$19,489.29
149	22	CANTERBURY	$19,414.48
150	126	SHELTON	$19,329.65
151	48	ELLINGTON	$19,051.55
152	124	SEYMOUR	$19,047.44
153	58	GRISWOLD	$18,749.76
154	9	BETHEL	$18,720.73
155	132	SOUTH WINDSOR	$18,637.45
156	49	ENFIELD	$18,548.41
157	166	WOLCOTT	$18,439.74
158	151	WATERBURY	$18,372.57
159	15	BRIDGEPORT	$18,327.62
160	88	NAUGATUCK	$18,083.99
161	43	EAST HARTFORD	$17,557.93
162	89	NEW BRITAIN	$17,518.90
163	34	DANBURY	$17,436.08
164	156	WEST HAVEN	$16,823.07
165	80	MERIDEN	$16,350.87

SECTION III:
THE BUDGET PROCESS

The Ledyard Public School District annual operating budget is developed each year through numerous school and central office staff members' collaborative efforts in conjunction with the Superintendent and Board of Education. The timeline for the process begins in August with a review of system objectives for the year, throughout fall with discussions of staffing and school budgets, and through to the Town Meeting held in May.

With the support of the Board of Education, the district continues its process of allocating resources and developing coherence as an organization. Budget requests are based on the holistic district needs and priorities, rather than isolating choices simply to specific schools or department requests. This approach allows for more directed systemic improvements and shifting of resources to improve outcomes for all students. Budget decisions impact educational programs for students as well as the broad range of operations and services within the schools, all of which are designed to support the learning experience and well-being of our students. Our holistic approach works to ensure facilities management, human resources and personnel, transportation, special services, curriculum development, programs of studies, curricular, co-curricular and extra-curricular activities, pupil services, special education, food services, supplies and materials, equipment, and other essential features are moving to an aligned, cohesive, efficient and effective system.

Under the direction of principals and district leadership, budget requests are initially developed at the school and department levels. Proposed budget changes are discussed with the Superintendent and Director of Finance during multiple and iterative school and department budget consultations. Each recommendation is carefully evaluated for its alignment and coherence to district efforts, focus on the improvement of student success/equity, and clearly identified critical needs.

The general steps in this process are:

1. Board of Education members provide ongoing feedback on current district operations, initiatives and future planning.

2. The Board of Education receives the Town Council Budget Directive Letter, and if necessary, the Board of Education issues guidance to the Superintendent through multiple iterative opportunities.

3. Superintendent provides a budget overview and reviews priorities with the leadership team.

4. Budget requests are reviewed by the Directors, Instructional Leaders, and Principals who make adjustments as necessary to meet overall goals for the department, school, and district as outlined in the Superintendent's guidance.

5. School/program budgets are submitted to the Director of Finance for preliminary review.

6. Budget discussions are held with administrators, the Director of Finance and Superintendent. This iterative process is designed to discuss and determine priorities for the overall district budget request.

7. Aligned with the Town Charter, the Superintendent presents the budget to the Board of Education for review in early January.

8. The Board of Education provides opportunity for community review and feedback.

9. The Board of Education discusses, modifies, and adopts the Board's budget, typically by mid-February.

10. The Board of Education budget is provided to the Mayor and Town Council for their consideration and eventual adoption by the community.

SECTION IV:
BUDGET REQUESTS/REDUCTIONS/INFLATIONARY ADJ

This section provides a summary of notable budget actions proposed for the coming fiscal year. Items in this section are color-coded to distinguish their purpose:

- Inflationary adjustments outside of collective bargaining agreements
- Targeted reductions
- Items included in the proposed budget
- Items considered but not recommended at this time
- Items identified for potential future consideration

In a complex and detailed budget, the intention is to quickly assist the reader in understanding the directional choices and trade-offs reflected in the budget, where offsets and reductions are being made, and where strategic investments are being prioritized.

This section is not intended to be an exhaustive list of all budget line changes, but rather an overview of the most significant actions that inform the overall budget proposal as aligned with district priorities

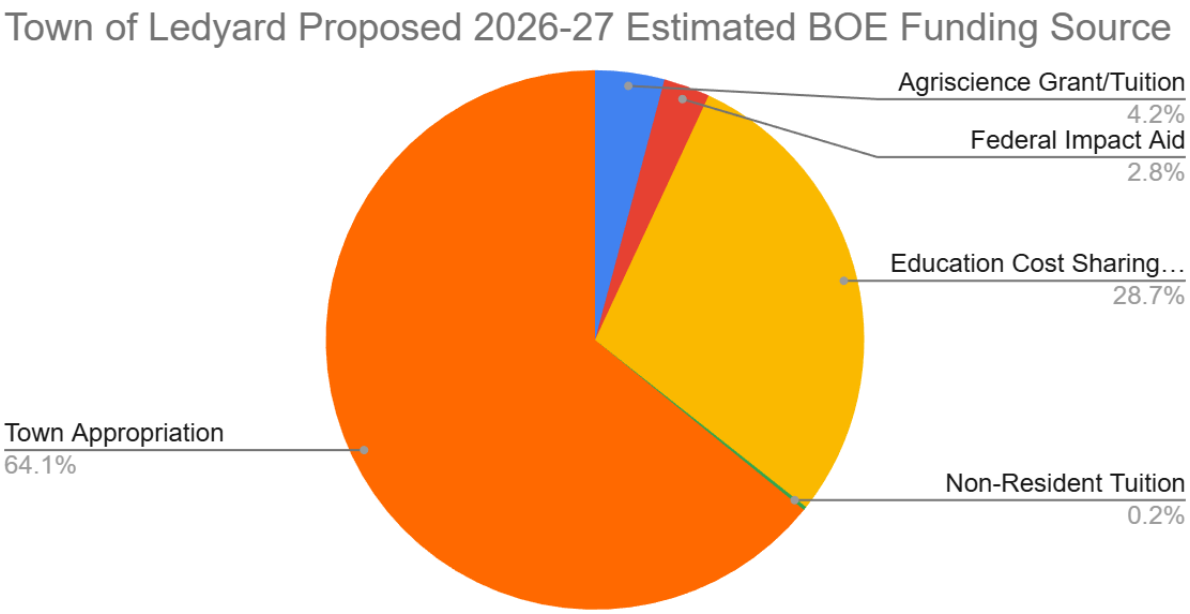
2026-2027 BOE Budget Request List

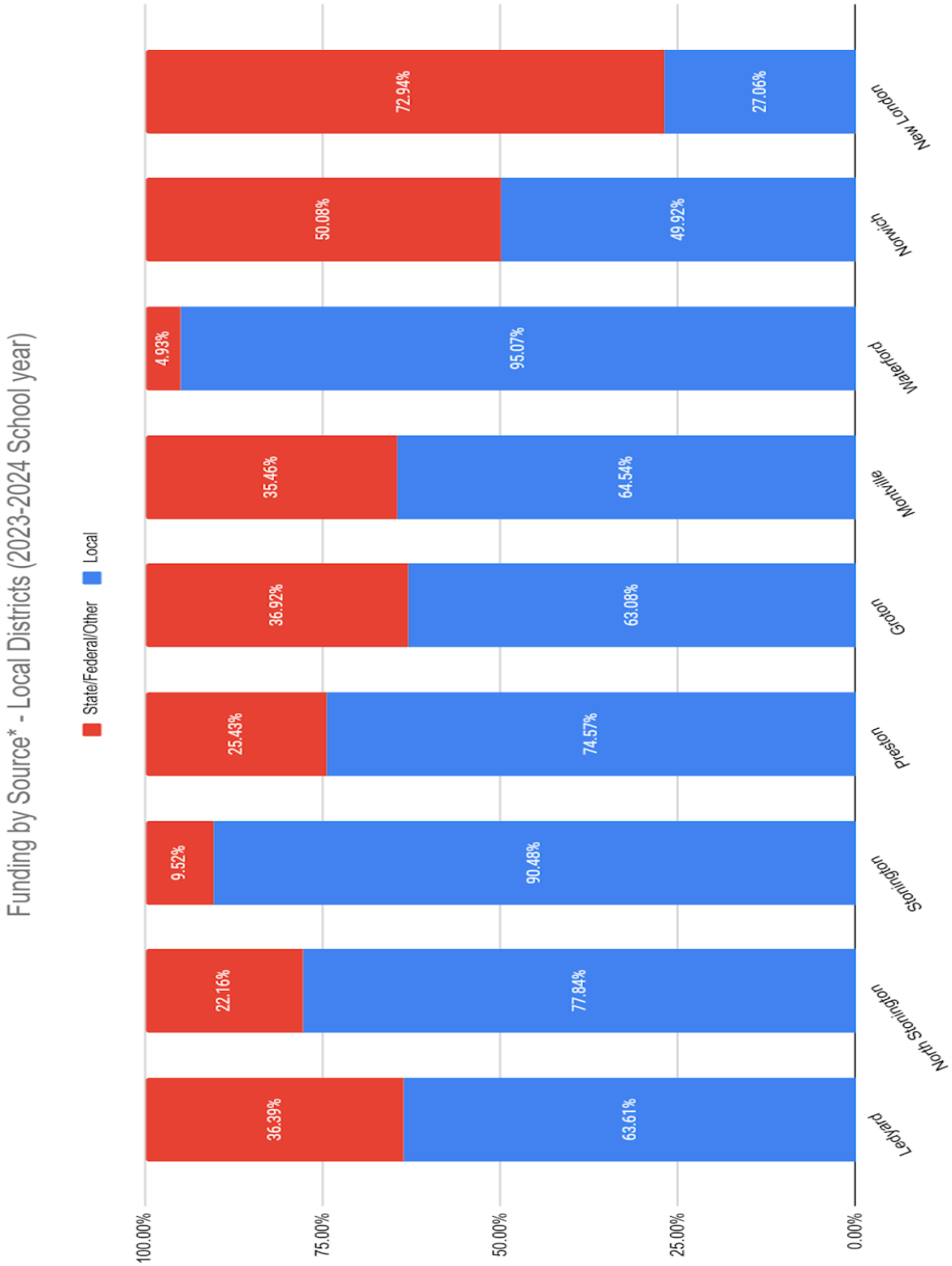
	PURPLE - Inflation Adjustments Outside of CBA's		$325,925			
	BLUE - Reduction to budget		-$297,123			
	GREEN - Included in budget		$304,487			
	YELLOW - Considered for inclusion in budget		$995,845			
	RED - Considered for inclusion in future budget		$1,173,906			
Line	Request	Strategic Plan Alignment/Other	Estimated Cost	Location	Type	Additional Explanation
1	Utilities expenses inflation adjustment		$27,339	Maintenance	Other	Utilities increase (electricity, sewer/water, etc.)
2	Misc supplies expenses inflation adjustment		$5,278	Districtwide	Supplies	Nursing supplies, art supplies, consumer science supplies, textbooks
3	Transportation expenses inflation adjustment		$115,678	Transportation	Professional Serv	Contractual
4	OOD Tuition expenses inflation adjustment		$133,052	Student Services	Other	Special education tuitions
5	Student Services/Special Education expenses inflation adj		$44,578	Student Services	Professional Serv	Services for special education students
6	Testing Supplies - iReady		-$44,266	Curriculum	Supplies	Replace with STARS Assessment
7	Testing Supplies - Curriculum Assoc		-$21,095	Curriculum	Supplies	
8	Wit & Wisdom Training		-$5,000	Curriculum	Professional Serv	Initial training complete
9	Curriculum Software - Dreambox, net of adj		-$20,821	Curriculum	Other	Remove Dreambox
10	Other Supplies - Athletics		-$10,000	LMS	Supplies	Wrestling mats - one-time purchase
11	Magnet School Tuition		-$62,473	Curriculum	Other	
12	Ignite Tutoring Services		-$25,000	Elementary School	Professional Serv	Maintain 10 seats for year 2 of program
13	Historic paraprofessional spending/turnover adjustment		-$36,468	Districtwide	Salary	
14	Equipment - Security		-$52,000	Districtwide	Equipment	Security items - one-time purchase
15	Teacher Retirement		-$20,000	LHS	Salary	
16	STAR Assessment for grades 4-8/ Offset with cut to Iready	Provide Opportunities	$15,000	Curriculum	Supplies	Replace iReady Component
17	Additional Seats mClass/Forefront	Provide Opportunities	$8,362	Curriculum	Supplies	Replace iReady Component
18	100 TI84 graphing calculators	Program Maintenance	$15,200	LHS	Supplies	Replacement of aged classroom sets
19	Textbooks - General/Math Instruction	Program Maintenance	$24,243	Districtwide	Supplies	Increase to FY26 based on replacement needs/cycle
20	Timekeeping system	Operational Efficiency	$40,802	Districtwide	Equipment	Cost of implementation of munis compatible timekeeping system
21	1.0 FTE Elementary Math Coach (1 of 2 for full complement)	Active Engaged Learning	$81,201	Elementary School	Salary	MA/step 10
22	Afterschool Activities Director	Operational Efficiency	$4,500	LMS	Salary	
23	Marching Band	Excellence	$12,180	LHS	Salary	5 Class F
24	District data dashboard engagement - year 1	Active Engaged Learning	$10,000	Districtwide	Professional Serv	
25	NEASC District accreditation - year 1	Excellence	$8,000	Districtwide	Professional Serv	
26	Professional Development - Teachers	Active Engaged Learning	$5,000	LHS	Professional Serv	ACDA/CMEA/NEAE/Atomic/NCTE
27	1.0 FTE Facilities Dept	Operational Efficiency	$80,000	Maintenance	Salary	

	PURPLE - Inflation Adjustments Outside of CBA's		$325,925			
	BLUE - Reduction to budget		-$297,123			
	GREEN - Included in budget		$304,487			
	YELLOW - Considered for inclusion in budget		$995,845			
	RED - Considered for inclusion in future budget		$1,173,906			
Line	Request	Strategic Plan Alignment/Other	Estimated Cost	Location	Type	Additional Explanation
28	Social/Emotional Curriculum Resource K-12 like Second Step		$10,000	Curriculum	Professional Serv	Delay due to district implementation capacity
29	1.0 FTE Special Ed/Transition teacher		$81,201	Student Services	Salary	MA/step 10
30	1.0 FTE Instructional Coach - LMS		$81,201	Curriculum	Salary	MA/step 10
31	1.0 FTE ELA Interventionist - LMS		$88,345	Curriculum	Salary	MA/step 12
32	1.0 FTE Math Interventionist - LMS		$88,345	Curriculum	Salary	MA/step 12
33	0.5 FTE ELL Tutor		$35,000	Curriculum	Salary	25 hours/week
34	CABE Membership		$20,000	Districtwide	Other	
35	Increase sub teacher rate		$34,090	Districtwide	Salary	Increase sub teacher rate from $130/day to $140/day
36	Increase only building sub rate		$14,400	Districtwide	Salary	Increase building sub rate to $140/day, maintain other subs @ $130/d
37	Food Service Bad Debt		$10,000	Districtwide	Supplies	
38	1.0 FTE Mathematics Teacher		$81,201	LHS	Salary	Math Lab - MA/step 10
39	1.0 FTE English Teacher		$81,201	LHS	Salary	Literacy Lab - MA/step 10
40	2.0 FTE Behavior interventionist		$72,772	Student Services	Salary	
41	2.0 FTE BCBA		$210,000	Student Services	Salary	
42	1.0 FTE Elementary Math Coach (2 of 2 for full complement)		$81,201	Elementary School	Salary	MA/step 10
43	Content Facilitator Stipends		$6,888	LMS	Salary	
44	2.0 FTE Attendance Home Visitors		$78,000	Student Services	Salary	
45	LHS/LMS Late bus		$167,582	Transportation	Professional Serv	
46	1.0 FTE Band teacher (add 0.5 FTE to JWL & GHS)		$71,551	Districtwide	Salary	MA/step 7
47	1.0 FTE Transition Kindergarten teacher		$65,763	GFS	Salary	MA/step 5
48	1.0 FTE Transition Kindergarten teacher		$65,763	GHS	Salary	MA/step 5
49	1.0 FTE General interventionist		$60,445	LMS	Salary	MA/step 3
50	1.0 FTE Director of Curriculum		$140,000	Curriculum	Salary	
51	Expanded prek; 3 teachers and 6 paraprofessionals		$345,000	Student Services	Salary	
52	2.0 FTE Elementary World Language Teachers		$143,102	Districtwide	Salary	MA/step 7
53	Grade level field experience		$15,500	LHS	Professional Serv	
54	Grade level field experience		$15,500	LMS	Professional Serv	
55	Disc Golf Course		$5,700	LHS	Equipment	

SECTION V:
PROJECTED REVENUES AS OF 12/31/2025

REVENUE					
	Actual 2023-24	Actual 2024-25	Town Budget 2025-26 (MUNIS)	Proposed Budget 2026-27	Variance Proposed 2026-27 Budget to 2025-26 Budget
State/Federal Revenues					
FPL 503 (Impact Aid)	$1,804,635	$1,207,133	$1,164,441	$1,178,414	$13,973
AgriScience Operating	$1,019,200	$1,508,652	$1,400,000	$1,400,000	$0
Education Cost Sharing (ECS)	$11,547,735	$11,949,448	$12,016,278	$12,032,619	$16,341
Subtotal - State/Federal Revenues	**$14,371,570**	**$14,665,233**	**$14,580,719**	**$14,611,033**	**$30,314**
Tuition Based Revenues					
Non-Resident Reg Ed Tuition	$71,867	$62,680	$62,680	$65,814	$3,134
Non-Resident Spec Ed Tuition	$60,559	$54,010	$25,500	$26,775	$1,275
AgriScience Tuition	$829,361	$403,649	$411,563	$411,563	$0
Subtotal - Tuition Based Revenues	**$961,787**	**$520,339**	**$499,743**	**$504,152**	**$4,409**
Total State/Federal & Tuition Based Revenues	**$15,333,357**	**$15,185,572**	**$15,080,462**	**$15,115,185**	**$34,723**




Funding by Source* - Local Districts (2023-2024 School year)
State/Federal/Other
Local
100.00%
75.00%
50.00%
25.00%
0.00%
36.39%
63.61%
22.16%
77.84%
9.52%
90.48%
25.43%
74.57%
36.92%
63.08%
35.46%
64.54%
4.93%
95.07%
50.08%
49.92%
72.94%
27.06%
Ledyard
North Stonington
Stonington
Preston
Groton
Montville
Waterford
Norwich
New London

SECTION VI:
ENROLLMENT

Ledyard Public Schools Actual District Enrollment Oct 2017 to Oct 2025									
GRADE	**ACTUAL Oct-2017**	**ACTUAL Oct-2018**	**ACTUAL Oct-2019**	**ACTUAL Oct-2020**	**ACTUAL Oct-2021**	**ACTUAL Oct-2022**	**ACTUAL Oct-2023**	**ACTUAL Oct-2024**	**ACTUAL Oct-2025**
PreK	72	70	68	75	86	104	96	87	98
K	179	171	175	138	187	150	169	131	143
1	163	164	165	168	149	184	156	159	128
2	173	150	173	166	173	148	185	151	151
3	165	180	171	174	169	188	151	184	142
4	179	167	178	161	182	172	188	157	182
5	174	180	177	172	176	191	171	183	157
6	190	178	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Total PK-5	**1295**	**1260**	**1107**	**1054**	**1122**	**1137**	**1116**	**1052**	**1001**
6	n/a	n/a	177	178	193	168	199	175	187
7	183	186	179	163	179	188	169	196	170
8	181	196	189	172	174	178	192	164	190
Total 6-8	**364**	**382**	**545**	**513**	**554**	**534**	**560**	**535**	**547**
9	179	205	218	192	181	190	185	188	188
10	191	179	191	210	195	180	193	184	185
11	196	200	167	194	197	184	179	180	177
12	193	182	188	165	197	180	188	189	181
Total 9-12	**759**	**766**	**764**	**761**	**770**	**734**	**745**	**741**	**731**
Total PK-12	**2418**	**2408**	**2416**	**2328**	**2438**	**2405**	**2421**	**2328**	**2279**

Projected Enrollment 2026-27

2025-26 Actuals (December 2025)							2026-27 Projected						
School	K	1	2	3	4	5	School	K	1	2	3	4	5
Gales Ferry/ Juliet Long	17	15	15	17	22	19	Gales Ferry/ Juliet Long	17	16	15	15	18	22
	18	15	14	18	20	19		18	16	15	16	18	22
	17	14	16	17	22	19		18	17	15	16	18	22
	16	14	14	16	21	19		18	17	15	16	18	23
Total	68	58	59	68	85	76	Total	71	66	60	63	72	89
Gallup Hill School	15	16	19	19	26	20	Gallup Hill School	17	16	15	19	18	25
	16	14	18	18	25	20		18	16	15	19	18	25
	16	15	19	19	24	21		18	17	15	19	19	25
	14	14	18	17	24	20		18	17	15	19	18	25
	15	14	20					18	17	16	19		
Total	76	73	94	73	99	81		89	83	76	95	73	100
K-5 Total	144	131	153	141	184	157		160	149	136	158	145	189

(Subject to change based on actual student enrollment)

GRADE	Actuals 2025-26 (Dec 25)	Projected 2026-27
6	188	162
7	169	193
8	191	174
Total 6-8	**548**	**529**
9	183	193
10	183	185
11	178	185
12	173	180
Total 9-12	**717**	**743**

Projected Enrollment

School District: Ledyard, CT **11/13/2025**

Enrollment Projections By Grade*

Birth Year	Births*		School Year	PK	K	1	2	3	4	5	6	7	8	9	10	11	12	UNGR	K-12	PK-12
2020	145		2025-26	95	145	131	153	145	183	157	189	170	191	185	184	178	172	< 10 **	2191	2286
2021	179		2026-27	95	175	140	128	150	150	179	161	184	167	201	181	177	174	< 10 **	2175	2270
2022	162	(prov.)	2027-28	95	158	168	137	125	155	147	184	157	181	175	197	174	173	< 10 **	2139	2234
2023	180	(prov.)	2028-29	95	176	152	165	134	129	152	151	179	154	190	172	189	171	< 10 **	2122	2217
2024	157	(prov.)	2029-30	96	153	169	149	162	138	126	156	147	176	162	186	165	185	< 10 **	2082	2178
2025	165	(est.)	2030-31	96	161	147	166	146	167	135	129	152	145	185	159	179	162	< 10 **	2041	2137
2026	169	(est.)	2031-32	96	164	155	144	163	151	164	138	126	149	152	181	153	175	< 10 **	2023	2119
2027	166	(est.)	2032-33	97	162	158	152	141	168	148	168	134	124	156	149	174	150	< 10 **	1992	2089
2028	167	(est.)	2033-34	97	163	156	155	149	146	165	152	164	132	130	153	143	171	< 10 **	1987	2084
2029	165	(est.)	2034-35	97	161	157	153	152	154	143	169	148	161	139	127	147	140	< 10 **	1959	2056
2030	166	(est.)	2035-36	98	162	155	154	150	157	151	147	165	146	169	136	122	144	< 10 **	1966	2064

Note: Ungraded students (UNGR) often are high school students whose anticipated years of graduation are unknown, or students with special needs - UNGR not included in Grade Combinations for 7-12, 9-12, etc.

Based on an estimate of births Based on children already born Based on students already enrolled

*Birth data provided by Public Health Vital Records Departments in each state.

** < 10 Not reported, to protect subgroups with fewer than 10 students.

Projected Enrollment in Grade Combinations*

School Year	PK-5	K-5	PK-2	3-5	K-2	K-8	PK-8	6-8	6-12	9-12
2025-26	1009	914	524	485	429	1464	1559	550	1269	719
2026-27	1017	922	538	479	443	1434	1529	512	1245	733
2027-28	985	890	558	427	463	1412	1507	522	1241	719
2028-29	1003	908	588	415	493	1392	1487	484	1206	722
2029-30	993	897	567	426	471	1376	1472	479	1177	698
2030-31	1018	922	570	448	474	1348	1444	426	1111	685
2031-32	1037	941	559	478	463	1354	1450	413	1074	661
2032-33	1026	929	569	457	472	1355	1452	426	1055	629
2033-34	1031	934	571	460	474	1382	1479	448	1045	597
2034-35	1017	920	568	449	471	1398	1495	478	1031	553
2035-36	1027	929	569	458	471	1387	1485	458	1029	571

*Projections should be updated annually to reflect changes in in/out-migration of families, births, and similar factors.

Projected Percentage Changes

School Year	K-12	Diff.	%
2025-26	2191		
2026-27	2175	-16	-0.7%
2027-28	2139	-36	-1.7%
2028-29	2122	-17	-0.8%
2029-30	2082	-40	-1.9%
2030-31	2041	-41	-2.0%
2031-32	2023	-18	-0.9%
2032-33	1992	-31	-1.5%
2033-34	1987	-5	-0.3%
2034-35	1959	-28	-1.4%
2035-36	1966	7	0.4%
Change		-225	-10.3%

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SECTION VII:
PROJECTED STAFFING

CERTIFIED STAFF							
Position*	**Level**	**Actual 22-23**	**Actual 23-24**	**Actual 24-25**	**Actual 25-26**	**Proposed 26-27**	**Change**
Superintendent	PK-12	1	1	1	1	1	0
Assistant Superintendent	PK-12	1	1	1	1	1	0
Director of Student Services	PK-12	1	1	1	1	1	0
Director of Finance	PK-12	1	1	1	1	1	0
Principal	PK-12	4	4	4	4	4	0
Assistant Principal	PK-12	5	5	5	5	5	0
Sped Coordinator	PK-12	4	4	4	4	4	0
Kindergarten	PK-5	10	9	9	9	9	0
Grade 1	PK-5	9	9	9	9	9	0
Grade 2	PK-5	9	9	8	9	9	0
Grade 3	PK-5	8	8	9	8	8	0
Grade 4	PK-5	8	8	8	8	8	0
Grade 5	PK-5	8	8	8	8	8	0
Art	PK-12	6.8	7	7	6	6	0
Elementary STEM	PK-5	0	0	0	2	2	0
Business	9-12	1	1	1	1	1	0
Language Arts	6-12	12	12	12	12	12	0
English Language (EL)	PK-12	2	2	2	2	2	0
World Language	6-12	7	7	7	7	7	0
Health	6-12	3	3	3	3	3	0
Agriscience	6-12	5	5	5	5	5	0
Family/Consumer Sci	6-12	1	1	2	2	2	0
Tech Ed/Computer	6-12	4	4	4	4	4	0
Mathematics	6-12	12	12	12	12	12	0
Science	6-12	14.67	14.67	14.67	14.67	14.67	0
Music	PK-12	7	7	7	7	7	0
Social Studies	6-12	12	12	12	12	12	0
Physical Education	PK-12	9	9	9	8	8	0
MTSS Coordinator	PK-8	0	0	1	1	1	0
Literacy Coordinator	PK-8	1	1	1	1	1	0

CERTIFIED STAFF (continued)							
Position*	**Level**	**Actual 22-23**	**Actual 23-24**	**Actual 24-25**	**Actual 25-26**	**Proposed 26-27**	**Change**
Mathematics Coordinator	PK-8	1	1	1	1	1	0
Literacy Interventionist	PK-12	5	7	8	8	8	0
Math Interventionist	PK-12	7	6	6	6	6	0
Literacy Instructional Coach	PK-5	0	2	2	2	2	0
Math Instructional Coach	PK-5	0	0	0	0	1	1
Clinical Supervision	PK-12	0	0	0	1	1	0
BCBA	PK-12	1	0	0	0	0	0
Sped Pre-K	PK	4	3	3	3	3	0
Sped K-12	K-12	30	32	32	33	33	0
School Readiness Pre-K	PK	2	2	2	2	2	0
Sped Medically Fragile	PK-8	1	1	1	1	1	0
Guidance	6-12	8	7.5	7.5	7.5	7.5	0
Psychologist	PK-12	5	4	4	4	4	0
Social Worker	PK-12	4	7	7	8	8	0
Speech	PK-12	6	6	6	6	6	0
Media Specialist	PK-12	4	4	4	4	4	0
Total Certified Staff		**244.5**	**248.2**	**251.2**	**254.2**	**255.2**	**1.0**

NON-CERTIFIED STAFF						
Position*	**Actual 22-23**	**Actual 23-24**	**Actual 24-25**	**Actual 25-26**	**Proposed 26-27**	**Change**
Non-union CO/District Staff	5.5	6	6	6	7	1
CO Clerical	6	6	6	6	6	0
School Clerical	14	14	14	14	14	0
Technology	8	5	4	4	4	0
Paraprofessional	75.2	75.6	69.8	73.4	73.4	0
Behavior Specialist	4	5	6	6	6	0
Tutor	1.2	1.2	1	1	1	0
Other Student Support	1.7	1.7	2.7	2.7	2.7	0
Custodial	20	20	20	21	21	0
Maintenance	4	4	4	4	4	0
Total Non-Certified Staff	**139.6**	**138.5**	**133.5**	**138.1**	**139.1**	**1.0**

TOTAL CERTIFIED & NON-CERTIFIED STAFF						
	Actual 22-23	Actual 23-24	Actual 24-25	Actual 25-26	Proposed 26-27	Change
Total Certified/Non-Certified Staff	384.1	386.7	384.7	392.3	394.3	2.0

NON-INSTRUCTIONAL STAFF (SUBCONTRACTED EMPLOYEES)	
Service	**Provider**
Food Service	Chartwells
School Nurses	Town of Ledyard
Transportation	Student Transportation of America
Special Education	Bloom, Community Therapeutix, Soliant

* Certain prior year figures have been reclassified for consistency with the current year presentation.

SECTION VIII:
BUDGET ORGANIZATION

The budget projection document in this section is sorted by ORG, composed of location code and function code. Second, it is sorted by object code, identified as OBJECT. The ORG code consists of seven numbers made of two components: the first three numbers are the budget line's location code, and the last four numbers are the budget line's function. The OBJECT code in the database groups budget lines by a specific expense in categories including salaries, benefits, purchased services, supplies, and equipment.

For example, a general instruction (1000) instructional supply (56110) budget line at the location Gales Ferry School (202) will be identified as 2021000 56110. A math instruction (1011) teacher salary (51040) at Ledyard Middle School (205) will be identified as 2051011 51040.

Location codes are utilized to group accounts by school building (location codes 201 to 206) and also to group accounts that relate to multiple buildings by type (location codes 207 to 216).

- 2026-2027 Budget Including $ Inc/Dec and % Inc/Dec: Excel spreadsheet showing both dollar and percentage changes over 2025-2026 budget
- Next Year Budget Comparison Report: MUNIS report reflecting proposed 2026-2027 budget

Location Code	Description	Location Code	Description
202	GALES FERRY SCHOOL (GFS)	**236**	TITLE III ELL
203	JULIET W. LONG SCHOOL (JWL)	**237**	TITLE III ELL C/O
204	GALLUP HILL SCHOOL (GHS)	**238**	TITLE IV
205	LEDYARD MIDDLE SCHOOL (LMS)	**241**	TITLE IV C/O
206	LEDYARD HIGH SCHOOL (LHS)	**250**	IDEA - SECT 619
207	LEDYARD AGRI-SCIENCE	**251**	IDEA - SECT 619 C/O
208	DISTRICT WIDE	**255**	IDEA - SECT 611
209	SPECIAL EDUCATION	**256**	IDEA - SECT 611 C/O
210	HEALTH DEPARTMENT	**258**	SPED EXPANSION & DEVELOP
211	PLANT & OPERATIONS	**268**	SPED EXCESS COST
212	TECHNOLOGY	**269**	ERATE
213	TRANSPORTATION	**270**	MAGNET SCHOOL TRANS / DODEA
216	CURRICULUM	**275**	LEAF GRANT
225	SCHOOL READINESS - SEV NEED	**277**	BEST TRAINING
230	TITLE I	**278**	SUPPLEMENTAL IMPACT AID
231	TITLE I C/O	**280**	ADULT EDUCATION
234	TITLE II	**285**	MEDICAID
235	TITLE II C/O / ESSER/ ARPA	**290**	MISCELLANEOUS GRANTS

Function Code	Description	Function Code	Description
1000	GENERAL INSTRUCTION	**1300**	EXTENDED DAY
1001	AGRI-SCIENCE INSTRUCTION	**1400**	SUMMER SCHOOL
1002	ART INSTRUCTION	**1600**	CURRICULUM
1003	BUSINESS EDUCATION INSTRUCTION	**2120**	GUIDANCE
1004	STEM INSTRUCTION	**2130**	HEALTH
1005	LANGUAGE ARTS INSTRUCTION	**2140**	PSYCHOLOGY
1006	FOREIGN LANGUAGE INSTRUCTION	**2150**	SPEECH & LANGUAGE
1007	KINDERGARTEN INSTRUCTION	**2190**	OTHER SUPPORT SERVICES
1008	HEALTH INSTRUCTION	**2200**	CAREER COUNSELING
1009	LIFE MANAGEMENT INSTRUCTION	**2210**	PROFESSIONAL DEVELOPMENT
1010	INDUSTRIAL TECH INSTRUCTION	**2213**	STAFF PROFESSIONAL DEVELOPMENT
1011	MATH INSTRUCTION	**2220**	MEDIA CENTER
1012	MUSIC INSTRUCTION	**2230**	INSTRUCTION RELATED TECHNOLOGY
1013	SCIENCE INSTRUCTION	**2305**	ADULT EDUCATION
1014	COMPUTER INSTRUCTION	**2310**	BOARD OF EDUCATION
1015	SOCIAL STUDIES INSTRUCTION	**2320**	DISTRICT ADMINISTRATIVE SERVICE
1051	READING INSTRUCTION	**2400**	GENERAL ADMINISTRATIVE SERVICE
1081	PHYSICAL EDUCATION	**2410**	DISTRICT WIDE SECRETARY LONGEV
1085	REMEDIAL READING INSTRUCTION	**2500**	DISTRICT COMMUNICATIONS
1086	REMEDIAL MATH INSTRUCTION	**2600**	OPERATION & MAINTENANCE OF PLT
1115	ACTIVITIES	**2610**	DIRECTORS SALARIES
1200	SPECIAL EDUCATION	**2620**	CUSTODIANS
1230	GEN SPED	**2630**	MAINTENANCE
1250	EARLY CHILDHOOD	**2640**	MAINTENANCE/CUST LONGEVITY
1260	LEARNING DISABILITIES	**2700**	TRANSPORTATION
1270	MULTI-HANDICAPPED	**3200**	ATHLETICS
1280	LITERACY	**6110**	TUITION-PUBLIC
1290	SPECIAL LEARNING	**6130**	TUITION-NON-PUBLIC

Object Code	Description	Object Code	Description
51010	DISTRICT ADMIN SALARIES	**54320**	TECHNOLOGY RELATED CLASSROOM
51020	ADMINISTRATIVE SALARIES	**54400**	RENTALS
51030	GUIDANCE SALARIES	**54900**	OTHER PURCHASED SERVICES
51040	TEACHER SALARY	**55100**	TRANSPORTATION
51050	MEDIA SALARIES	**55110**	SPECIAL ED TRANSPORTATION
51060	TECHNOLOGY SALARIES	**55200**	STUDENT ACCIDENT INSURANCE
51100	SECRETARY/CLERICAL SALARIES	**55300**	COMMUNICATIONS
51130	OVERTIME	**55400**	DISTRICT ADVERTISING
51140	PARAPROFESSIONAL SALARIES	**55600**	SPED TUITION PUBLIC
51160	CUSTODIAN SALARIES	**55660**	MAGNET SCHOOL TUITION
51200	OTHER SALARY	**55700**	SPED TUITION-NON-PUBLIC
51210	SUBSTITUTE TEACHER SALARIES	**55800**	TRAVEL
51300	SEASONAL HELP	**55900**	ADULT EDUCATION
52200	SS AND MEDICARE	**56110**	INSTRUCTIONAL SUPPLIES
52300	RETIREMENT	**56200**	HEATING OIL/PROPANE
52350	DISTRICT TUITION REIMBURSEMENT	**56210**	NATURAL GAS
52600	UNEMPLOYMENT COMP	**56220**	ELECTRICITY
52800	DISTRICT INSURANCE	**56260**	GASOLINE/OIL
53210	TUTORS	**56400**	TEXTBOOKS
53300	PROFESSIONAL/TECH SERVICES	**56410**	PERIODICALS
53400	OTHER PROFESS/TECH SERVICES	**56420**	BOOKS, MEDIA & TECHNOLOGY
53410	SPEC ED DOCTORS	**56800**	TESTING SUPPLIES
53440	SPEC ED OT	**56890**	TECHNOLOGY SUPPLIES
53460	SPEC ED PT	**56900**	NON-INSTRUCTIONAL SUPPLIES
53500	DISTRICT CURRICULUM DEVELOP	**57300**	NEW EQUIPMENT
53740	TECH RELATED CLASS SUPP	**57310**	REPLACEMENT EQUIPMENT
54100	WATER & SEWER	**57350**	BUSINESS OFFICE SOFTWARE
54210	DISPOSAL SERVICE	**58100**	DUES & FEES
54300	REPAIRS & MAINTENANCE	**58120**	PROJECT O DUES & FEES
54310	EQUIPMENT MAINTENANCE		

FY2026-2027 BUDGET

Line#	Org	Object Code	Account Description	Details	2025-2026	2026-2027	Variance $	Var %
1								
2				**Gales Ferry School (GFS) Location: 202**				
3	2021000	51040	TEACHER SALARY	4.00 FTE Kindergarten Teacher	$1,074,006.00	$1,129,903.00	$55,897.00	5.20%
4				4.00 FTE First Grade Teacher				
5				4.00 FTE Second Grade Teacher				
6				0.50 FTE Literacy Instructional Coach				
7				0.17 FTE Literacy Coordinator				
8				0.25 FTE Math Instructional Coach				
9				0.17 FTE Mathematics Coordinator				
10				0.17 FTE MTSS Coordinator				
11	2021000	51140	PARAPROFESSIONAL SALARIES	3.20 FTE Paraprofessional	$78,674.00	$78,967.00	$293.00	0.37%
12	2021000	56110	INSTRUCTIONAL SUPPLIES		$15,150.00	$15,150.00	$0.00	0.00%
13	2021000	56890	TECHNOLOGY SUPPLIES		$6,000.00	$6,000.00	$0.00	0.00%
14	2021000	57310	REPLACEMENT EQUIPMENT		$475.00	$475.00	$0.00	0.00%
15	2021002	51040	TEACHER SALARY-ART INSTR	0.50 FTE Art Teacher	$49,856.00	$51,351.00	$1,495.00	3.00%
16	2021002	56110	INSTR SUPPLIES-ART INSTR		$1,800.00	$1,800.00	$0.00	0.00%
17	2021004	51040	TEACHER SALARY-STEM INSTR	0.50 FTE STEM Teacher	$43,413.00	$46,077.00	$2,664.00	6.14%
18	2021004	56110	INSTR SUPPLIES-STEM INSTR		$1,125.00	$1,125.00	$0.00	0.00%
19	2021005	56110	INSTR SUPPLIES-LA INSTR		$1,525.00	$1,525.00	$0.00	0.00%
20	2021007	56110	INSTR SUPPLIES-KG INSTR		$750.00	$750.00	$0.00	0.00%
21	2021011	56110	INSTR SUPPLIES-MATH INSTR		$675.00	$675.00	$0.00	0.00%
22	2021012	51040	TEACHER SALARY-MUSIC INST	1.00 FTE Music Teacher	$76,509.00	$81,202.00	$4,693.00	6.13%
23	2021012	54300	REPAIRS & MAINT-MUSIC INST		$500.00	$500.00	$0.00	0.00%
24	2021012	56110	INSTR SUPPLIES-MUSIC INST		$1,100.00	$1,100.00	$0.00	0.00%
25	2021013	56110	INSTR SUPPLIES-SCI INSTR		$1,100.00	$1,100.00	$0.00	0.00%
26	2021051	56110	INSTR SUPPLIES-READ INSTR		$4,000.00	$4,000.00	$0.00	0.00%
27	2021081	51040	TEACHER SALARY-PHYS ED	0.50 FTE Physical Education Teacher	$39,902.00	$42,349.00	$2,447.00	6.13%
28	2021081	56110	INSTR SUPPLIES-PHYS ED		$1,350.00	$1,350.00	$0.00	0.00%
29	2021085	51040	TEACHER SALARY-REM READ	0.50 FTE Literacy Interventionist	$52,279.00	$53,848.00	$1,569.00	3.00%
30	2021085	51140	PARAPROFESSIONAL SALARIES	1.60 FTE Paraprofessional	$38,703.00	$39,384.00	$681.00	1.76%
31	2021085	51200	OTHER SALARY	0.50 FTE Tutor	$12,600.00	$12,978.00	$378.00	3.00%
32	2021085	56110	INSTR SUPPLIES-REMED INST		$950.00	$950.00	$0.00	0.00%
33	2021086	51040	TEACHER SALARY-REM MATH	1.00 FTE Math Interventionist	$94,467.00	$96,702.00	$2,235.00	2.37%
34	2021115	51040	TEACHER SALARY-EXTRA CUR		$1,625.00	$1,650.00	$25.00	1.54%
35	2021115	56900	OTHER SUPPLIES-EXTRA CURR		$1,625.00	$1,625.00	$0.00	0.00%
36	2021200	51140	PARAPROFESSIONAL SALARIES	5.60 FTE Paraprofessional	$136,552.00	$137,135.00	$583.00	0.43%
37	2021200	56900	SUPPLIES SPED		$500.00	$500.00	$0.00	0.00%
38	2021260	56110	INSTR SUPPLIES-LRN DISAB		$1,800.00	$1,800.00	$0.00	0.00%
39	2022140	56110	INSTR SUPPLIES-PSYCHOLOGY		$250.00	$250.00	$0.00	0.00%
40	2022140	56800	TESTING SUPPLIES-PSYCHOLOGY		$125.00	$125.00	$0.00	0.00%
41	2022150	56110	INSTR SUPPLIES-SPCH LANG		$900.00	$900.00	$0.00	0.00%
42	2022150	56800	TESTING SUPPLIES-SPCH LANG		$325.00	$325.00	$0.00	0.00%
43	2022210	53300	PROF/TECH SERVICES-PROF DEV		$3,000.00	$3,000.00	$0.00	0.00%
44	2022220	51050	MEDIA SALARIES-MEDIA CTR	0.50 FTE Media Specialist	$39,902.00	$42,349.00	$2,447.00	6.13%
45	2022220	51140	PARA SALARIES-MEDIA CTR	0.80 FTE Paraprofessional	$19,661.00	$20,056.00	$395.00	2.01%
46	2022220	56110	INSTR SUPPLIES-MEDIA CTR		$2,700.00	$2,700.00	$0.00	0.00%
47	2022220	56900	OTHER SUPPLIES-MEDIA CTR		$400.00	$400.00	$0.00	0.00%
48	2022230	56890	TECHNOLOGY SUPPLIES-INSTR TECH		$1,000.00	$1,000.00	$0.00	0.00%
49	2022400	51020	ADMIN SALARIES-GEN ADM	0.50 FTE Principal	$150,875.00	$157,786.00	$6,911.00	4.58%
50				0.50 FTE Asst Principal				
51	2022400	51100	SEC/CLERICAL SALARIES-GEN ADM	1.50 FTE School Clerical	$60,591.00	$61,075.00	$484.00	0.80%
52	2022400	55300	COMMUNICATIONS-GEN ADM		$875.00	$875.00	$0.00	0.00%
53	2022400	56900	OTHER SUPPLIES-GEN ADM		$650.00	$650.00	$0.00	0.00%
54								
55				**Total Gales Ferry School (GFS) Location: 202**	**$2,020,265.00**	**$2,103,462.00**	**$83,197.00**	**4.12%**

FY2026-2027 BUDGET

Line#	Org	Object Code	Account Description	Details	2025-2026	2026-2027	Variance $	Var %
56								
57			**Juliet W Long School (JWL) Location: 203**					
58	2031000	51040	TEACHER SALARY	4.00 FTE Third Grade Teacher	$979,767.00	$1,014,738.00	$34,971.00	3.57%
59				4.00 FTE Fourth Grade Teacher				
60				4.00 FTE Fifth Grade Teacher				
61				0.50 FTE Literacy Instructional Coach				
62				0.17 FTE Literacy Coordinator				
63				0.25 FTE Math Instructional Coach				
64				0.17 FTE Mathematics Coordinator				
65				0.17 FTE MTSS Coordinator				
66	2031000	56110	INSTRUCTIONAL SUPPLIES		$18,900.00	$18,900.00	$0.00	0.00%
67	2031000	56890	TECHNOLOGY SUPPLIES		$6,000.00	$6,000.00	$0.00	0.00%
68	2031000	57310	REPLACEMENT EQUIPMENT		$475.00	$475.00	$0.00	0.00%
69	2031002	51040	TEACHER SALARY-ART INSTR	0.50 FTE Art Teacher	$49,856.00	$51,351.00	$1,495.00	3.00%
70	2031002	56110	INSTR SUPPLIES-ART INSTR		$2,200.00	$2,200.00	$0.00	0.00%
71	2031004	51040	TEACHER SALARY-STEM INSTR	0.50 FTE STEM Teacher	$43,413.00	$46,077.00	$2,664.00	6.14%
72	2031004	56110	INSTR SUPPLIES-STEM INSTR		$1,125.00	$1,125.00	$0.00	0.00%
73	2031005	56110	INSTR SUPPLIES-LA INSTR		$1,525.00	$1,525.00	$0.00	0.00%
74	2031011	56110	INSTR SUPPLIES-MATH INSTR		$500.00	$500.00	$0.00	0.00%
75	2031012	51040	TEACHER SALARY-MUSIC INST	0.50 FTE Music Teacher	$27,051.00	$28,582.00	$1,531.00	5.66%
76	2031012	54300	REPAIRS & MAIN-MUSIC INST		$500.00	$500.00	$0.00	0.00%
77	2031012	56110	INSTR SUPPLIES-MUSIC INST		$1,450.00	$1,450.00	$0.00	0.00%
78	2031013	56110	INSTR SUPPLIES-SCI INSTR		$1,100.00	$1,100.00	$0.00	0.00%
79	2031015	56110	INSTR SUPPLIES-SS INST		$1,700.00	$1,700.00	$0.00	0.00%
80	2031051	56110	INSTR SUPPLIES-READ INSTR		$2,000.00	$2,000.00	$0.00	0.00%
81	2031081	51040	TEACHER SALARY-PHYS ED	0.50 FTE Physical Education Teacher	$39,902.00	$42,349.00	$2,447.00	6.13%
82	2031081	56110	INSTR SUPPLIES-PHYS ED		$750.00	$750.00	$0.00	0.00%
83	2031085	51040	TEACHER SALARY-REM READ	1.50 FTE Literacy Interventionist	$133,763.00	$140,106.00	$6,343.00	4.74%
84	2031085	51200	OTHER SALARY	0.50 FTE Tutor	$12,600.00	$12,978.00	$378.00	3.00%
85	2031085	56110	INSTR SUPPLIES-REMED INST		$950.00	$950.00	$0.00	0.00%
86	2031086	51040	TEACHER SALARY-REM MATH	1.50 FTE Math Interventionist	$112,965.00	$120,227.00	$7,262.00	6.43%
87	2031115	51040	TEACHER SALARY-EXTRA CUR		$1,625.00	$1,650.00	$25.00	1.54%
88	2031115	56900	OTHER SUPPLIES-EXTRA CURR		$1,625.00	$1,625.00	$0.00	0.00%
89	2031200	51140	PARAPROFESSIONAL SALARIES	5.60 FTE Paraprofessional	$144,889.00	$145,163.00	$274.00	0.19%
90	2031200	56900	SUPPLIES SPED		$500.00	$500.00	$0.00	0.00%
91	2031260	56110	INSTR SUPPLIES-LRN DISAB		$1,800.00	$1,800.00	$0.00	0.00%
92	2032140	56110	INSTRUCTIONAL SUPPLIES		$250.00	$250.00	$0.00	0.00%
93	2032140	56800	TESTING SUPPLIES		$125.00	$125.00	$0.00	0.00%
94	2032150	56110	INSTR SUPPLIES-SPCH LANG		$400.00	$400.00	$0.00	0.00%
95	2032150	56800	TESTING SUPPLIES-SPCH LANG		$325.00	$325.00	$0.00	0.00%
96	2032210	53300	PROF/TECH SERVICES-PROF DEV		$3,000.00	$3,000.00	$0.00	0.00%
97	2032220	51050	MEDIA SALARIES-MEDIA CTR	0.50 FTE Media Specialist	$39,902.00	$42,349.00	$2,447.00	6.13%
98	2032220	56110	INSTR SUPPLIES-MEDIA CTR		$2,700.00	$2,700.00	$0.00	0.00%
99	2032220	56900	NON INSTRUCTIONAL SUPPLIES		$400.00	$400.00	$0.00	0.00%
100	2032230	56890	TECHNOLOGY SUPPLIES		$1,000.00	$1,000.00	$0.00	0.00%
101	2032400	51020	ADMIN SALARIES-GEN ADM	0.50 FTE Principal	$150,875.00	$157,786.00	$6,911.00	4.58%
102				0.50 FTE Asst Principal				
103	2032400	51100	SEC/CLERICAL SALARIES-GEN ADM	1.00 FTE School Clerical	$57,138.00	$58,844.00	$1,706.00	2.99%
104	2032400	55300	COMMUNICATIONS-GEN ADM		$650.00	$650.00	$0.00	0.00%
105	2032400	56900	OTHER SUPPLIES-GEN ADM		$650.00	$650.00	$0.00	0.00%
106								
107			**Total Juliet W Long School (JWL) Location: 203**		**$1,846,346.00**	**$1,914,800.00**	**$68,454.00**	**3.71%**

FY2026-2027 BUDGET

Line#	Org	Object Code	Account Description	Details	2025-2026	2026-2027	Variance $	Var %
108								
109				**Gallup Hill School (GHS) Location: 204**				
110	2041000	51040	TEACHER SALARY	5.00 FTE Kindergarten Teacher	$2,595,113.00	$2,703,075.00	$107,962.00	4.16%
111				5.00 FTE First Grade Teacher				
112				5.00 FTE Second Grade Teacher				
113				4.00 FTE Third Grade Teacher				
114				4.00 FTE Fourth Grade Teacher				
115				4.00 FTE Fifth Grade Teacher				
116				1.00 FTE Literacy Instructional Coach				
117				0.33 FTE Literacy Coordinator				
118				0.50 FTE Math Instructional Coach				
119				0.33 FTE Mathematics Coordinator				
120				0.32 FTE MTSS Coordinator				
121	2041000	51140	PARA SALARIES-GEN INSTR	4.00 FTE Paraprofessional	$96,090.00	$96,470.00	$380.00	0.40%
122	2041000	56110	INSTR SUPPLIES-GEN INSTR		$38,795.00	$38,795.00	$0.00	0.00%
123	2041000	56890	TECHNOLOGY SUPPLIES-GEN INSTR		$12,000.00	$12,000.00	$0.00	0.00%
124	2041000	57310	REPLACEMENT EQUIPMENT		$4,500.00	$4,500.00	$0.00	0.00%
125	2041002	51040	TEACHER SALARY-ART INSTR	1.00 FTE Art Teacher	$67,416.00	$71,551.00	$4,135.00	6.13%
126	2041002	56110	INSTR SUPPLIES-ART INSTR		$4,200.00	$4,200.00	$0.00	0.00%
127	2041004	51040	TEACHER SALARY-STEM INSTR	1.00 FTE STEM Teacher	$70,320.00	$74,633.00	$4,313.00	6.13%
128	2041004	56110	INSTR SUPPLIES-STEM INSTR		$2,250.00	$2,250.00	$0.00	0.00%
129	2041005	56110	INSTR SUPPLIES-LA INSTR		$3,660.00	$3,660.00	$0.00	0.00%
130	2041007	56110	INSTR SUPPLIES-KG INSTR		$3,110.00	$3,110.00	$0.00	0.00%
131	2041011	56110	INSTR SUPPLIES-MATH INSTR		$2,495.00	$2,495.00	$0.00	0.00%
132	2041012	51040	TEACHER SALARY-MUSIC INST	1.50 FTE Music Teacher	$83,231.00	$87,940.00	$4,709.00	5.66%
133	2041012	54300	REPAIRS & MAINT-MUSIC INST		$850.00	$850.00	$0.00	0.00%
134	2041012	56110	INSTR SUPPLIES-MUSIC INST		$3,650.00	$3,650.00	$0.00	0.00%
135	2041013	56110	INSTR SUPPLIES-SCI INSTR		$2,000.00	$2,000.00	$0.00	0.00%
136	2041015	56110	INSTR SUPPLIES-SS INST		$4,500.00	$4,500.00	$0.00	0.00%
137	2041051	56110	INSTR SUPPLIES-READ INSTR		$8,600.00	$8,600.00	$0.00	0.00%
138	2041081	51040	TEACHER SALARY-PHYS ED	1.00 FTE Physical Education Teacher	$76,509.00	$81,201.00	$4,692.00	6.13%
139	2041081	56110	INSTR SUPPLIES-PHYS ED		$3,600.00	$3,600.00	$0.00	0.00%
140	2041085	51040	TEACHER SALARY-REM READ	5.00 FTE Literacy Interventionist	$453,468.00	$468,803.00	$15,335.00	3.38%
141	2041085	56110	INSTR SUPPLIES-REMED INST		$2,350.00	$2,350.00	$0.00	0.00%
142	2041086	51040	TEACHER SALARY-REM MATH	2.50 FTE Math Interventionist	$160,502.00	$163,956.00	$3,454.00	2.15%
143	2041115	51040	TEACHER SALARY-EXTRA CUR		$3,250.00	$3,300.00	$50.00	1.54%
144	2041115	56900	OTHER SUPPLIES-EXTRA CURR		$3,250.00	$3,250.00	$0.00	0.00%
145	2041200	51140	PARAPROFESSIONAL SALARIES	12.00 FTE Paraprofessional	$302,651.00	$304,064.00	$1,413.00	0.47%
146	2041200	56900	SUPPLIES SPED		$1,700.00	$1,700.00	$0.00	0.00%
147	2041250	51140	PARAPROFESSIONAL SALARIES	5.60 FTE Paraprofessional	$95,623.00	$96,001.00	$378.00	0.40%
148	2041260	56110	INSTR SUPPLIES-LRN DISAB		$4,600.00	$4,600.00	$0.00	0.00%
149	2042140	56110	INSTR SUPPLIES-PSYCHOLOGY		$600.00	$600.00	$0.00	0.00%
150	2042140	56800	TESTING SUPPLIES-PSYCHOLOGY		$800.00	$800.00	$0.00	0.00%
151	2042150	56110	INSTR SUPPLIES-SPCH LANG		$1,000.00	$1,000.00	$0.00	0.00%
152	2042150	56800	TESTING SUPPLIES-SPCH LANG		$700.00	$700.00	$0.00	0.00%
153	2042210	53300	PROF/TECH SERVICES-PROF DEV		$14,350.00	$14,350.00	$0.00	0.00%
154	2042220	51050	MEDIA SALARIES-MEDIA CTR	1.00 FTE Media Specialist	$104,558.00	$107,695.00	$3,137.00	3.00%
155	2042220	51140	PARA SALARIES-MEDIA CTR	0.80 FTE Paraprofessional	$19,201.00	$19,589.00	$388.00	2.02%
156	2042220	56110	INSTR SUPPLIES-MEDIA CTR		$8,850.00	$8,850.00	$0.00	0.00%
157	2042220	56900	OTHER SUPPLIES-MEDIA CTR		$550.00	$550.00	$0.00	0.00%
158	2042230	56890	TECHNOLOGY SUPPLIES		$2,000.00	$2,000.00	$0.00	0.00%
159	2042400	51020	ADMIN SALARIES-GEN ADM	1.00 FTE Principal	$310,914.00	$320,152.00	$9,238.00	2.97%
160				1.00 FTE Asst Principal				
161	2042400	51100	SEC/CLERICAL SALARIES-GEN ADM	2.50 FTE School Clerical	$121,250.00	$124,563.00	$3,313.00	2.73%
162	2042400	55300	COMMUNICATIONS-GEN ADM		$1,000.00	$1,000.00	$0.00	0.00%
163	2042400	56900	OTHER SUPPLIES-GEN ADM		$2,300.00	$2,300.00	$0.00	0.00%
164	2042700	51140	PARA SALARIES-TRANSP	0.20 FTE Paraprofessional	$6,043.00	$6,217.00	$174.00	2.88%
165								
166				**Total Gallup Hill School (GHS) Location: 204**	**$4,704,399.00**	**$4,867,470.00**	**$163,071.00**	**3.47%**

FY2026-2027 BUDGET

Line#	Org	Object Code	Account Description	Details	2025-2026	2026-2027	Variance $	Var %
167								
168	**Ledyard Middle School (LMS) Location: 205**							
169	2051000	56110	INSTRUCTIONAL SUPPLIES		$26,582.00	$26,582.00	$0.00	0.00%
170	2051000	56890	TECHNOLOGY SUPPLIES		$2,500.00	$2,500.00	$0.00	0.00%
171	2051002	51040	TEACHER SALARY-ART INSTR	2.00 FTE Art Teacher	$160,288.00	$167,207.00	$6,919.00	4.32%
172	2051002	56110	INSTR SUPPLIES-ART INSTR		$4,900.00	$4,900.00	$0.00	0.00%
173	2051005	51040	TEACHER SALARY-LA INSTR	4.00 FTE Language Arts Teacher	$477,338.00	$494,264.00	$16,926.00	3.55%
174				1.00 FTE Literacy Interventionist				
175				0.33 FTE Literacy Coordinator				
176				0.17 FTE MTSS Coordinator				
177	2051005	56110	INSTR SUPPLIES-LA INSTR		$7,400.00	$7,400.00	$0.00	0.00%
178	2051006	51040	TEACHER SALARY-FLANG INST	2.00 FTE World Language Teacher	$170,031.00	$177,635.00	$7,604.00	4.47%
179	2051006	56110	INSTR SUPPLIES-FLANG INST		$1,600.00	$1,600.00	$0.00	0.00%
180	2051008	51040	TEACHER SALARY-HLTH INSTR	1.00 FTE Health Teacher	$99,711.00	$102,702.00	$2,991.00	3.00%
181	2051008	56110	INSTR SUPPLIES-HLTH INSTR		$1,150.00	$1,150.00	$0.00	0.00%
182	2051009	51040	TEACHER SALARY-LIFE INSTR	1.00 FTE Family/Consumer Sci Teacher	$99,711.00	$102,702.00	$2,991.00	3.00%
183	2051009	56110	INSTR SUPPLIES-LIFE INSTR		$2,000.00	$2,000.00	$0.00	0.00%
184	2051010	51040	TEACHER SALARY-INDUS INST	1.00 FTE Tech Ed/Computer Teacher	$99,711.00	$103,002.00	$3,291.00	3.30%
185	2051010	56110	INSTR SUPPLIES-INDUS INST		$3,000.00	$3,000.00	$0.00	0.00%
186	2051011	51040	TEACHER SALARY-MATH INSTR	5.00 FTE Mathematics Teacher	$467,056.00	$487,829.00	$20,773.00	4.45%
187				1.00 FTE Math Interventionist				
188				0.33 FTE Mathematics Coordinator				
189				0.17 FTE MTSS Coordinator				
190	2051011	56110	INSTR SUPPLIES-MATH INSTR		$1,200.00	$1,200.00	$0.00	0.00%
191	2051012	51040	TEACHER SALARY-MUSIC INST	2.00 FTE Music Teacher	$140,192.00	$148,790.00	$8,598.00	6.13%
192	2051012	54300	REPAIRS & MAINT-MUSIC INST		$1,400.00	$1,400.00	$0.00	0.00%
193	2051012	56110	INSTR SUPPLIES-MUSIC INST		$2,350.00	$2,350.00	$0.00	0.00%
194	2051012	57310	REPL EQUIPMENT-MUSIC INST		$3,708.00	$3,708.00	$0.00	0.00%
195	2051012	58100	DUES & FEES-MUSIC INST		$455.00	$455.00	$0.00	0.00%
196	2051013	51040	TEACHER SALARY-SCI INSTR	6.00 FTE Science Teacher	$490,694.00	$511,639.00	$20,945.00	4.27%
197	2051013	56110	INSTR SUPPLIES-SCI INSTR		$10,000.00	$10,000.00	$0.00	0.00%
198	2051013	58120	PROJECT DUES & FEES-SCI INSTR		$8,500.00	$8,500.00	$0.00	0.00%
199	2051014	56890	TECHNOLOGY SUPPLIES-COMP INSTR		$2,500.00	$2,500.00	$0.00	0.00%
200	2051015	51040	TEACHER SALARY-SS INST	5.00 FTE Social Studies Teacher	$453,173.00	$471,016.00	$17,843.00	3.94%
201	2051015	56110	INSTR SUPPLIES-SS INST		$3,750.00	$3,750.00	$0.00	0.00%
202	2051051	51040	TEACHER SALARY-READ INSTR	1.00 FTE Language Arts Teacher	$56,180.00	$59,358.00	$3,178.00	5.66%
203	2051051	56110	INSTR SUPPLIES-READ INSTR		$2,900.00	$2,900.00	$0.00	0.00%
204	2051081	51040	TEACHER SALARY-PHYS ED	3.00 FTE Physical Education Teacher	$230,461.00	$244,594.00	$14,133.00	6.13%
205	2051081	56110	INSTR SUPPLIES-PHYS ED		$2,100.00	$2,100.00	$0.00	0.00%
206	2051115	51040	TEACHER SALARY-EXTRA CUR		$26,152.00	$31,044.00	$4,892.00	18.71%
207	2051115	55100	TRANSPORTATION-EXTRA CUR		$2,950.00	$2,950.00	$0.00	0.00%
208	2051115	56900	OTHER SUPPLIES-EXTRA CUR		$2,150.00	$2,150.00	$0.00	0.00%
209	2051200	51140	PARAPROFESSIONAL SALARIES	11.20 FTE Paraprofessional	$264,416.00	$265,638.00	$1,222.00	0.46%
210	2051200	56110	INSTR SUPPLIES-SPED		$2,900.00	$2,900.00	$0.00	0.00%
211	2051200	56800	TESTING SUPPLIES		$300.00	$300.00	$0.00	0.00%
212	2051200	56900	SUPPLIES SPED		$2,000.00	$2,000.00	$0.00	0.00%
213	2052120	51030	GUIDANCE SALARIES-GUIDANCE	3.00 FTE Guidance/School Counselor	$265,928.00	$278,361.00	$12,433.00	4.68%
214	2052120	56110	INSTR SUPPLIES-GUIDANCE		$650.00	$650.00	$0.00	0.00%
215	2052140	56110	INSTR SUPPLIES-PSYCHOLOGY		$350.00	$350.00	$0.00	0.00%
216	2052150	56110	INSTR SUPPLIES-SPCH LANG		$750.00	$750.00	$0.00	0.00%
217	2052210	53300	PROF/TECH SERVICES-PROF DEV		$3,350.00	$3,350.00	$0.00	0.00%
218	2052220	51050	MEDIA SALARIES-MEDIA CTR	1.00 FTE Media Specialist	$84,711.00	$79,691.00	-$5,020.00	-5.93%
219	2052220	56110	INSTR SUPPLIES-MEDIA CTR		$9,650.00	$9,650.00	$0.00	0.00%
220	2052400	51020	ADMIN SALARIES-GEN ADM	1.00 FTE Principal	$329,816.00	$339,621.00	$9,805.00	2.97%
221				1.00 FTE Asst Principal				
222	2052400	51100	SEC/CLERICAL SALARIES-GEN ADM	2.50 School Clerical	$104,775.00	$115,297.00	$10,522.00	10.04%
223	2052400	55300	COMMUNICATIONS-GEN ADM		$5,950.00	$5,950.00	$0.00	0.00%
224	2052400	56900	OTHER SUPPLIES-GEN ADM		$7,000.00	$7,000.00	$0.00	0.00%
225	2052400	58100	DUES & FEES-GEN ADM		$1,200.00	$1,200.00	$0.00	0.00%
226	2053200	51040	TEACHER SALARY-ATHLETICS		$35,394.00	$35,925.00	$531.00	1.50%
227	2053200	53400	OTHER PROF/TECH SVCS-ATHLETICS		$4,800.00	$4,800.00	$0.00	0.00%
228	2053200	55100	TRANSPORTATION-ATHLETICS		$6,380.00	$6,380.00	$0.00	0.00%
229	2053200	56900	OTHER SUPPLIES-ATHLETICS		$14,000.00	$4,000.00	-$10,000.00	-71.43%
230								
231			**Total Ledyard Middle School (LMS) Location: 205**		**$4,208,113.00**	**$4,358,690.00**	**$150,577.00**	**3.58%**

FY2026-2027 BUDGET

Line#	Org	Object Code	Account Description	Details	2025-2026	2026-2027	Variance $	Var %
232								
233	**Ledyard High School (LHS) Location: 206**							
234	2061000	56110	INSTR SUPPLIES-GEN INSTR		$10,994.00	$10,994.00	$0.00	0.00%
235	2061002	51040	TEACHER SALARY-ART INSTR	2.00 FTE Art Teacher	$179,922.00	$188,155.00	$8,233.00	4.58%
236	2061002	56110	INSTR SUPPLIES-ART INSTR		$11,200.00	$12,000.00	$800.00	7.14%
237	2061003	51040	TEACHER SALARY-BUS INSTR	1.00 FTE Business Teacher	$99,316.00	$107,695.00	$8,379.00	8.44%
238	2061003	56110	INSTR SUPPLIES-BUS INSTR		$2,106.00	$2,106.00	$0.00	0.00%
239	2061005	51040	TEACHER SALARY-LA INSTR	7.00 FTE Language Arts Teacher	$621,488.00	$653,009.00	$31,521.00	5.07%
240	2061005	56110	INSTR SUPPLIES-LA INSTR		$1,000.00	$1,000.00	$0.00	0.00%
241	2061005	58100	DUES & FEES-LA INSTR		$500.00	$500.00	$0.00	0.00%
242	2061006	51040	TEACHER SALARY-FLANG INST	5.00 FTE World Language Teacher	$443,912.00	$467,106.00	$23,194.00	5.22%
243	2061006	56110	INSTR SUPPLIES-FLANG INST		$800.00	$800.00	$0.00	0.00%
244	2061006	58100	DUES & FEES-FLANG INST		$200.00	$200.00	$0.00	0.00%
245	2061008	51040	TEACHER SALARY-HLTH INSTR	2.00 FTE Health Teacher	$193,541.00	$202,168.00	$8,627.00	4.46%
246	2061008	56110	INSTR SUPPLIES-HLTH INSTR		$900.00	$900.00	$0.00	0.00%
247	2061009	51040	TEACHER SALARY-LIFE INSTR	1.00 FTE Family/Consumer Sci Teacher	$99,711.00	$102,702.00	$2,991.00	3.00%
248	2061009	56110	INSTR SUPPLIES-LIFE INSTR		$8,500.00	$9,000.00	$500.00	5.88%
249	2061010	51040	TEACHER SALARY-INDUS INST	3.00 FTE Tech Ed/Computer Teacher	$270,617.00	$280,537.00	$9,920.00	3.67%
250	2061010	54300	REPAIRS & MAINT-INDUS INST		$1,000.00	$1,000.00	$0.00	0.00%
251	2061010	54400	RENTALS-INDUS INST		$1,200.00	$1,200.00	$0.00	0.00%
252	2061010	56110	INSTR SUPPLIES-INDUS INST		$24,500.00	$24,500.00	$0.00	0.00%
253	2061011	51040	TEACHER SALARY-MATH INSTR	7.00 FTE Mathematics Teacher	$603,065.00	$608,284.00	$5,219.00	0.87%
254	2061011	56110	INSTR SUPPLIES-MATH INSTR		$1,500.00	$1,500.00	$0.00	0.00%
255	2061011	58100	DUES & FEES-MATH INSTR		$100.00	$100.00	$0.00	0.00%
256	2061012	51040	TEACHER SALARY-MUSIC INST	2.00 FTE Music Teacher	$179,922.00	$188,155.00	$8,233.00	4.58%
257	2061012	53400	OTR PROF/TECH SVCS-MUSIC INST		$5,000.00	$5,000.00	$0.00	0.00%
258	2061012	54300	REPAIRS & MAINT-MUSIC INST		$1,500.00	$1,500.00	$0.00	0.00%
259	2061012	56110	INSTR SUPPLIES-MUSIC INST		$4,600.00	$4,600.00	$0.00	0.00%
260	2061012	57310	REPL EQUIPMENT-MUSIC INST		$17,957.00	$17,957.00	$0.00	0.00%
261	2061013	51040	TEACHER SALARY-SCI INSTR	8.67 FTE Science Teacher	$837,212.00	$868,754.00	$31,542.00	3.77%
262	2061013	56110	INSTR SUPPLIES-SCI INSTR		$16,000.00	$16,000.00	$0.00	0.00%
263	2061013	57310	REPL EQUIPMENT-SCI INSTR		$3,600.00	$3,600.00	$0.00	0.00%
264	2061013	58120	PROJECT DUES & FEES-SCI INSTR		$28,319.00	$28,319.00	$0.00	0.00%
265	2061014	56890	TECHNOLOGY SUPPLIES		$5,500.00	$5,500.00	$0.00	0.00%
266	2061015	51040	TEACHER SALARY-SS INST	7.00 FTE Social Studies Teacher	$687,776.00	$710,610.00	$22,834.00	3.32%
267	2061015	56110	INSTR SUPPLIES-SS INST		$1,000.00	$1,000.00	$0.00	0.00%
268	2061081	51040	TEACHER SALARY-PHYS ED	3.00 FTE Physical Education Teacher	$278,553.00	$289,235.00	$10,682.00	3.83%
269	2061081	56110	INSTR SUPPLIES-PHYS ED		$6,000.00	$6,000.00	$0.00	0.00%
270	2061115	51040	TEACHER SALARY-EXTRA CUR		$85,805.00	$99,272.00	$13,467.00	15.69%
271	2061115	55100	TRANSPORTATION-EXTRA CUR		$7,500.00	$7,500.00	$0.00	0.00%
272	2061200	51140	PARAPROFESSIONAL SALARIES	5.60 FTE Paraprofessional	$120,243.00	$120,744.00	$501.00	0.42%
273	2061200	56900	SUPPLIES SPED		$3,200.00	$3,200.00	$0.00	0.00%
274	2061300	53210	TUTORS-EXT DAY		$4,500.00	$4,500.00	$0.00	0.00%
275	2062120	51030	GUIDANCE SALARIES-GUIDANCE	4.50 FTE Guidance/School Counselor	$466,971.00	$486,923.00	$19,952.00	4.27%
276	2062120	55300	COMMUNICATIONS-GUIDANCE		$4,000.00	$4,000.00	$0.00	0.00%
277	2062120	56900	OTHER SUPPLIES-GUIDANCE		$2,000.00	$2,000.00	$0.00	0.00%
278	2062140	56110	INSTR SUPPLIES-PSYCHOLOGY		$2,100.00	$2,100.00	$0.00	0.00%
279	2062140	56900	NON INSTRUCTIONAL SUPPLIES		$5,250.00	$5,250.00	$0.00	0.00%
280	2062200	51200	OTHER SALARY-SCH CARER	0.70 FTE Other Student Support	$40,505.00	$41,720.00	$1,215.00	3.00%
281	2062210	53300	PROF/TECH SERVICES-PROF DEV		$3,500.00	$8,500.00	$5,000.00	142.86%
282	2062220	51050	MEDIA SALARIES-MEDIA CTR	1.00 FTE Media Specialist	$104,558.00	$107,995.00	$3,437.00	3.29%
283	2062220	51140	PARA SALARIES-MEDIA CTR	0.80 FTE Paraprofessional	$22,128.00	$22,560.00	$432.00	1.95%
284	2062220	56110	INSTR SUPPLIES-MEDIA CTR		$25,950.00	$25,950.00	$0.00	0.00%
285	2062220	57300	NEW EQUIPMENT-MEDIA CTR		$1,100.00	$1,100.00	$0.00	0.00%
286	2062220	58100	DUES & FEES-MEDIA CTR		$250.00	$250.00	$0.00	0.00%
287	2062400	51020	ADMIN SALARIES-GEN ADM	1.00 FTE Principal	$515,330.00	$531,656.00	$16,326.00	3.17%
288				2.00 FTE Asst Principal				
289	2062400	51100	SEC/CLERICAL SALARIES-GEN ADM	4.50 FTE School Clerical	$239,115.00	$246,686.00	$7,571.00	3.17%
290	2062400	51140	PARA SALARIES-GEN ADM	3.60 FTE Paraprofessional	$109,010.00	$111,055.00	$2,045.00	1.88%

FY2026-2027 BUDGET

Line#	Org	Object Code	Account Description	Details	2025-2026	2026-2027	Variance $	Var %
291	2062400	53400	OTR PROFESS/TECH SVCS-GEN ADM		$7,375.00	$7,375.00	$0.00	0.00%
292	2062400	55300	COMMUNICATIONS-GEN ADM		$13,200.00	$13,200.00	$0.00	0.00%
293	2062400	56900	OTHER SUPPLIES-GEN ADM		$14,650.00	$14,650.00	$0.00	0.00%
294	2062400	58100	DUES & FEES-GEN ADM		$15,000.00	$15,000.00	$0.00	0.00%
295	2062500	53400	OTR PROF/TECH SVCS ATHLETICS		$1,350.00	$1,350.00	$0.00	0.00%
296	2063200	51040	TEACHER SALARY-ATHLETICS		$222,551.00	$233,225.00	$10,674.00	4.80%
297	2063200	51200	OTHER SALARY	1.00 FTE Other Student Support	$70,440.00	$72,959.00	$2,519.00	3.58%
298	2063200	54300	REPAIRS & MAINT-ATHLETICS		$14,000.00	$14,000.00	$0.00	0.00%
299	2063200	54400	RENTALS-ATHLETICS		$5,000.00	$5,000.00	$0.00	0.00%
300	2063200	56900	OTHER SUPPLIES-ATHLETICS		$48,950.00	$48,950.00	$0.00	0.00%
301	2063200	57300	NEW EQUIPMENT-ATHLETICS		$5,600.00	$5,600.00	$0.00	0.00%
302	2063200	57310	REPL EQUIPMENT-ATHLETICS		$17,000.00	$17,000.00	$0.00	0.00%
303								
304			**Total Ledyard High School (LHS) Location: 206**		**$6,847,142.00**	**$7,102,956.00**	**$255,814.00**	**3.74%**
305								
306			**LHS Ag-Science Location: 207**					
307	2071001	51040	TEACHER SALARY-AGRI INSTR	5.00 FTE Agriscience Teacher	$576,846.00	$600,003.00	$23,157.00	4.01%
308	2071001	51200	OTHER SALARY		$7,500.00	$7,875.00	$375.00	5.00%
309	2071001	53400	OTHER PRO/TECH SVCS-AGRI INSTR		$16,500.00	$16,500.00	$0.00	0.00%
310	2071001	54300	REPAIRS & MAINT-AGRI INSTR		$7,500.00	$7,500.00	$0.00	0.00%
311	2071001	55800	TRAVEL-AGRI INSTR		$2,000.00	$2,000.00	$0.00	0.00%
312	2071001	56110	INSTR SUPPLIES-AGRI INSTR		$52,697.00	$52,697.00	$0.00	0.00%
313	2071001	56890	TECHNOLOGY SUPPLIES-AGRI INSTR		$1,000.00	$1,000.00	$0.00	0.00%
314	2071001	56900	OTHER SUPPLIES-AGRI INSTR		$1,600.00	$1,600.00	$0.00	0.00%
315	2071001	58100	DUES & FEES-AGRI INSTR		$5,710.00	$5,882.00	$172.00	3.01%
316								
317			**Total LHS Ag-Science Location: 207**		**$671,353.00**	**$695,057.00**	**$23,704.00**	**3.53%**

FY2026-2027 BUDGET

Line#	Org	Object Code	Account Description	Details	2025-2026	2026-2027	Variance $	Var %
318								
319				**Districtwide/CO Location: 208**				
320	2081000	51040	TEACHER SALARY-GEN INSTR		$13,545.00	$14,285.00	$740.00	5.46%
321	2081000	51210	SUB TEACHER SALARIES-GEN INSTR		$456,172.00	$456,172.00	$0.00	0.00%
322	2081000	53210	TUTORS		$50,000.00	$25,000.00	-$25,000.00	-50.00%
323	2081000	56110	INSTRUCTIONAL SUPPLIES		$6,100.00	$6,100.00	$0.00	0.00%
324	2081000	56400	TEXTBOOKS-GEN INSTR		$101,928.00	$112,482.00	$10,554.00	10.35%
325	2081000	56900	NON INSTRUCTIONAL SUPPLIES		$6,000.00	$6,000.00	$0.00	0.00%
326	2081006	56400	TEXTBOOKS-FLANG INST		$3,000.00	$3,000.00	$0.00	0.00%
327	2081011	56110	INSTR SUPPLIES-MATH INSTR		$800.00	$16,000.00	$15,200.00	1900.00%
328	2081011	56400	TEXTBOOKS-MATH INSTR		$21,012.00	$34,701.00	$13,689.00	65.15%
329	2081013	56110	INSTR SUPPLIES-SCI INSTR		$1,500.00	$1,936.00	$436.00	29.07%
330	2081015	56400	TEXTBOOKS-SS INST		$500.00	$500.00	$0.00	0.00%
331	2081051	56110	INSTRUCTIONAL SUPPLIES		$44,085.00	$44,085.00	$0.00	0.00%
332	2081051	56400	TEXTBOOKS-READ INSTR		$1,500.00	$1,950.00	$450.00	30.00%
333	2082210	53500	DIST CURR DEVELOP-PROF DEV		$5,000.00	$5,000.00	$0.00	0.00%
334	2082213	53300	PROF/TECH SERVICES-STAFF PD		$36,760.00	$31,760.00	-$5,000.00	-13.60%
335	2082230	56800	TESTING SUPPLIES-INSTR TECH		$94,959.00	$52,960.00	-$41,999.00	-44.23%
336	2082305	55900	ADULT EDUCATION-ADULT ED		$32,725.00	$32,725.00	$0.00	0.00%
337	2082310	53400	OTHER PROF/TECH SERVICES-BOE		$5,000.00	$5,000.00	$0.00	0.00%
338	2082320	51010	DIST ADMIN SALARIES-DIST ADM	1.00 FTE Director of Human Resources	$862,743.00	$888,590.00	$25,847.00	3.00%
339				1.00 FTE Direcxtor of Operations				
340				1.00 FTE Director of Finance				
341				1.00 FTE Asst Director of Finance				
342				1.00 FTE Superintendent				
343				1.00 FTE Asst Superintendent				
344	2082320	51100	SEC/CLERICAL SALARIES-DIST ADM	1.00 FTE Non-Union Office Staff	$74,693.00	$76,724.00	$2,031.00	2.72%
345	2082320	53400	OTR PROF/TECH SVCS-DIST ADM		$144,750.00	$162,750.00	$18,000.00	12.44%
346	2082400	51100	SEC/CLERICAL SALARIES-GEN ADM	5.00 FTE CO Clerical	$259,360.00	$273,023.00	$13,663.00	5.27%
347	2082400	51140	PARA SALARIES-GEN ADM		$1,020.00	$1,020.00	$0.00	0.00%
348	2082400	51300	SEASONAL HELP-GEN ADM		$9,600.00	$9,888.00	$288.00	3.00%
349	2082400	57300	NEW EQUIPMENT		$113,500.00	$102,302.00	-$11,198.00	-9.87%
350	2082410	51100	SEC/CLER SALARIES-DW SEC LON		$2,650.00	$2,450.00	-$200.00	-7.55%
351	2082500	51100	SEC/CLER SALARIES-DIST COMM	1.00 FTE Non-Union Office Staff	$35,754.00	$64,506.00	$28,752.00	80.42%
352	2082500	52200	SS AND MEDICARE		$620,704.00	$675,728.00	$55,024.00	8.86%
353	2082500	52300	RETIREMENT & HEALTH REIMB		$126,630.00	$129,689.00	$3,059.00	2.42%
354	2082500	52350	DIST TUITION REIMB-DIST COMM		$40,300.00	$40,300.00	$0.00	0.00%
355	2082500	52600	DISTRICT UNEMP COMP-DIST COMM		$37,350.00	$35,250.00	-$2,100.00	-5.62%
356	2082500	52800	DISTRICT INSURANCE-DIST COMM		$105,000.00	$105,000.00	$0.00	0.00%
357	2082500	55200	STUDENT ACCIDENT INS-DIST COMM		$12,950.00	$12,950.00	$0.00	0.00%
358	2082500	55300	COMMUNICATIONS-DIST COMM		$133,265.00	$133,265.00	$0.00	0.00%
359	2082500	55400	DISTRICT ADVERTISING-DIST COMM		$2,300.00	$2,300.00	$0.00	0.00%
360	2082500	55800	TRAVEL-DIST COMM		$10,700.00	$10,700.00	$0.00	0.00%
361	2082500	56890	TECHNOLOGY SUPPLIES-DIST COMM		$2,800.00	$2,800.00	$0.00	0.00%
362	2082500	56900	OTHER SUPPLIES-DIST COMM		$15,280.00	$15,280.00	$0.00	0.00%
363	2082500	57350	BUSINESS OFFICE SOFTWARE		$118,158.00	$118,158.00	$0.00	0.00%
364	2082500	58100	DUES & FEES-DIST COMM		$44,761.00	$44,761.00	$0.00	0.00%
365	2086110	55660	MAGNET SCHOOL TUITION		$291,973.00	$229,500.00	-$62,473.00	-21.40%
366								
367				**Total Districtwide/CO Location: 208**	**$3,946,827.00**	**$3,986,590.00**	**$39,763.00**	**1.01%**

FY2026-2027 BUDGET

Line#	Org	Object Code	Account Description	Details	2025-2026	2026-2027	Variance $	Var %
368								
369				**Student Services Location: 209**				
370	2091200	51020	ADMINISTRATIVE SALARIES-SPED	1.00 FTE PPS Director	$763,055.00	$786,090.00	$23,035.00	3.02%
371				4.00 FTE Sped Coordinator				
372	2091200	51140	PARA SALARIES-SPED		$48,192.00	$48,192.00	$0.00	0.00%
373	2091200	51200	OTHER SALARY-SPED	6.00 FTE Behavior Specialist	$268,479.00	$270,305.00	$1,826.00	0.68%
374				1.00 FTE Social Worker				
375				1.00 FTE Other Student Support				
376	2091200	53400	OTHER PROFESS/TECH SERVICES		$35,000.00	$35,000.00	$0.00	0.00%
377	2091200	54900	OTHER PURCHASED SERVICES-SPED		$8,000.00	$8,000.00	$0.00	0.00%
378	2091200	55800	TRAVEL-SPED		$500.00	$500.00	$0.00	0.00%
379	2091200	56800	TESTING SUPPLIES-SPED		$24,500.00	$24,500.00	$0.00	0.00%
380	2091200	56900	OTHER SUPPLIES-SPED		$500.00	$500.00	$0.00	0.00%
381	2091200	57300	NEW EQUIPMENT-SPED		$10,000.00	$10,000.00	$0.00	0.00%
382	2091200	58100	DUES & FEES-SPED		$4,250.00	$4,250.00	$0.00	0.00%
383	2091230	51040	TEACHER SALARY-SPED	28.00 FTE Special Education Teacher	$2,579,989.00	$2,699,549.00	$119,560.00	4.63%
384				1.00 FTE Special Ed Pre-K Teacher				
385	2091260	51040	TEACHER SALARY-LRN DISAB	1.00 FTE Special Education Teacher	$94,467.00	$102,702.00	$8,235.00	8.72%
386	2091260	51200	OTHER SALARY		$25,000.00	$27,071.00	$2,071.00	8.28%
387	2091260	53400	OTHER PROFESS/TECH SERVICES		$430,500.00	$452,025.00	$21,525.00	5.00%
388	2091260	53410	SPEC ED DOCTORS		$4,000.00	$4,000.00	$0.00	0.00%
389	2091260	55300	COMMUNICATIONS		$500.00	$500.00	$0.00	0.00%
390	2091260	55800	TRAVEL		$1,500.00	$1,500.00	$0.00	0.00%
391	2091260	56110	INSTRUCTIONAL SUPPLIES		$6,400.00	$6,400.00	$0.00	0.00%
392	2091260	57300	NEW EQUIPMENT		$3,000.00	$3,000.00	$0.00	0.00%
393	2091270	51040	TEACHER SALARY-MULTHAND	1.00 FTE Sp Ed Medically Fragile Teacher	$99,711.00	$102,702.00	$2,991.00	3.00%
394	2091280	53210	TUTORS-HOMEBOUND		$10,000.00	$10,000.00	$0.00	0.00%
395	2091290	51040	TEACHER SALARY-SPEC LRN	2.00 FTE English Language (EL) Teacher	$154,867.00	$147,613.00	-$7,254.00	-4.68%
396	2091400	51040	TEACHER SALARY-SUMMER		$35,669.00	$42,565.00	$6,896.00	19.33%
397	2091400	51100	SECRETARY/CLERICAL SALARIES		$5,763.00	$5,763.00	$0.00	0.00%
398	2091400	51140	PARA SALARIES-SUMMER		$26,412.00	$27,204.00	$792.00	3.00%
399	2091400	56900	OTHER SUPPLIES-SUMMER		$2,500.00	$2,500.00	$0.00	0.00%
400	2092140	51040	TEACHER SALARY-PSYCHOLOGY	3.00 FTE Psychologist	$726,014.00	$779,533.00	$53,519.00	7.37%
401				7.00 FTE Social Worker				
402	2092140	51200	OTHER SALARY	1.00 FTE Clinical Supervisor	$128,750.00	$132,000.00	$3,250.00	2.52%
403	2092150	51040	TEACHER SALARY-SPCH LANG	6.00 FTE Speech Pathologist	$584,129.00	$606,832.00	$22,703.00	3.89%
404	2092190	53400	OTHER PROF/TECH SVCS-OTR SUPP		$258,447.00	$266,200.00	$7,753.00	3.00%
405	2092190	53410	SPEC ED DOCTORS-OTR SUPP		$55,000.00	$55,000.00	$0.00	0.00%
406	2092190	53440	SPEC ED OT-OTR SUPP		$400,000.00	$412,000.00	$12,000.00	3.00%
407	2092190	53460	SPEC ED PT-OTR SUPP		$110,000.00	$113,300.00	$3,300.00	3.00%
408	2092400	51100	SEC/CLERICAL SALARIES-GEN ADM	2.00 FTE School Clerical	$140,058.00	$139,462.00	-$596.00	-0.43%
409				1.00 FTE CO Clerical				
410	2096110	55600	SPED TUITION PUBLIC		$365,080.00	$374,207.00	$9,127.00	2.50%
411	2096130	55700	SPED TUIT-NON-PUBLIC-TUIT-NP		$2,478,490.00	$2,602,415.00	$123,925.00	5.00%
412	2096130	55701	TUITION - GRANT OFFSET		-$1,198,010.00	-$1,198,010.00	$0.00	0.00%
413								
414				**Total Student Services Location: 209**	**$8,690,712.00**	**$9,105,370.00**	**$414,658.00**	**4.77%**
415								
416				**Health Services Location: 210**				
417	2102130	54900	OTHER PURCH SERVICES-HEALTH		$2,500.00	$2,500.00	$0.00	0.00%
418	2102130	56900	OTHER SUPPLIES-HEALTH		$7,778.00	$10,698.00	$2,920.00	37.54%
419								
420				**Total Health Services Location: 210**	**$10,278.00**	**$13,198.00**	**$2,920.00**	**28.41%**

FY2026-2027 BUDGET

Line#	Org	Object Code	Account Description	Details	2025-2026	2026-2027	Variance $	Var %
421								
422			**Maintenance Location: 211**					
423	2112600	51130	OVERTIME/ABSENCE COVERAGE		$15,450.00	$26,185.00	$10,735.00	69.48%
424	2112600	51160	CUST SALARIES-CUSTODIANS	21.00 FTE Custodial	$1,118,618.00	$1,156,074.00	$37,456.00	3.35%
425	2112600	51300	SEASONAL HELP-MAINTENANC		$61,924.00	$59,840.00	-$2,084.00	-3.37%
426	2112600	54100	WATER & SEWER-MAINTENANC		$95,250.00	$98,822.00	$3,572.00	3.75%
427	2112600	54210	DISPOSAL SERVICE-MAINTENANC		$13,200.00	$13,596.00	$396.00	3.00%
428	2112600	54300	REPAIRS & MAINTENANCE-MAINT		$368,850.00	$368,850.00	$0.00	0.00%
429	2112600	55800	TRAVEL-MAINTENANC		$460.00	$460.00	$0.00	0.00%
430	2112600	56200	HEATING OIL/PROPANE-MAINTENANC		$300,000.00	$300,000.00	$0.00	0.00%
431	2112600	56210	NATURAL GAS		$161,400.00	$161,400.00	$0.00	0.00%
432	2112600	56220	ELECTRICITY-MAINTENANC		$779,021.00	$802,392.00	$23,371.00	3.00%
433	2112600	56260	GASOLINE/OIL		$30,000.00	$30,000.00	$0.00	0.00%
434	2112600	56900	OTHER SUPPLIES-MAINTENANC		$236,495.00	$236,495.00	$0.00	0.00%
435	2112600	57310	REPL EQUIPMENT-MAINTENANC		$10,000.00	$10,000.00	$0.00	0.00%
436	2112610	51160	CUST SALARIES-DIRECTOR SAL	1.00 FTE Director of Facilities	$123,007.00	$206,697.00	$83,690.00	68.04%
437				1.00 FTE Asst Director of Facilities				
438	2112630	51160	CUST SALARIES-MAINTENANCE WAGE	4.00 FTE Maintenance	$252,333.00	$268,425.00	$16,092.00	6.38%
439	2112640	51160	CUST SALARIES-MTCUST LONGEVITY		$6,350.00	$6,200.00	-$150.00	-2.36%
440								
441				**Total Maintenance Location: 211**	**$3,572,358.00**	**$3,745,436.00**	**$173,078.00**	**4.84%**
442								
443			**Operations/IT Location: 212**					
444	2122230	51060	TECHNOLOGY SALARIES-INSTR TECH	4.00 FTE Technician	$241,010.00	$241,010.00	$0.00	0.00%
445	2122230	53400	OTR PROF/TECH SVCS-INSTR TECH		$27,130.00	$27,130.00	$0.00	0.00%
446	2122230	53740	TECH REL CLASS SVC-INSTR TECH		$14,500.00	$14,500.00	$0.00	0.00%
447	2122230	54310	EQUIPMENT MAINTENANCE		$440,255.00	$440,255.00	$0.00	0.00%
448	2122230	54320	TECH REL REPAIR-INSTR TECH		$13,700.00	$13,700.00	$0.00	0.00%
449	2122230	55800	TRAVEL-INSTR TECH		$2,000.00	$2,000.00	$0.00	0.00%
450	2122230	56890	TECHNOLOGY SUPPLIES-INSTR TECH		$91,075.00	$91,075.00	$0.00	0.00%
451								
452				**Total Operations/IT Location: 212**	**$829,670.00**	**$829,670.00**	**$0.00**	**0.00%**
453								
454			**Transportation Location: 213**					
455	2131200	55110	SPECIAL ED TRANSPORTATION-SPED		$1,102,433.00	$1,135,506.00	$33,073.00	3.00%
456	2132700	55100	TRANSPORTATION-TRANS		$1,619,269.00	$1,699,951.00	$80,682.00	4.98%
457	2132700	55101	TRANSPORTATION - GRANT OFFSET		-$18,000.00	-$18,000.00	$0.00	0.00%
458	2132700	56260	DIESEL/GASOLINE-TRANS		$162,220.00	$162,220.00	$0.00	0.00%
459	2133200	55100	TRANSPORTATION-ATHLETICS		$64,070.00	$65,993.00	$1,923.00	3.00%
460								
461				**Total Transportation Location: 213**	**$2,929,992.00**	**$3,045,670.00**	**$115,678.00**	**3.95%**
462								
463			**Curriculum Location: 216**					
464	2161601	56110	INSTRUCTIONAL SUPPLIES		$18,000.00	$18,000.00	$0.00	0.00%
465	2161601	57350	CURRICULUM SOFTWARE		$85,744.00	$65,095.00	-$20,649.00	-24.08%
466	2161601	58100	DUES & FEES		$16,000.00	$15,828.00	-$172.00	-1.08%
467	2161606	56110	INSTRUCTIONAL SUPPLIES		$52,000.00	$52,000.00	$0.00	0.00%
468	2772213	51040	TEACHER SALARY BEST/TEAM		$13,043.00	$13,043.00	$0.00	0.00%
469								
470				**Total Curriculum Location: 216**	**$184,787.00**	**$163,966.00**	**-$20,821.00**	**-11.27%**
471								
472				**Total Fund 0150**	**$40,462,242.00**	**$41,932,335.00**	**$1,470,093.00**	**3.63%**

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

GENERAL INSTRUCTION		2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2021000 51040	TEACH SAL	1,127,521.00	1,074,006.00	1,129,903.00	1,129,903.00	.00	.00
0150-70-0002-01000-51040 -							
2021000 51140	PARA SAL	95,517.00	78,674.00	78,967.00	78,967.00	.00	.00
0150-70-0002-01000-51140 -							
2021000 56110	INSTRUCT	19,250.00	15,150.00	15,150.00	15,150.00	.00	.00
0150-70-0002-01000-56110 -							
2021000 56890	TECH SUPP	6,000.00	6,000.00	6,000.00	6,000.00	.00	.00
0150-70-0002-01000-56890 -							
2021000 57310	EQUIP REPL	475.00	475.00	475.00	475.00	.00	.00
0150-70-0002-01000-57310 -							
2021002 51040	TEACH SAL	48,974.00	49,856.00	51,351.00	51,351.00	.00	.00
0150-70-0002-01002-51040 -							
2021002 56110	INSTRUCT	1,200.00	1,800.00	1,800.00	1,800.00	.00	.00
0150-70-0002-01002-56110 -							
2021004 51040	TEACH SAL	.00	43,413.00	46,077.00	46,077.00	.00	.00
0150-70-0002-01004-51040 -							
2021004 56110	INSTRUCT	.00	1,125.00	1,125.00	1,125.00	.00	.00
0150-70-0002-01004-56110 -							
2021005 56110	INSTRUCT	1,525.00	1,525.00	1,525.00	1,525.00	.00	.00
0150-70-0002-01005-56110 -							
2021007 56110	INSTRUCT	750.00	750.00	750.00	750.00	.00	.00
0150-70-0002-01007-56110 -							
2021011 56110	INSTRUCT	500.00	675.00	675.00	675.00	.00	.00
0150-70-0002-01011-56110 -							
2021012 51040	TEACH SAL	72,158.00	76,509.00	81,202.00	81,202.00	.00	.00
0150-70-0002-01012-51040 -							
2021012 54300	REP MAINT	500.00	500.00	500.00	500.00	.00	.00
0150-70-0002-01012-54300 -							
2021012 56110	INSTRUCT	1,100.00	1,100.00	1,100.00	1,100.00	.00	.00
0150-70-0002-01012-56110 -							
2021013 56110	INSTRUCT	1,100.00	1,100.00	1,100.00	1,100.00	.00	.00
0150-70-0002-01013-56110 -							
2021051 56110	INSTRUCT	2,000.00	4,000.00	4,000.00	4,000.00	.00	.00
0150-70-0002-01051-56110 -							
2021081 51040	TEACH SAL	34,644.00	39,902.00	42,349.00	42,349.00	.00	.00
0150-70-0002-01081-51040 -							

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

PHYSICAL EDUCTION		2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2021081 56110	INSTRUCT	750.00	1,350.00	1,350.00	1,350.00	.00	.00
0150-70-0002-01081-56110 -							
2021085 51040	TEACH SAL	102,709.00	52,279.00	53,848.00	53,848.00	.00	.00
0150-70-0002-01085-51040 -							
2021085 51140	PARA SAL	35,987.00	38,703.00	39,384.00	39,384.00	.00	.00
0150-70-0002-01085-51140 -							
2021085 51200	OTHER SAL	.00	12,600.00	12,978.00	12,978.00	.00	.00
0150-70-0002-01085-51200 -							
2021085 56110	INSTRUCT	950.00	950.00	950.00	950.00	.00	.00
0150-70-0002-01085-56110 -							
2021086 51040	TEACH SAL	89,098.00	94,467.00	96,702.00	96,702.00	.00	.00
0150-70-0002-01086-51040 -							
2021115 51040	TEACH SAL	.00	1,625.00	1,650.00	1,650.00	.00	.00
0150-70-0002-01115-51040 -							
2021115 56900	N INS SUPP	.00	1,625.00	1,625.00	1,625.00	.00	.00
0150-70-0002-01115-56900 -							
2021200 51140	PARA SAL	166,635.00	136,552.00	137,135.00	137,135.00	.00	.00
0150-70-0002-01200-51140 -							
2021200 56900	SUPPL SPED	.00	500.00	500.00	500.00	.00	.00
0150-70-0002-01200-56900 -							
2021260 56110	INSTRUCT	1,800.00	1,800.00	1,800.00	1,800.00	.00	.00
0150-70-0002-01260-56110 -							
2022140 56110	INSTRUCT	250.00	250.00	250.00	250.00	.00	.00
0150-70-0002-02140-56110 -							
2022140 56800	TEST SUPP	125.00	125.00	125.00	125.00	.00	.00
0150-70-0002-02140-56800 -							
2022150 56110	INSTRUCT	400.00	900.00	900.00	900.00	.00	.00
0150-70-0002-02150-56110 -							
2022150 56800	TEST SUPP	325.00	325.00	325.00	325.00	.00	.00
0150-70-0002-02150-56800 -							
2022210 53300	PROF SERV	3,000.00	3,000.00	3,000.00	3,000.00	.00	.00
0150-70-0002-02210-53300 -							
2022220 51050	MEDIA SAL	37,633.00	39,902.00	42,349.00	42,349.00	.00	.00
0150-70-0002-02220-51050 -							
2022220 51140	PARA SAL	18,692.00	19,661.00	20,056.00	20,056.00	.00	.00
0150-70-0002-02220-51140 -							

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

MEDIA CENTER		2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2022220 56110	INSTRUCT	2,700.00	2,700.00	2,700.00	2,700.00	.00	.00
0150-70-0002-02220-56110 -							
2022220 56900	OTHER SUPP	400.00	400.00	400.00	400.00	.00	.00
0150-70-0002-02220-56900 -							
2022230 56890	TECH SUPP	1,000.00	1,000.00	1,000.00	1,000.00	.00	.00
0150-70-0002-02230-56890 -							
2022400 51020	ADM SAL	148,671.00	150,875.00	157,786.00	157,786.00	.00	.00
0150-70-0002-02400-51020 -							
2022400 51100	SEC SAL	59,368.00	60,591.00	61,075.00	61,075.00	.00	.00
0150-70-0002-02400-51100 -							
2022400 55300	COMM	650.00	875.00	875.00	875.00	.00	.00
0150-70-0002-02400-55300 -							
2022400 56900	OTHER SUPP	650.00	650.00	650.00	650.00	.00	.00
0150-70-0002-02400-56900 -							
2031000 51040	TEACH SAL	1,019,398.00	979,767.00	1,014,738.00	1,014,738.00	.00	.00
0150-70-0003-01000-51040 -							
2031000 56110	INSTRUCT	19,250.00	18,900.00	18,900.00	18,900.00	.00	.00
0150-70-0003-01000-56110 -							
2031000 56890	TECH SUPP	6,000.00	6,000.00	6,000.00	6,000.00	.00	.00
0150-70-0003-01000-56890 -							
2031000 57310	EQUIP REPL	475.00	475.00	475.00	475.00	.00	.00
0150-70-0003-01000-57310 -							
2031002 51040	TEACH SAL	48,974.00	49,856.00	51,351.00	51,351.00	.00	.00
0150-70-0003-01002-51040 -							
2031002 56110	INSTRUCT	1,200.00	2,200.00	2,200.00	2,200.00	.00	.00
0150-70-0003-01002-56110 -							
2031004 51040	TEACH SAL	.00	43,413.00	46,077.00	46,077.00	.00	.00
0150-70-0003-01004-51040 -							
2031004 56110	INSTRUCT	.00	1,125.00	1,125.00	1,125.00	.00	.00
0150-70-0003-01004-56110 -							
2031005 56110	INSTRUCT	1,525.00	1,525.00	1,525.00	1,525.00	.00	.00
0150-70-0003-01005-56110 -							
2031011 56110	INSTRUCT	500.00	500.00	500.00	500.00	.00	.00
0150-70-0003-01011-56110 -							
2031012 51040	TEACH SAL	27,634.00	27,051.00	28,582.00	28,582.00	.00	.00
0150-70-0003-01012-51040 -							

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

MUSIC INSTRUCTION	2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2031012 54300 REP MAINT	500.00	500.00	500.00	500.00	.00	.00
0150-70-0003-01012-54300 -						
2031012 56110 INSTRUCT	1,100.00	1,450.00	1,450.00	1,450.00	.00	.00
0150-70-0003-01012-56110 -						
2031013 56110 INSTRUCT	1,100.00	1,100.00	1,100.00	1,100.00	.00	.00
0150-70-0003-01013-56110 -						
2031015 56110 INSTRUCT	1,700.00	1,700.00	1,700.00	1,700.00	.00	.00
0150-70-0003-01015-56110 -						
2031051 56110 INSTRUCT	2,000.00	2,000.00	2,000.00	2,000.00	.00	.00
0150-70-0003-01051-56110 -						
2031081 51040 TEACH SAL	34,645.00	39,902.00	42,349.00	42,349.00	.00	.00
0150-70-0003-01081-51040 -						
2031081 56110 INSTRUCT	750.00	750.00	750.00	750.00	.00	.00
0150-70-0003-01081-56110 -						
2031085 51040 TEACH SAL	77,049.00	133,763.00	140,106.00	140,106.00	.00	.00
0150-70-0003-01085-51040 -						
2031085 51200 OTHER SAL	.00	12,600.00	12,978.00	12,978.00	.00	.00
0150-70-0003-01085-51200 -						
2031085 56110 INSTRUCT	950.00	950.00	950.00	950.00	.00	.00
0150-70-0003-01085-56110 -						
2031086 51040 TEACH SAL	106,712.00	112,965.00	120,227.00	120,227.00	.00	.00
0150-70-0003-01086-51040 -						
2031115 51040 TEACH SAL	.00	1,625.00	1,650.00	1,650.00	.00	.00
0150-70-0003-01115-51040 -						
2031115 56900 N INS SUPP	.00	1,625.00	1,625.00	1,625.00	.00	.00
0150-70-0003-01115-56900 -						
2031200 51140 PARA SAL	40,745.00	144,889.00	145,163.00	145,163.00	.00	.00
0150-70-0003-01200-51140 -						
2031200 56900 SUPPL SPED	.00	500.00	500.00	500.00	.00	.00
0150-70-0003-01200-56900 -						
2031260 56110 INSTRUCT	1,800.00	1,800.00	1,800.00	1,800.00	.00	.00
0150-70-0003-01260-56110 -						
2032140 56110 INSTRUCT	250.00	250.00	250.00	250.00	.00	.00
0150-70-0003-02140-56110 -						

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

PYSCHOLOGY	2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2032140 56800 TEST SUPP	125.00	125.00	125.00	125.00	.00	.00
0150-70-0003-02140-56800 -						
2032150 56110 INSTRUCT	400.00	400.00	400.00	400.00	.00	.00
0150-70-0003-02150-56110 -						
2032150 56800 TEST SUPP	325.00	325.00	325.00	325.00	.00	.00
0150-70-0003-02150-56800 -						
2032210 53300 PROF SERV	3,000.00	3,000.00	3,000.00	3,000.00	.00	.00
0150-70-0003-02210-53300 -						
2032220 51050 MEDIA SAL	37,634.00	39,902.00	42,349.00	42,349.00	.00	.00
0150-70-0003-02220-51050 -						
2032220 56110 INSTRUCT	2,700.00	2,700.00	2,700.00	2,700.00	.00	.00
0150-70-0003-02220-56110 -						
2032220 56900 N INS SUPP	400.00	400.00	400.00	400.00	.00	.00
0150-70-0003-02220-56900 -						
2032230 56890 TECH SUPP	1,000.00	1,000.00	1,000.00	1,000.00	.00	.00
0150-70-0003-02230-56890 -						
2032400 51020 ADM SAL	148,671.00	150,875.00	157,786.00	157,786.00	.00	.00
0150-70-0003-02400-51020 -						
2032400 51100 SEC SAL	55,474.00	57,138.00	58,844.00	58,844.00	.00	.00
0150-70-0003-02400-51100 -						
2032400 55300 COMM	650.00	650.00	650.00	650.00	.00	.00
0150-70-0003-02400-55300 -						
2032400 56900 OTHER SUPP	650.00	650.00	650.00	650.00	.00	.00
0150-70-0003-02400-56900 -						
2041000 51040 TEACH SAL	2,570,293.00	2,595,113.00	2,703,075.00	2,703,075.00	.00	.00
0150-70-0004-01000-51040 -						
2041000 51140 PARA SAL	167,762.00	96,090.00	96,470.00	96,470.00	.00	.00
0150-70-0004-01000-51140 -						
2041000 56110 INSTRUCT	38,795.00	38,795.00	38,795.00	38,795.00	.00	.00
0150-70-0004-01000-56110 -						
2041000 56890 TECH SUPP	12,000.00	12,000.00	12,000.00	12,000.00	.00	.00
0150-70-0004-01000-56890 -						
2041000 57310 EQUIP REPL	4,500.00	4,500.00	4,500.00	4,500.00	.00	.00
0150-70-0004-01000-57310 -						
2041002 51040 TEACH SAL	161,531.00	67,416.00	71,551.00	71,551.00	.00	.00
0150-70-0004-01002-51040 -						
2041002 56110 INSTRUCT	4,200.00	4,200.00	4,200.00	4,200.00	.00	.00
0150-70-0004-01002-56110 -						

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

ART INSTRUCTION	2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2041004 51040 TEACH SAL	.00	70,320.00	74,633.00	74,633.00	.00	.00
0150-70-0004-01004-51040 -						
2041004 56110 INSTRUCT	.00	2,250.00	2,250.00	2,250.00	.00	.00
0150-70-0004-01004-56110 -						
2041005 56110 INSTRUCT	3,660.00	3,660.00	3,660.00	3,660.00	.00	.00
0150-70-0004-01005-56110 -						
2041007 56110 INSTRUCT	3,110.00	3,110.00	3,110.00	3,110.00	.00	.00
0150-70-0004-01007-56110 -						
2041011 56110 INSTRUCT	2,495.00	2,495.00	2,495.00	2,495.00	.00	.00
0150-70-0004-01011-56110 -						
2041012 51040 TEACH SAL	88,592.00	83,231.00	87,940.00	87,940.00	.00	.00
0150-70-0004-01012-51040 -						
2041012 54300 REP MAINT	850.00	850.00	850.00	850.00	.00	.00
0150-70-0004-01012-54300 -						
2041012 56110 INSTRUCT	3,650.00	3,650.00	3,650.00	3,650.00	.00	.00
0150-70-0004-01012-56110 -						
2041013 56110 INSTRUCT	2,000.00	2,000.00	2,000.00	2,000.00	.00	.00
0150-70-0004-01013-56110 -						
2041015 56110 INSTRUCT	4,500.00	4,500.00	4,500.00	4,500.00	.00	.00
0150-70-0004-01015-56110 -						
2041051 56110 INSTRUCT	8,600.00	8,600.00	8,600.00	8,600.00	.00	.00
0150-70-0004-01051-56110 -						
2041081 51040 TEACH SAL	127,426.00	76,509.00	81,201.00	81,201.00	.00	.00
0150-70-0004-01081-51040 -						
2041081 56110 INSTRUCT	3,600.00	3,600.00	3,600.00	3,600.00	.00	.00
0150-70-0004-01081-56110 -						
2041085 51040 TEACH SAL	454,608.00	453,468.00	468,803.00	468,803.00	.00	.00
0150-70-0004-01085-51040 -						
2041085 51140 PARA SAL	17,733.00	.00	.00	.00	.00	.00
0150-70-0004-01085-51140 -						
2041085 56110 INSTRUCT	2,350.00	2,350.00	2,350.00	2,350.00	.00	.00
0150-70-0004-01085-56110 -						
2041086 51040 TEACH SAL	183,061.00	160,502.00	163,956.00	163,956.00	.00	.00
0150-70-0004-01086-51040 -						

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

REMEDIAL MATH INSTRUCTION	2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2041115 51040 TEACH SAL	.00	3,250.00	3,300.00	3,300.00	.00	.00
0150-70-0004-01115-51040 -						
2041115 56900 N INS SUPP	.00	3,250.00	3,250.00	3,250.00	.00	.00
0150-70-0004-01115-56900 -						
2041200 51140 PARA SAL	342,815.00	302,651.00	304,064.00	304,064.00	.00	.00
0150-70-0004-01200-51140 -						
2041200 56900 SUPPL SPED	.00	1,700.00	1,700.00	1,700.00	.00	.00
0150-70-0004-01200-56900 -						
2041250 51140 PARA SAL	.00	95,623.00	96,001.00	96,001.00	.00	.00
0150-70-0004-01250-51140 -						
2041260 56110 INSTRUCT	4,600.00	4,600.00	4,600.00	4,600.00	.00	.00
0150-70-0004-01260-56110 -						
2042140 56110 INSTRUCT	600.00	600.00	600.00	600.00	.00	.00
0150-70-0004-02140-56110 -						
2042140 56800 TEST SUPP	800.00	800.00	800.00	800.00	.00	.00
0150-70-0004-02140-56800 -						
2042150 56110 INSTRUCT	1,000.00	1,000.00	1,000.00	1,000.00	.00	.00
0150-70-0004-02150-56110 -						
2042150 56800 TEST SUPP	700.00	700.00	700.00	700.00	.00	.00
0150-70-0004-02150-56800 -						
2042210 53300 PROF SERV	14,350.00	14,350.00	14,350.00	14,350.00	.00	.00
0150-70-0004-02210-53300 -						
2042220 51050 MEDIA SAL	102,709.00	104,558.00	107,695.00	107,695.00	.00	.00
0150-70-0004-02220-51050 -						
2042220 51140 PARA SAL	18,254.00	19,201.00	19,589.00	19,589.00	.00	.00
0150-70-0004-02220-51140 -						
2042220 56110 INSTRUCT	8,850.00	8,850.00	8,850.00	8,850.00	.00	.00
0150-70-0004-02220-56110 -						
2042220 56900 OTHER SUPP	550.00	550.00	550.00	550.00	.00	.00
0150-70-0004-02220-56900 -						
2042230 56890 TECH SUPP	2,000.00	2,000.00	2,000.00	2,000.00	.00	.00
0150-70-0004-02230-56890 -						
2042400 51020 ADM SAL	301,947.00	310,914.00	320,152.00	320,152.00	.00	.00
0150-70-0004-02400-51020 -						

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

GENERAL ADMINISTRATIVE SERVICE	2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2042400 51100 SEC SAL 0150-70-0004-02400-51100 -	123,162.00	121,250.00	124,563.00	124,563.00	.00	.00
2042400 55300 COMM 0150-70-0004-02400-55300 -	1,000.00	1,000.00	1,000.00	1,000.00	.00	.00
2042400 56900 OTHER SUPP 0150-70-0004-02400-56900 -	2,300.00	2,300.00	2,300.00	2,300.00	.00	.00
2042700 51140 PARA SAL 0150-70-0004-02700-51140 -	5,745.00	6,043.00	6,217.00	6,217.00	.00	.00
2051000 56110 INSTRUCT 0150-70-0005-01000-56110 -	28,762.00	26,582.00	26,582.00	26,582.00	.00	.00
2051000 56890 TECH SUPP 0150-70-0005-01000-56890 -	2,500.00	2,500.00	2,500.00	2,500.00	.00	.00
2051002 51040 TEACH SAL 0150-70-0005-01002-51040 -	253,286.00	160,288.00	167,207.00	167,207.00	.00	.00
2051002 56110 INSTRUCT 0150-70-0005-01002-56110 -	4,900.00	4,900.00	4,900.00	4,900.00	.00	.00
2051005 51040 TEACH SAL 0150-70-0005-01005-51040 -	461,797.00	477,338.00	494,264.00	494,264.00	.00	.00
2051005 56110 INSTRUCT 0150-70-0005-01005-56110 -	7,400.00	7,400.00	7,400.00	7,400.00	.00	.00
2051006 51040 TEACH SAL 0150-70-0005-01006-51040 -	164,270.00	170,031.00	177,635.00	177,635.00	.00	.00
2051006 56110 INSTRUCT 0150-70-0005-01006-56110 -	1,600.00	1,600.00	1,600.00	1,600.00	.00	.00
2051008 51040 TEACH SAL 0150-70-0005-01008-51040 -	157,542.00	99,711.00	102,702.00	102,702.00	.00	.00
2051008 56110 INSTRUCT 0150-70-0005-01008-56110 -	1,150.00	1,150.00	1,150.00	1,150.00	.00	.00
2051009 51040 TEACH SAL 0150-70-0005-01009-51040 -	.00	99,711.00	102,702.00	102,702.00	.00	.00
2051009 56110 INSTRUCT 0150-70-0005-01009-56110 -	.00	2,000.00	2,000.00	2,000.00	.00	.00
2051010 51040 TEACH SAL 0150-70-0005-01010-51040 -	157,542.00	99,711.00	103,002.00	103,002.00	.00	.00
2051010 56110 INSTRUCT 0150-70-0005-01010-56110 -	3,000.00	3,000.00	3,000.00	3,000.00	.00	.00

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

INDUSTRIAL TECH INSTRUCTIN	2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2051011 51040 TEACH SAL	420,045.00	467,056.00	487,829.00	487,829.00	.00	.00
0150-70-0005-01011-51040 -						
2051011 56110 INSTRUCT	1,200.00	1,200.00	1,200.00	1,200.00	.00	.00
0150-70-0005-01011-56110 -						
2051012 51040 TEACH SAL	139,467.00	140,192.00	148,790.00	148,790.00	.00	.00
0150-70-0005-01012-51040 -						
2051012 54300 REP MAINT	1,400.00	1,400.00	1,400.00	1,400.00	.00	.00
0150-70-0005-01012-54300 -						
2051012 56110 INSTRUCT	2,350.00	2,350.00	2,350.00	2,350.00	.00	.00
0150-70-0005-01012-56110 -						
2051012 57310 EQUIP REPL	3,708.00	3,708.00	3,708.00	3,708.00	.00	.00
0150-70-0005-01012-57310 -						
2051012 58100 DUES FEES	275.00	455.00	455.00	455.00	.00	.00
0150-70-0005-01012-58100 -						
2051013 51040 TEACH SAL	415,434.00	490,694.00	511,639.00	511,639.00	.00	.00
0150-70-0005-01013-51040 -						
2051013 56110 INSTRUCT	10,000.00	10,000.00	10,000.00	10,000.00	.00	.00
0150-70-0005-01013-56110 -						
2051013 58120 PROJECT O	8,500.00	8,500.00	8,500.00	8,500.00	.00	.00
0150-70-0005-01013-58120 -						
2051014 56890 TECH SUPP	2,500.00	2,500.00	2,500.00	2,500.00	.00	.00
0150-70-0005-01014-56890 -						
2051015 51040 TEACH SAL	449,777.00	453,173.00	471,016.00	471,016.00	.00	.00
0150-70-0005-01015-51040 -						
2051015 56110 INSTRUCT	3,750.00	3,750.00	3,750.00	3,750.00	.00	.00
0150-70-0005-01015-56110 -						
2051051 51040 TEACH SAL	53,224.00	56,180.00	59,358.00	59,358.00	.00	.00
0150-70-0005-01051-51040 -						
2051051 56110 INSTRUCT	2,900.00	2,900.00	2,900.00	2,900.00	.00	.00
0150-70-0005-01051-56110 -						
2051081 51040 TEACH SAL	147,217.00	230,461.00	244,594.00	244,594.00	.00	.00
0150-70-0005-01081-51040 -						
2051081 56110 INSTRUCT	2,100.00	2,100.00	2,100.00	2,100.00	.00	.00
0150-70-0005-01081-56110 -						
2051115 51040 TEACH SAL	20,737.00	26,152.00	31,044.00	31,044.00	.00	.00
0150-70-0005-01115-51040 -						

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

ACTIVITIES		2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2051115 55100	TRANSPORT	2,950.00	2,950.00	2,950.00	2,950.00	.00	.00
0150-70-0005-01115-55100 -							
2051115 56900	OTHER SUPP	2,150.00	2,150.00	2,150.00	2,150.00	.00	.00
0150-70-0005-01115-56900 -							
2051200 51140	PARA SAL	246,714.00	264,416.00	265,638.00	265,638.00	.00	.00
0150-70-0005-01200-51140 -							
2051200 56110	INSTRUCT	2,900.00	2,900.00	2,900.00	2,900.00	.00	.00
0150-70-0005-01200-56110 -							
2051200 56800	TEST SUPP	300.00	300.00	300.00	300.00	.00	.00
0150-70-0005-01200-56800 -							
2051200 56900	SUPPL SPED	.00	2,000.00	2,000.00	2,000.00	.00	.00
0150-70-0005-01200-56900 -							
2052120 51030	GUID SAL	265,397.00	265,928.00	278,361.00	278,361.00	.00	.00
0150-70-0005-02120-51030 -							
2052120 56110	INSTRUCT	650.00	650.00	650.00	650.00	.00	.00
0150-70-0005-02120-56110 -							
2052140 56110	INSTRUCT	350.00	350.00	350.00	350.00	.00	.00
0150-70-0005-02140-56110 -							
2052150 56110	INSTRUCT	750.00	750.00	750.00	750.00	.00	.00
0150-70-0005-02150-56110 -							
2052210 53300	PROF SERV	3,350.00	3,350.00	3,350.00	3,350.00	.00	.00
0150-70-0005-02210-53300 -							
2052220 51050	MEDIA SAL	97,948.00	84,711.00	79,691.00	79,691.00	.00	.00
0150-70-0005-02220-51050 -							
2052220 56110	INSTRUCT	9,650.00	9,650.00	9,650.00	9,650.00	.00	.00
0150-70-0005-02220-56110 -							
2052400 51020	ADM SAL	320,298.00	329,816.00	339,621.00	339,621.00	.00	.00
0150-70-0005-02400-51020 -							
2052400 51100	SEC SAL	110,205.00	104,775.00	115,297.00	115,297.00	.00	.00
0150-70-0005-02400-51100 -							
2052400 55300	COMM	5,950.00	5,950.00	5,950.00	5,950.00	.00	.00
0150-70-0005-02400-55300 -							
2052400 56900	OTHER SUPP	26,500.00	7,000.00	7,000.00	7,000.00	.00	.00
0150-70-0005-02400-56900 -							
2052400 58100	DUES FEES	1,200.00	1,200.00	1,200.00	1,200.00	.00	.00
0150-70-0005-02400-58100 -							
2053200 51040	TEACH SAL	25,876.00	35,394.00	35,925.00	35,925.00	.00	.00
0150-70-0005-03200-51040 -							

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

ATHLETICS		2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2053200 53400	OTHER PROF	4,800.00	4,800.00	4,800.00	4,800.00	.00	.00
0150-70-0005-03200-53400 -							
2053200 55100	TRANSPORT	6,380.00	6,380.00	6,380.00	6,380.00	.00	.00
0150-70-0005-03200-55100 -							
2053200 56900	OTHER SUPP	4,000.00	14,000.00	4,000.00	4,000.00	.00	.00
0150-70-0005-03200-56900 -							
2061000 56110	INSTRUCT	10,994.00	10,994.00	10,994.00	10,994.00	.00	.00
0150-70-0006-01000-56110 -							
2061002 51040	TEACH SAL	173,192.00	179,922.00	188,155.00	188,155.00	.00	.00
0150-70-0006-01002-51040 -							
2061002 56110	INSTRUCT	11,200.00	11,200.00	12,000.00	12,000.00	.00	.00
0150-70-0006-01002-56110 -							
2061003 51040	TEACH SAL	93,913.00	99,316.00	107,695.00	107,695.00	.00	.00
0150-70-0006-01003-51040 -							
2061003 56110	INSTRUCT	2,106.00	2,106.00	2,106.00	2,106.00	.00	.00
0150-70-0006-01003-56110 -							
2061005 51040	TEACH SAL	613,182.00	621,488.00	653,009.00	653,009.00	.00	.00
0150-70-0006-01005-51040 -							
2061005 56110	INSTRUCT	1,000.00	1,000.00	1,000.00	1,000.00	.00	.00
0150-70-0006-01005-56110 -							
2061005 58100	DUES FEES	500.00	500.00	500.00	500.00	.00	.00
0150-70-0006-01005-58100 -							
2061006 51040	TEACH SAL	428,573.00	443,912.00	467,106.00	467,106.00	.00	.00
0150-70-0006-01006-51040 -							
2061006 56110	INSTRUCT	800.00	800.00	800.00	800.00	.00	.00
0150-70-0006-01006-56110 -							
2061006 58100	DUES FEES	200.00	200.00	200.00	200.00	.00	.00
0150-70-0006-01006-58100 -							
2061008 51040	TEACH SAL	102,709.00	193,541.00	202,168.00	202,168.00	.00	.00
0150-70-0006-01008-51040 -							
2061008 56110	INSTRUCT	900.00	900.00	900.00	900.00	.00	.00
0150-70-0006-01008-56110 -							
2061009 51040	TEACH SAL	97,948.00	99,711.00	102,702.00	102,702.00	.00	.00
0150-70-0006-01009-51040 -							
2061009 56110	INSTRUCT	8,500.00	8,500.00	9,000.00	9,000.00	.00	.00
0150-70-0006-01009-56110 -							
2061010 51040	TEACH SAL	284,994.00	270,617.00	280,537.00	280,537.00	.00	.00
0150-70-0006-01010-51040 -							

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

INDUSTRIAL TECH INSTRUCTIN	2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2061010 54300 REP MAINT 0150-70-0006-01010-54300 -	1,000.00	1,000.00	1,000.00	1,000.00	.00	.00
2061010 54400 RENTALS 0150-70-0006-01010-54400 -	1,200.00	1,200.00	1,200.00	1,200.00	.00	.00
2061010 56110 INSTRUCT 0150-70-0006-01010-56110 -	24,500.00	24,500.00	24,500.00	24,500.00	.00	.00
2061011 51040 TEACH SAL 0150-70-0006-01011-51040 -	579,034.00	603,065.00	628,284.00	608,284.00	.00	.00
2061011 56110 INSTRUCT 0150-70-0006-01011-56110 -	1,500.00	1,500.00	1,500.00	1,500.00	.00	.00
2061011 58100 DUES FEES 0150-70-0006-01011-58100 -	100.00	100.00	100.00	100.00	.00	.00
2061012 51040 TEACH SAL 0150-70-0006-01012-51040 -	173,192.00	179,922.00	188,155.00	188,155.00	.00	.00
2061012 53400 OTHER PROF 0150-70-0006-01012-53400 -	5,000.00	5,000.00	5,000.00	5,000.00	.00	.00
2061012 54300 REP MAINT 0150-70-0006-01012-54300 -	1,500.00	1,500.00	1,500.00	1,500.00	.00	.00
2061012 56110 INSTRUCT 0150-70-0006-01012-56110 -	4,600.00	4,600.00	4,600.00	4,600.00	.00	.00
2061012 57310 EQUIP REPL 0150-70-0006-01012-57310 -	2,500.00	17,957.00	17,957.00	17,957.00	.00	.00
2061013 51040 TEACH SAL 0150-70-0006-01013-51040 -	806,091.00	837,212.00	868,754.00	868,754.00	.00	.00
2061013 56110 INSTRUCT 0150-70-0006-01013-56110 -	16,000.00	16,000.00	16,000.00	16,000.00	.00	.00
2061013 57310 EQUIP REPL 0150-70-0006-01013-57310 -	3,600.00	3,600.00	3,600.00	3,600.00	.00	.00
2061013 58120 PROJECT O 0150-70-0006-01013-58120 -	28,319.00	28,319.00	28,319.00	28,319.00	.00	.00
2061014 56890 TECH SUPP 0150-70-0006-01014-56890 -	5,500.00	5,500.00	5,500.00	5,500.00	.00	.00
2061015 51040 TEACH SAL 0150-70-0006-01015-51040 -	666,388.00	687,776.00	710,610.00	710,610.00	.00	.00
2061015 56110 INSTRUCT 0150-70-0006-01015-56110 -	1,000.00	1,000.00	1,000.00	1,000.00	.00	.00
2061081 51040 TEACH SAL 0150-70-0006-01081-51040 -	343,047.00	278,553.00	289,235.00	289,235.00	.00	.00

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

PHYSICAL EDUCTION		2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2061081 56110	INSTRUCT	6,000.00	6,000.00	6,000.00	6,000.00	.00	.00
0150-70-0006-01081-56110 -							
2061115 51040	TEACH SAL	82,578.00	85,805.00	99,272.00	99,272.00	.00	.00
0150-70-0006-01115-51040 -							
2061115 55100	TRANS-EC	.00	7,500.00	7,500.00	7,500.00	.00	.00
0150-70-0006-01115-55100 -							
2061200 51140	PARA SAL	37,030.00	120,243.00	120,744.00	120,744.00	.00	.00
0150-70-0006-01200-51140 -							
2061200 56900	SUPPL SPED	.00	3,200.00	3,200.00	3,200.00	.00	.00
0150-70-0006-01200-56900 -							
2061300 53210	TUTORS	4,500.00	4,500.00	4,500.00	4,500.00	.00	.00
0150-70-0006-01300-53210 -							
2062120 51030	GUID SAL	443,843.00	466,971.00	486,923.00	486,923.00	.00	.00
0150-70-0006-02120-51030 -							
2062120 55300	COMM	4,000.00	4,000.00	4,000.00	4,000.00	.00	.00
0150-70-0006-02120-55300 -							
2062120 56900	OTHER SUPP	2,000.00	2,000.00	2,000.00	2,000.00	.00	.00
0150-70-0006-02120-56900 -							
2062140 56110	INSTRUCT	2,100.00	2,100.00	2,100.00	2,100.00	.00	.00
0150-70-0006-02140-56110 -							
2062140 56900	N INS SUPP	5,250.00	5,250.00	5,250.00	5,250.00	.00	.00
0150-70-0006-02140-56900 -							
2062200 51200	OTHER SAL	39,711.00	40,505.00	41,720.00	41,720.00	.00	.00
0150-70-0006-02200-51200 -							
2062210 53300	PROF SERV	3,500.00	3,500.00	8,500.00	8,500.00	.00	.00
0150-70-0006-02210-53300 -							
2062220 51050	MEDIA SAL	102,709.00	104,558.00	107,995.00	107,995.00	.00	.00
0150-70-0006-02220-51050 -							
2062220 51140	PARA SAL	17,733.00	22,128.00	22,560.00	22,560.00	.00	.00
0150-70-0006-02220-51140 -							
2062220 56110	INSTRUCT	25,950.00	25,950.00	25,950.00	25,950.00	.00	.00
0150-70-0006-02220-56110 -							
2062220 57300	NEW EQUIP	1,100.00	1,100.00	1,100.00	1,100.00	.00	.00
0150-70-0006-02220-57300 -							
2062220 58100	DUES FEES	250.00	250.00	250.00	250.00	.00	.00
0150-70-0006-02220-58100 -							

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

MEDIA CENTER	2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2062400 51020 ADM SAL 0150-70-0006-02400-51020 -	500,879.00	515,330.00	531,656.00	531,656.00	.00	.00
2062400 51100 SEC SAL 0150-70-0006-02400-51100 -	249,631.00	239,115.00	246,686.00	246,686.00	.00	.00
2062400 51140 PARA SAL 0150-70-0006-02400-51140 -	125,637.00	109,010.00	111,055.00	111,055.00	.00	.00
2062400 53400 OTHER PROF 0150-70-0006-02400-53400 -	5,500.00	7,375.00	7,375.00	7,375.00	.00	.00
2062400 54300 REP MAINT 0150-70-0006-02400-54300 -	2,500.00	.00	.00	.00	.00	.00
2062400 55300 COMM 0150-70-0006-02400-55300 -	9,500.00	13,200.00	13,200.00	13,200.00	.00	.00
2062400 56900 OTHER SUPP 0150-70-0006-02400-56900 -	14,650.00	14,650.00	14,650.00	14,650.00	.00	.00
2062400 58100 DUES FEES 0150-70-0006-02400-58100 -	15,000.00	15,000.00	15,000.00	15,000.00	.00	.00
2062500 53400 OTHER PROF 0150-70-0006-02500-53400 -	2,700.00	1,350.00	1,350.00	1,350.00	.00	.00
2063200 51040 TEACH SAL 0150-70-0006-03200-51040 -	218,187.00	222,551.00	233,225.00	233,225.00	.00	.00
2063200 51200 OTHER SAL 0150-70-0006-03200-51200 -	68,000.00	70,440.00	72,959.00	72,959.00	.00	.00
2063200 54300 REP MAINT 0150-70-0006-03200-54300 -	14,000.00	14,000.00	14,000.00	14,000.00	.00	.00
2063200 54400 RENTALS 0150-70-0006-03200-54400 -	5,000.00	5,000.00	5,000.00	5,000.00	.00	.00
2063200 56900 OTHER SUPP 0150-70-0006-03200-56900 -	17,500.00	48,950.00	48,950.00	48,950.00	.00	.00
2063200 57300 NEW EQUIP 0150-70-0006-03200-57300 -	5,600.00	5,600.00	5,600.00	5,600.00	.00	.00
2063200 57310 EQUIP REPL 0150-70-0006-03200-57310 -	17,000.00	17,000.00	17,000.00	17,000.00	.00	.00
2071001 51040 TEACH SAL 0150-70-0007-01001-51040 -	553,377.00	576,846.00	600,003.00	600,003.00	.00	.00
2071001 51200 OTHER SAL 0150-70-0007-01001-51200 -	7,500.00	7,500.00	7,875.00	7,875.00	.00	.00
2071001 53400 OTHER PROF 0150-70-0007-01001-53400 -	14,000.00	16,500.00	16,500.00	16,500.00	.00	.00
2071001 54300 REP MAINT 0150-70-0007-01001-54300 -	7,500.00	7,500.00	7,500.00	7,500.00	.00	.00

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

AGRI-SCIENCE INSTRUCTION	2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2071001 55800 TRAVEL	2,000.00	2,000.00	2,000.00	2,000.00	.00	.00
0150-70-0007-01001-55800 -						
2071001 56110 INSTRUCT	37,000.00	52,697.00	52,697.00	52,697.00	.00	.00
0150-70-0007-01001-56110 -						
2071001 56890 TECH SUPP	1,000.00	1,000.00	1,000.00	1,000.00	.00	.00
0150-70-0007-01001-56890 -						
2071001 56900 OTHER SUPP	1,600.00	1,600.00	1,600.00	1,600.00	.00	.00
0150-70-0007-01001-56900 -						
2071001 58100 DUES FEES	4,000.00	5,710.00	5,882.00	5,882.00	.00	.00
0150-70-0007-01001-58100 -						
2081000 51040 TEACH SAL	1,260.00	13,545.00	14,285.00	14,285.00	.00	.00
0150-70-0008-01000-51040 -						
2081000 51210 SUB SAL	394,012.00	456,172.00	456,172.00	456,172.00	.00	.00
0150-70-0008-01000-51210 -						
2081000 53210 TUTORS	.00	50,000.00	25,000.00	25,000.00	.00	.00
0150-70-0008-01000-53210 -						
2081000 56110 INSTRUCT	6,100.00	6,100.00	6,100.00	6,100.00	.00	.00
0150-70-0008-01000-56110 -						
2081000 56400 TEXTBOOKS	85,156.00	101,928.00	112,482.00	112,482.00	.00	.00
0150-70-0008-01000-56400 -						
2081000 56900 N INS SUPP	6,000.00	6,000.00	6,000.00	6,000.00	.00	.00
0150-70-0008-01000-56900 -						
2081006 56400 TEXTBOOKS	3,000.00	3,000.00	3,000.00	3,000.00	.00	.00
0150-70-0008-01006-56400 -						
2081011 56110 INSTRUCT	800.00	800.00	16,000.00	16,000.00	.00	.00
0150-70-0008-01011-56110 -						
2081011 56400 TEXTBOOKS	3,400.00	21,012.00	34,701.00	34,701.00	.00	.00
0150-70-0008-01011-56400 -						
2081013 56110 INSTRUCT	1,500.00	1,500.00	1,936.00	1,936.00	.00	.00
0150-70-0008-01013-56110 -						
2081015 56400 TEXTBOOKS	500.00	500.00	500.00	500.00	.00	.00
0150-70-0008-01015-56400 -						
2081051 56110 INSTRUCT	29,085.00	44,085.00	44,085.00	44,085.00	.00	.00
0150-70-0008-01051-56110 -						
2081051 56400 TEXTBOOKS	1,500.00	1,500.00	1,950.00	1,950.00	.00	.00
0150-70-0008-01051-56400 -						
2082210 53500 CURR DEV	5,000.00	5,000.00	5,000.00	5,000.00	.00	.00
0150-70-0008-02210-53500 -						

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

PROFESSIONAL DEVELOPMENT	2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2082213 53300 PROF SERV 0150-70-0008-02213-53300 -	36,760.00	36,760.00	31,760.00	31,760.00	.00	.00
2082230 56800 TEST SUPP 0150-70-0008-02230-56800 -	15,520.00	94,959.00	52,960.00	52,960.00	.00	.00
2082305 55900 ADULT EDUC 0150-70-0008-02305-55900 -	32,725.00	32,725.00	32,725.00	32,725.00	.00	.00
2082310 53400 OTHER PROF 0150-70-0008-02310-53400 -	5,000.00	5,000.00	5,000.00	5,000.00	.00	.00
2082320 51010 DISTR SAL 0150-70-0008-02320-51010 -	829,716.00	862,743.00	888,590.00	888,590.00	.00	.00
2082320 51100 SEC SAL 0150-70-0008-02320-51100 -	72,762.00	74,693.00	76,724.00	76,724.00	.00	.00
2082320 53400 OTHER PROF 0150-70-0008-02320-53400 -	67,778.00	144,750.00	162,750.00	162,750.00	.00	.00
2082400 51100 SEC SAL 0150-70-0008-02400-51100 -	149,614.00	259,360.00	273,023.00	273,023.00	.00	.00
2082400 51140 PARA SAL 0150-70-0008-02400-51140 -	.00	1,020.00	1,020.00	1,020.00	.00	.00
2082400 51300 SEAS SAL 0150-70-0008-02400-51300 -	9,600.00	9,600.00	9,888.00	9,888.00	.00	.00
2082400 57300 NEW EQUIP 0150-70-0008-02400-57300 -	.00	113,500.00	102,302.00	102,302.00	.00	.00
2082410 51100 SEC SAL 0150-70-0008-02410-51100 -	2,650.00	2,650.00	2,450.00	2,450.00	.00	.00
2082500 51100 SEC SAL 0150-70-0008-02500-51100 -	77,613.00	35,754.00	64,506.00	64,506.00	.00	.00
2082500 52200 SS & MED 0150-70-0008-02500-52200 -	546,497.00	620,704.00	675,728.00	675,728.00	.00	.00
2082500 52300 RETIREMENT 0150-70-0008-02500-52300 -	124,460.00	126,630.00	129,689.00	129,689.00	.00	.00
2082500 52350 DISTRICT T 0150-70-0008-02500-52350 -	15,447.00	40,300.00	40,300.00	40,300.00	.00	.00
2082500 52600 DISTRICT U 0150-70-0008-02500-52600 -	40,950.00	37,350.00	35,250.00	35,250.00	.00	.00
2082500 52800 DIST INS 0150-70-0008-02500-52800 -	105,000.00	105,000.00	105,000.00	105,000.00	.00	.00

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

DISTRICT COMMUNICATIONS		2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2082500 55200	STUDENT AC	12,950.00	12,950.00	12,950.00	12,950.00	.00	.00
0150-70-0008-02500-55200 -							
2082500 55300	COMM	107,950.00	133,265.00	133,265.00	133,265.00	.00	.00
0150-70-0008-02500-55300 -							
2082500 55400	ADVERT	2,300.00	2,300.00	2,300.00	2,300.00	.00	.00
0150-70-0008-02500-55400 -							
2082500 55800	TRAVEL	10,700.00	10,700.00	10,700.00	10,700.00	.00	.00
0150-70-0008-02500-55800 -							
2082500 56890	TECH SUPP	2,800.00	2,800.00	2,800.00	2,800.00	.00	.00
0150-70-0008-02500-56890 -							
2082500 56900	OTHER SUPP	10,580.00	15,280.00	15,280.00	15,280.00	.00	.00
0150-70-0008-02500-56900 -							
2082500 57350	BUSINSOFT	102,100.00	118,158.00	118,158.00	118,158.00	.00	.00
0150-70-0008-02500-57350 -							
2082500 58100	DUES FEES	63,761.00	44,761.00	44,761.00	44,761.00	.00	.00
0150-70-0008-02500-58100 -							
2086110 55660	MAGNET SCH	219,916.00	291,973.00	229,500.00	229,500.00	.00	.00
0150-70-0008-06110-55660 -							
2091200 51020	ADM SAL	736,172.00	763,055.00	786,090.00	786,090.00	.00	.00
0150-70-0009-01200-51020 -							
2091200 51140	PARA SAL	.00	48,192.00	48,192.00	48,192.00	.00	.00
0150-70-0009-01200-51140 -							
2091200 51200	OTHER SAL	253,884.00	268,479.00	270,305.00	270,305.00	.00	.00
0150-70-0009-01200-51200 -							
2091200 53400	OTHER PROF	43,291.00	35,000.00	35,000.00	35,000.00	.00	.00
0150-70-0009-01200-53400 -							
2091200 54900	OTHER PUR	8,000.00	8,000.00	8,000.00	8,000.00	.00	.00
0150-70-0009-01200-54900 -							
2091200 55800	TRAVEL	500.00	500.00	500.00	500.00	.00	.00
0150-70-0009-01200-55800 -							
2091200 56800	TEST SUPP	24,500.00	24,500.00	24,500.00	24,500.00	.00	.00
0150-70-0009-01200-56800 -							
2091200 56900	OTHER SUPP	8,400.00	500.00	500.00	500.00	.00	.00
0150-70-0009-01200-56900 -							
2091200 57300	NEW EQUIP	10,000.00	10,000.00	10,000.00	10,000.00	.00	.00
0150-70-0009-01200-57300 -							
2091200 58100	DUES FEES	4,250.00	4,250.00	4,250.00	4,250.00	.00	.00
0150-70-0009-01200-58100 -							
2091230 51040	TEACH SAL	2,277,431.00	2,579,989.00	2,699,549.00	2,699,549.00	.00	.00
0150-70-0009-01230-51040 -							
2091260 51040	TEACH SAL	89,098.00	94,467.00	102,702.00	102,702.00	.00	.00
0150-70-0009-01260-51040 -							

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

LEARNING DISABILITIES	2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2091260 51200 OTHER SAL	25,000.00	25,000.00	27,071.00	27,071.00	.00	.00
0150-70-0009-01260-51200 -						
2091260 53400 OTHER PROF	228,187.00	430,500.00	452,025.00	452,025.00	.00	.00
0150-70-0009-01260-53400 -						
2091260 53410 SPED DR	.00	4,000.00	4,000.00	4,000.00	.00	.00
0150-70-0009-01260-53410 -						
2091260 55300 COMM	500.00	500.00	500.00	500.00	.00	.00
0150-70-0009-01260-55300 -						
2091260 55800 TRAVEL	1,500.00	1,500.00	1,500.00	1,500.00	.00	.00
0150-70-0009-01260-55800 -						
2091260 56110 INSTRUCT	6,400.00	6,400.00	6,400.00	6,400.00	.00	.00
0150-70-0009-01260-56110 -						
2091260 57300 NEW EQUIP	3,000.00	3,000.00	3,000.00	3,000.00	.00	.00
0150-70-0009-01260-57300 -						
2091270 51040 TEACH SAL	97,948.00	99,711.00	102,702.00	102,702.00	.00	.00
0150-70-0009-01270-51040 -						
2091280 53210 TUTORS	2,204.00	10,000.00	10,000.00	10,000.00	.00	.00
0150-70-0009-01280-53210 -						
2091290 51040 TEACH SAL	161,453.00	154,867.00	147,613.00	147,613.00	.00	.00
0150-70-0009-01290-51040 -						
2091400 51040 TEACH SAL	33,425.00	35,669.00	42,565.00	42,565.00	.00	.00
0150-70-0009-01400-51040 -						
2091400 51100 SEC SAL	5,650.00	5,763.00	5,763.00	5,763.00	.00	.00
0150-70-0009-01400-51100 -						
2091400 51140 PARA SAL	17,980.00	26,412.00	27,204.00	27,204.00	.00	.00
0150-70-0009-01400-51140 -						
2091400 56900 OTHER SUPP	2,500.00	2,500.00	2,500.00	2,500.00	.00	.00
0150-70-0009-01400-56900 -						
2092140 51040 TEACH SAL	805,952.00	726,014.00	779,533.00	779,533.00	.00	.00
0150-70-0009-02140-51040 -						
2092140 51200 OTHER SAL	.00	128,750.00	132,000.00	132,000.00	.00	.00
0150-70-0009-02140-51200 -						
2092150 51040 TEACH SAL	567,528.00	584,129.00	606,832.00	606,832.00	.00	.00
0150-70-0009-02150-51040 -						
2092190 53400 OTHER PROF	305,785.00	258,447.00	266,200.00	266,200.00	.00	.00
0150-70-0009-02190-53400 -						
2092190 53410 SPED DR	27,687.00	55,000.00	55,000.00	55,000.00	.00	.00
0150-70-0009-02190-53410 -						

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

OTHER SUPPORT SERVICES			2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2092190	53440	SPED OT	390,799.00	400,000.00	412,000.00	412,000.00	.00	.00
0150-70-0009-02190-53440 -								
2092190	53460	SPED PT	104,340.00	110,000.00	113,300.00	113,300.00	.00	.00
0150-70-0009-02190-53460 -								
2092400	51100	SEC SAL	199,264.00	140,058.00	139,462.00	139,462.00	.00	.00
0150-70-0009-02400-51100 -								
2096110	55600	TUIT PUBLI	267,409.00	365,080.00	374,207.00	374,207.00	.00	.00
0150-70-0009-06110-55600 -								
2096130	55700	SPED TUIT	2,306,895.00	2,478,490.00	2,602,415.00	2,602,415.00	.00	.00
0150-70-0009-06130-55700 -								
2096130	55701	TUITION GR	-999,211.00	-1,198,010.00	-1,198,010.00	-1,198,010.00	.00	.00
0150-70-0009-06130-55701 -								
2102130	54900	OTHER PUR	2,500.00	2,500.00	2,500.00	2,500.00	.00	.00
0150-70-0010-02130-54900 -								
2102130	56900	OTHER SUPP	7,778.00	7,778.00	10,698.00	10,698.00	.00	.00
0150-70-0010-02130-56900 -								
2112600	51130	OT/ABSENCE	15,450.00	15,450.00	26,185.00	26,185.00	.00	.00
0150-70-0011-02600-51130 -								
2112600	51160	H CUS SAL	1,051,253.00	1,118,618.00	1,156,074.00	1,156,074.00	.00	.00
0150-70-0011-02600-51160 -								
2112600	51300	SEAS SAL	60,120.00	61,924.00	59,840.00	59,840.00	.00	.00
0150-70-0011-02600-51300 -								
2112600	54100	WA & SE	71,200.00	95,250.00	98,822.00	98,822.00	.00	.00
0150-70-0011-02600-54100 -								
2112600	54210	DISP SERV	13,200.00	13,200.00	13,596.00	13,596.00	.00	.00
0150-70-0011-02600-54210 -								
2112600	54300	REP MAINT	352,300.00	368,850.00	368,850.00	368,850.00	.00	.00
0150-70-0011-02600-54300 -								
2112600	55800	TRAVEL	460.00	460.00	460.00	460.00	.00	.00
0150-70-0011-02600-55800 -								
2112600	56200	HEAT	325,000.00	300,000.00	300,000.00	300,000.00	.00	.00
0150-70-0011-02600-56200 -								
2112600	56210	NATGAS	156,400.00	161,400.00	161,400.00	161,400.00	.00	.00
0150-70-0011-02600-56210 -								
2112600	56220	ELECT	721,500.00	779,021.00	802,392.00	802,392.00	.00	.00
0150-70-0011-02600-56220 -								
2112600	56260	GAS/OIL	30,000.00	30,000.00	30,000.00	30,000.00	.00	.00
0150-70-0011-02600-56260 -								
2112600	56900	OTHER SUPP	260,000.00	236,495.00	236,495.00	236,495.00	.00	.00
0150-70-0011-02600-56900 -								

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

OPERATION AND MAINTENANCE OF P	2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2112600 57310 EQUIP REPL	14,000.00	10,000.00	10,000.00	10,000.00	.00	.00
0150-70-0011-02600-57310 -						
2112610 51160 H CUS SAL	120,347.00	123,007.00	126,697.00	206,697.00	.00	.00
0150-70-0011-02610-51160 -						
2112630 51160 H CUS SAL	259,168.00	252,333.00	268,425.00	268,425.00	.00	.00
0150-70-0011-02630-51160 -						
2112640 51160 H CUS SAL	.00	6,350.00	6,200.00	6,200.00	.00	.00
0150-70-0011-02640-51160 -						
2122230 51060 TECH SAL	233,979.00	241,010.00	241,010.00	241,010.00	.00	.00
0150-70-0012-02230-51060 -						
2122230 53400 OTHER PROF	27,130.00	27,130.00	27,130.00	27,130.00	.00	.00
0150-70-0012-02230-53400 -						
2122230 53740 TCH CLSSVC	14,500.00	14,500.00	14,500.00	14,500.00	.00	.00
0150-70-0012-02230-53740 -						
2122230 54310 EQUIP MAIN	428,197.00	440,255.00	440,255.00	440,255.00	.00	.00
0150-70-0012-02230-54310 -						
2122230 54312 EQ MAIN GR	-45,000.00	.00	.00	.00	.00	.00
0150-70-0012-02230-54312 -						
2122230 54320 TECHNOLOGY	13,700.00	13,700.00	13,700.00	13,700.00	.00	.00
0150-70-0012-02230-54320 -						
2122230 55800 TRAVEL	2,000.00	2,000.00	2,000.00	2,000.00	.00	.00
0150-70-0012-02230-55800 -						
2122230 56890 TECH SUPP	77,150.00	91,075.00	91,075.00	91,075.00	.00	.00
0150-70-0012-02230-56890 -						
2131200 55110 SPED	1,216,411.00	1,102,433.00	1,135,506.00	1,135,506.00	.00	.00
0150-70-0013-01200-55110 -						
2132700 55100 TRANSPORT	1,542,018.00	1,619,269.00	1,699,951.00	1,699,951.00	.00	.00
0150-70-0013-02700-55100 -						
2132700 55101 TRANSP GR	-18,000.00	-18,000.00	-18,000.00	-18,000.00	.00	.00
0150-70-0013-02700-55101 -						
2132700 56260 DIESEL/GAS	162,220.00	162,220.00	162,220.00	162,220.00	.00	.00
0150-70-0013-02700-56260 -						
2133200 55100 TRANSPORT	51,000.00	64,070.00	65,993.00	65,993.00	.00	.00
0150-70-0013-03200-55100 -						
2161601 56110 INSTRUCT	18,000.00	18,000.00	18,000.00	18,000.00	.00	.00
0150-70-0016-01000-56110 -						

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

Curriculum General		2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
2161601 57350	CURRICSOFT	69,520.00	85,744.00	65,095.00	65,095.00	.00	.00
0150-70-0016-01000-57350 -							
2161601 58100	DUES FEES	16,000.00	16,000.00	15,828.00	15,828.00	.00	.00
0150-70-0016-01000-58100 -							
2161606 56110	INSTRUCT	100,000.00	52,000.00	52,000.00	52,000.00	.00	.00
0150-70-0016-01051-56110 -							
2772213 51040	TEACH SAL	3,000.00	13,043.00	13,043.00	13,043.00	.00	.00
0150-70-0077-02213-51040 -							
	GRAND TOTAL	38,358,623.00	40,462,242.00	41,872,335.00	41,932,335.00	.00	.00

** END OF REPORT - Generated by Ken Knight **

NEXT YEAR BUDGET LEVELS REPORT

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

BEST/TEAM		2025 REVISED BUD	2026 REVISED BUD	2027 DEPT	2027 MAYOR/SUP	2027 FIN COMM	2027 TWN CNCL
	Field #	Total	Page Break				
Sequence 1	9	N	N				
Sequence 2	0	N	N				
Sequence 3	0	N	N				
Sequence 4	0	N	N				

Report title:
02/11/2026 09:30 |Town and Schools of Ledyard |P
6695KKni |NEXT YEAR BUDGET LEVELS REPORT |bgnyrp

PROJECTION: 27150 FY27 BOE GENERAL FUND BUDGET FOR PERIOD 99

Report type:	2
Budget level:	2
Percentage change calculation method:	1
Print first or second year of budget requests:	F
Print revenue as credit:	Y
Include cfwd in rev bud:	N
Include cfwd in actuals:	N
Print totals only:	N
Include segment code:	N
Include report grand totals by account type:	N
Print full GL account:	Y
Double space:	N
Suppress zero bdgt accts:	Y
Print as worksheet:	N
Print percent change or comment:	C
Print text:	N
Amounts/totals exceed 999 million dollars:	N
Print five budget levels:	N
Report view:	D

Find Criteria

Field Name	Field Value
Org	
Object	
Project	
Account type	
Account status	

SECTION XI:
TOWN IN-KIND EXPENSES

Each year, the Town allocates a portion of municipal expenses that the Mayor has determined directly support the operations of the school district. These in-kind expenses represent costs that the Town wishes to allocate to the district and thus are required to be included in the district's Net Current Expenditure per Pupil (NCEP) calculation, representing approximately 21% of the district's per pupil expenditure.

In-kind expenses include a range of shared or centrally provided services, such as portions of Town staff salaries, employee health care costs, and other municipal services. While these costs do not flow through the Board of Education's operating budget, they are an important component of the district's total cost of education and are included to ensure full transparency and compliance with state reporting requirements.

BOE In-Kinds Paid by General Government
FY 2025-26 Projected

Description	Gross Expense	Revenue Reduction	Net Expense	BOE Share %	Total BOE Amount
Director of Finance	$ 133,000		$ 133,000	20.00%	$ 26,600
Assistant Finance Director	73,548		73,548	20.00%	14,710
Treasurer	19,551		19,551	20.00%	3,910
			-		
School Nurses Salary	332,940		332,940	100.00%	332,940
School Nurses Aides	80,129		80,129	100.00%	80,129
School Nurse - Admin Wages	49,321		49,321	100.00%	49,321
School Nurse - Other Wages	38,100		38,100	100.00%	38,100
School Nurse - Clothing Allowance	1,500		1,500	100.00%	1,500
School Nurses Operating	700		700	100.00%	700
School Nurses - Training	1,500		1,500	100.00%	1,500
Police Officer -- DARE Program	10,000		10,000	100.00%	10,000
Debt P&I on School Buildings	2,255,751		2,255,751	100.00%	2,255,751
Employer Contr to Health Ins--School Nurses	77,000		77,000	100.00%	77,000
In-lieu of healthcare payment for school nurses	7,700		7,700	100.00%	7,700
Employer Contr Health Ins--BOE	6,069,790	-	6,069,790	100.00%	6,069,790
Retiree Health - BOE	525,000	(525,000)	-	100.00%	-
Workers' Compensation, BOE	313,183		313,183	100.00%	313,183
Social Security for in-kind salaries	555,710		555,710	7.65%	42,512
Property Insurance, BOE	92,250		92,250	100.00%	92,250
School Leaders Liability Insurance	16,555		16,555	100.00%	16,555
General Liability	177,870		177,870	50.00%	88,935
Public Officials Liability	44,945		44,945	50.00%	22,473
Defined Contribution Employer Contr BOE Employees	55,000		55,000	100.00%	55,000
Defined Contribution Employer Contr School Nurses	10,000		10,000	100.00%	10,000
Financial Software	65,000		65,000	50.00%	32,500
Total In-Kind Education Expenses included in the General Government Budget					**$ 9,643,058**

Ledyard Public Schools

4 Blonders Boulevard, Ledyard, CT 06339 (860)464-9255 ext 1401

Capital Needs Report FY 2027

Approved by the Ledyard Board of Education 1/13/2026

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Introduction

The Ledyard School District has, currently under its care, six municipal buildings:

- Ledyard High School
- Ledyard Middle School
- Gallup Hill School
- Juliet W. Long School
- Gales Ferry School
- Board of Education

The objective of this report is to provide a narrative summary of the Board of Education's capital requests for each of these locations, as well as those items that are district-wide in nature.

Background

By State statute, the Ledyard BOE must provide its students with an appropriate learning environment that is safe and properly maintained. This obligation includes the daily upkeep of school facilities, equipment and routine maintenance. In addition to providing safe and properly maintained schools, the local BOE must continually study the need for school facilities and must make building recommendations to the town (CGS § 10-220(a)). As such, this report is part of an ongoing process to provide more comprehensive information regarding the capital needs of the District to the Town Council and members of the community. At the request of the Town Council Finance Committee, we are providing information and cost estimates for foreseeable Capital projects.

A Capital Item, for the purposes of this report, is defined as a project in excess of $5,000, long term in nature, which aims to repair, maintain or improve building infrastructure. While this report will describe District needs per location, they have been ranked in priority on a District-wide level.

- **Bondable**: these are large-scale projects which would require funding sources outside of typical annual capital appropriations (typically bond issue).

- **Non-Recurring**: The items under this heading exceed, in dollar amount, what can reasonably be executed with yearly operating funds, but may or may not meet the need for bonding. The funding source may be existing funds in the Board of Education Capital Account or through newly appropriated town funding.
- **Operating**: while these items may be capital in dollar value, their scope allows for careful, targeted execution through Repair and Maintenance (54300) and Supply (56900) line items.

- **AG Science Non-Recurring**: This account holds the State ASTI funds provided by the State for exclusive use in support of the Agricultural Science Program at Ledyard High school and requires approval of the Board of Education for authorized projects.

- **Escalation:** Provided is the escalation costs of each project.

The projects may range from “critical” in nature to “nice to have”, but each has been put forth for discussion because the Board believes they either preserve or enhance the learning environment at Ledyard Public Schools. They address a range of issues: refurbishing deteriorated or aging facilities, safety and security upgrades, increasing operating and energy efficiencies, providing higher quality indoor air, etc. Within this report, a summary cost estimate is provided; suggested ten year financial layouts.

Gales FerrySchool
1858 Route 12

Gales Ferry Elementary School, built in 2001. It is a 45,362 square foot building that houses students in kindergarten through second grades.

Despite the relative age of Gales Ferry School (which will be 26 years old in 2027), there are facilities concerns that have arisen, and others that are anticipated given the life expectancy of finishes. The highest priorities of these are:

- Replacement of the low impact playground surfaces.
- Install of Solar is ongoing
- PA Replacement

Juliet W. Long School
1854 Route 12

Juliet Long School serving third through fifth grades, is a 37,600 square foot building constructed in two phases in 1961 and 1964, with no major extensions or alterations since.

The highest priority facilities needs at this location include:

- Renovations to the remaining classrooms over the 2026-28 budget years.
- PA Replacement
- Additional capital items of lower priority for Juliet W. Long School are detailed in the full report.

Ledyard High School

24 Gallup Hill Road

Ledyard High School (9-12) is a 275,000 square foot, two story building. The main portion of the building was constructed in two phases in 1962 and 1966. A 1988 project added the band/choral rooms and an auxiliary gymnasium; a 2002 project added the media center and Agri-Science extension.

The highest priority facilities needs at this location include (in priority order):

- Classroom Renovations: The renovations to the general ed classrooms has been completed. The Specialty and Science rooms will be completed over the next few years.

- Main Gymnasium:
    - The existing dividing wall is not used because it prevents the teacher from monitoring the entire gym during class and should be replaced with a drop down net tyra material to allow visual access to the entire gym. ($35,000)
    - The existing bleachers at times are not fully extended and are not ADA compliant. New bleachers are needed that have the proper safety features to allow partial operation of the bleachers. ($140,000)
    - Gym: The padding in the gym is in need of replacement and has reached the end of its useful life. ($30,000)
- Renovate locker and restrooms on the lower level $125,000

- Renovations to the locker rooms on the lower level. This would be a continuation of the student restroom renovations on the main levels. This will also provide equity to the student athletes that currently do not have access to lockers and restrooms on the lower level.

- Replacement of windows. The existing windows are significantly aged, inefficient and at times hard to operate. $3,500,000 This project should be completed prior to the heating and HVAC projects being completed.

- Replacement of the boilers. Both of the oil boilers at the High School are long past their expected life cycle and also do not meet the modern energy saving criteria. Consideration should be given to replacement of the entire heating system to a hot water system, eliminating the steam. This should also be tied to the installation of a Building Management System to allow better control of the heating in each space. $20,000,000.

- Ventilation and AC to classrooms. Currently only special needs rooms and computer labs have single unit air conditioning. With the warmer days in the fall and spring along with summer school the high temperatures make keeping students engaged difficult. $21,250,000

● Air conditioned auditorium. This space is not currently air conditioned and is used as the town's only large meeting space and the only district facility able to accommodate groups over 300 people. Even in milder times of the year the occupancy loads make the space uncomfortable. $500,000

● Replace roof on media center. The existing roof has reached the end of its useful life and we continue to have repairs. To prevent water infiltration this section should be replaced. $600,000.

● Renovation to the culinary classroom at LHS. The existing culinary room does not efficiently support the curriculum needs of the students and as with the remainder of the building is in need of renovation. $75,000.

● Replace turf field scoreboard. The new turf field is a multi-sports field including football, soccer and lacrosse. The existing scoreboard was set up for football only. There is the possibility of the vendor moving the existing scoreboard to Crandall field at no cost. $70,000

● Tennis courts will need to be resurfaced. This is a normal cycle occurring every 10-15 years, $50,000

● Paving of the parking area. The parking lot has drainage and design issues, multiple potholes and broken or missing curbing. $1,500,000.

● PA Replacement. $10,000

● Add an elevator to the lower level. The current lower level of the High School is limited to access via stairs. There is no current accessibility access to the lower level. $325,000

● Additional capital items of lower priority for Ledyard High School are detailed in the full report

Gallup Hill School
169 Gallup Hill Rd

Gallup Hill School (PK-5) is a 80,000 square foot building, renovated and expanded in 2019. Due to the renovation there are limited needs.

Ledyard Middle School
1860 Route 12

Renovated and expanded in 2019, Ledyard Middle School is a 93,000 square foot building. Serving students in 6th to 8th grade. Due to the renovation there are limited capital needs at this time.

- The current design of the Middle School Cafeteria is undersized for the student population. It does not provide seating for a single grade level for lunch, causing program impacts. $600,000

Board of Education - Capital Improvement Plan FY2027

24-Sep-25

BONDABLE ITEMS

Page #	Line #	Rank	Project Title or Item Requested	Location	Evaluation Category	Alternate Financing	FY 2027	FY 2028	FY 2029	FY 2030	FY 2031	FY 2032	FY 2033	FY 2034	FY 3035	Total
13	1	20	Boiler heating system Replacement & BMS system	LHS	DF	DAS Grant		$20,000,000								$20,000,000
14	2	36	Parking Lot	LHS	DF	None				$1,500,000						$1,500,000
15	3	18	Window Replacement	LHS	DF	DAS Grant		$3,500,000								$3,500,000
16	4	34	Add Elevator to Lower Level	LHS	NEF	DSF						$350,000				$350,000
17	5	23	LHS Classroom Ventilation and Air Conditioning	LHS	DF	DAS Grrant		$21,250,000								$21,250,000
18	6	33	LHS roof replacement	LHS	SR	None						$8,000,000				$8,000,000
19	7	24	Replace Roof on Media Center	LHS	DF	DAS Grant		$525,000								$525,000
20	8	22	LHS Auditorium Air Conditioning	LHS	NEF	DAS Grant		$500,000								$450,000
21	9	21	Expand LMS Cafeteria	LMS	NEF	None	$600,000									$600,000
22	10	35	Window Replacement	JWL	IOE	DAS Grant					$1,200,000					$1,200,000
23	11	37	Parking Lot	JWL	DF	None			$500,000							$500,000
							$ 600,000.00	**$ 45,775,000.00**	**$ 500,000.00**	**$ 1,500,000.00**	**$ 1,200,000.00**	**$ 8,350,000.00**	**$ -**	**$ -**	**$ -**	**$ 57,875,000.00**

Evaluation Categories:

- Risk to Public Health
- Deteriorated Facility
- Systematic Replacement
- Improvement of Operating Efficiency
- Coordination
- Equitable Provision of Services
- New or Expanded Facilities

State grant requirements currently allow towns to approve only the town share of project costs instead of the total project cost.

Board of Education - Capital Improvement Plan FY2027

24-Sep-25

Possible Grant Funding

Page #	Line #	Project Title or Item Requested	Location	Evaluation Category	Alternate Financing	FY2027	FY Other	SDE Grant %	SDE Grant	Net Cost to Ledyard
13	**1**	Boiler heating system Replacement & BMS system	LHS	DF	Possible SDE Grant		$20,000,000	62.14%	$12,428,000.00	$7,572,000.00
14	**2**	Parking Lot	LHS	DF	None		$1,500,000	62.14%		$1,500,000.00
15	**3**	Window Replacement	LHS	DF	SDE Grant		$3,500,000	62.14%	$2,174,900.00	$1,325,100.00
16	**4**	Add Elevator to Lower Level	LHS	NEF	SDE Grant		$325,000	62.14%	$201,955.00	$123,045.00
17	**5**	Classroom Ventilation and Air Conditioning	LHS	DF	SDE Grant		$21,250,000	62.14%	$13,204,750.00	$8,045,250.00
18	**6**	LHS Main Roof Replacement	LHS	DF	SDE Grant		$8,000,000	62.14%	$4,971,200.00	$3,028,800.00
19	**7**	Replace Roof on Media Center	LHS	DF	SDE Grant		$600,000	62.14%	$372,840.00	$227,160.00
20	**8**	Auditorium Air Conditioning	LHS	DF	SDE Grant		$450,000	62.14%	$279,630.00	$170,370.00
21	**9**	Expand LMS Cafeteria	LMS	NEF	None	$600,000		62.14%	$372,840.00	$600,000.00
22	**10**	Window Replacement	JWL	IOE	SDE Grant		$600,000	62.14%	$372,840.00	$227,160.00
23	**11**	Parking Lot	JWL	DF	None		$400,000	62.14%		$400,000.00
						$600,000	**$56,625,000**			

Evaluation Categories:

RPH	Risk to Public Health
DF	Deteriorated Facility
SR	Systematic Replacement
IOE	Improvement of Operating Efficiency
C	Coordination
EPS	Equitable Provision of Services
NEF	New or Expanded Facilities

State grant requirements currently allow towns to approve only the town share of project costs instead of the total project cost.

Bondable Escalation Costs

Page #	Line #	Item	Location	FY27	FY28	FY29	FY30	FY31	FY32	FY33	FY34	FY35	FY36
13	1	Boiler heating system Replacement & BMS system	LHS		$20,000,000	$20,600,000	$21,218,000	$21,854,540	$22,510,176	$23,185,481	$23,881,046	$24,597,477	$25,335,402
14	2	Parking Lot	LHS				$1,500,000	$1,545,000	$1,591,350	$1,639,091	$1,688,263	$1,738,911	$1,791,078
15	3	Window Replacement	LHS		$3,500,000	$3,605,000	$3,713,150	$3,824,545	$3,939,281	$4,057,459	$4,179,183	$4,304,559	$4,433,695
16	4	Add Elevator to Lower Level	LHS						$350,000	$360,500	$371,315	$382,454	$393,928
17	5	LHS Classroom Ventilation and Air Conditioning	LHS		$21,250,000	$21,887,500	$22,544,125	$23,220,449	$23,917,062	$24,634,574	$25,373,611	$26,134,820	$26,918,864
18	6	LHS roof replacement	LHS						$8,000,000	$8,240,000	$8,487,200	$8,741,816	$9,004,070
19	7	Replace Roof on Media Center	LHS		$525,000	$540,750	$556,973	$573,682	$590,892	$608,619	$626,877	$645,684	$665,054
20	8	Auditorium Air Conditioning	LHS		$500,000	$515,000	$530,450	$546,364	$562,754	$579,637	$597,026	$614,937	$633,385
21	9	Expand LMS Cafeteria	LMS	$600,000	$618,000	$636,540	$655,636	$675,305	$695,564	$716,431	$737,924	$760,062	$782,864
22	10	Window Replacement	JWL					$1,200,000	$1,236,000	$1,273,080	$1,311,272	$1,350,611	$1,391,129
23	11	Parking Lot	JWL			$500,000	$515,000	$530,450	$546,364	$562,754	$579,637	$597,026	$614,937
		Total		**$600,000**	**$46,393,000**	**$48,284,790**	**$51,233,334**	**$53,970,334**	**$63,939,444**	**$65,857,627**	**$67,833,356**	**$69,868,357**	**$71,964,407**

Evaluation Categories:

Risk to Public Health

Deteriorated Facility

Systematic Replacement

Improvement of Operating Efficiency

Coordination

Equitable Provision of Services

New or Expanded Facilities

Form 1. Individual project proposal descriptions and justifications

Prepared by:Wayne Donaldson **Date Prepared**: December 1, 2021
Project title:LHS Boiler Heating System **Program Area**: Facilities Replacement

Line 1

Project Description: The existing boilers at Ledyard High School are original to the building and are 63 years old. There are currently a limited number of companies that continue to service these types of boilers. During the repairs in 2020 we were advised that the amount of repairs has downgraded the metal and future repairs are questionable. Conversion from steam to hot water should be considered. This will generate energy savings of between 13-27% on oil costs. Replacement of the current pneumatic thermostat system is also recommended to allow better control of the heating cycle.

Evaluation Category: Deteriorated Facility

Planning Context: Order time on the boilers will be long so the maximum time frame from approval to commencement of work should be allowed. Time will also be needed for engineering and design.

Schedule: Late Spring to early Fall.

Coordination: Will depend on the final plan and amount of project approved.

Previous Town Meeting Action: Previous repairs were paid for in the operating budget which carries a $22,000 repair item

Project Priority: 20
H Priority within department / program area
H Risk of deferring project

Estimated Cost: $20,000,000 / 2028

Escalation Costs: 2029 $20,600,000 2032 $22,510,176 2035 $24,597,477

Basis of cost estimate:

__ Cost of comparable facility or equipment.
__ Rule of thumb indicator, unit cost
X From the cost estimate from architect engineer, or vendor
__ From Bids Received
__ Preliminary Estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: Possible US DEEP or State School Facilities grant funding

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared:** December 1, 2021

Project title: LHS Parking Lot **Program Area:** Facilities

Line 2

Project Description: The Ledyard High School parking lot is in need of resurfacing. It ponds water and has multiple cracks and potholes. The District has cut out and replaced small sections that created especially dangerous walking conditions over the past few years. Broken curbing prevents the proper diversion of rain water to the catch basins.

Evaluation Category: Deteriorated Facility

Planning Context: Needs to be scheduled around school and town events.

Schedule: Summer

Coordination: none

Previous Town Meeting Action: none

Project Priority: 36
L Priority within department / program area
M Risk of Deferring Project

Estimated Cost: $1,500,000 / 2030

Escalation Costs: 2032 $1,591,350 2034 $1,688,263 2036 $1,791,078

__ Cost of Comparable Facility or Equipment
X_ Rule of Thumb Indicator, Unit Cost
__ Cost Estimate from Architect, Engineer or Vendor
__ From Bids Received
__ Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared**: December 1, 2021

Project title: LHS Window Replacement **Program Area**: Facilities

Line 3

Project Description: Windows in the original section of the building are in need of replacement. The windows are original to the building and no longer meet the current energy codes. Many windows do not function or are difficult to operate. Replacement will result in energy savings and a better ability to control the room temperature with less drafts.

Evaluation Category: Deteriorated Facility/Improvement of Operating Effiency

Planning Context: If possible this should be coordinated with the boiler and heating system replacement or before. The quality of the windows will affect the sizing of the system and should provide savings on the heating system and boiler change over.

Schedule: Summer

Coordination: None

Previous Town Meeting Action: None

Project Priority: 18
L Priority within department / program area
L Risk of Deferring Project

Estimated Cost: $3,500,000 / 2027

Escalation Costs: 2030 $3,824,545 2033 $4,179,183 2036 $4,566,706

__ Cost of Comparable Facility or Equipment
__ Rule of Thumb Indicator, Unit Cost
_X Cost Estimate from Architect, Engineer or Vendor
__ From Bids Received
__ Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: Possible state school facilities grant funding

Form 1. Individual Project Proposal Descriptions and Justification

Prepared by: Wayne Donaldson **Date Prepared**: December 1, 2021

Project Title: LHS Elevator LL Addition **Program Area**: School Facilities

Line 4

Project Description: The existing lower level of the school does not have elevator access. At some point an ADA conformity inspection will require HC access to the lower level if it continues to be used.

Evaluation Category: Equitable Provision of Services/New or Expanded Facilities

Planning Context: Needs to be scheduled for summer work.

Schedule: Summer.

Coordination: None.

Previous Town Meeting Action: None.

Project Priority: 34
L Priority within department/program area
L Risk of deferring project

Estimated Cost: 2032 $350,000

Escalation Costs: 2034 $371,315 2036 $393,928

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.

__ Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
X Cost estimate from engineer, architect, or vendor
__ From bids received
__ Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: This project should be covered under the State School facilities grant for code compliance. The current reimbursement rate is 62.14%.

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared**: December 1, 2021

Project title: Classroom air conditioning **Program Area**: Facilities & ventilation

Line 5

Project Description: The warmer early spring days and the higher temps into September and October make portions of Ledyard High School excessively warm. This creates a poor learning environment. This combined with the lack of ventilation to control CO2 levels results in students becoming less than attentive. This will bring the High School in parity with the other schools in the district.

Evaluation Category: New or Expanded Facilities/Improvement of Operating Effiency/Equitable Provision of Services

Planning Context: Project will need 6-8 months minimum for engineering and material acquisition. Project may need to be completed over 2 years. This should also be completed after the window project.

Schedule: Summer

Coordination: None but may want to look to see if this should be combined with the heating project.

Previous Town Meeting Action: None

Project Priority: 23

L Priority within department / program area

L Risk of Deferring Project

Estimated Cost: $21,250,000 / 2028

Escalation Costs: 2029 $21,887,500 2032 $23,917,062 2035 $26,134,820

__ Cost of Comparable Facility or Equipment

__ Rule of Thumb Indicator, Unit Cost

X_ Cost Estimate from Architect, Engineer or Vendor

__ From Bids Received

__ Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: Possible state school facilities grant funding

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared**: December 1, 2021

Project title: LHS Roof Replacement **Program Area:** Facilities

Line 6

Project Description: The Ledyard High School roof will reach the end of its useful life in 2032. To prevent structural damage the roof should be scheduled for replacement.

Evaluation Category: Deteriorated Facility/Systematic Replacement

Planning Context: To allow for State funding this should be released at minimum 1 year in advance.

Schedule: Summer

Coordination: None

Previous Town Meeting Action: None

Project Priority: 33

M Priority within department / program area

M Risk of Deferring Project

Estimated Cost: $8,000,000 / 2032

Escalation Costs: 2034 $8,487,200 2036 $9,004,070

__ Cost of Comparable Facility or Equipment

__ Rule of Thumb Indicator, Unit Cost

_X Cost Estimate from Architect, Engineer or Vendor

__ From Bids Received

__ Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: State School Facilities Grant currently 62.14% of eligible project costs.

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared:** December 1, 2021

Project title: LHS Media Center Roof **Program Area**: Facilities

Line 7

Project Description: The Ledyard High School Media Center roof has reached the end of its useful life and is over 20 years old. There are consistent leaks and to prevent structural damage the roof should be scheduled for replacement.

Evaluation Category: Deteriorated Facility/Systematic Replacement

Planning Context: To allow for State funding this should be released at minimum 1 year in advance.

Schedule: Summer

Coordination: None

Previous Town Meeting Action: None

Project Priority: 24

M Priority within department / program area

M Risk of Deferring Project

Estimated Cost: $525,000 / 2028

Escalation Costs: 2029 $540,750 2032 $590,892 2035 $645,684

__ Cost of Comparable Facility or Equipment

__ Rule of Thumb Indicator, Unit Cost

X Cost Estimate from Architect, Engineer or Vendor

__ From Bids Received

__ Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: State School Facilities Grant currently 62.14% of eligible project costs.

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldso **DatePrepared**: December 1, 2021

Project title: LHS Auditorium AC **Program Area**: Facilities

Line 8

Project Description: Currently there is no Air conditioning in the school auditorium. The space is used by the school, town and outside organizations for meetings along with musical and theatrical programs.

Evaluation Category: New or Expanded Facilities

Planning Context: This may stand alone or combined with the Classroom AC project for savings of scale.

Schedule: Summer

Coordination: Possibly with the Classroom AC project

Previous Town Meeting Action: None

Project Priority: 22

L Priority within department / program area

L Risk of Deferring Project

Estimated Cost: 2027 $500,000

Escalation Costs: 2029 $530,450 2032 $579,637 2035 $633,385

__ Cost of Comparable Facility or Equipment

__ Rule of Thumb Indicator, Unit Cost

X Cost Estimate from Architect, Engineer or Vendor

__ From Bids Received

__ Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: Possible state school facilities grant funding

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared**: December 1, 2021

Project title: LMS Cafeteria Expansion **Program Area**: Facilities

Line 9

Project Description: The design of the LMS cafeteria does not allow for an entire grade level to have lunch as one body. Additional space is needed to alleviate overcrowding and maintain each grade level as a harmonious group.

Evaluation Category: Improvement of Operating Efficiency / Equitable Provision of Services

Planning Context: Allow one budget cycle for State Funding.

Schedule: Summer

Coordination: None

Previous Town Meeting Action: None

Project Priority: 21

M Priority within department / program area

M Risk of Deferring Project

Estimated Cost: $600,000 / 2027

Escalation Costs: 2030 $655,636 2033 $716,431 2036 $782,864

__ Cost of Comparable Facility or Equipment

__ Rule of Thumb Indicator, Unit Cost

X Cost Estimate from Architect, Engineer or Vendor

__ From Bids Received

__ Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: Possible State School Facilities Grant currently 62.14% of eligible project costs.

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepare**d: December 1, 2021
Project title: JWL Window replacement **Program Area**: Facilities

Line 10

Project Description: The windows at JWL no longer meet the energy standards, creating drafty classrooms and significant heat loss.

Evaluation Category: Improvement of Operating Efficiency

Planning Context: Allow one budget cycle for State Funding.

Schedule: Summer

Coordination: None

Previous Town Meeting Action: None

Project Priority: 35
M Priority within department / program area
M Risk of Deferring Project

Estimated Cost: $1,200,000 / 2031

Escalation Costs: 2032 $1,236,000 2034 $1,311,272 2036 $1,391,129

__ Cost of Comparable Facility or Equipment
__ Rule of Thumb Indicator, Unit Cost
__ Cost Estimate from Architect, Engineer or Vendor
__ From Bids Received
X Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: State School Facilities Grant currently 62.14% of eligible project costs.

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared**: December 1, 2021

Project title: JWL repave parking lot **Program Area:** Facilities

Line 11

Project Description: The JWL parking lot has deteriorated showing many cracks and potholes. The district has completed some significant patching but plans need to be made for total replacement.

Evaluation Category: Deteriorated Facility

Planning Context: Needs to be done during a period with no building use.

Schedule: Summer

Coordination: None

Previous Town Meeting Action: None

Project Priority: 37

M Priority within department / program area

M Risk of Deferring Project

Estimated Cost: $500,000 / 2029

Escalation Costs: 2032 $546,364 2034 $579,637 2036 $614,937

__ Cost of Comparable Facility or Equipment

__ Rule of Thumb Indicator, Unit Cost

__Cost Estimate from Architect, Engineer or Vendor

__ From Bids Received

_X Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Board of Education - Capital Improvement Plan FY2027

24-Sep-25

Capital Items

Page #	Line #	Rank	Project Title or Item Requested	Funds Source	Location	Evaluation Category	Alternate Financing	FY 2027	FY 2028	FY 2029	FY 2030	FY2031	FY2032	FY2033	FY2034	FY2035	FY2036	Total
29	1	1	LHS Study	Tax Levy	LHS	DF		$ 75,000.00										
30	2	25	LHS LL Bathrooms	Tax Levy	LHS	DF				$ 85,000.00								$ 85,000.00
31	3	26	LHS LL Locker rooms	Tax Levy	LHS	DF					$ 125,000.00							$ 125,000.00
32	4	2	LHS Boiler/Heating System Repairs	Tax Levy	LHS	DF/SR		$ 22,500.00										$ 22,500.00
33	5	30	Electrostatic Painting of Lockers	Tax Levy	LHS	DF									$ 50,000.00			$ 50,000.00
34	6	6	Science Labaratory Upgrades	Tax Levy	LHS	DF/EPS			$ 138,000.00	$ 142,000.00	$ 145,000.00							$ 425,000.00
35	7	38	Culinary room renovations	Tax Levy	LHS	IOE/C				$ 75,000.00								$ 75,000.00
36	8	28	Resurface Tennis courts	Tax Levy	LHS	IOE			$ 50,000.00									$ 50,000.00
37	9	29	Outdoor Athletics Lavs/Storage	Tax Levy	LHS	NEF/IOE										$ 200,000.00		$ 200,000.00
38	10	16	Replace turf field scoreboard	Tax Levy	LHS	NEF/IOE			$ 70,000.00									$ 70,000.00
39	11	19	Varsity lockerroom renovation	Tax Levy	LHS	DF				$ 150,000.00								$ 150,000.00
40	12	10	Athletic lockerroom renovation	Tax Levy	LHS	DF				$ 150,000.00								$ 150,000.00
41	13	27	Replacement field lights	Tax Levy	LHS	DF/IOE					$ 125,000.00							$ 125,000.00
42	14	5	Replace PA system	Tax Levy	LHS	DF/SR		$ 10,000.00										$ 6,000.00
43	15	31	LHS Bleachers	Tax Levy	LHS	DF/C			$ 200,000.00									$ 200,000.00
44	16	17	LHS Gym Dividing Wall	Tax Levy	LHS	DF/C			$ 35,000.00									$ 35,000.00
45	17	32	LHS Gym Padding	Tax Levy	LHS	DF/C			$ 30,000.00									$ 30,000.00
46	18	15	Replace sewer piping	Tax Levy	LHS	DF/RPH				$ 70,000.00								$ 70,000.00
47	19	11	LHS Softball Field Renovation	Tax Levy	LHS	DF/SR			$ 45,000.00									$ 45,000.00
48	20	7	JWL Classroom renovations	Tax Levy	JWL	DF/IOE/C		$ 140,000.00	$ 143,000.00	$ 146,000.00								$ 429,000.00
49	21	12	JWL Basketball Court Pavement	Tax Levy	JWL	DF			$ 70,000.00									$ 70,000.00
50	22	3	Replace PA system	Tax Levy	JWL	DF/SR		$ 6,000.00										$ 6,000.00
51	23	8	Replacement Truck	Tax Levy	C/O	IOE		$ 80,000.00										$ 80,000.00
52	24	9	Trailer	Tax Levy	District			$ 5,000.00										$ 5,000.00
53	25	13	GFS Playground Surfaces	Tax Levy	GFS	SR			$ 50,000.00									$ 50,000.00
54	26	4	Replace PA system	Tax Levy	GFS	DF/SR		$ 6,000.00										$ 6,000.00
55	27	14	Turf Playground	Tax Levy	GHS	DF		$ 47,000.00										
			Evaluation Categories:															
	RPH		Risk to Public Health					**$ 269,500.00**	**$ 831,000.00**	**$ 818,000.00**	**$ 395,000.00**	**$ -**	**$ -**	**$ -**	**$ 50,000.00**	**$ 200,000.00**	**$ -**	**$ 2,559,500.00**
	DF		Deteriorated Facility															
	SR		Systematic Replacement															
	IOE		Improvement of Operating Efficiency															
	C		Coordination															
	EPS		Equitable Provision of Services															

State grant requirements currently allow towns to approve only the town share of project costs instead of the total project cost.

Capital Items Cost Escalation

Page #	Line #	Project Title or Item Requested	Funds source	Location	Evaluation Category	Alternate Financing	FY 2027	FY 2028	FY 2029	FY2030	FY2031	FY2032	FY2033	FY2034	FY2035
29	1	LHS Study	Tax Levy	LHS	DF		$75,000	$77,250	$79,568	$81,955	$84,413	$86,946	$89,554	$92,241	$95,008
30	2	LHS LL Bathrooms	Tax Levy	LHS	DF				$85,000	$87,550	$90,177	$92,882	$95,668	$98,538	$101,494
31	3	LHS LL Locker rooms	Tax Levy	LHS	DF					$125,000	$128,750	$132,613	$136,591	$140,689	$144,909
32	4	LHS Boiler/Heating System Repairs	Tax Levy	LHS	DF/SR	Tax Levy	$22,500	$23,175	$23,870	$24,586	$25,324	$26,084	$26,866	$27,672	$28,502
33	5	Electrostatic Painting of Lockers	Tax Levy	LHS	DF									$50,000	$51,500
34	6	Science Labaratory Upgrades	Tax Levy	LHS	DF/EPS	Tax Levy		$138,000	$142,000	$145,000	$149,350	$153,831	$158,445	$163,199	$168,095
35	7	Culinary room renovations	Tax Levy	LHS	IOE/C				$75,000	$77,250	$79,568	$81,955	$84,413	$86,946	$89,554
36	8	Resurface Tennis courts	Tax Levy	LHS	IOE			$50,000	$51,500	$53,045	$54,636	$56,275	$57,964	$59,703	$61,494
37	9	Outdoor Athletics Lavs/Storage	Tax Levy	LHS	NEF/IOE										$200,000
38	10	Replace turf field scoreboard	Tax Levy	LHS	NEF/IOE			$70,000	$72,100	$74,263	$76,491	$78,786	$81,149	$83,584	$86,091
39	11	Varsity lockerroom renovation	Tax Levy	LHS	DF				$150,000	$154,500	$159,135	$163,909	$168,826	$173,891	$179,108
40	12	Athletic lockerroom renovation	Tax Levy	LHS	DF				$150,000	$154,500	$159,135	$163,909	$168,826	$173,891	$179,108
41	13	Replacement field lights	Tax Levy	LHS	DF/IOE					$125,000	$128,750	$132,613	$136,591	$140,689	$144,909
42	14	Replace PA System	Tax Levy	LHS	DF/DR	None	$10,000	$10,300	$10,609	$10,927	$11,255	$11,593	$11,941	$12,299	$12,668
--		LHS Gym	Tax Levy												
43	15	LHS Bleachers	Tax Levy	LHS	DF/C			$200,000	$206,000	$212,180	$218,545	$225,102	$231,855	$238,810	$245,975
44	16	LHS Gym Dividing Wall	Tax Levy	LHS	DF/C			$35,000	$36,050	$37,132	$38,245	$39,393	$40,575	$41,792	$43,046
45	17	LHS Gym Padding	Tax Levy	LHS	DF/C			$30,000	$30,900	$31,827	$32,782	$33,765	$34,778	$35,822	$36,896
46	18	Replace sewer piping	Tax Levy	LHS	DF/RPH	Tax Levy			$70,000	$72,100	$74,263	$76,491	$78,786	$81,149	$83,584
47	19	LHS Softball Field Renovation	Tax Levy	LHS	DF/SR	Tax Levy		$45,000	$46,350	$47,741	$49,173	$50,648	$52,167	$53,732	$55,344
48	20	JWL Classroom renovations	Tax Levy	JWL	DF/IOE/C	Tax Levy	$140,000	$143,000	$146,000	$150,380	$154,891	$159,538	$164,324	$169,254	$174,332
49	21	JWL Playground Pavement	Tax Levy	JWL	DF			$70,000	$72,100	$74,263	$76,491	$78,786	$81,149	$83,584	$86,091

Capital Items Cost Escalation

Page #	Line #	Project Title or Item Requested	Funds source	Location	Evaluation Category	Alternate Financing	FY 2027	FY 2028	FY 2029	FY2030	FY2031	FY2032	FY2033	FY2034	FY2035
50	22	Replace PA System	Tax Levy	JWL	DF/SR	None	$6,000	$6,180	$6,365	$6,556	$6,753	$6,956	$7,164	$7,379	$7,601
51	23	Replacement Truck	Tax Levy	C/O	IOE		$80,000	$82,400	$84,872	$87,418	$90,041	$92,742	$95,524	$98,390	$101,342
52	24	Trailer	Tax Levy	District	IOE		$5,000	$5,150	$5,305	$5,464	$5,628	$5,796	$5,970	$6,149	$6,334
53	25	GFS Playground Surfaces	Tax Levy	GFS	SR			$50,000	$51,500	$53,045	$54,636	$56,275	$57,964	$59,703	$61,494
54	26	Replace PA System	Tax Levy	GFS	DF/SR	None	$6,000	$6,180	$6,365	$6,556	$6,753	$6,956	$7,164	$7,379	$7,601
55	27	Turf Playground	Tax Levy	GHS	DF		$47,000	$48,410	$49,862	$51,358	$52,899	$54,486	$56,120	$57,804	$59,538
							$263,500	**$958,205**	**$1,515,521**	**$1,809,727**	**$1,864,019**	**$1,919,939**	**$1,977,537**	**$2,086,863**	**$2,349,469**

Evaluation Categories:

Risk to Public Health

Deteriorated Facility

Systematic Replacement

Improvement of Operating Efficiency

Coordination

Equitable Provision of Services

New or Expanded Facilities

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson
Date Prepared: September 29, 2025
Project title: LHS Study
Program Area: Facilities

Line 1

Project Description: Contract for a comprehensive plan for the modernization needs of Ledyard High School. Repairs composed to renovate as new cost to include reimbursement by the state

Evaluation Category: Deteriorated Facility

Planning Context: Should be completed before the next budget cycle

Schedule: Summer 2026

Coordination: None

Previous Town Meeting Action: None

Project Priority: 1

H Priority within department/program area
H Risk of Deferring Project

Estimated Cost: 2027 $75,000

Escalation Costs: 2029 $79,568 2031 $84,413 2034 $92,941

__Cost of Comparable Facility or Equipment
__Rule of Thumb Indicator, Unit Cost
X Cost Estimate from Architect, Engineer or Vendor
__From Bids Received
__Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared**: December 1, 2021

Project title: LHS LL Restrooms **Program Area**: Facilities

Line 2

Project Description: The lower level restrooms have not been updated since the school opened and are in extremely poor condition. Part of upgrades to LHS

Evaluation Category: Deteriorated Facility

Planning Context:

Schedule: Anytime

Coordination: None

Previous Town Meeting Action: None

Project Priority: 25
L Priority within department / program area
L Risk of Deferring Project

Estimated Cost: $85,000/ 2029

Escalation Costs: 2031 $90,177 2033 $95,668 2035 $101,494

_X_ Cost of Comparable Facility or Equipment
___ Rule of Thumb Indicator, Unit Cost
___ Cost Estimate from Architect, Engineer or Vendor
__ From Bids Received
___ Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared**: December 1, 2021

Project title: LHS LL Locker Rooms **Program Area:** Facilities

Line 3

Project Description: The lower level locker rooms at Ledyard High School are original to the school building. These rooms are in desperate need of remodeling. These locker rooms will also service the Emergency Operations Center if there is a need to man for an extended period of time.

Evaluation Category: Deteriorated Facility

Planning Context: Part of the upgrade to LHS

Schedule: Summer

Coordination: None

Previous Town Meeting Action: None

Project Priority: 26
M Priority within department / program area
M Risk of Deferring Project

Estimated Cost: 2030 $125,000

Escalation Costs: 2031 $128,750 2033 $136,591 2035 $144,909

_X Cost of Comparable Facility or Equipment
__ Rule of Thumb Indicator, Unit Cost
__ Cost Estimate from Architect, Engineer or Vendor
__ From Bids Received
__ Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared**: December 1, 2021

Project title: LHS Boiler Repairs **Program Area**: Facilities

Line 4

Project Description: The boilers at LHS will require Re-Tubing in the near future. During the yearly inspections we are observing more and more pitting of the metal and a few of the tubes have failed and been sealed. This request is to allow for reasonable emergency repairs without seeking additional funds.

Evaluation Category: Deteriorated Facility

Planning Context: Provide funds for expected needed repairs to the boilers

Schedule: As needed

Coordination: None

Previous Town Meeting Action: yearly approval

Project Priority: 2
M Priority within department / program area
M Risk of Deferring Project

Estimated Cost: 2026 $22,500

Escalation Costs: 2029 $24,586 2032 $26,866 2035 $29,357

__ Cost of Comparable Facility or Equipment
__ Rule of Thumb Indicator, Unit Cost
_X Cost Estimate from Architect, Engineer or Vendor
__ From Bids Received
__ Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared**: December 1, 2021

Project title: LHS Electrostatic painting of lockers **Program Area**: Facilities

Line 5

Project Description: As part of the ongoing renovations to LHS the existing lockers are original to the building and are in need of rehabilitation. This will provide funds to repaint the existing lockers

Evaluation Category: Deteriorated Facility

Planning Context: Part of the larger program to update the facilities at LHS

Schedule: Summer

Coordination: None

Previous Town Meeting Action: None

Project Priority: 30
L Priority within department / program area
L Risk of Deferring Project

Estimated Cost: 2034 $50,000

Escalation Costs: 2035 $51,500

__ Cost of Comparable Facility or Equipment
__ Rule of Thumb Indicator, Unit Cost
__ Cost Estimate from Architect, Engineer or Vendor
__ From Bids Received
X Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual Project Proposal Descriptions and Justification

Prepared by: Wayne Donaldson **Date Prepared:** December 1,2021

Project Title: LHS Science Labs **Program Area:** School Facilities

Line 6

Project Description: Continuation of project to address safety issues in LHS Science labs, renovate and modernize. As next generation science standards come into play, the need for these renovations will increase.

Evaluation Category: Deteriorated Facility

Planning Context: Second floor lab renovations completed previously between 2007-2010, 2023, and 2024. Plan is to renovate the remaining three laboratories.

Schedule: Summer work would be necessary to provide the least interference with student activity.

Coordination: Work is not contingent upon other CIP projects.

Previous Town Meeting Action: Previous renovations funded by Town through CNR.

Project Priority: 6
M priority within department/program area
L Risk of deferring project

Estimated Cost: 2028: $138,000; 2029: $142,000; 2030: $145,000

Escalation Costs: 2031 $149,350 2033 $158,445 2035 $168,095

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.

X Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
__ From the cost estimate from engineer, architect, or vendor .
__ From bids received
__ Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: None.

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared:** December 1, 2021

Project title: LHS Culinary room renovations **Program Area:** Facilities

Line 7

Project Description: The culinary room at LHS is a hodgepodge of work areas with wiring running across floors to service refrigeration units. There is no clear view for the teacher to see every work area from one position. The ceiling lighting are original to the building. This is an ongoing part of the classroom renovations at Ledyard High School

Evaluation Category: Deteriorated Facility

Planning Context: Planning needs to occur well before implementation to allow for ordering of equipment.

Schedule: Summer

Coordination: None

Previous Town Meeting Action: None

Project Priority: 38
M Priority within department / program area
L Risk of Deferring Project

Estimated Cost: 2029 $75.000

Escalation Costs: 2030 $77,250 2032 $81,955 2034 $86,946

__ Cost of Comparable Facility or Equipment
__ Rule of Thumb Indicator, Unit Cost
__ Cost Estimate from Architect, Engineer or Vendor
__ From Bids Received
_X Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared:** December 1, 2021

Project title: LHS resurface tennis courts **Program Area:** Facilities

Line 8

Project Description: The tennis courts at Ledyard High School need regular resurfacing. It is estimated that they will need resurfacing again in 2028. This may change depending on use and weather.

Evaluation Category: Systematic Replacement

Planning Context: Preliminary time frame for resurfacing.

Schedule: Summer

Coordination: None

Previous Town Meeting Action: None

Project Priority: 28
H Priority within department / program area
M Risk of Deferring Project

Estimated Cost: 2028 $50,000

Escalation Costs: 2030 $53,045 2032 $56,275 2034 $59,703

__ Cost of Comparable Facility or Equipment
__ Rule of Thumb Indicator, Unit Cost
__ Cost Estimate from Architect, Engineer or Vendor
__ From Bids Received
_X Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared:** December 1, 2021

Project title: LHS outdoor athletic **Program Area:** Facilities storage & restrooms

Line 9

Project Description: Additions to the concession stand at the LHS field to create permanent restrooms and additional storage for athletic equipment.

Evaluation Category: New or Expanded Facilities

Planning Context: Long term upgrades to complete the athletic facilities complex.

Schedule: Summer

Coordination: None

Previous Town Meeting Action: None

Project Priority: 29
L Priority within department / program area
L Risk of Deferring Project

Estimated Cost: 2035 $200,000

Escalation Costs: NA

__ Cost of Comparable Facility or Equipment
__ Rule of Thumb Indicator, Unit Cost
__ Cost Estimate from Architect, Engineer or Vendor
__ From Bids Received
_X Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared:** December 1, 2021

Project title: LHS Score Board Replacement **Program Area:** Facilities

Line 10

Project Description: The new turf field is a multi-use field covering football soccer and lacrosse. The existing scoreboard was designed for football only. This will allow the proper display for all three sports. If the vendor's offer is still valid they offered to move the existing board to Crandall field free of charge. The Recreation Department would welcome the upgrade.

Evaluation Category: Equitable Provision of Services

Planning Context: This was an add alternate for the turf field project

Schedule: Summer
Coordination: Possibly with Recreation Department for the move of the current scoreboard to to Crandall field

Previous Town Meeting Action: Not authorized as part of the turf field project

Project Priority: 16

M Priority within department / program area

L Risk of Deferring Project

Estimated Cost: 2028 $70,000

Escalation Costs: 2029 $72,100 2032 $78,786 2035 $86,091

__ Cost of Comparable Facility or Equipment
__ Rule of Thumb Indicator, Unit Cost
__ Cost Estimate from Architect, Engineer or Vendor
X From Bids Received
__ Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual Project Proposal Descriptions and Justification

Prepared by: Wayne Donaldson **Date Prepared:** December 1, 2022

Project Title: LHS Varsity locker room renovation **Program Area:** School Facilities

Line 11

Project Description: The LHS locker rooms have not been renovated since installed. These funds will allow the installation of new wall covering, lockers and benches. We will also provide ADA compliant facilities.

Evaluation Category: Deteriorated Facility

Planning Context: This is part of the normal upgrade of facilities at LHS

Schedule: Summer work contract.

Coordination: None

Previous Town Meeting Action: No previous Town action.

Project Priority: 19

H Priority within department/program area
L Risk of deferring project

Estimated Cost: 2029: $150,000

Escalation Costs: 2030 $154,500 2032 $163,909 2034 $173,891

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.

__ Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
_X From the cost estimate from engineer, architect, or vendor
__ From bids received
__ Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: None

Form 1. Individual Project Proposal Descriptions and Justification

Prepared by: Wayne Donaldson **Date Prepared:** December 1, 2022

Project Title: LHS Athletic locker room renovation **Program Area:** School Facilities

Line 12

Project Description: The LHS locker rooms have not been renovated since installed. These funds will allow the installation of new wall covering, lockers and benches. We will also provide ADA compliant facilities.

Evaluation Category: Deteriorated Facility

Planning Context: This is part of the normal upgrade of facilities at LHS **Schedule:**

Summer work contract.

Coordination: None

Previous Town Meeting Action: No previous Town action.

Project Priority: 10

H Priority within department/program area
L Risk of deferring project

Estimated Cost: 2029: $150,000

Escalation Costs: 2030 $154,500 2032 $163,909 2034 $173,891

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.

__Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
X From the cost estimate from engineer, architect, or vendor
__ From bids received
__ Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: None

Form 1. Individual Project Proposal Descriptions and Justification

Prepared by: Wayne Donaldson **Date Prepared:** December 1, 2022

Project Title: Replacement field lights **Program Area:** School Facilities

Line 13

Project Description: The current field lights at some point will need replacement bulbs and parts. At that point it would be an energy cost saving to upgrade the lights to LED. This will also provide savings in maintenance and the cost of lift rental to change the bulbs.

Evaluation Category: Systematic Replacement

Planning Context: Needs to be completed after enough of the existing lights fail.

Schedule: Winter or Summer

Coordination: None.

Previous Town Meeting Action: No previous Town action.

Project Priority: 27

H Priority within department/program area
L Risk of deferring project

Estimated Cost: $ 2030: $125,000

Escalation Costs: 2031 $128,750 2033 $136,591 2035 $144,909

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.

__ Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
__ From the cost estimate from engineer, architect, or vendor
__ From bids received
X Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: Energy incentives.

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared**: September 29, 2025

Project title: LHS Replace PA System **Program Area:** Facilities

Line 14

Project Description: PA system has reached the end of it's useful life. Continued repairs have been needed over the last few years

Evaluation Category: Deteriorated Facility / Risk to Public Health

Planning Context: It is critical the PA system is available in emergencies

Schedule: Anytime

Coordination: None

Previous Town Meeting Action: None

Project Priority: 5

Estimated Cost: 2027: $10,000

Escalation Costs: 2028 $10,300 2030 $10,927 2034 $12,299

__Cost of Comparable Facility or Equipment
__Rule of Thumb Indicator, Unit Cost
X Cost Estimate from Architect, Engineer or Vendor
__From Bids Received
__Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared:** December 1, 2021

Project Title: LHS Gym Bleacher Replacement **Program Area:** Facilities

Line 15

Project Description: The current bleachers at Ledyard High School do not meet the current ADA standards. The bleachers are original to the building and date back to 1963-64. The current bleachers when fully deployed come out on to the basketball playing floor. Currently during basketball games the bleachers are not fully deployed and lack positive stops and locking mechanisms.

Evaluation Category: Deteriorated Facility

Planning Context: Continuation of concerted effort to improve the conditions of athletic facilities.

Schedule: This work could take place at any time, scheduled around athletic seasons.

Coordination: Work is not contingent upon other CIP projects.

Previous Town Meeting Action: No previous Town action.

Project Priority: 31
M Priority within department/program area
L Risk of deferring project

Estimated Cost: 2028: $200,000

Escalation Costs: 2029 $206,000 2032 $225,102 2034 $238,810

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.

__ Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
_X From the cost estimate from engineer, architect, or vendor
__ From bids received
__ Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: None.

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared:** December 1, 2021

Project title: LHS Gym dividing wall replacement **Program Area:** School Facilities

Line 16

Project Description: The current dividing wall in the LHS gym is no longer in use due to problems opening and closing it. The solid wall also prevents teachers from viewing the entire gym space during class. The inability to divide the gym space limits the activities that can occur for physical education. Replacing the current divider with a drop down curtain/net will allow teachers full view of the activities in all areas of the gym.

Evaluation Category: Deteriorated Facility

Planning Context: Continuation of concerted effort to improve the conditions of athletic facilities.

Schedule: This work could take place at any time, scheduled around athletic seasons. **Coordination:** Work is not contingent upon other CIP projects.

Previous Town Meeting Action: No previous Town action.

Project Priority: 17
M Priority within department/program area
L Risk of deferring project

Estimated Cost: 2028 $35,000

Escalation Costs: 2029 $36,050 2031 $38,245 2034 $41,792

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.

__ Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
_X From the cost estimate from engineer, architect, or vendor
___ From bids received
___ Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: None.

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared:** December 1, 2021

Project Title: LHS Gym Padding **Program Area:** Facilities

Line 17

Project Description: The current wall pads in the LHS gym are in need of replacement. Individual panels have been replaced on doors during the installation of new doors and hardware. The wall padding in the gym has reached the end of its useful life and needs replacement.

Evaluation Category: Deteriorated Facility

Planning Context: Continuation of concerted effort to improve the conditions of athletic facilities.

Schedule: This work could take place at any time, scheduled around athletic seasons.

Coordination: Work is not contingent upon other CIP projects.

Previous Town Meeting Action: No previous Town action.

Project Priority: 32
M Priority within department/program area
L Risk of deferring project

Estimated Cost: 2028 $30,000

Escalation Costs: 2030 $31,827 2032 $33,765 2034 $35,822

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.

__ Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
_X From the cost estimate from engineer, architect, or vendor
__ From bids received
__ Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: None.

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared:** September 30, 2024

Project Title: LHS Sewer piping **Program Area:** School Facilities

Line 18

Project Description: The existing cast iron sewer piping at LHS is rotting out. We have had numerous leaks in the tunnels lower level and the Town Emergency Operations Center. This is proposed as a 4 year program to replace all of the sewer piping in LHS lower lever and tunnels. Cost is for material only.

Evaluation Category: Deteriorated Facility/ Risk to Public Health

Planning Context: The cost is for materials only with the labor supplied by the facilities department. Cost figures are the amount of work that can safely be completed during the summer break.

Schedule: Work needs to be completed over the summer break.

Coordination: None

Previous Town Meeting Action: None

Project Priority: 15

Estimated Costs: 2029 $70,000

Escalation Costs: 2030 $72,100 2032 $76,491

___ Cost of comparable facility or equipment
____Rule of thumb indicator, unit costs
____Cost estimate from engineer, architect, or vendor
____From bids received
__X__Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: None

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared:** October 23, 2024

Project title: LHS Softball Field Renovation **Program Area:** School Facilities

Line 19

Project Description: The current playing surface is unlevel creating bumps and holes where the ball can jump off the ground. These unexpected movements of the ball are dangerous and can create injury. These funds will be used to regrade the field to eliminate the bumps and realign the bases. We will also look at irrigation for the field.

Evaluation Category: Systematic Replacement/Deteriorated Facility

Planning Context: Continuation of concerted effort to improve the conditions of school athletic fields

Schedule: This work could take place during summer break or in the fall...

Coordination: Work is not contingent upon other CIP projects.

Previous Town Meeting Action: No previous Town action.

Project Priority: 11
M Priority within department/program area
L Risk of deferring project

Estimated Cost: $ 2028 $45,000

Escalation Costs: $2030 $47,741 2033 $52,167 2035 $55,344

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.
___Cost of comparable facility or equipment
____Rule of thumb indicator, unit costs
___ From the cost estimate from engineer, architect, or vendor
__ _ From bids received
_X_ Preliminary estimate, (e.g. no other basis for estimate, guesstimate)
Alternative Financing: None.

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared**: December 1, 2022

Project title: JWL Classroom renovations **Program Area**: Facilities

Line 20

Project Description: The classroom fixtures at JWL are original to the building. We have two brand new schools along with one relatively new school and current renovations of the classrooms at LHS ongoing will bring JWL to the standards that more closely match the needs of today's learning environment.

Evaluation Category: Deteriorated Facilities/Equitable Provision of Services

Planning Context: Upgrades to facilities are occurring throughout the district. This is the next step in that process.

Schedule: summer

Coordination: None

Previous Town Meeting Action: None

Project Priority: 7
M Priority within department / program area
M Risk of Deferring Project

Estimated Cost: 2027 $140,000, 2028 $143,000, 2029 $146,000

Escalation Costs: 2031 $154,891 2034 $169,254

__ Cost of Comparable Facility or Equipment
__ Rule of Thumb Indicator, Unit Cost
X Cost Estimate from Architect, Engineer or Vendor
__ From Bids Received
__ Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual Project Proposal Descriptions and Justification

Prepared by: Wayne Donaldson **Date Prepared**: December 1, 2021

Project Title: JWL Asphalt Resurface **Program Area**: School Facilities

Line 21

Project Description: The basketball court pavement at Juliet Long School has many cracks, heaves, and divots; many are becoming tripping/safety hazards. In addition to this, the drainage from the paved areas needs to be addressed, as currently pitch leads toward swing set areas; heavy rains lead to the washing away of playground surface mulching. The age of the pavement is uncertain, but the pavement is likely to be original. Approximate area: 2,800 square yards. Further study is needed to determine scope of work - if removal of existing asphalt will be necessary, or if these issues can be addressed without full scope of removal.

Evaluation Category: Deteriorated Facility

Planning Context: Chow-Lawler (1996) and SMMA (2011 studies) both spoke to the issue of playground surface needs.

Schedule: Summer work would provide the best conditions for the process, and the least interference with student activities, although it would interfere with Town P&R camp activity. Also, if coordinated with Town summer pavement projects, a substantial discount on material may be obtained.

Coordination: This work is not dependent on any other capital work.

Previous Town Meeting Action: No previous Town action.

Project Priority: 12
M Priority within department/program area
L Risk of deferring project

Estimated Cost: 2028 $70,000

Escalation Costs: 2029 $72,100 2031 $76,491 2034 $83,584

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.

__ Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
X From the cost estimate from engineer, architect, or vendor
__ From bids received
__ Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: None.

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared**: September 29, 2025

Project title: JWL Replace PA System **Program Area:** Facilities

Line 22

Project Description: PA system has reached the end of it's useful life. Continued repairs have been needed over the last few years

Evaluation Category: Deteriorated Facility / Risk to Public Health

Planning Context: It is critical the PA system is available in emergencies

Schedule: Anytime

Coordination: None

Previous Town Meeting Action: None

Project Priority: 3

Estimated Cost: 2027: $6,000

Escalation Costs: 2028 $6,180 2030 $6,556 2034 $7,379

__Cost of Comparable Facility or Equipment
__Rule of Thumb Indicator, Unit Cost
X Cost Estimate from Architect, Engineer or Vendor
__From Bids Received
__Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared:** December 1, 2021

Project title: Replacement Truck **Program Area**: Facilities

Line 23

Project Description: Vehicles need routine replacement. While mileage is relatively low for the age of our vehicles, the plowing and use during periods of heavy salt use in the winter take a toll on the undercarriage and frames. We have instituted a program of coating the frames and undercarriage parts each fall to limit the damage from the salts and deicing materials used on the roads. The current truck up for replacement is a 2010 and will be 17 years old when received if approved.

Evaluation Category: Systematic Replacement/Deteriorated Facility

Planning Context: Creating a schedule of replacement for vehicles to limit maintenance expenses and breakdowns.

Schedule: anytime

Coordination: None

Previous Town Meeting Action: None

Project Priority: 8

H Priority within department / program area

H Risk of Deferring Project

Estimated Cost: 2027 $80,000

Escalation Costs: 2028 $82,400 2031 $90,041 2034 $98,390

__ Cost of Comparable Facility or Equipment

__ Rule of Thumb Indicator, Unit Cost

_X Cost Estimate from Architect, Engineer or Vendor

__ From Bids Received

__ Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared**: September 29, 20

Project title: District Trailer **Program Area:** Facilities

Line 24

Project Description: Purchase trailer to allow transport of lifts between schools

Evaluation Category: Improvement of Operating Efficiency

Planning Context: Provide safe transportation of lifts between schools

Schedule: Anytime

Coordination: None

Previous Town Meeting Action: None

Project Priority: 9

Estimated Cost: 2027 $5,000

Escalation Costs: 2028 $5,150 2030 $5,464 2034 $6,149

X Cost of Comparable Facility or Equipment
__ Rule of Thumb Indicator, Unit Cost
__ Cost Estimate from Architect, Engineer or Vendor
__ From Bids Received
__ Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared:** December 1, 2021

Project Title: GFS Playground Surfaces **Program Area**: School Facilities

Line 25

Project Description: Gales Ferry School Playground has poured rubber surfaces, original to building construction (2001). Currently, the surface is in Fair condition; however, given their age, and the ten-year timespan of this Capital Request, it is prudent to expect replacement toward the end of the timespan.

Evaluation Category: Systematic Replacement

Planning Context: Further study necessary.

Schedule: Schedule will follow deterioration of surface conditions.

Coordination: Work is not contingent upon other CIP projects, however PMBC will obtain cost/benefit and lifecycle information on various playground substrates, which will aid in selection for this project.

Previous Town Meeting Action: No previous Town action.

Project Priority: 13

M Priority within department/program area

L Risk of deferring project

Estimated Cost: 2028: $50,000

Escalation Costs: 2029 $51,500 2032 $56,275 2035 $61,494

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.

__ Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
__ From the cost estimate from engineer, architect, or vendor
__ From bids received
X Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: None.

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared**: September 29,2025

Project title: GFS Replace PA System **Program Area:** Facilities

Line 26

Project Description: PA system has reached the end of it's useful life. Continued repairs have been needed over the last few years

Evaluation Category: Deteriorated Facility, Risk to Public Health

Planning Context: It is critical the PA system is available in emergencies

Schedule: Anytime

Coordination None

Previous Town Meeting Action: None

Project Priority: 4

Estimated Cost: 2027: $6,000

Escalation Costs: 2028 $6,180 2030 $6,556 2034 $7,379

__Cost of Comparable Facility or Equipment
__Rule of Thumb Indicator, Unit Cost
X Cost Estimate from Architect, Engineer or Vendor
__From Bids Received
__Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson
Date Prepared: December 1, 2025
Project title: GHS Turf Playground
Program Area: Facilities

Line 27

Project Description: Install turf-like material in the grass playground area, which is all mud.

Evaluation Category: Deteriorated Facility

Planning Context: None

Schedule: Summer 2026

Coordination: None

Previous Town Meeting Action: None

Project Priority: 14

M Priority within department/program area
M Risk of Deferring Project

Estimated Cost: 2027 $47,000

Escalation Costs: 2028 $48,410 2030 $51,358 2033 $56,120

__Cost of Comparable Facility or Equipment
__Rule of Thumb Indicator, Unit Cost
X Cost Estimate from Architect, Engineer or Vendor
__From Bids Received
__Preliminary Estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: None

Board of Education - Capital Improvement Plan FY2027

Operating Items

Page #	Line #	Project Title or Item Requested	Location	Evaluation Category	Alternate Financing	FY 2027	FY 2028	FY 2029	FY 2029	Total
58	1	Parking Lot Curbing Repairs	LHS	DF		$ 4,000.00	$ 4,000.00	$ 4,000.00	$ 4,000.00	$ 16,000.00
59	3	Athletic Fields Repairs	LHS	SR		$ 7,500.00	$ 7,500.00	$ 7,500.00	$ 7,500.00	$ 30,000.00
60	4	Masonry Repairs	LHS	DF		$ 5,000.00	$ 5,000.00	$ 5,000.00	$ 5,000.00	$ 20,000.00
61	5	HVAC Maintenance	District Wide	IOE		$ 140,000.00	$ 140,000.00	$ 140,000.00	$ 140,000.00	$ 560,000.00
						$ 156,500.00	**$ 156,500.00**	**$ 156,500.00**	**$ 156,500.00**	**$ 626,000.00**

Evaluation Categories:

RPH	Risk to Public Health
DF	Deteriorated Facility
SR	Systematic Replacement
IOE	Improvement of Operating Efficiency
C	Coordination
EPS	Equitable Provision of Services
NEF	New or Expanded Facilities

State grant requirements currently allow towns to approve only the town share of project costs instead of the total project cost.

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Form 1. Individual Project Proposal Descriptions and Justification

Prepared by: Wayne Donaldson **Date Prepared**: December 1, 2021
Project Title: LHS Curb Repair **Program Area**: School Facilities

Line 1

Project Description: Approximately 25 radius sections and 30 straight sections of concrete curbing have been damaged beyond repair, and many more seem to be deteriorating similarly. It is possible that there was a bad mix of concrete that has accelerated this damage. This budget figure is an estimate to address these major issues to start with, but further investigation is needed to implement a plan to preserve or replace the rest of the curbing, if possible.

Evaluation Category: Deteriorated Facility

Planning Context: Curbing was installed as part of the 2001/2002 Critical Needs work at Ledyard High School.

Schedule: Summer or vacation work would be necessary to keep traffic and parking from construction areas.

Coordination: Work is not contingent upon other CIP projects.

Previous Town Meeting Action: No previous Town action.

Project Priority:
M Priority within department/program area
L Risk of deferring project

Estimated Cost: 2027: $4,000; 2028: $4,000; 2029: $4000; 2030: $4000

Escalation Costs: Not applicable

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.

__ Cost of comparable facility or equipment
X Rule of thumb indicator, unit costs
__ From the cost estimate from engineer, architect, or vendor
__ From bids received
__ Preliminary estimate, (e.g. no other basis for estimate,guesstimate)

Alternative Financing: None.

Form 1. Individual Project Proposal Descriptions and Justification

Prepared by: Wayne Donaldson **Date Prepared**: December 1, 2021
Project Title: Athletic Field Repairs **Program Area**: School Facilities

Line 2

Project Description: This project is a continuation to improvements made on athletic fields at Ledyard High School. The introduction of a watering/fertilization program has been successful and will be continued. New backstops were installed on the varsity fields and the JV baseball field in 2020. Dugouts for the Varsity fields were updated in 2021.

Evaluation Category: Deteriorated Facility

Planning Context: Continuation of concerted effort to improve the conditions of athletic fields.

Schedule: This work could take place at any time, scheduled around athletic season
Coordination: Work is not contingent upon other CIP projects.
Previous Town Meeting Action: Funding provided for previous work.

Project Priority:

M Priority within department/program area
L Risk of deferring project

Estimated Cost: 2027: $7,500; 2028: $7,500; 2029: $7,500; 2030: $7500

Escalation Costs: Not applicable

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.

X Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
__ From the cost estimate from engineer, architect, or vendor
__ From bids received
X Preliminary estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: None

Form 1. Individual Project Proposal Descriptions and Justification

Prepared by: Wayne Donaldson **Date Prepared**: December 1, 2021

Project Title: LHS Masonry Repair **Program Area**: School Facilities

Line 3

Project Description: Several areas of the LHS brick façade are in need of repair. A false column near the media center is pulling away from the building and has no wire ties to the building; the main chimney would benefit from installation of a cap; several areas in need of repointing. Further, more in-depth investigation is needed to establish the full scope of need, but this budget figure is an estimate to address these major issues to start with.

Evaluation Category: Deteriorated Facility

Planning Context: The chimney was repaired approximately 7 years ago, but capping was not in the budget/scope of work.

Schedule: Summer or vacation work would be necessary at the media center location of work; however, several other areas could be addressed at any time.

Coordination: Work is not contingent upon other CIP projects.

Previous Town Meeting Action: No previous Town action.

Project Priority:
M Priority within department/program area
L Risk of deferring project

Estimated Cost: 2027: $5,000

Escalation Costs: Not applicable

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.
__ Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
__ From the cost estimate from engineer, architect, or vendor
__ From bids received
X Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: None.

Form 1. Individual Project Proposal Descriptions and Justification

Prepared by: Wayne Donaldson **Date Prepared:** December 1, 2022

Project Title: District Wide HVAC Maintenance **Program Area**: School Facilities

Line 4

Project Description: Provide funds for the proper maintenance of the HVAC systems

Evaluation Category: Deteriorated Facility

Planning Context: The new equipment at LMS and GHS along with the existing heating and cooling systems need regular scheduled maintenance to ensure the proper operation over the life of the units. This work will be completed with a combination of inhouse and contractors.

Schedule: As required by the manufacturer.

Coordination: As needed, major inspections and verification before the start of school each year.

Previous Town Meeting Action: No previous action by Town.

Project Priority:
M Priority within department/program area
L Risk of deferring project

Estimated Cost: 2027: $140,000; 2028: $130,000

Escalation Costs: Not applicable

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.
__ Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
X From the cost estimate from engineer, architect, or vendor
__ From bids received
__ Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: None.

Board of Education - Capital Improvement Plan FY2027

24-Sep-25

Ag Science Capital Non-Recurring Items

Page #	Line #	Rank	Project Title or Item Requested	Location	Evaluation Category	Alternate Financing	FY 2027	FY 2028	FY 2029	FY 2030	FY 2031	Total
64	1	2	Replace Carpet	LHS/AG Sci	DF		$ 16,000.00					$ 16,000.00
65	2	5	Remove sheetrock wall and install folding wall	LHS/AG Sci	SR					$ 35,000.00		$ 35,000.00
66	3	3	Renovate Ag Science wood and metal shop	LHS/AG Sci	SR				$ 200,000.00			$ 200,000.00
67	4	1	Wood Metal Shop LED Lighting	LHS/AG Sci	IOE		$ 10,000.00					
68	5	4	Renovate Ag Science Restrooms	LHS/AG Sci	SR		$ 20,000.00					$ 20,000.00
							$ 46,000.00	**$ -**	**$ 200,000.00**	**$ 35,000.00**	**$ -**	**$ 271,000.00**

	Evaluation Categories:	
RPH	Risk to Public Health	
DF	Deteriorated Facility	
SR	Systematic Replacement	
IOE	Improvement of Operating Efficiency	
C	Coordination	
EPS	Equitable Provision of Services	
NEF	New or Expanded Facilities	

Ag Science Capital Non-Recurring Items Escalation Cost

Page #	Line #	Project Title or Item Requested	Location	Evaluation Category	Alternate Financing	FY 2027	FY 2028	FY 2029	FY 2030
64	1	Replace Carpet i	LHS/AG Sci	DF		$16,000	$16,480	$16,974	$17,484
65	2	Remove sheetrock wall and install folding wall	LHS/AG Sci	SR					$35,000
66	3	Renovate Ag Science wood and metal shop	LHS/AG Sci	SR				$200,000	$206,000
67	4	Wood Metal Shop LED Lighting	LHS/AG Sci	IOE		$10,000	$10,300	$10,609	$10,927
68	5	Renovate Ag Science Restrooms	LHS/AG Sci	SR		$20,000	$20,600	$21,218	$21,855
						$46,000	**$47,380**	**$248,801**	**$291,265**

Evaluation Categories:

Risk to Public Health

Deteriorated Facility

Systematic Replacement

Improvement of Operating Efficiency

Coordination

Equitable Provision of Services

New or Expanded Facilities

Form 1. Individual Project Proposal Descriptions and Justification

Prepared by: Wayne Donaldson Date Prepared: December 1, 2022

Project Title: Replace Ag-Science office flooring & conference room Program Area: Facilities

Line 1

Project Description: The office carpet is 20 years old and in need of replacement.

Evaluation Category: Deteriorated Facility

Planning Context: Scheduled replacement

Schedule: Summer.

Coordination: None

Previous Town Meeting Action: No previous action by Town.

Project Priority: 2

M Priority within department/program area

L Risk of deferring project

Estimated Cost: 2027: $16,000

Escalation Costs: 2028 $16,480 2030 $17,484

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.

__ Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
X From the cost estimate from engineer, architect, or vendor
__ From bids received
__ Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: Aste Grant

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson Date Prepared: December 1, 2022

Project title: Ag Science media center Program Area: Facilities

Line 2

Project Description: The current ag science media center and computer lab no longer function as designed due to program changes. Removing the wall between the two areas and installing a folding wall will allow for a better use of the space for larger gatherings of / for multiple smaller space use.

Evaluation Category: New or Expanded Facilities

Planning Context: The removal of the wall will allow a better use of the existing space.

Schedule: Anytime

Coordination: None

Previous Town Meeting Action: None

Project Priority: 5
M_Priority within department / program area
L_ Risk of Deferring Project

Estimated Cost: 2030 $35,000

Escalation Costs:

__ Cost of Comparable Facility or Equipment
__ Rule of Thumb Indicator, Unit Cost
__ Cost Estimate from Architect, Engineer or Vendor
__ From Bids Received
_X Preliminary Estimate, (e.g. no other basis for estimate guesstimate)

Alternative Financing: Aste Grant

Form 1. Individual Project Proposal Descriptions and Justification

Prepared by: Wayne Donaldson Date Prepared: December 1, 2022

Project Title: Renovate Ag Sci wood & metal shop Program Area: School Facilities

Line 3

Project Description: Renovations will be made to the wood and metal shop to align with the current curriculum. Some of the renovations will include painting, installing new electrical outlets as needed, and implementing a new exhaust system for the welding area.

Evaluation Category: Improvement of Operating Efficiency

Planning Context: The current layout of the shop area no longer meets the current curriculum needs.

Schedule: Summer.

Coordination: None

Previous Town Meeting Action: No previous action by Town.

Project Priority: 3

M Priority within department/program area

L Risk of deferring project

Estimated Cost: 2029 $200,000

Escalation Costs: 2030 $206,000

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.

__ Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
X From the cost estimate from engineer, architect, or vendor
__ From bids received
__ Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: Aste Grant

Form 1. Individual project proposal descriptions and justifications

Prepared by: Wayne Donaldson **Date Prepared:** September 30, 2024

Project Title: LHS Ag Sci wood/metal shop lights **Program Area:** School Facilities

Line 4

Project Description: The wood and metal shop in LHS Ag Science should be upgraded to LED.

Evaluation Category: Improvement of Operating Efficiency

Planning Context: The existing lighting in the Ag Science wood and metal shop should be replaced with LED lighting. This will improve the student working area lighting and lower the lighting electric costs.

Schedule: Work needs to be completed during the summer break.

Coordination: None

Previous Town Meeting Action: None

Project Priority: 1

Estimated Costs: 2027 $10,000

Escalation Costs: 2028 $10,300 2029 $10,609 2030 $10,927

_X_ Cost of comparable facility or equipment
____ Rule of thumb indicator, unit costs
____ Cost estimate from engineer, architect, or vendor
____ From bids received
____ Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: Aste Grant

Form 1. Individual Project Proposal Descriptions and Justification

Prepared by: Wayne Donaldson Date Prepared: December 1, 2022

Project Title: Upgrade Ag Sci restrooms Program Area: School Facilities

Line 5

Project Description: Ongoing upgrades to facilities

Evaluation Category: Systematic Replacement

Planning Context: The current restrooms will be 25 years old in 2025 and no longer meet the current water use codes...

Schedule: Summer.

Coordination: None

Previous Town Meeting Action: No previous action by Town.

Project Priority: 4
M Priority within department/program area
L Risk of deferring project

Estimated Cost: 2027: $20,000

Basis of Cost Estimate: Check one of the following. If you want to provide more detail on the estimate, do so with a narrative after indicating the type of estimate.

Escalation Costs: 2028 $20,600 2029 $21,218 2030 $21,855

__ Cost of comparable facility or equipment
__ Rule of thumb indicator, unit costs
X From the cost estimate from engineer, architect, or vendor
__ From bids received
__ Preliminary estimate, (e.g. no other basis for estimate, guesstimate)

Alternative Financing: Aste Grant

SECTION XIII:
CONTINGENCY STATEMENT

The Ledyard Town Charter Revision, dated December 3, 2018, requires the Board of Education to include as part of the annual budget submittal, "plans for dealing with additional reductions in State funding that might occur after the Board of Education budget is prepared that could include reduction in services."

Upon direction from the Ledyard Town Council that included a target reduction amount, the Ledyard Board of Education will evaluate the Board of Education adopted budget to identify potential specific reductions. It should be understood that any reductions to the budget will impact programs or district services to students.

It is important to consider that the Ledyard Board of Education budget is approximately 72% salary and wages. The remaining portions are made of relatively small allocations of mostly required expenses including student transportation. Any reduction to the 2026-2027 approved Board of Education budget would necessitate a reduction in staff, which will potentially result in reduction in the number of class offerings, programming and student opportunities.

Collective bargaining rules and current contracts would require the newest hired staff, potentially the lowest compensated to be eliminated first, based on their particular assignment and the least impact to students.

For example:

- A $121,000 reduction could necessitate the reduction of two teaching staff
- A $178,000 reduction could necessitate the reduction of two teaching staff and three paraprofessional staff
- A $219,000 reduction could necessitate the reduction of three teaching staff and two paraprofessional staff
- A $257,000 reduction could necessitate the reduction of three teaching staff and four paraprofessional staff

The Board of Education will conduct Special Meetings, as required, to review the options identified by the Central Office and Staff and develop and approve a proposed budget revision to address the Town Council required reduction(s).

Ledyard Public Schools: Capital Improvement Plan FY 2027

A Strategic Investment in Infrastructure, Safety, and Fiscal Responsibility

Ledyard Board of Education
Superintendent Jay Hartling
Director of Facilities Wayne Donaldson
January 2026

Focusing on the preservation of six municipal buildings and the prioritization of Ledyard High School modernization.



Why Facilities Matter

Schools are the town's largest long-term capital assets.
Protecting them is a matter of safety, reliability, and law.



Statutory Obligation

Compliance with CGS § 10-220(a) mandates the Board of Education to provide "safe and properly maintained" maintained" learning environments. This is a legal requirement, not a choice.



Operational Reliability

A breakdown in HVAC, plumbing, or power stops the school day. We focus on preventing catastrophic system failures tailurer that disrupt learning and force emergency closures.



Asset Preservation

Shifting from reactive emergency repairs (expensive) to proactive lifecycle management (predictable). This strategy extends the useful life of the Town's infrastructure.

Financial Stewardship & Funding Sources

Matching the right funding mechanism to the project scope.

Bondable Projects

Large-scale infrastructure (Boilers, Windows, Roofs). Eligible for State Reimbursement.

Capital Non-Recurring (CNR)

Medium-scale projects exceeding annual operating capacity (Gym upgrades, Vehicles).

Operating Budget

Routine maintenance preventing decay. HVAC service contracts ($140k/yr), Curbing repairs ($4k/yr).

Ag Science (ASTI) Fund

Restricted State funds for the Ag Science program.

No impact to Town tax levy.

Current State of District Facilities

Condition assessment based on age of infrastructure and date of last major renovation.



Ledyard High School (LHS)
Status: Critical. Built 1962/1966. Major mechanical systems (Boilers, Windows, Roof) are at end-of-life. 90% of current capital needs are concentrated here.



Gales Ferry / Juliet Long School
Status: Aging. Built 2001 / 1961. Finishes reaching 26+ years. Specific system replacements needed (PA systems, Playground surfaces, Windows).



Ledyard Middle School / Gallup Hill School
Status: Good. Renovated 2019. Limited capital needs; currently in maintenance mode.



Board of Education / District
Status: Operational. Routine maintenance only.

The Primary Challenge: Ledyard High School

Infrastructure from the 1960s is reaching total system failure.

Main Roof

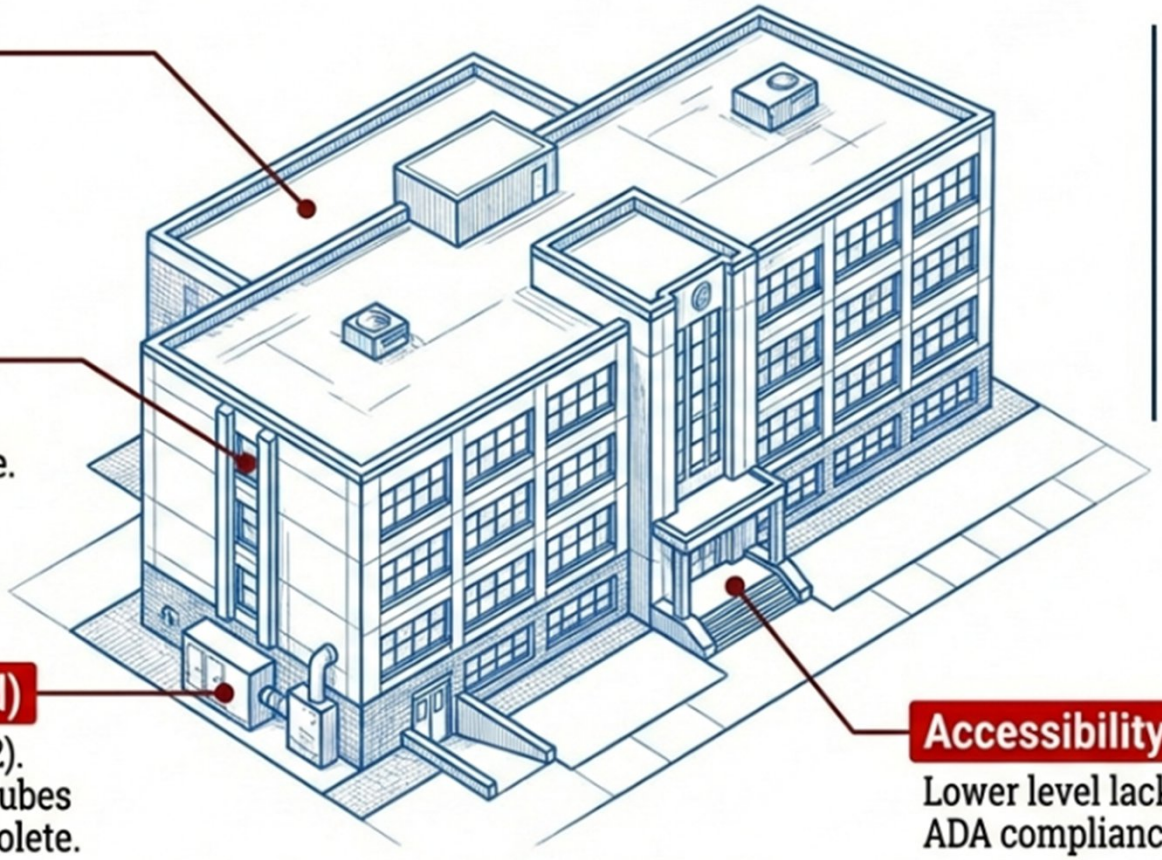
Reaches end of life in 2032. Media Center roof currently leaking.

Original Windows

Inefficient single-pane. Drafty, difficult to operate. Prerequisite for HVAC upgrade.

Boilers (63 Years Old)

Original to building (1962). Metal pitting observed. Tubes failing. Service parts obsolete.



Accessibility

Lower level lacks elevator access. ADA compliance risk.

90% of major capital needs are concentrated at LHS due to infrastructure age and deferred modernization.

The Facilities Conditions Assessment (FCA): A Physical Exam for Our School

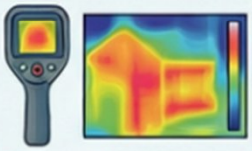
THE FOUNDATION OF THE FCA



An Expert Observational Audit
Licensed architects perform a non-invasive "deep dive" into the existing physical plant.



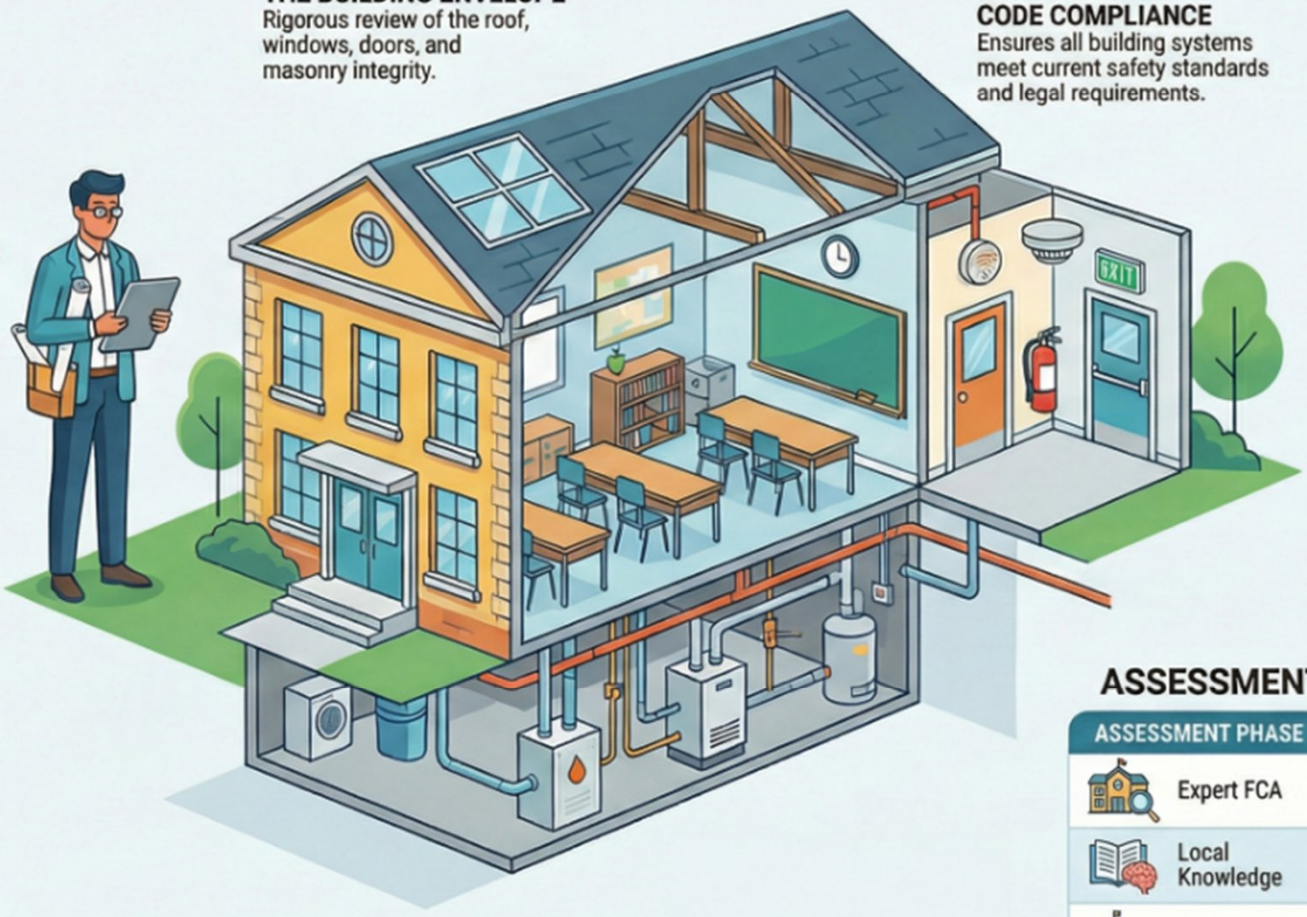
Purely Physical Evaluation
Focuses on identifying structural deficienciee rather than programmatic or educational layouts.



Thermal Scanning for Efficiency
Includes infrared scanning of the building envelope to detect air, heat, and cooling leakage.

THE BUILDING ENVELOPE

Rigorous review of the roof, windows, doors, and masonry integrity.



LIFE SAFETY & CODE COMPLIANCE

Ensures all building systems meet current safety standards and legal requirements.

OUTCOMES & PRIORITIZATION



Severity-Based Ranking
Deficiencies are prioritized based on the urgency of physical repair.



Applied Cost Estimates
Each identified issue is assigned a cost to provide a clear financial roadmap.

ASSESSMENT & APPLICATION ROLES

ASSESSMENT PHASE	PRIMARY FOCUS	EVALUATED BY
Expert FCA	Physical Condition & Code	Professional Consultants
Local Knowledge	Educational Needs & Programs	District Administrators
Financial Plan	Cost Application & Scheduling	Town & Board of Education

The Road to Renewal: Ledyard Public Schools Facility Decision Process

Structured assessment framework to move from initial building observations to final infrastructure decisions, ensuring facility improvements align with physical plant requirements and modern educational standards.

Phase 1: Data Gathering & Needs Assessment

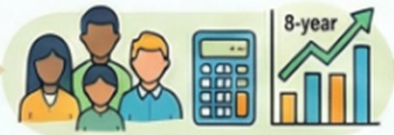




Facility Conditions Assessment (FCA)

A comprehensive, observation-based review of the building envelope, mechanical systems, and life safety codes.





Enrollment & Space Projections

Calculating 6-year high enrollment to determine the required square footage and state reimbursement eligibility.



Educational Specifications (Ed Specs)

Defining the specific classrooms and programs needed to meet modern learning standards regardless of construction type.

Phase 2: Evaluation & Final Decision



Renovation Status Analysis

A licensed architect evaluates mandatory criteria (Form 3920) to determine if a building qualifies for state renovation status.



Comparing Solution Paths

Weighing the FCA and Ed Specs against three options: Repair, Renovate, or Build New.

Option: Repair



Primary Trigger:	Localized deterioration or aging finishes
Financial Impact:	Targeted operating or non-recurring capital funds

Option: Renovate



Primary Trigger:	Financial Impact:
Significant physical deficiencies/Code needs	Bondable project; requires state "Renovation Status"

Option: Build New



Primary Trigger:	Financial Impact:
Low enrollment/Space standard mismatch	Bondable project; focus on right-sizing the facility

Ledyard Public Schools: Long-Term Bondable Projects & Infrastructure Plan

Outlining non-high school capital projects requiring bond funding and the shift towards strategic future planning

LMS Cafeteria Expansion



Expanding the Middle School cafeteria to accommodate entire grade levels and alleviate overcrowding.

Total Estimated Cost:
$600,000

Net Cost to Ledyard (Est.):
$227,160

JWL Window Replacement



Replacing aged windows at Juliet W. Long to meet energy standards and reduce heat loss.

Total Estimated Cost:
$1,200,000

Net Cost to Ledyard (Est.):
$454,320

JWL Parking Lot Repave

$500,000 | **$500,000**
No Grant

FY2027 Critical Capital Priorities



Emergency Communication Overhaul

Critical PA system replacements at LHS ($10k), JWL ($6k), and GFS ($6k) for emergency safety.



LHS Modernization Foundation

$75,000 allocated for a comprehensive modernization study to plan the high school's future.



Classroom Renewal ($140,000)

Continuing renovations at Jullet W. Long School to meet modern learning environment standards.

High-Priority Non-Recurring FY27 Requests

Replacement Maintenance Truck	$80,000 District-Wide
GHS Turf Playground Installation	$47,000 Gallup Hill School
Ag-Science Restroom Upgrades	$20,000 Ledyard High School

BUDGET PREPARATION
SUGGESTED SCHEDULE/GUIDE
AND
ANNUAL TOWN BUDGET PROCESS
(Suggested Schedule Guide)

(Please Note Some Dates are Subject to Change)

Key:
Purple: Suggested Date - Not Dictated by Town Charter;
Green/Blue: Dictated by Town Charter.

Reference: Town Charter Chapter VII - Pages (s) 28 – 31

October/November (**Election Year-Dec**) Town Council prepares and submits letter of Directive for Fiscal Year Budget to Mayor and Board of Education.
(This Date is NOT dictated by Charter)

December – Town Council approves Town Council Department budget to submit to Mayor's Office.
(This Date is NOT dictated by Charter)

Per Town Charter
(1/20/2026)
3rd Monday in January All Departments submit preliminary budget to Mayor's Office
(Monday 1/19/2026 is Martin Luther King Day Holiday).

Per Town Charter
(2/23/2026)
4th Monday in February the Board of Education shall file budget estimates to Mayor's Office.

Per Town Charter
(3/2/2026)
1st Monday in March the Mayor submits budget to Town Council and files with Town Clerk's Office.

March
Finance Committee conducts Departmental Budget Work Sessions. Departments review and submits budget materials to Town Council.

(4/8/2026)
Town Council finalizes budge to Present to a Public Hearing.
(This Date is NOT dictated by Charter)

(4/15/2026)
Town Council files proposed budget with Town Clerk's Office for Public Hearing.
(This Date is NOT dictated by Charter)

Per Town Charter On or Before Last Monday in April
(4/21/2026) (Tuesday)
On OR Before the last Monday in April the Town Council conducts one or more Public Hearings on the proposed budget at the Council Chambers. (School Vacation 4/13/2026 - 4/17/2026)

4/22/2026
Town Council Votes to Finalize Budget
(This Date is NOT dictated by Charter)

Per Town Charter
(5/4/2026)
1st Monday of May the Town Council files proposed budget with Town Clerk's Office for Annual Town Meeting

Per Town Charter
(5/18/2026)
3rd Monday in May Annual Town Meeting on the proposed budget to adjourn to a vote on the voting machine the following day (Tuesday)**.**

Per Town Charter
(Tuesday 5/19/2026)
Vote on Budget on voting machine

Per Town Charter
Should the Referendum does not approve the budget; the budget will be referred back to the Council, the Town Council should reconsider the budget and present it for a second vote on the voting machines three weeks following the previous referendum.

In the event the second referendum does not approve a budget, the Town Council shall adopt a final budget by the fourth Monday in June. Should both the referenda and the Town Council fail to adopt a final budget by the fourth Monday in June, the budget that was presented at the second referendum shall be deemed to have been adopted.

Per Town Charter
6/22/2026
On or before the **Fourth Monday in June**, the Town Council shall fix the tax rate in mils.

** The budget must be presented as a Resolution

Current CLC Discounts

INGRAM

- 43% off hardcover trade
- 37.5% off paperback
- 22% off library bound/reinforced books
- 30% off graphic novels
- 0-43% off prebound books
- 16% off university press trade
- 8% off textbooks and technical books
- 8% off small press, university press non-trade, limited demand titles
- 0% off Net Books, NO service charge
- 0-15% off DVD, Blu-Ray, and 4K Ultra HD
- 0-15% off audiobooks on CD
- 0-5% off music on CD
- 0-5% off console video games

Amazon

There are no set discounts by item type, but a variety of discounts depending on the purchase and brand of item. Free shipping. Amazon Business Books for Libraries offers special library benefits including extra discounts on new releases and free MARC records.

Midwest Tape

- 25% off DVD, Blu-Ray, 4K Ultra HD
- 0% off with free library safe packaging Audiobooks on CD / Spoken Word CDs
- 20% Playaway
- 25% off Music CDs
- 0% off VidieGoGo

WT Cox: Discounted magazines, ranging from 0-28%

Transparent Language: 30% off service

Thorndike Cengage: 25% off Large Print (35% with free shipping during quarterly sales)

updated 9/23/2024 pbh

Preliminary All Fees FYE 2025-2026 (3% Ops & Pika 5% Overdrive & Delivery)

Library	Staff Ports	Library PCs	OPS	3% inc	PIKA	3% inc	OVERDRIVE	5% inc	DELIVERY	5% inc	Fees 2024-2025	Fees 2025-2026	Overall Inc
Bethany	4	11	$ 16,626	$ 17,125	$ 438	$ 451	$ 3,168	$ 3,326	$ 1,154	$ 1,211	$ 21,386	$ 22,114	3.40%
Branford	12	58	$ 53,380	$ 54,982	$ 2,203	$ 2,269	$ 9,718	$ 10,204	$ 5,768	$ 6,056	$ 71,070	$ 73,511	3.44%
Durham	10	20	$ 40,516	$ 41,731	$ 1,383	$ 1,424	$ 3,566	$ 3,744	$ 3,613	$ 3,794	$ 49,077	$ 50,693	3.29%
East Haddam	7	20	$ 29,201	$ 30,077	$ 996	$ 1,025	$ 4,078	$ 4,282	$ 2,660	$ 2,793	$ 36,935	$ 38,178	3.36%
East Hampton	6	16	$ 24,870	$ 25,616	$ 433	$ 446	$ 2,163	$ 2,271	$ 1,155	$ 1,212	$ 28,620	$ 29,545	3.23%
East Lyme	12	31	$ 49,599	$ 51,087	$ 1,692	$ 1,742	$ 10,325	$ 10,841	$ 4,461	$ 4,684	$ 66,076	$ 68,354	3.45%
Essex	4	20	$ 17,887	$ 18,423	$ 608	$ 627	$ 2,147	$ 2,254	$ 1,601	$ 1,681	$ 22,243	$ 22,985	3.34%
Ivoryton	2	8	$ 8,663	$ 8,923	$ 295	$ 304	$ 1,886	$ 1,980	$ 801	$ 841	$ 11,645	$ 12,048	3.46%
Guilford	12	78	$ 56,180	$ 57,866	$ 1,987	$ 2,046	$ 14,739	$ 15,476	$ 5,110	$ 5,365	$ 78,016	$ 80,753	3.51%
Haddam	5	17	$ 21,238	$ 21,875	$ 595	$ 612	$ 3,703	$ 3,888	$ 1,601	$ 1,681	$ 27,137	$ 28,057	3.39%
Hamden	20	49	$ 82,292	$ 84,761	$ 2,807	$ 2,891	$ 16,291	$ 17,105	$ 7,415	$ 7,786	$ 108,805	$ 112,543	3.44%
Ledyard	10	22	$ 40,796	$ 42,020	$ 1,420	$ 1,462	$ 6,600	$ 6,930	$ 3,743	$ 3,930	$ 52,558	$ 54,342	3.39%
Lyme	3	14	$ 12,513	$ 12,888	$ 300	$ 309	$ 1,310	$ 1,376	$ 735	$ 772	$ 14,858	$ 15,345	3.28%
Madison	12	42	$ 51,140	$ 52,674	$ 1,692	$ 1,742	$ 11,496	$ 12,071	$ 4,484	$ 4,709	$ 68,812	$ 71,196	3.46%
Middlefield	2	11	$ 9,083	$ 9,356	$ 309	$ 318	$ 1,832	$ 1,924	$ 801	$ 841	$ 12,025	$ 12,438	3.44%
Mitchell	4	0	$ 15,086	$ 15,539	$ 516	$ 532	$ 445	$ 467	$ 1,365	$ 1,433	$ 17,412	$ 17,971	3.21%
New London	8	57	$ 38,154	$ 39,299	$ 1,268	$ 1,306	$ 3,669	$ 3,852	$ 3,214	$ 3,375	$ 46,304	$ 47,831	3.30%
North Branford	8	30	$ 34,373	$ 35,404	$ 1,065	$ 1,097	$ 4,376	$ 4,595	$ 2,754	$ 2,891	$ 42,568	$ 43,988	3.33%
North Haven	10	2	$ 37,995	$ 39,135	$ 1,171	$ 1,206	$ 7,573	$ 7,952	$ 3,095	$ 3,250	$ 49,834	$ 51,542	3.43%
North	3	11	$ 12,598	$ 12,976	$ 302	$ 311	$ 1,760	$ 1,848	$ 811	$ 852	$ 15,471	$ 15,987	3.33%
Norwich	14	51	$ 59,943	$ 61,741	$ 2,042	$ 2,103	$ 7,066	$ 7,420	$ 5,368	$ 5,636	$ 74,419	$ 76,900	3.33%
Old Lyme	7	25	$ 29,901	$ 30,799	$ 1,019	$ 1,049	$ 4,823	$ 5,064	$ 2,672	$ 2,806	$ 38,415	$ 39,717	3.39%
Old Saybrook	7	46	$ 32,842	$ 33,828	$ 1,120	$ 1,154	$ 5,168	$ 5,427	$ 2,955	$ 3,103	$ 42,086	$ 43,511	3.39%
Orange	9	42	$ 39,825	$ 41,020	$ 1,355	$ 1,396	$ 7,036	$ 7,388	$ 3,473	$ 3,646	$ 51,689	$ 53,450	3.41%
Preston	3	9	$ 12,333	$ 12,703	$ 318	$ 328	$ 1,395	$ 1,465	$ 773	$ 812	$ 14,820	$ 15,308	3.29%
Stony Creek	4	7	$ 16,066	$ 16,548	$ 544	$ 560	$ 1,313	$ 1,378	$ 1,424	$ 1,495	$ 19,347	$ 19,982	3.28%
Wallingford	18	117	$ 84,272	$ 86,800	$ 3,157	$ 3,252	$ 17,999	$ 18,899	$ 8,265	$ 8,678	$ 113,693	$ 117,629	3.46%
Woodbridge	9	31	$ 38,285	$ 39,433	$ 1,175	$ 1,211	$ 5,659	$ 5,942	$ 3,096	$ 3,251	$ 48,215	$ 49,837	3.36%
West Haven	13	0	$ 49,029	$ 50,500	$ 1,678	$ 1,728	$ 6,317	$ 6,633	$ 4,213	$ 4,423	$ 61,237	$ 63,285	3.34%
Westbrook	6	27	$ 26,410	$ 27,202	$ 622	$ 641	$ 2,681	$ 2,815	$ 1,613	$ 1,693	$ 31,326	$ 32,352	3.27%
Totals	244	872	$ 1,041,099	$ 1,072,332	$ 34,509	$ 35,544	$ 170,302	$ 178,817	$ 90,190	$ 94,699	$ 1,336,099	$ 1,381,392	3.39%

	2024/2025
Port	$3,771.50
PC Fee	$140.04

	2024/2025	2025/2026
Port	$3,771.50	$3,884.65
PC Fee	$140.04	$144.24

updated 9/11/2025 ah

Preliminary All Fees FYE 2026-2027 (3% Ops & Pika 5% Overdrive & Delivery)

Library	Staff Ports	Library PCs	OPS	3% inc	PIKA	3% inc	OVERDRIVE	5% inc	DELIVERY	5% inc	Fees 2025-2026	Fees 2026-2027	Overall Inc
Bethany	4	11	$ 17,125	$ 17,639	$ 451	$ 465	$ 3,326	$ 3,493	$ 1,211	$ 1,272	$ 22,114	$ 22,868	3.41%
Branford	12	58	$ 54,982	$ 56,631	$ 2,269	$ 2,337	$ 10,204	$ 10,714	$ 6,056	$ 6,359	$ 73,511	$ 76,042	3.44%
Durham	10	20	$ 41,731	$ 42,983	$ 1,424	$ 1,467	$ 3,744	$ 3,931	$ 3,794	$ 3,983	$ 50,693	$ 52,365	3.30%
East Haddam	7	20	$ 30,077	$ 30,980	$ 1,025	$ 1,056	$ 4,282	$ 4,496	$ 2,793	$ 2,933	$ 38,178	$ 39,465	3.37%
East Hampton	6	16	$ 25,616	$ 26,384	$ 446	$ 459	$ 2,271	$ 2,385	$ 1,212	$ 1,273	$ 29,545	$ 30,501	3.24%
East Lyme	12	31	$ 51,087	$ 52,620	$ 1,742	$ 1,795	$ 10,841	$ 11,383	$ 4,684	$ 4,918	$ 68,354	$ 70,715	3.45%
Essex	4	20	$ 18,423	$ 18,976	$ 627	$ 645	$ 2,254	$ 2,367	$ 1,681	$ 1,765	$ 22,985	$ 23,753	3.34%
Ivoryton	2	8	$ 8,923	$ 9,191	$ 304	$ 313	$ 1,980	$ 2,079	$ 841	$ 883	$ 12,048	$ 12,466	3.47%
Guilford	12	78	$ 57,866	$ 59,602	$ 2,046	$ 2,108	$ 15,476	$ 16,249	$ 5,365	$ 5,634	$ 80,753	$ 83,592	3.52%
Haddam	5	17	$ 21,875	$ 22,532	$ 612	$ 631	$ 3,888	$ 4,083	$ 1,681	$ 1,765	$ 28,057	$ 29,010	3.40%
Hamden	20	49	$ 84,761	$ 87,303	$ 2,891	$ 2,978	$ 17,105	$ 17,960	$ 7,786	$ 8,175	$ 112,543	$ 116,417	3.44%
Ledyard	10	22	$ 42,020	$ 43,280	$ 1,462	$ 1,506	$ 6,930	$ 7,276	$ 3,930	$ 4,127	$ 54,342	$ 56,189	3.40%
Lyme	3	14	$ 12,888	$ 13,275	$ 309	$ 318	$ 1,376	$ 1,444	$ 772	$ 810	$ 15,345	$ 15,848	3.28%
Madison	12	42	$ 52,674	$ 54,254	$ 1,742	$ 1,795	$ 12,071	$ 12,674	$ 4,709	$ 4,944	$ 71,196	$ 73,667	3.47%
Middlefield	2	11	$ 9,356	$ 9,637	$ 318	$ 328	$ 1,924	$ 2,020	$ 841	$ 883	$ 12,438	$ 12,867	3.44%
Mitchell	4	0	$ 15,539	$ 16,005	$ 532	$ 548	$ 467	$ 491	$ 1,433	$ 1,505	$ 17,971	$ 18,548	3.21%
New London	8	57	$ 39,299	$ 40,478	$ 1,306	$ 1,345	$ 3,852	$ 4,045	$ 3,375	$ 3,543	$ 47,831	$ 49,411	3.30%
North Branford	8	30	$ 35,404	$ 36,466	$ 1,097	$ 1,130	$ 4,595	$ 4,825	$ 2,891	$ 3,036	$ 43,988	$ 45,457	3.34%
North Haven	10	2	$ 39,135	$ 40,309	$ 1,206	$ 1,242	$ 7,952	$ 8,349	$ 3,250	$ 3,412	$ 51,542	$ 53,313	3.43%
North Stonington	3	11	$ 12,976	$ 13,365	$ 311	$ 321	$ 1,848	$ 1,940	$ 852	$ 894	$ 15,987	$ 16,520	3.34%
Norwich	14	51	$ 61,741	$ 63,593	$ 2,103	$ 2,166	$ 7,420	$ 7,791	$ 5,636	$ 5,918	$ 76,900	$ 79,468	3.34%
Old Lyme	7	25	$ 30,799	$ 31,722	$ 1,049	$ 1,081	$ 5,064	$ 5,317	$ 2,806	$ 2,946	$ 39,717	$ 41,066	3.40%
Old Saybrook	7	46	$ 33,828	$ 34,842	$ 1,154	$ 1,188	$ 5,427	$ 5,698	$ 3,103	$ 3,258	$ 43,511	$ 44,987	3.39%
Orange	9	42	$ 41,020	$ 42,250	$ 1,396	$ 1,438	$ 7,388	$ 7,758	$ 3,646	$ 3,828	$ 53,450	$ 55,274	3.41%
Preston	3	9	$ 12,703	$ 13,084	$ 328	$ 338	$ 1,465	$ 1,538	$ 812	$ 853	$ 15,308	$ 15,812	3.30%
Stony Creek	4	7	$ 16,548	$ 17,045	$ 560	$ 577	$ 1,378	$ 1,447	$ 1,495	$ 1,570	$ 19,982	$ 20,639	3.29%
Wallingford	18	117	$ 86,800	$ 89,404	$ 3,252	$ 3,350	$ 18,899	$ 19,844	$ 8,678	$ 9,112	$ 117,629	$ 121,710	3.47%
Woodbridge	9	31	$ 39,433	$ 40,616	$ 1,211	$ 1,247	$ 5,942	$ 6,240	$ 3,251	$ 3,413	$ 49,837	$ 51,516	3.37%
West Haven	13	0	$ 50,500	$ 52,015	$ 1,728	$ 1,780	$ 6,633	$ 6,965	$ 4,423	$ 4,644	$ 63,285	$ 65,404	3.35%
Westbrook	6	27	$ 27,202	$ 28,018	$ 641	$ 660	$ 2,815	$ 2,956	$ 1,693	$ 1,778	$ 32,352	$ 33,413	3.28%
Totals	**244**	**872**	**$ 1,072,332**	**$ 1,104,501**	**$ 35,544**	**$ 36,610**	**$ 178,817**	**$ 187,758**	**$ 94,699**	**$ 99,434**	**$ 1,381,392**	**$ 1,428,304**	**3.40%**

	2024/2025	2025/2026	2026/2027
Port Fee	$3,771.50	$3,884.65	$4,001.18
PC Fee	$140.04	$144.24	$148.57

TOWN OF LEDYARD
CONNECTICUT

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

Chairman Gary St. Vil

March 17, 2026

Senator Cathy Osten
Representative Gregory Howard
Representative Larry Pemberton
Representative Brian Lanoue
Legislative Office Building
300 Capitol Avenue; Room 2700
Hartford, Connecticut 06106-1591

Dear Senator Osten and Representatives Howard, Lanoue, and Pemberton:

On behalf of the Ledyard Town Council, I write to express our strong support for legislative efforts to modernize and strengthen Connecticut's Education Cost Sharing (ECS) formula.

Public education is one of the most important investments we make in our communities. However, the ECS foundation amount has not been meaningfully updated since 2013. During that time, inflation and rising operational costs have significantly increased the true cost of educating students. Municipal leaders and policy organizations estimate that if ECS funding had simply kept pace with inflation, the State of Connecticut would be investing roughly $900 million more annually in public education than it does today.

Because the ECS formula has not kept pace with economic realities, the financial burden has increasingly shifted onto municipalities and local property taxpayers. As a result, towns like Ledyard are placed in the difficult position of balancing responsible fiscal stewardship with our obligation to support strong schools. Local governments have limited revenue options, and property taxes can only sustain so much of the growing cost of public education.

In Ledyard, education represents the largest portion of our municipal budget. Our community strongly values the quality of our schools and the opportunities they provide for our students but maintaining that standard while keeping property taxes affordable for residents becomes increasingly difficult when state education funding does not reflect current economic realities.

This issue has become a recurring challenge for municipalities across Connecticut. Each year, Boards of Education must develop budgets to meet student needs, while municipal leaders must simultaneously ensure that local taxes remain affordable for residents. When state funding formulas fail to reflect current economic conditions, it creates unnecessary tension in the local budget process and places additional pressure on municipal taxpayers.

The Ledyard Town Council believes that modernizing the ECS formula is an important step toward restoring balance to Connecticut's education funding system. Adjusting the ECS foundation to better reflect current costs, and ensuring the formula remains responsive to inflation over time, would provide municipalities with greater predictability and stability in the budget process while continuing to support high-quality public education.

We respectfully urge the General Assembly to continue pursuing reforms that strengthen the ECS program and ensure that state education funding reflects the true cost of educating Connecticut's students.

We welcome the opportunity to work collaboratively with the legislature to modernize the ECS formula so that municipalities can provide high-quality education without over-reliance on local property taxes.

Thank you for your continued service to the residents of Ledyard and the State of Connecticut.

Sincerely,

Gary St. Vil
Town Council Chairman

cc: Senator Martin Looney, President Pro Tempore, Connecticut State Senate
Representative Matthew Ritter, Speaker of the House
Senator Doug McCrory, Co-Chair, Education Committee
Representative Jennifer Leeper, Co-Chair, Education Committee
Representative Nick Gauther
Mayor Fred Allyn III, Town of Ledyard
Jennifer Reguin, Chair, Ledyard Board of Education
Connecticut Conference of Municipalities (CCM)

TOWN OF LEDYARD
CONNECTICUT

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

March 17, 2026

Senator Martin Looney, President of the Senate
Legislative Office Building
300 Capitol Avenue; Room 3300
Hartford, Connecticut 06106-1591

Senator Cathy Osten
Legislative Office Building
300 Capitol Avenue; Room 2700
Hartford, Connecticut 06106-1591

Dear Senator Looney, Senator Osten, and Representatives Howard, Pemberton, Lanoue:

On behalf of the Ledyard Town Council, we write to transmit Resolution #003-2026/Mar 11(a), adopted by the Ledyard Town Council, expressing our support for Raised House Bill #5407, "*An Act Concerning State Reimbursement to Municipalities for Revenue Lost Due to the Property Tax Exemption for Veterans with a One Hundred Percent Permanent and Total Disability Rating.*"

The Town of Ledyard proudly supports the men and women who have served in the United States Armed Forces and especially those veterans who have sustained permanent and total service-connected disabilities in defense of our nation. Public Act #24-45 represents an important recognition of those sacrifices, and our community strongly supports the intent of the exemption established under that legislation.

As a neighboring community to Naval Submarine Base New London and other regional military installations, Ledyard is home to many active-duty service members, veterans, and military families who contribute greatly to the fabric of our town. We remain deeply committed to supporting those who have served our country.

At the same time, the fiscal impact of this exemption is currently borne entirely by municipalities. As the number of qualifying veterans increases, the resulting loss of local property tax revenue places increasing pressure on municipal budgets and local taxpayers.

Raised House Bill #5407 provides a responsible and balanced solution by establishing a mechanism for the full reimbursement of municipalities for revenue losses attributable to the exemption. This approach ensures that Connecticut's commitment to its most severely disabled veterans remains strong while also ensuring that the cost of that commitment is shared equitably across the state.

The Ledyard Town Council respectfully urges the Connecticut General Assembly to support Raised House Bill #5407 during the current legislative session.

Should you have any questions or wish to discuss this matter further, please do not hesitate to contact us.

Sincerely,

Fred Allyn, III, Mayor

Gary St. Vil, Chairman

cc: Senator Anthony Nolan
Senator Martha Marx
Representative Greg Howard
Representative Larry Pemberton
Representative Brian Lanoue
Courtney Cullinan, Chief of Staff
Members of the Veterans and Military Affairs Committee

GS/rm

TOWN OF LEDYARD
CONNECTICUT

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

Res: 003-2026/Mar 11 (a)

TOWN OF LEDYARD
RESOLUTION SUPPORTING HOUSE BILL #5407
"AN ACT CONCERNING STATE REIMBURSEMENT TO MUNICIPALITIES FOR REVENUE LOST DUE TO THE PROPERTY TAX EXEMPTION FOR VETERANS WITH A ONE HUNDRED PERCENT PERMANENT AND TOTAL DISABILITY RATING".

WHEREAS, the Town of Ledyard proudly supports the men and women who have served in the United States Armed Forces and recognizes the extraordinary sacrifices made by veterans who have sustained service-connected permanent and total disabilities; and

WHEREAS, the Town of Ledyard strongly supports the property tax exemption established by Public Act 24-45 and believes that veterans who have sustained permanent and total service-connected disabilities deserve meaningful recognition for their sacrifices; and

WHEREAS, the Town of Ledyard is proud to be home to many active-duty service members, veterans, and military families due to our proximity to Naval Submarine Base New London and other regional military installations; and

WHEREAS, Public Act 24-45, implemented on October 1, 2024, established a property tax exemption for veterans who have been determined by the United States Department of Veterans Affairs to have a 100% permanent and total service-connected disability; and

WHEREAS, the fiscal impact of this exemption is currently borne entirely by municipalities, resulting in a reduction in local property tax revenue and placing additional financial pressure on municipal budgets and local taxpayers; and

WHEREAS, Raised House Bill #5407, *"An Act Concerning State Reimbursement to Municipalities for Revenue Lost Due to the Property Tax Exemption for Veterans with a One Hundred Percent Permanent and Total Disability Rating,"* proposes to establish a mechanism for the full reimbursement of municipalities for the revenue losses attributable to this exemption; and

WHEREAS, providing state reimbursement would ensure that the cost of honoring Connecticut's most severely disabled veterans is shared equitably across the State of Connecticut rather than borne solely by the municipalities in which those veterans reside; and

WHEREAS, the Town of Ledyard is required, by charter, to hold a public hearing on the municipal budget prior to the last Monday in April, develop and file said budget with accurate revenue projects with the Town Clerk by the first Monday in May, and subsequently adopt a final municipal budget by the fourth Monday in June;

GS/rm

NOW, THEREFORE BE IT RESOLVED, that the Ledyard Town Council hereby expresses its strong support for Raised House Bill #5407 and respectfully urges the Connecticut General Assembly to pass this legislation during the current legislative session.

BE IT FURTHER RESOLVED, that the Ledyard Town Council calls upon the Governor of the State of Connecticut and the Connecticut General Assembly to work collaboratively with municipalities to ensure that programs designed to support disabled veterans are funded in a fair and sustainable manner.

BE IT FURTHER RESOLVED, that the Town Council expresses its appreciation to the members of Connecticut's Veterans and Military Affairs Committee for their continued work on behalf of Connecticut's veteran community.

BE IT FURTHER RESOLVED, that the Town Council Clerk is directed to transmit a copy of this resolution to Governor Ned Lamont, Senator Martin Looney, President Pro Tempore of the Senate, Speaker of the House Matt Ritter, Senator Cathy Osten, Senator Martha Marx, Senator Anthony Nolan, Representative Brian Lanoue, Representative Greg Howard, Representative Larry Pemberton, the Connecticut General Assembly Veterans' Affairs Committee, and the Connecticut General Assembly Finance, Revenue and Bonding Committee to convey the Town of Ledyard's position on this matter.

Adopted by the Ledyard Town Council on: March 11, 2026

Fred Allyn, III, Mayor

Gary St. Vil, Chairman

Roxanne Maher

From: Timothy Ryan
Sent: Thursday, March 19, 2026 3:49 PM
To: Jessica Buhle
Cc: Roxanne Maher; Carmen Garcia Irizarry; Fred Allyn, III
Subject: Re: Budget workshop on 3/19

First, I'd like to apologize for not being able to attend today.

As we have seen in the past three workshops, the general government budget is indeed running lean, with responsible, thoughtful budgets put forward by our town department heads.

Taking healthcare and town-wide capital out of the equation, we see the following increases in operations costs:

- General Government increases ~2.4% from 2025-26; this includes the mayor's request that we received today for an additional line item for $1,000 for reimbursements, which I support.

- The BOE budget increases ~3.6%.

Beyond the edits and updates we have discussed in the aforementioned workshops, the only proposed budget changes I would have are the following:

- Reduce the increase to the top line BOE budget to $1,000,000, for a new budget of $41,462,242.

This represents an increase of nearly 2.5% from last year's BOE budget, and is a slightly higher increase than the general government, which generally faces the same inflationary and contractual salary challenges that the BOE cites in their presentation.

I believe this should result in a .25 mill, or nearly 30% reduction, to the proposed increase to the tax levy, but I'll leave the exact calculations to Finance Director Bonin and his team.

It is my position that ANY increase to the equivalent neutral mill rate after revaluation will have an outsized effect on all homeowners, since the value of a "mill" is substantially more than the last budget cycle. This, combined with the fact that revaluation shifted a bigger portion of the tax burden onto residential properties, and lack of any clear path to additional significant revenue at this time, demands that we pass a budget as minimal an increase as possible. The sad truth is that, even if we passed a budget with a zero mill increase, the average tax bill would still increase due to the effects of revaluation.

After last year's dramatic increase in the BOE budget, and two failed budget referendums, we need to put our best foot forward and control the ever-increasing burden on taxpayers.

I do remain hopeful that the CT Legislature will act fast on House Bill 5407, and we can amend our projected revenue prior to finalizing the budget; however, we can't assume that will be the case.

Again, my apologies for not being able to attend.

-Tim

Timothy Ryan

> On Mar 18, 2026, at 11:16 PM, Timothy Ryan <tryan@ledyardct.org> wrote:
>
> Jess;
>
> I have an emergent schedule issue with my kids that will prevent me from attending tomorrow's workshop for more than 15 minutes.
>
> I could support an earlier start (3pm) but I don't think that worked for Carmen, and it's inside of 24 hours, anyway.
>
> While I want to be part of the discussion, I also don't expect the meeting to be canceled/rescheduled on my account. To that end, I will at least submit my written remarks tomorrow for yours and Carmen's consideration.
>
> Sorry for the late notice.
>
> -Tim
> Timothy Ryan

Roxanne Maher

From: Carmen Garcia Irizarry
Sent: Tuesday, March 31, 2026 9:58 PM
To: Roxanne Maher
Subject: Budget Data

Hi Roxanne,

Can you forward this email to Councilor Buhle and Councilor Ryan? Unfortunately, I won't be able to attend the meeting so I want to share this with them.

In preparation for the budget workshops, I reviewed the budgets for the fiscal years 2023, 2024, and 2025. I only did three years as finding the documents in our website is not always very straight forward. I believe some of this information will answer questions that some of our fellow councilors might have and also questions from the public.

I analyzed the original and revised appropriations for each department, as well as the final amounts spent. I also compared the predicted revenues with the actual revenues received by the Town. All this data was recorded in two spreadsheets using the numbers from the budget documents found on our website for each year and the Excel spreadsheet that Matt sent to the Finance Committee. Since I won't be able to attend the Finance Committee meeting on April 1, 2026, I can discuss these spreadsheets in more detail at our next Town Council meeting and answer any questions that may arise. But in the meantime, I would like to share some of my observations.

These are some of the things that I noticed:

1. Many departments ended the year with a positive balance, although some were only a few hundred dollars.
2. More departments ended the year in the positive than in the negative. However, some departments, like the police department, finished the year with a significant deficit due to overtime pay as the department is understaffed. For others the deficit was by a few thousand dollars.
3. The Town, overall, consistently finished each year under budget.
4. The Town's revenues exceeded predictions in all three years. The revenue from interest on deposits was significantly higher than estimated. For 2023, the estimated amount was $80,000 and the amount received was $576,150. For 2024, the estimated amount was $300,000 and received was $1,014,472. For 2025, the estimated amount was $550,000 and the amount received was $1,031,324. Matt explained to us the difficulty of making adequate estimates for this specific line item.
5. For General Government Grants, the amount received was also significantly higher than estimated, although the difference was not as substantial as for the interest on deposits. For Education Grants, 2023 and 2024 ended with a significant amount higher than estimated, but 2025 saw a significant decrease. However, the Education Charges for 2025 were higher than estimated due to changes made by the state to the formulas.
6. Each year, the Town finished the year with a surplus and the mill rate stabilization fund was not used.

Regarding the budget draft, at this time, I don't have any other changes that I would like to propose.

Thanks,
Carmen

Sent from my iPad

File #: 26-0350 **Agenda Date:** 4/8/2026 **Agenda #:** 7.

AGENDA REQUEST
GENERAL DISCUSSION ITEM

Subject:
MOTION to set a Public Hearing (Hybird Format - Video Conference and In-Person) date to be held on April 21, 2026 at 7:00 p.m. to be held in the Council Chambers, Town Hall Annex, 741 Colonel Ledyard Highway, Ledyard**,** to receive comments and recommendations on the proposed Fiscal Year 2026/2027 Budget.

Background:
In accordance with Chapter VII; Section 5 of the Town Charter:

The Town Council shall have the power to revise any of the proposed budget items. After formation of a preliminary budget, the Town Council shall provide sufficient copies of said budget for general distribution in the office of the Town Clerk, ***and shall conduct one or more public hearings on or before the last Monday of April.*** The Town Council shall then prepare a budget for recommendation to the annual Town Meeting and shall file said budget with the Town Clerk no later than the first Monday of May.

Department Comment/Recommendation:
(type text here)

April 2026

Sunday	Monday	Sunday	Wednesday	Thursday	Friday	Saturday
			1 FINANCE 5:00 CC **(Recommend FY 26/27 Budget to Town Council)**	2	3	4
5	6 LUPPW 6:00 CC	7	8 ADMIN 5:30 CC TOWN COUNCIL 7:00 CC **APPROVE BUDGET FOR PUBLIC HEARING**	9	10	11
12	13 SCHOOL VACATION	14 SCHOOL VACATION	15 FINANCE 5:00 CC COMM REL 6:30 CC SCHOOL VACATION	16 SCHOOL VACATION	17 SCHOOL VACATION	18
19	20	21 **PUBLIC HEARING** Fiscal Year 2026/2027 Budget	22 TOWN COUNCIL 7:00 CC (Finalize Budget for Annual Town Meeting)	23	24	25
26	27	28	29	30		

File #: 26-0352 **Agenda Date:** 4/8/2026 **Agenda #:** 8.

AGENDA REQUEST
GENERAL DISCUSSION ITEM

Subject:
MOTION to set the Annual Town Meeting (Hybrid Format -Video Conference and In-Person) date regarding the proposed Fiscal Year 2026/2027 Budget on May 18, 2026 at 7:00 p.m. to be held at the Council Chambers, Town Hall Annex, 741 Colonel Ledyard Highway, Ledyard Connecticut; and to adjourn to a Referendum to be held on May 19, 2026 between the hours of 6:00 a.m. 8:00 pm.

Background:
In accordance with Chapter VII; Section 6

The **Annual Town Meeting** for the consideration of the budget and the transaction of other business **shall be held on the third Monday of May** at such hour and at such place as the Town Council shall determine.

The Town Meeting(s) may not alter the amount of any appropriation recommended by the Town Council. The vote of the Town meeting on **the annual budget shall be adjourned to a vote on the voting machines the day following the Town Meeting** in the same manner as outlined in Chapter VII, Section 9D and, if approved by a majority of those voting hereon, shall be deemed to be the vote of the Town Meeting.

Department Comment/Recommendation:
(type text here)

BUDGET PREPARATION
SUGGESTED SCHEDULE/GUIDE
AND
ANNUAL TOWN BUDGET PROCESS
(Suggested Schedule Guide)

(Please Note Some Dates are Subject to Change)

Key:
Purple: Suggested Date - Not Dictated by Town Charter;
Green/Blue: Dictated by Town Charter.

Reference: Town Charter Chapter VII - Pages (s) 28 – 31

October/November (**Election Year-Dec**) Town Council prepares and submits letter of Directive for Fiscal Year Budget to Mayor and Board of Education.
(This Date is NOT dictated by Charter)

December – Town Council approves Town Council Department budget to submit to Mayor's Office.
(This Date is NOT dictated by Charter)

Per Town Charter
(1/20/2026)
3rd Monday in January All Departments submit preliminary budget to Mayor's Office
(Monday 1/19/2026 is Martin Luther King Day Holiday).

Per Town Charter
(2/23/2026)
4th Monday in February the Board of Education shall file budget estimates to Mayor's Office.

Per Town Charter
(3/2/2026)
1st Monday in March the Mayor submits budget to Town Council and files with Town Clerk's Office.

March
Finance Committee conducts Departmental Budget Work Sessions. Departments review and submits budget materials to Town Council.

(4/8/2026)
Town Council finalizes budge to Present to a Public Hearing.
(This Date is NOT dictated by Charter)

(4/15/2026)
Town Council files proposed budget with Town Clerk's Office for Public Hearing.
(This Date is NOT dictated by Charter)

Per Town Charter On or Before Last Monday in April
(4/21/2026) (Tuesday)
On OR Before the last Monday in April the Town Council conducts one or more Public Hearings on the proposed budget at the Council Chambers. (School Vacation 4/13/2026 - 4/17/2026)

4/22/2026
Town Council Votes to Finalize Budget
(This Date is NOT dictated by Charter)

Per Town Charter
(5/4/2026)
1st Monday of May the Town Council files proposed budget with Town Clerk's Office for Annual Town Meeting

Per Town Charter
(5/18/2026)
3rd Monday in May Annual Town Meeting on the proposed budget to adjourn to a vote on the voting machine the following day (Tuesday)**.**

Per Town Charter
(Tuesday 5/19/2026)
Vote on Budget on voting machine

Per Town Charter
Should the Referendum does not approve the budget; the budget will be referred back to the Council, the Town Council should reconsider the budget and present it for a second vote on the voting machines three weeks following the previous referendum.

In the event the second referendum does not approve a budget, the Town Council shall adopt a final budget by the fourth Monday in June. Should both the referenda and the Town Council fail to adopt a final budget by the fourth Monday in June, the budget that was presented at the second referendum shall be deemed to have been adopted.

Per Town Charter
6/22/2026
On or before the **Fourth Monday in June**, the Town Council shall fix the tax rate in mils.

** The budget must be presented as a Resolution

March 2026

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						
1	**2** SP HISTORIC 6:00 AMR PUBLIC SAFETY 3:30 MO LUPPW 6:00 CC HOUSING 7:00 KCM **MAYORS BUDGET DUE**	**3** LBC 5:00 AMR EDC 6:00 AMR IWWC 7:00 CC	**4** FINANCE 5:00 CC FARMERS MKT 5:30 CC SP WPCA 7:00 CC	**5** **BUDGET WORK SESSIONS 2:00 – 4:30 CC**	**6**	**7**
8 **DAY LIGHT SAVINGS**	**9** **BUDGET WORK SESSIONS 2:00 – 4:30 CC** BUILD CMT 5:30 CC RTC 7:00 CC	**10** AMERICA 250 CMT 1:00 CC CONSERV 6:30 CC	**11** ADMIN 5:30 CC TOWN COUNCIL 7:00 CC	**12** **BUDGET WORK SESSIONS 2:00 – 4:30 CC** P&Z 6:00 CC	**13**	**14**
15	**16** HISTORIC 7:00AMRC LIBRARY 7:00 GFL	**17** RETIRE 10:00 am CC PR & SC 5:30 P&R AGRI COMM 6:00 AMR **ST. PATRICKS DAY**	**18** FINANCE 5:00 CC COMM REL 6:30 CC ZBA 6:30 CC	**19** BOARD APPEALS 5:30 CC	**20** **THINK SPRING !**	**21** BOARD APPEALS 5:30 CC
22	**23** DTC 6:00 CC	**24** BOARD APPEALS 5:30 AMR WPCA 7:00 CC	**25** BOARD APPEALS 5:30 AMR PUB HEAR 5:30 CC TOWN COUNCIL 7:00 CC	**26**	**27** BOARD APPEALS 5:30 CC	**28**
29	**30**	**31**				

April 2026

Sunday	Monday	Sunday	Wednesday	Thursday	Friday	Saturday
			1 FINANCE 5:00 CC **(Recommend FY 26/27 Budget to Town Council)**	2	3	4
5	6 LUPPW 6:00 CC	7	8 ADMIN 5:30 CC TOWN COUNCIL 7:00 CC **APPROVE BUDGET FOR PUBLIC HEARING**	9	10	11
12	13 SCHOOL VACATION	14 SCHOOL VACATION	15 FINANCE 5:00 CC COMM REL 6:30 CC SCHOOL VACATION	16 SCHOOL VACATION	17 SCHOOL VACATION	18
19	20	21 **PUBLIC HEARING** Fiscal Year 2026/2027 Budget	22 TOWN COUNCIL 7:00 CC (Finalize Budget for Annual Town Meeting)	23	24	25
26	27	28	29	30		

May 2025

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1	2
3	4 **TOWN COUNCIL FILES** **FY 26/27 BUDGET WITH TOWN CLERK** LUPPW 6:00 CC	5	6 FINANCE 5:00 CC	7	8	9
10	11	12	13 ADMIN 5:30 CC TOWN COUNCIL 7:00 CC	14	15	16
17	18 **ANNUAL TOWN MTG FY 26/27 BUDGET 7:00 COUNCIL CHAMBERS**	19 **TOWN-WIDE REFERENDUM FY26/27 BUDGET ON VOTING MACHINES**	20 FINANCE 5:00 CC **(Review If Budget Fails)** COMM REL 6:30 CC	21	22	23
24	25 MEMORIAL DAY	26	27 TOWN COUNCIL 7:00 CC **(If Budget Fails—Review for 2nd Referendum)**	28	29	30
31						

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
June 2026						
	1 LUPPW 6:00 CC	2	3 FINANCE 5:00 CC	4	5	6
7	8	9 **SECOND TOWN-WIDE REFERENDUM ON MACHINES** (If Required)	10 ADMIN 5:30 CC TOWN COUNCIL 7:00 CC **SET MILL RATE** **(On or Before the 4th Monday in June))**	11	12	13
14	15	16	17 FINANCE 5:00 CC COMM REL 6:30 CC	18	19	20
21	22	23	24 TOWN COUNCIL 7:00 CC	25	26	27
28	29	30				