

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
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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 <lfld.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

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TOWN OF LEDYARD CONNECTICUT

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(860) 464-3226
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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 or 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.

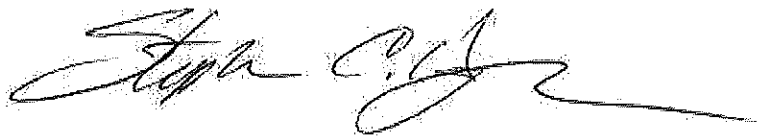
While this may seem to be splitting hairs, it does create issue when Section 5, Item a. ("*A town official, employee... has a financial or beneficial interest*"). We have several volunteer fire department members who are also small business owners and who do business with the Town. I have concerns that 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,

A handwritten signature in black ink, appearing to read "Stephen Holyfield", with a long horizontal flourish extending to the right.

Stephen Holyfield
Administrator of Emergency Services
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(860) 449-3364