

TOWN OF LEDYARD

Code of Ethics & Ethics Commission

*“An Ordinance Establishing a Town of Ledyard Code
of Ethics and Ethics Commission”*

Public Hearing Dates:

- ***September 24th, 2025***
- ***November 10th, 2025***
- ***March 25th, 2026***

DIFFERENCES BETWEEN DRAFTS FROM 10/29/2025 AND 03/11/2026

- The term “Board of Education” was inserted in several provisions to ensure language consistency.
- Some definitions were simplified (i.e. “consultant” definition was narrowed).
- The overall structure was streamlined, reducing the number of sections from 15 to 12 by merging certain sections.
- Input from both the public and Town employees was taken into account.
- The Communications section was eliminated.

Ordinance Sections

Section 1: Authority

Granted by Chapter III of the Ledyard Town Charter

Section 2: Declaration of Policy and Purpose

Officials, employees, and consultants are expected to be:

1. **Independent & Impartial**
2. **Act only through proper channels**
3. **Not use public office for beneficial or financial interest**
4. **Citizens deserve confidence in the integrity of their government.**

Section 3: Definitions

Section 4: Confidential Information & Withholding of Information

Section 5: Conflict of Interest Provisions & Other Prohibited Activities

Section 6: Disclosure and Disqualification

Section 7: Required Filings for Certain Town & board of Education Officials

Section 8: Acknowledgement Forms

Section 9: Establishments & Qualifications of Ethics Commission

Section 10: Powers and Duties of Ethics Commission

Section 11: Ethics Commission Rules of Procedure

Section 12: Severability

CONFLICT OF INTEREST

Sections 5 & 6 — Conflict of Interest, Prohibited Activities & Disclosure Requirements

PROHIBITED ACTIVITIES

- Participating in contracts or decisions where officials, employees, consultants, or their family members have a financial/beneficial interest
- Directly hiring or supervising a family member (except during temporary emergencies)
- Using Town vehicles, equipment, or property for personal profit
- Soliciting or accepting gifts from persons interested directly or indirectly in a business transaction or pending matter within the purview of the official, employee, or consultant.

DISCLOSURE REQUIREMENTS

- Must disclose any conflict of interest in contracts, transactions, or decisions within the official, employee, or consultant's purview
- Cannot represent private parties before agencies without first disclosing his or her interest
- May request an advisory opinion from the Ethics Commission if there's uncertainty as to whether the official, employee, or consultant has a conflict of interest, beneficial or financial interest that could disqualify him or her from participation in a matter.

ANNUAL DISCLOSURE FILINGS

Section 7 — Required Annual Filings for Mayor, Town Council & Board of Education



Due Date: January 1st each year — filed under oath with the Town Clerk

A

Real Estate Holdings

All Town of Ledyard real estate owned or leased (>5 yrs), excluding primary residence. Includes corporate, trust, or partnership holdings where official holds $\geq 5\%$ interest.

B

Business Interests & Employment

Names of any firm, partnership, or corporation where official holds $\geq 5\%$ interest or is employed and if applicable note if that entity has sold or supplied >\$10,000 in goods/services to the Town in the prior two years.

C

Income from the Town

Any income, fees, salary, or wages received from the Town of Ledyard during the two years immediately preceding election to office.

IMPLEMENTATION & TRAINING

Section 8 — Acknowledgement Forms

10 business days

Code incorporated into all new consultant contracts

Responsible: Town & BOE

30 business days

Current consultants receive copy of Code of Ethics

Responsible: HR Directors

60 business days

New employees given copy within 60 days of hire

Responsible: HR Directors

120 business days

Current employees receive copy from effective date

Responsible: HR Directors

ETHICS COMMISSION

Section 9 — Structure, Qualifications & Appointment

5

Regular Members

2

Alternate Members

3

Year Term

7

Council Votes Required

PARTY AFFILIATION RULES

- No more than 2 regular members from any one party
- At least 1 regular member must be unaffiliated
- Alternate members cannot both be from the same party

DISQUALIFICATIONS

- Currently employed by Town or BOE (or within 2 yrs)
- Holds or held elective Town office (within 2 yrs)
- Serves on another Town agency or political committee
- Found in violation of any code of ethics

Members serve without compensation. Max 3 terms total.

SECTION 11: ETHICS COMMISSION RULES OF PROCEDURE

Section 11A — Advisory Opinions

WHO CAN REQUEST?

- Current, former, or prospective Town/BOE officials
- Current, former, or prospective employees
- Consultants engaged by the Town or BOE
- Officials asking about departments under their jurisdiction

TIMELINE & PROCESS

Day 1

Sealed form submitted to Town Clerk
(www.ledyardct.org)

Day 5

Clerk notifies Commission Chair/Vice-Chair

Next meeting

Chair presents request (exec. session by default)

90 business days

Commission issues written advisory opinion

+30 days

Optional extension if needed

ETHICS COMMISSION RULES OF PROCEDURE

Section 11A – Advisory Opinions & Section 11B - Complaints

1

Filing of a complaint

- Shall be made on a form prescribed by the Ethics Commission and must be signed under penalty of false statement.
- Form shall be delivered to the Town Clerk in a sealed envelope who will date stamp the envelope and forward it to the Ethics Commission.
- Must file within 3 years of alleged violation

2

Probable Cause Determination

- Must be determined within 60 business days of receipt
- Requires 3 affirmative votes to proceed
- Complaint shall remain confidential unless probable cause is found

3

Public Hearing

- Respondent will have the right to be represented by legal counsel & present evidence and witnesses

4

Final Decision & Penalties

- Decisions by the Ethics Commission that a person is in violation of the Code of Ethics requires 4 concurring votes
- The commission must render its decision within 60 business days of the closing of the hearing.
- Penalties will be determined by a majority vote of the Town Council

PENALTIES FOR VIOLATIONS

Section 11B(v) — Range of Consequences for Ethics Violations

Cease & Desist

Order to immediately stop the violating conduct

Civil Penalty

Up to maximum amount permitted under State law

Censure

Formal public reprimand of the official or employee

Suspension

Suspension without pay for specified period

Demotion

Reduction in rank or level of employment

Termination

End of employment or contract with the Town/BOE

Restitution

Repayment of any benefits gained from the violation

*QUESTIONS
& COMMENTS*

