



TOWN OF LEDYARD
CONNECTICUT
TOWN COUNCIL

HYBRID FORMAT

741 Colonel Ledyard Highway
Ledyard, CT 06339
860 464-3203
<http://www.ledyardct.org>
Roxanne M. Maher
Administrative Assistant

Chairman Gary St. Vil

MINUTES
ADMINISTRATION COMMITTEE
SPECIAL MEETING

Wednesday, February 11, 2026

5:30 PM

Town Hall Annex Building

DRAFT

- I. CALL TO ORDER – The Meeting was called to order by Committee Chairman Councilor Garcia-Irizarry at 5:30 p.m. at the Council Chambers, Town Hall Annex Building.

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

II. ROLL CALL-

| Attendee Name | Title | Status | Location | Arrived | Departed |
|------------------------|---|---------|-----------|---------|----------|
| Bill Barnes | Town Councilor | Present | In-Person | 5:30 pm | 6:26 pm |
| April Brunelle | Town Councilor | Present | In-Person | 5:30 pm | 6:56 pm |
| Carmen Garcia-Irizarry | Committee Chairman | Present | In-Person | 5:30 pm | 6:56 pm |
| Earl (Ty) Lamb | Town Councilor | Present | In-Person | 5:30 pm | 6:56 pm |
| Christine Dias | Director of Human Resources | Present | In-Person | 5:30 pm | 6:56 pm |
| Brandon Graber | Board of Education Member | Present | In-Person | 5:30 pm | 6:56 pm |
| Jeff Eillenberger | Resident | Present | In-Person | 5:30 pm | |
| M. Dave Schroder, Jr | Resident | Present | In-Person | 5:30 pm | |
| Anne Roberts-Pierson | Resident | Present | In-Person | 5:30 pm | |
| Joe Gush | Permanent Municipal Building Cmt Chairman | Present | Remote | 5:30 pm | 6:56 pm |
| Carol Schneider | Resident | Present | Remote | 5:30 pm | 6:56 pm |
| Eleanor Murray | Resident | Present | Remote | 5:30 pm | |
| Ed Murray | Resident | Present | Remote | 5:30 pm | |
| Eric Treaster | Resident | Present | Remote | 5:30 pm | 6:56 pm |
| Brandon Sabbag | Resident | Present | Remote | 5:30 pm | 6:56 pm |
| Roxanne Maher | Administrative Assistant | Present | In-Person | 5:30 pm | 6:56 pm |

III. CITIZENS' COMMENTS

Mr. Jeff Eillenberger, 2 Village Drive, Ledyard, provided the Administration Committee with a packet of materials that he obtained from the Town of Waterford regarding their recent Ethics Complaint. He urged the Administration Committee to contact the Town of Waterford to talk with their staff regarding their Ethics Process, before Ledyard moved forward with implementing an Ethics Commission. He stated the Waterford staff were candid and helpful

Mr. Dave Schroeder, Jr. 290 Whalehead Road, Gales Ferry, expressed support for New Business Item #1 to establish an Ad Hoc Committee to evaluate separating the Planning & Zoning Commission into two separate Commissions.

Mr. Eric Treaster, 10 Huntington Way, Ledyard, addressed the proposed “*Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”; noting that he thought the Administration Committee’s draft dated January 28, 2026 in which they included suggestions that were discussed at their special meeting was much more comprehensive than the draft dated February 9, 2026 that was labeled “*Attorney’s Mark-Up*”. He asked that during tonight’s meeting the Administration Committee review the Town Attorney’s changes and the reasons for his changes.

IV. PRESENTATIONS/INFORMATIONAL ITEMS - None.

V. REVIEW AND APPROVAL OF PRIOR MEETING MINUTES

MOTION to approve the Administration Committee Special Minutes of January 28, 2026
Moved by Councilor Barnes, seconded by Councilor Brunelle

VOTE: 3– 0 Approved and so declared

VI. OLD BUSINESS -

1. Continued discussion and possible action on the proposed “*Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”.

Councilor Garcia-Irizarry presented a draft Ethics Ordinance dated February 9, 2026 noting after the Administration Committee’s January 28, 2026 meeting, she implemented the suggestions provided by residents Mr. Schroeder and Mr. Treaster, as well as the items the Administration Committee discussed during their meeting. She stated that she then had about a one-hour Zoom conversation with Town Attorney Matt Ritter to discuss the additional updates and the entire proposed *Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”; which produced the February 9, 2026 draft that was being presented this evening.

Councilor -Garcia-Irizarry continued by noting the following:

- **Section 2 “Principals for a Code of Ethics** – Councilor Garcia-Irizarry stated that Town Attorney Matt Riter took the Section out, because all of the behaviors that were addressed in the Ordinance were the “*Code of Ethics*”; noting that the following language summarized the “*Code of Ethics*”.

“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.”

- ***Business Associate*** - Councilor Garcia-Irizarry stated Attorney Ritter took “*Business Associate*” out of the “Definition” Section, explaining that if the Town was doing business with a company of 500 employees that all 500 employees would be considered “*Business Associates*”. Also, the term was not used anywhere else in the proposed Ethics Ordinance.
- ***Reprisals and Associated Definitions (suggested by Mr. Treaster)***: Councilor Garcia-Irizarry stated that Attorney Ritter removed the language because *Reprisals* were already covered under “*Whistle Blower Laws*”; and therefore, it did not have to be covered in the Ordinance.
- ***Gifts*** – Councilor Garcia-Irizarry stated that Attorney Ritter shortened the “Definition” by removing the language regarding “*donations; third party, and gifts from those that reside in a Committee Member’s household, etc.*” because it could not be enforced.
- ***Section 5. Conflict of Interest Provisions and Other Prohibited Activities*** – Paragraph (a) Councilor Garcia-Irizarry stated that Attorney Ritter was ambivalent about including “*consultant*”. She stated after talking about some examples Attorney Ritter agreed that “*consultant*” could stay in Section 5. However, she noted that Attorney Ritter removed “*consultant*” from paragraph (b).
- ***Section 11 Ethics Commission Rules of Procedure - Advisory Opinions*** Councilor Garcia-Irizarry stated that Attorney Ritter discussed the ability for the public to submit a request electronically, noting that we are in the 21st Century and the Age of Technology. She noted that Attorney Ritter suggested the Administration Committee discuss electronic submissions.

Advisory Opinions: Paragraph (A) Councilor Garcia-Irizarry stated for the public to submit a request for an Advisory Opinion that she thought electronic submission would be okay because it was an opinion and it was not binding, however, she noted that it was not the same as filing a Complaint in which they had to sign the form that was basically under oath. Councilor Barnes stated suggested that they start with the in-person process for the Advisory Opinions. He stated if they found that they could be more efficient with electronic submissions for Advisory Opinion that they could move in that direction based on the volume.

Complaints: Paragraph (B) Councilor Garcia-Irizarry stated filing a Complaint was very serious, noting that it required the person to fill out and sign the Complaint Form. Therefore, she questioned how the town could offer the filing a Complaint on-line, because they would be required to sign the Complaint Form. Councilor Brunelle stated the Town would need to have a program such as “*DocuSign*” for people to electronically sign documents. Councilor Barnes explained that there were a number of digital identity platforms; however, the Town would need to ensure whether the signature was authentic and valid. He stated for the Complaint that he would prefer using the paper process. The Committee agreed the Complaint process was fine as it was currently written in the proposed Ethics Ordinance.

- **Communications** – Councilor Garcia-Irizarry explained that Attorney Ritter made some changes to “*Communications*” that the Ethics Commission could receive, because the Ethics Commission would be subject to Freedom of Information Act (FOIA). She stated any Confidential Communications regarding a Complaint should not be sent by email, because they would be subject to FOIA. She stated everything regarding the Complaint should be included with the submission of the Complaint Form. Councilor Barnes stated that Attorney Ritter’s change supported the Committee’s position not to use an electronic means regarding the Advisory Questions and the Complaint Form
- **Appendix Listing Who would be covered by the Ethics Ordinance** - Councilor Garcia-Irizarry stated that Attorney Ritter stated that they could have an Appendix. However, to modify the Appendix that they would still be required to follow the same process as to amend/modify the Ordinance, which would require a Public Hearing. She went on to note that Attorney Ritter also explained that the Town Council could not restrict the actions of a future Town Council by stating that certain individuals such as elected officials, certain employees, and certain volunteer members of regulatory boards and commissions, would be *Mandatory*; and could not be removed from the Appendix.

Councilor Barnes stated after hearing Attorney Ritter’s guidance, that because the Appendix to the proposed Ethics Ordinance would be changing who the Ordinance would cover, and not just providing clarification detail. He stated that the language the Administration Committee discussed at their January 28, 2026 meeting would have probably been alright, if they were simply defining what is, but because the suggested Appendix was actually including, and excluding who would be covered by the Ordinance; that it was probably better if they do not include an Appendix. He stated he was a little disappointed but understood.

Councilor Garcia-Irizarry stated that it would be simpler if the Ethics Ordinance applied to everyone. Councilor Barnes stated although they had good intentions in considering an Appendix, that he agreed it would be simpler not to. He suggested that during the Public Hearing the Administration Committee share that they worked to try find a means to separate certain groups that the Town Council might choose not to subject to the Ethics Ordinance, however, they came away with a legal opinion that it was not an enforceable approach.

The Administration Committee continued by reviewing the Attorney’s Ritter’s recommendations as noted in the marked-up draft below, noting that Attorney Ritter removed language that he thought he could not enforce, and for clarity changed the titles of some sections, moved some sections around; and provided some editorial changes to make the language more concise and succinct.

DRAFT: 2/9/2026
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:

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, ~~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 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 circumstance, 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 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.~~ b. ~~The~~ 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 (120)~~ thirty (30) business days of its effective date. Copies of the Code o 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 (~~6~~ 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. **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 laws
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

MOTION to recommend the Town Council adopt a proposed “*Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*”; as presented in the draft dated February 9, 2026.

Moved by Councilor Brunelle, seconded by Councilor Barnes

Discussion: Councilor Garcia-Irizarry stated that she was satisfied with the proposed “*Ordinance Establishing a Town of Ledyard Code of Ethics and Ethics Commission*” as presented in the Town Attorney’s draft dated February 9, 2026.

Councilor Barnes noted that *Section 9. Establishment and Qualifications of Ethics Commission*; Paragraph € stated the following: *Members of the Ethics Commission shall be appointed by a minimum of (67) seven affirmative votes of the Town Council.* (see above discussion).

VOTE: 3 – 0 Approved and so declared

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| RESULT: | 3 – 0 APPROVED TO RECOMMEND |
| MOVER: | April Brunelle, Committee Member |
| SECONDER: | Bill Barnes, Committee Member |
| AYES: | Bill Barnes, April Brunelle, Carmen Garcia-Irizarry |

❖ MOTION to recommend the Town Council set a Public Hearing (Hybrid Format - Video Conference and In-Person) Public Hearing (*date to be determined*) to be held in Council Chambers, Town Hall Annex, 741 Colonel Ledyard Highway, Ledyard, Connecticut, to receive comments and recommendations regarding a proposed “*An Ordinance Establishing a Town of Ledyard Code Of Ethics*”

Moved by Councilor Brunelle, seconded by Councilor Barnes

Discussion: Councilor Barnes suggested they could forward setting the Public Hearing to the Town Council without a date to allow them to determine the date of the Public

hearing for the proposed “*An Ordinance Establishing a Town of Ledyard Code of Ethics*”.

The Administration Committee agreed to allow the Town Council to determine the date of the Public Hearing as noted in the Motion (*date to be determined*).

VOTE: 3 – 0 Approved and so declared

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| RESULT: | 3 – 0 APPROVED TO RECOMMEND |
| MOVER: | April Brunelle, Committee Member |
| SECONDER: | Bill Barnes, Committee Member |
| AYES: | Bill Barnes, April Brunelle, Carmen Garcia-Irizarry |

Human Resources Director Christine Dias addressed *Section 8. “Acknowledgment Forms”* of the proposed Ethics Ordinance. She noted that Attorney Ritter changed the language for all of the Acknowledgement Forms to be returned the Town’s Human Resources Office, and she questioned his justification. Councilor Garcia-Irizarry stated that she and Attorney Ritter discussed sending the Acknowledgement Form to everyone electronically.

Ms. Dias stated that Town Officials typically work through the Town Clerk’s Office and that she typically only handles Employees. She stated that she was fine with all the Acknowledge Forms being returned to her Office. However, she stated that she thought it would make more sense for the Town Employees to return the Acknowledgement Forms to her; but for the Elected Officials and Volunteers serving on Town Committees/ Commissions/Boards to return their Acknowledge Forms to the Town Clerk.

Councilor Garcia-Irizarry stated that she would talk to Attorney Ritter; and after the Public Hearing that the Town Council could make the modification as Human Resources Director Christine Dias suggested for Employees to return the Acknowledgement Forms to her Office; but for the Elected Officials and Volunteers serving on Town Committees/ Commissions/Boards to return their Acknowledge Forms to the Town Clerk.

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| RESULT: CONTINUED | Next Meeting:02/11/2026 5:30 p.m. |
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2. Continued discussion and possible action to review and update

Councilor Garcia-Irizarry stated she and Town Attorney Matt Ritter had a lengthy discussing regarding the Res#001-2023/Feb 22 “*Resolution Establishing Administrator Department Head Benefits*” because she thought that the Resolution and the Town Charter were in conflict as follows:

Councilor Garcia-Irizarry stated that Chapter II; Section IV (page 8) of the Town Charter stated the following:

*“Such Town Council may by ordinance regulate the internal operation of boards, commissions, and offices which it fills by appointment, and shall fix the compensation and conditions of employment of all officers and **employees not in the classified service** as hereinafter provided in Chapter VIII, Section 2.”*

Chapter VII; Section 13 of the Town Charter (page 27) stated the following:

- **Section 13. Salaries**

“Salaries of all directors and of all employees in the classified service of the Town shall be determined by the Town Council, in conformity with a systematic pay plan for the positions involved, upon recommendation of the Mayor, provided nothing herein shall be construed to limit the power of the Board of Education to fix compensation of the professional employees of the school system”.

Councilor Garcia-Irizarry continued by stating that Town Attorney Matt Ritter stated that these parts of the Town Charter were confusing and it was his opinion that it was not well written.

Councilor Garcia-Irizarry stated that it was her opinion that the Town Council was the Legislative Body and that the finances go through the Town Council. She stated in accordance with the Res #001-2023/Feb 22 “*Resolution Establishing Administrator Department Head Benefits*” that the Section titled: “*Wages And Compensation*” as noted below; was the only financial thing that would not go through the Town Council:

- *“Employees shall be paid at the rate as designated by the Mayor or contractually negotiated. Increases in wages shall be effective on the first day of July; and continuing until June 30, 2025, wage increases may not be less than the percentage of the highest union contracted increase for that fiscal year.”*

Councilor Garcia-Irizarry went on to state that the Town Charter says that the Mayor had to submit to the Town Council a Payment Plan and Salary Recommendations. Therefore, she stated the Town Council was setting the salaries for some employees, but for others, and she noted that she was talking about the Employees who were not in the Classified Service. She went on to state that the contractual salaries were another thing.

Councilor Barnes stated that the majority of the benefits were probably okay, and he questioned whether Councilor Garcia-Irizarry had a problem with the one sentence in *Wages and Compensation* Section of the Resolution which said “*Employees shall be paid at a rate as designated by the Mayor, or contractually negotiated*”. Councilor Garcia-Irizarry stated that she would like the wording to say: “*The salaries were designated by the Town Council, with the recommendation of the Mayor*”.

Human Resources Director Christine Dias questioned the process if they had a Department Head vacancy mid-year, and whether the town would need to wait to post the position for the Town Council to have a meeting to set the salary for the vacant position; noting that could delay the posting and filling of the position. Councilor Garcia-Irizarry stated that the salary would be what was listed in the budget. Councilor Brunelle stated if they needed to change the salary, they could come to the Town Council.

Ms. Dias requested clarification, noting that the salaries would be set as part of the Annual Budget process, based on the Mayor's recommendation. Therefore, she questioned what the change would be to the Department Head Resolution. Councilor Garcia-Irizarry stated that the wording in the Resolution would be changed. She stated the Administration Committee did not have to vote on the Department Head Resolution tonight, noting that she could email the Mayor to ask for clarification about the process to hire employees.

Councilor Barnes noted the language in the "*Salaries and Wages*" Section of the Department Head Resolution currently stated the following:

"Employees shall be paid at the rate as designated by the Mayor or contractually negotiated. Increases in wages shall be effective on the first day of July; and continuing until June 30, 2025, wage increases may not be less than the percentage of the highest union contracted increase for that fiscal year".

Councilor Barnes stated the language "*wage increases may not be less than the percentage of the highest union contracted increase for that fiscal year*" was a constraint; or an obligation, that they may want to clarify as to whether that was appropriate or not. Councilor Brunelle stated that she did not have a problem leaving that language in the Resolution, noting that was not what was in conflict with the Town Charter.

Councilor Garcia-Irizarry stated as an example that the Mayor would provide a salary recommendation based on the instructions in the Department Head Resolution, and the Town Council would give the salary a "*Stamp of Approval*". Ms. Dias questioned whether it would be fair to say that if they had a Department Head vacancy mid-way in the year that as long as they were within the confines of budgeted salary for that year, they would not have to obtain Town Council approval; because it was already approved. Councilor Barnes explained if the employment market was such that they could not fill the position within the budgeted salary amount and they needed to increase it by 20% then they would be required to obtain Town Council approval.

Councilor Garcia-Irizarry stated that she was envisioning the number that they approved in the budget. Ms. Dias stated that the salary number in budget was tied to the language in the Resolution that stated: "*wage increases may not be less than the percentage of the highest union contracted increase for that fiscal year*". She stated in the last budget process this was where there were some differing opinions, because employees had a set salary, and then they were getting the 3% increase, because that was the highest contractually negotiated increase with the unions. Councilor Garcia-Irizarry noted during the Fiscal Year 2025/2026 Budget process, there was one union position that Ms. Dias mentioned that had to have a certain number of hours per the contract; and that the salary had to provide for those hours; therefore, the Town Council fixed that salary to match the contract. She stated the Town Council would follow terms of the contract; however, she stated when they do something that was beyond the contract, that was where the decision should fall to the Town Council. She stated that this was what she thought should be clarified in the Department Head Resolution. She stated that she would send the Mayor an email to get more clarification for the Administration Committee's March 11, 2025 meeting.

Ms. Dias asked whether the Administration Committee had any questions regarding the other edits she provided for the Res#001-2023/Feb 22 “*Resolution Establishing Administrator Department Head Benefits*”. Councilor Garcia-Irizarry stated not at this time, but that she would email Ms. Dias if she had any questions.

RESULT: CONTINUED

Next Meeting:03/11/2026 5:30 p.m.

VII. NEW BUSINESS

1. Discussion consider establishing of an Ad-Hoc Committee to evaluate if the Planning & Zoning Commission should stay as one commission or if it should be split.

Councilor Garcia-Irizarry noted that several residents have asked for the Town Council to evaluate whether the Planning & Zoning Commission should be separate Commissions. She stated that it has been quite a while since the two Commissions were combined, and therefore, she stated that things always need to be reviewed. She went on to note that it was her opinion that the individuals that serve on the Ad Hoc Committee to evaluate whether or not the Combined Commission should be two separate Commissions should have knowledge of Planning and Zoning. She stated that she would work to draft a Resolution for the Administration Committee’s March 11, 2026 meeting.

RESULT: CONTINUED

Next Meeting:03/11/2026 5:30 p.m.

2. Any other New Business proper to come before the Committee. – None.

VIII. ADJOURNMENT

VOTE: Councilor Barnes moved the meeting be adjourned, seconded by Councilor Brunelle
3 - 0 Approved and so declared, the meeting was adjourned at 6:26 p.m.

Respectfully submitted,

Carmen Garcia-Irizarry
Committee Chairman
Administration Committee