



April 23, 2009

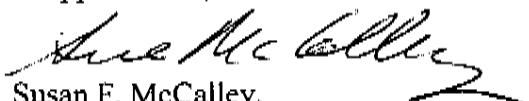
Mr. Paul deBary, Chair
Board of Ethics
One White Birch Road
Cos Cob, CT 06807

Dear Mr. deBary:

Enclosed is the newly-adopted position statement of the League of Women Voters of Greenwich on changes to the Greenwich Code of Ethics. The study committee of the LWVG thanks the members of the Board of Ethics, past and present, who were interviewed in the course of this study. Mr. Pittoco has received a copy under separate cover, and I have included copies here for Ms. Finn, Mr. Grele; and Ms. Parkinson-Webb.

On behalf of the Ethics Study committee and our LWVG President, Naomi Schiff Myers, I am requesting a meeting with you, and/or the Board of Ethics at an upcoming meeting, to have the opportunity to hear your views and reactions to the position and to discuss how we can move this issue forward for meaningful change in the Code of Ethics. As I am out of town after May 10th for the balance of the month, I am suggesting a meeting with you on May 1 or 5th at your convenience. I will call you to arrange the most convenient meeting time.

In appreciation,


Susan F. McCalley,
VP for Advocacy

LEAGUE OF WOMEN VOTERS OF GREENWICH

P. O. Box 604 • Greenwich, CT 06836-0604 • 203.352.4700 • www.lwvg.org



LWVG Local Position on ETHICS:

The League of Women Voters of Greenwich believes that the public should have confidence in the integrity of its government. Town government officials and employees should be held accountable for carrying out their duties in both an effective and an ethically responsible manner. The Code of Ethics and procedures for its administration should be clear, transparent, comprehensive and effective.

Therefore, the LWVG believes that the Town of Greenwich should:

- ensure that every newly elected, appointed or employed town officer (as defined by the Municipal Code 2-6a3) read and acknowledge understanding of the Town's Code of Ethics;
- create an interpretative companion guide to the Ethics Code which could include examples of ethical and non-ethical behavior;
- develop a mechanism for the annual distribution of the Code of Ethics Disclosure Form to all town officers and explicit procedures for collecting, evaluating and storing completed disclosure forms;
- provide sufficient funding and resources (e.g., storage and clerical assistance) to support the work of the Board of Ethics, including annual dissemination and collection of disclosure forms and issuance of the code to town officers.

The LWVG believes that the Town of Greenwich Code of Ethics should be amended to include:

- non-financial conflicts of interest and the appearance of conflicts of interest;
- an expanded gift policy section to address "pattern" of gifts, for example, "no town officer should routinely accept any gift or item that could give the appearance of influencing the performance or non-performance of duties";
- requiring the appointing authority to acknowledge in a timely manner the findings of the Board of Ethics and report action taken;
- prohibiting the divulging of confidential information by town officers;
- increasing the current \$100 threshold for filing a Code of Ethics Disclosure Form.
- requiring town officers to recuse themselves from deliberations on issues where a conflict of interest exists.
- prohibiting town officers from representing private interests before the town related to his/her area of service to the Town;
- prohibiting town officers from using public resources not otherwise available to the public

The LWVG believes that the Town of Greenwich should:

- enact a town ordinance that establishes a system to enable disciplinary action as a result of Board of Ethics findings relating to town officers.

LEAGUE OF WOMEN VOTERS OF GREENWICH EDUCATIONAL FUND

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