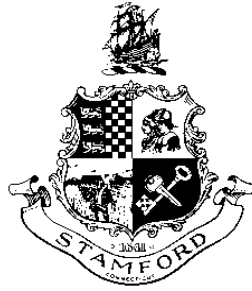


MAYOR
Caroline Simmons



CHAIR
Fred C. Springer
MEMBERS
Christine A. Dzujna
Benjamin Folkinshteyn
Laura Indellicati
Vito Quivelli
Ira Stechel
Dennis Torres
ALTERNATE
Kevin J. Quinn
Janibell Comerford

CITY OF STAMFORD

BOARD OF ETHICS

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ANNUAL REPORT

Pursuant to
Section 19-14 E (2) of
The Stamford Municipal Code of Ethics

May 31, 2024

This Annual Report has been prepared by the Board of Ethics of the City of Stamford (the “Board”) and is delivered to the Mayor and the President of the Board of Representatives pursuant to Section 19-14 E (2) of the Stamford Municipal Code of Ethics (“the Code”). The report period begins June 1, 2023 and ends May 31, 2024 (the “Report Period”).

The Board engaged in the following activities during the Report Period:

1. **Advisory Opinions**

During the Report Period, the Board received four requests for Advisory Opinions. The Board issued three Advisory Opinions and one request for an Advisory Opinion was withdrawn.

2. **Formal Complaints**

During the Report Period, the Board received four Complaints to investigate. All Complaints were investigated and dismissed upon finding no probable cause.

3. **Training for the Board**

According to **Sec. 19-14 A (2)**, “new members shall provide documentation they have completed the State of Connecticut Office of State Ethics' online ethics training, "Ethics 101" or the equivalent state course, within thirty (30) days of appointment by the Board of Representatives. No appointee may participate in any Board of Ethics activities until such training is completed.”

In addition, **Sec. 19-18 A**, states that, “the Director of Human Resources is responsible for developing and delivering, or contracting with other entities to develop and deliver, training programs for all officers and employees of the City of Stamford, whether elected or appointed, paid or unpaid, concerning the requirements of ethical behavior, as encompassed in the Code of Ethics. Such training shall be required promptly following the initial appointment, election or hiring of any officer or employee of the City of Stamford and mandatory follow-up training shall take place every four (4) years. The Director of Human Resources shall be responsible for certifying and maintaining records that all officers and employees have received such training.”

Most recently, Board of Ethics training for all Board members was provided through a collaborative effort by the City’s Human Resources and IT Department through the KnowBe4 portal.

4. Board Members

The Code calls for a body of seven Members and two Alternates. Functionally, as has been the practice in past years, Alternate Board Members are “considered working members of the Board” pursuant to Code Section 19-14 A (6) and participated in all meetings and work of the Board.

In previous years, the Board voted to report the attendance record of each Board Member in the Annual Report. During the Report Period, there were twelve meetings scheduled, four were cancelled, leaving a total of eight meetings which members could possibly attend; depending on term dates and any approved leaves. The following is the attendance record for the Report Period:

Member Name	Meetings Present	Possible Meetings	Attendance Percentage %
Janibell Comerford	1	1* *Appointed by BoR May 6, 2024	100%
Christine Dzujna	8	8	100%
Benjamin Folkinshteyn	8	8	100%
Laura Indellicati	5	5* *Excused LOA for (3) meetings	100%
Allan Lang	1	1* *Resigned July 15, 2023	100%

Member Name	Meetings Present	Possible Meetings	Attendance Percentage %
Kevin Quinn	8	8	100%
Vito Quivelli	1	1* *Appointed by BoR May, 6, 2024	100%
Monica Smyth	7	7* *Term ended prior to May meeting date	100%
Fred Springer	6	8	75%
Ira Stechel	6	7* *Appointed by BoR June 20, 2023	85.7%
Dennis Torres	7	8	87.5%

5. Administrative Support

Our Administrative Assistant, Kimberly Hawreluk continues to provide the Board with outstanding support, for which we are most appreciative.

6. Recommendations

The Board would like to present Code revisions to definitions in Sec. 19-3 for *Official Action* and *Private Interest*. In addition, the Board would like to propose a recommendation to Sec. 19-14 C(1)(c) relating to *Advisory Opinions*. Please refer to the attached recommendations. The Board's suggested Code revisions are underscored and highlighted in red.

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Sec. 19-3. - Definitions.

[]

Officer. An individual elected to a municipal office or appointed by the Mayor, including but not limited to ad hoc committee members and members of the Board of Education, but excluding Justices of the Peace and constables.

Official Action. Discretionary or ministerial acts by an Officer or Employee. Official Action is discretionary when it is the result of an exercise of judgment. An Official Action is ministerial when it is absolute, certain, and imperative, involving merely the execution of a set task, and when the law that imposes it prescribes and defines the time, manner, and occasion of the performance with such certainty that nothing remains for judgment or discretion.

Person. Includes associations, firms, partnerships and bodies politic and corporate, as well as individuals.

[]

Section 19-4. - Conflicts of Interests.

A. *General rule.* To avoid the appearance and risk of impropriety, a city officer or employee shall not take any discretionary Official Action or abstain from taking or alter the performance of a ministerial Official Action that such person knows is likely to affect the economic interests of:

[]

[]

D. For the avoidance of doubt, it shall not be a violation of this provision for any city officer or employee to take any ministerial official action regardless of whether taking that action is likely to affect the economic interests of any person or entity listed in 19-4A(1)-(9).

DRAFT

Sec. 19-3. - Definitions. []

[]

Person. Includes associations, firms, partnerships and bodies politic and corporate, as well as individuals.

Private Interest. A personal interest, including any economic interest, that is not shared by other similarly situated members of the general public. When considering whether someone has a private interest, it should be considered, among other things, whether the interest is capable of impeding the officer's or employee's ability to fairly assess the merits and/or propriety of an action or proposal.

Probable cause. More than mere suspicion. There must be facts and circumstances within the Investigating Committee members' knowledge, and of which they have trustworthy information, sufficient to justify the belief of a reasonable person that a violation of the Code of Ethics has occurred.

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Suggested Code revisions relating to reliance on advisory opinions:

19-14 C(1)(c): An advisory opinion shall only be issued when all hearings concerning the request are held in open public meeting. Such advisory opinion, which shall be confined to the specifics of the question(s) put to the Board in rendering such opinion, shall be binding on the Board, the officer(s), board or commission member(s) or alternate(s), or employee(s) until amended or revoked, and reliance on it in good faith shall be an absolute defense in any action or proceedings brought under the Code of Ethics. The finding of any advisory opinion shall pertain only to the specific circumstances put forth in the request submitted by the officer or employee seeking that advisory opinion and should not be construed as precedent for any future requests for an advisory opinion or complaint filed with the Board filed by the same (or any other) officer or employee. Similarly, any advisory opinion issued by the Board should not be relied upon by any officer, employee, or member of the public when seeking guidance on any other question of conduct addressed in the Code.