

GREENWICH BOARD OF ETHICS

Minutes of Regular Meeting on June 12th, 2018

Members Present: Paul de Bary, Chair and Acting Secretary, Robert Grele and John Margenot.

Members Absent: Rev. Ian Jeremiah, Robert Sisca

Others Present: Patricia Burns, Steve Katz

The meeting was called to order at 5:40 P.M. The Chair noted that the agenda for the meeting had been provided to all the members, posted online and posted in Town Hall in accordance with Freedom of Information Act requirements. He also noted that, with Mr. Grele and Mr. Margenot present, there was a quorum. The members present had received a draft of the minutes of Board's meeting on April 24th, 2018. After review, there were no revisions requested to the draft minutes.

Upon motion made by Mr. Grele and seconded by Mr. Margenot, the minutes of the April 24th, 2018 meeting of the Board were approved as attached to these minutes as Exhibit A.

The Chair then confirmed that the members present had received drafts of a reminder notice to Town Officers concerning their obligation to file disclosure statements prior to July 31st. After discussion of the notice and the mechanics of distribution, the Chair indicated that he would proceed with distribution of the reminder and that it would be attached to the minutes as Exhibit B.

The Board then reviewed a revised draft statement of facts that had been prepared in connection with a request for an advisory opinion from the Commission on Aging. The Chair reported that he had met with Mr. Sisca and that the revisions from the draft that was discussed at the last meeting were a result of that meeting as well as reflecting the discussions of the full Board.

The Board then engaged in further discussion with Mrs. Burns and Mr. Katz to clarify facts and ensure that the issues raised were responsive to the request on behalf of the Commission. The Chair then polled Mr. Grele and Mr. Margenot with regard to their feelings on the issues and agreed to prepare a draft advisory opinion consistent with the consensus of the Board at the meeting. This would be subject to further review and approval at the next meeting of the Board.

At this point, the Board thanked Mrs. Burns and Mr. Katz for their assistance and they left the meeting.

The next item on the agenda was a request for an advisory opinion by the director of a Town Department who had been asked to sit on a “client advisory board” by a Town vendor. A copy of a draft statement of facts and issues had been provided to the members of the Board. The Chair explained that he had been in contact with the person requesting the opinion that afternoon and was expecting that the Board would be able to discuss the draft with the person, but that there must have been a mis-communication.

After reviewing the facts and issues presented in the draft, the members requested additional information concerning the cost, duration and scope of the Town’s contract with the vendor in question. The Chair indicated that he would contact the person requesting the opinion and make further revisions in the draft reflecting the information and the Board’s discussion of the matter at the meeting. This would also be subject to review and approval at the next meeting of the Board.

Following this discussion, there was no further business before the Board and the meeting was adjourned by unanimous consent at 7:14 P.M.

EXHIBIT A

GREENWICH BOARD OF ETHICS

Minutes of Regular Meeting on April 24th, 2018

Members Present: Paul de Bary, Chair and Acting Secretary, and Robert Grele throughout, John Margenot and Robert Sisca, as indicated.

Members Absent: Rev. Ian Jeremiah

Others Present: Thomas Klein

The meeting was called to order at 5:48 P.M. by the Chair, who noted that the agenda for the meeting had been provided to all the members, posted online and posted in Town Hall in accordance with Freedom of Information Act requirements. He also noted that, with Mr. Grele and Mr. Sisca present, there was a quorum. The members present had received a draft of the minutes of Board's meeting on February 13th, 2018. After review, there were no revisions requested to the draft minutes.

Upon motion made by Mr. Grele and seconded by Mr. Sisca, the minutes of the February 13th, 2018 meeting of the Board were approved as attached to these minutes as Exhibit A.

The Chair then reported that he had not been able to maintain sufficient contact with representatives of the Commission on Aging for them to be able to attend the meeting. He indicated that it was also inconvenient for them to attend the June 5th scheduled regular meeting, although they could attend the Tuesday before or after. After getting a sense of the availability of the Board members present, the Chair indicated that he would see if it was feasible to reschedule the June 5th meeting. Discussion of the Commission's request was then deferred until later in the meeting.

The next item on the agenda was a request for an advisory opinion by the director of a Town Department who had been asked to sit on a "Client Advisory Board" by a Town Vendor. A copy of the request had been provided to the members of the Board and the person requesting the opinion was present to answer any questions that the Board might have.

The members of the Board reviewed a number of areas with the Director, requesting additional details about the Director's role in the selection and ongoing supervision of the vendor, the exact nature of the advisory board's expected operations, the benefit of participating in the advisory board compared to the time involved, the possibility that the operations of the advisory board might change in ways that could compromise the Director and what expenses were expected to be covered by the Town vs. the vendor. During this discussion, Mr. Margenot joined the meeting.

Following this discussion, the Director offered to provide the Chair with more information and the Chair indicated that the information would be shared with the members of the Board. The next step would be to work on a description of facts and have it reviewed at the next meeting. The Director indicated that there was no urgent need for the advisory opinion and, as a result, continuing the review at the next meeting would be fine. At this point, Mr. Klein and Mr. Sisca left the meeting.

The Board then briefly reviewed a draft statement of facts that had been prepared in connection with the request from the Commission on Aging. It was agreed that further discussion with representatives of the Commission would be helpful.

Following this discussion, there was no further business before the Board and the meeting was adjourned by unanimous consent at 7:42 P.M.

EXHIBIT B



TOWN OF GREENWICH

Town Hall, 101 Field Point Road, Greenwich CT 06830

Board of Ethics

Paul A. deBary, Chairman
Rev. Ian Jeremiah, Secretary
Robert F. Grele, Member
John Margenot, Member
Robert V. Sisca, Member

Tel: 1 (888) 432-2777
Fax: 1(203) 724-3000

May 14, 2020

Re: Annual Ethics Disclosure Filings

To all Town Officers:

First of all, we'd like to thank some of you for not filing financial disclosure forms over the last few years. That may sound surprising. But it shows that there is a better understanding of the requirements of our Code of Ethics today than there was a few years ago, when many forms were filed showing nothing to report. As most of you know, all Town employees and elected and appointed officials in Greenwich are subject to the Code's reporting requirements. So there are literally thousands of people responsible to comply with the Code. If everyone was required to file annually, even if they had nothing to report, it would needlessly use up quite a bit of paper, not to mention valuable time.

It's easy to see that the decision, made many years ago, not to ask people to file disclosure forms when they had nothing to disclose, was a smart one. What may not be so easy to see is that the decision was based on trust.

Trust is actually reflected in our Code of Ethics in many ways. It's not just about whether you need to file a disclosure statement every year whether you have an interest in a Town transaction or not. It goes much deeper than that.

It's reflected in the fact that that the Code establishes a set of simple guidelines and relies on our common sense and integrity to put them into practice. It's reflected in the expectation that people will voluntarily reach out to the Board of Ethics for guidance when they find themselves in situations where they don't feel the rules are clear. And it's reflected in the belief that if you're willing to disclose

your interest in a Town transaction, you aren't likely to be taking advantage of it for personal gain.

And that gets to the issue we are left with now that most of the unnecessary filings have been done away with: Is it really possible that, with all the thousands of transactions that the Town engages in on an annual basis, only a handful of Town Officers have something to report each year?

Several years ago, the Board of Ethics did a survey to try to judge how well our Town Officers understood the requirements of the Code. What we found was that there were some common misconceptions about the Code's reporting requirement. One of them was that reporting was required every year. But a much more common misconception was that reporting was required only if you were personally involved in a Town transaction that you had an interest in it.

In fact, you're required to file a statement if you have a financial interest in a Town transaction, even if you have no involvement in that transaction at all.

Why? It gets back to trust. In this case, it's about public trust, which can sometimes be in short supply. In effect, the Code of Ethics reflects a philosophy that full disclosure is necessary to maintain public trust, and that Town Officers can be trusted to make the necessary effort that full disclosure involves, even if it seems like a bit of a nuisance.

Thank you all for taking the time to consider your financial interests and those of your family and the organizations you have an interest in, either as an investor, employer, partner, manager or major donor. Think about what the Town normally does and what it's been doing in the 2017-2018 fiscal year. If you find you have a financial interest in a Town transaction, justify the trust that the Code of Ethics places on you by filing a disclosure statement. You'll be helping Greenwich look good inside as well as outside.

If you have questions or need to download a copy of the form, check out our website at: http://www.greenwichct.org/government/boards/board_of_ethics/. And if you still have any questions, that's what we're here for. Give us a call on our private confidential number at (888) 432-2777. We'll be happy to help.

Have a great summer!

**BOARD OF ETHICS OF THE TOWN OF GREENWICH
RECORD OF VOTES BY THE BOARD**

DATE: JUNE 12, 2018

**MOTION/RESOLUTION: TO APPROVE THE MINUTES OF THE
BOARD'S FEBRUARY 13TH, 2018 MEETING.**

Member	Yea	Nay	Abstain	Absent
Paul de Bary	x			
Robert Grele	x			
Rev. Ian Jeremiah				x
John Margenot	x			
Robert Sisca				x