

**DRAFT**

## **GREENWICH BOARD OF ETHICS**

### **Minutes of Regular Meeting on September 7, 2022**

**Members Present:** Paul de Bary, Chair, Jennifer Paul Cohen, Secretary, Robert Grele (via Zoom video link), Rev. Stephanie Johnson

**Members Absent:** Robert Sisca

**Others Present:** Selectman Lauren Rabin, Town Clerk Jacqueline Budkins, William Grad, Board of Assessment Appeals (joined meeting at 5:43)

The hybrid meeting was called to order by roll call at 5:33 P.M. by the Chair, who noted that a quorum was present and 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. The Chair also noted that Robert's Rules of Order would be suspended in the interest of efficiency, subject to being reinstated in the interest of an orderly discussion.

The first item on the agenda was consideration of the Board's report on referral and recommendation practices, which included a proposed policy for consideration by the Selectman. The Chair explained that following a request from the 1<sup>st</sup> Selectman to determine the usefulness of a formal policy on referrals and recommendations by Town departments, the Board interviewed 17 Town departments and invited comment and feedback. Following input from Town Departments the Board circulated a draft policy and further incorporated Department feedback. The Chair summarized the Board's findings, i.e. most Town Departments follow an unwritten policy not to make specific referrals or recommendations of product and service providers. The Board's draft policy is intended to clarify rather than change this existing policy. Some departments need to make exceptions to this policy in order to properly carry out their responsibilities and have developed procedures to do so. The Board's policy reflected these differences and special accommodations and made some recommendations, specifically with respect to the creation, maintenance, and circulation of lists of providers some departments maintain.

The Chair invited comments on the draft report from Board members and attendees, and thanked Town Officers for assisting the Board. There being no further comment, the Secretary moved that the report be approved. Stephanie Johnson seconded the motion. The Secretary read out the following resolution,

**RESOLVED** that the Board's report to the Selectmen recommending a Town Policy with respect to referrals and recommendations be approved in the form attached as Exhibit A to the minutes of the meeting.

The Chair took a roll call vote with all members present approving the motion unanimously.

The next item on the agenda was approval of the minutes from the June 8, 2022, meeting. The Secretary had distributed drafts of the minutes from the 1<sup>st</sup> meeting in executive session, 2<sup>nd</sup> meeting in executive session, and the regular meeting of the Board on June 8, 2022, noting that the approval of draft minutes from the 3<sup>rd</sup> meeting in executive session is deferred pending the conclusion of a confidential evaluation. There were no further revisions requested to the minutes. The Secretary then moved for adoption of the minutes of the 1<sup>st</sup> meeting in executive session, 2<sup>nd</sup> meeting in executive session, and the regular meeting of the Board on June 8, 2022. The Chair seconded the motion, and the minutes from these meetings of the Board were approved unanimously in the form attached to these minutes as Exhibit B.

The Chair then reported that no complaints or requests had been made since the last meeting of the Board.

The Chair then moved to the election of officers. The Chair moved that Jennifer Cohen continue as Secretary, and Stephanie Johnson seconded the motion. A roll call vote was taken with the Secretary abstaining. All members voting approved the motion unanimously.

A motion was made by the Secretary for Paul de Bary to continue as Chair and Stephanie Johnson seconded the motion. A roll call vote was taken with Paul de Bary abstaining. All members voting approved the motion unanimously.

A motion was made to institute the position of Assistant Secretary who would succeed as Secretary or fill-in as Secretary if needed. The Chair made a motion to nominate Stephanie Johnson as Assistant Secretary and Jennifer Cohen seconded the motion. A roll call vote was taken with Stephanie Johnson abstaining. All members voting approved the motion unanimously.

The Chair then reviewed the disclosure filings submitted through the online system, noting that discussions with the IT department regarding arranging a more robust and secure online filing system would be useful in order to map out the scope of work. Selectman Lauren Rabin mentioned that the Town's Civic Engage platform offered a module that the Town hadn't yet subscribed to that might be helpful in this regard.

The Chair then noted that a draft of the Board's 2022 annual report to the Selectmen and the RTM had been circulated to each of the members and indicated that the draft would be updated to reflect the approval of the Board's report to the Selectmen on referrals and recommendations and the proposed policy it recommended. A copy of the report would be posted on the Town website and a link would be provided in the annual report so the results could be socialized with the members of the RTM.

The Board then discussed revisions to the Board's Statement of Procedures and Rules of Conduct reflecting the online filing system for financial disclosures, FOIA revisions during the pandemic, and updates reflecting the Board's review and investigation of reports of violations of the Code. A motion was made by Stephanie Johnson and seconded by Jennifer Cohen to adopt the revised Statement of Procedures. The Chair asked if there was any further discussion. Hearing none, the following resolution was read out by the Secretary and adopted unanimously by roll call:

WHEREAS the Board's Statement of Procedures and Rules of Conduct were last revised in 2019; and

WHEREAS the Greenwich Code of Ethics was amended to provide for an online system of filing in 2021; and

WHEREAS, the procedures for meetings have recently been updated in the 2022 amendments to the Connecticut Freedom of Information Act as a result of experience during the pandemic; and

WHEREAS, the Board has reviewed its Statement of Procedures and Rules of Conduct and considered changes appropriate to accommodate these legislative changes and to reflect the experiences of the Board since the last revisions to the Statement;

**BE IT RESOLVED** that the Board's Statement of Procedures and Rules of Conduct be amended and revised and as so amended and revised is hereby adopted in the form attached as Exhibit C to the minutes of this meeting.

Following this discussion, there was no further business before the Board and the meeting was adjourned by unanimous consent at 6:00 P.M.

## EXHIBIT A

Below is a link to the Report on Referrals and Recommendations

chrome-  
extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.greenwichct.gov/DocumentCenter/View/32777/Report-on-Referrals-and-Recommendations

## **GREENWICH BOARD OF ETHICS**

### **Minutes of 1<sup>st</sup> Special Meeting held in Executive Session on June 8<sup>th</sup>, 2022**

**Members Present:** Paul de Bary, Chair, Jennifer Paul Cohen, Secretary,  
Robert Grele, Robert Sisca and Rev. Stephanie Johnson

**Members Absent:** None

**Others Present:** None

The meeting was called to order at 5:04 P.M. by the Chair, who noted that, a quorum was present and that a notice of the special meeting had been provided to all the members, posted online and posted in Town Hall in accordance with Freedom of Information Act requirements. As a special meeting in executive session, the Chair advised that only items on the agenda and items permitted to be considered in executive session would be considered.

The first order of business was approval of the minutes of two meetings held in executive session on April 6<sup>th</sup>, 2022. Receipt of the draft minutes by the members was confirmed and the Chair asked if there were any comments or revisions that should be made. It was requested that the minutes of the 1<sup>st</sup> Executive Session be revised to reflect the fact that a decision was adopted, rather than an advisory opinion. It was also requested that the decision adopted at each of these meetings be reflected as attached to the minutes of the respective meeting as an exhibit. Since the result of the 1<sup>st</sup> executive session was a finding of no probable cause, the Secretary was directed to seal the minutes and all other official correspondence related to the matter.

As revised, the Secretary moved adoption of the minutes, seconded by Rob Sisca, and they were approved following a roll call vote. Stephanie Johnson abstained as she was not in attendance on April 6, 2022. The Chair directed that a copy of the final minutes as approved be attached as an Exhibit to the minutes of this meeting.

The second item on the agenda was consideration of a report received via voice mail on the Board's hotline. The Chair explained that the report concerned a possible HIPAA violation at Witherell and did not indicate that the action taken related to a financial interest in the matter. He had spoken to the person submitting the report, who confirmed that it was made in error. The Chair confirmed that each of the members had received a copy of the draft decision that had been circulated dismissing the report as failing to describe a violation of the Code of Ethics and asked if there was any discussion of the matter.

There being no discussion, the Chair asked for a motion to approve the decision dismissing the report. The motion was made by Mr. Sisca and seconded by Rev. Johnson and was unanimously approved by roll call vote. The Chair noted that, as the Board had determined that the report it received was not a complaint describing a violation of the Code of Ethics, the minutes of the meeting and all of the Board's records with regard to the matter would now become public records. He therefore directed the Secretary to file the minutes.

Following this the Chair indicated that all matters listed on the agenda had come before the Board and moved to adjourn the meeting which was approved unanimously by roll call vote at 5:09.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jennifer Cohen".

Jennifer Cohen, Secretary



# **Exhibit A**

To 6/8/21 Minutes

## **Minutes of Special Meetings on April 6<sup>th</sup>, 2022**

**Were approved in final form at the  
June 8<sup>th</sup> meeting and are not  
included to avoid duplication.**

**GREENWICH BOARD OF ETHICS**

**Minutes of 2<sup>nd</sup> Special Meeting held in Executive  
Session on June 8<sup>th</sup>, 2022**

**Members Present:** Paul de Bary, Chair, Jennifer Paul Cohen, Secretary,  
Robert Grele, Robert Sisca and Rev. Stephanie Johnson

**Members Absent:** None

**Others Present:** None

The meeting was called to order at 5:09 P.M. by the Chair, who noted that, a quorum was present and that a notice of the special meeting had been provided to all the members, posted online and posted in Town Hall in accordance with Freedom of Information Act requirements. As a special meeting in executive session, the Chair advised that only items on the agenda and items permitted to be considered in executive session would be considered. In consideration of the fact that the Chair had made allowances for parties to attend who had declined, the Chair asked the members to waive the change in time for the meeting so additional time would be available for the next meeting. The change in time was approved by roll call. As an executive session, no one other than the Board was affected by the change in time.

The first order of business was consideration of a report received via email and attachments on the Board's hotline. The Chair explained that the report was made by a couple in Ridgefield Connecticut about activities in Ridgefield by a Greenwich Town Officer. The initial report was addressed to both the Ridgefield and Greenwich Board of Ethics. The Chair had asked the persons submitting the initial report to file an amended report that would identify violations of the Greenwich Code of Ethics, which had been forwarded to each of the members. The Chair also invited them to appear at the meeting, which they had declined to do. The Chair asked each of the members if they felt that the amended report described any violation of the Code of Ethics and each indicated that they did not. He then asked if there was any member who wished to further discuss the matter.

There being no further discussion, the Chair confirmed that each of the members had received a copy of the draft decision that had been circulated dismissing the report as failing to describe a violation of the Code of Ethics and asked for a motion to approve the decision dismissing the report. The motion was made by Rev. Johnson and seconded by Mr. Sisca and was unanimously approved by roll call vote. The Chair noted that, as the Board had determined that the report it received was not a complaint describing a violation of the Code of Ethics, the minutes of the meeting and all of the Board's records with regard to the matter would now become public records. He therefore directed the Secretary to file the minutes with the Town Clerk and attach Decision 22-04 as Exhibit A.

Following this the Chair indicated that all matters listed on the agenda had come before the Board and moved to adjourn the meeting which was approved unanimously by roll call vote at 5:11.

Respectfully submitted

A handwritten signature in cursive script that reads "Jennifer Cohen".

Jennifer Cohen, Secretary

**Exhibit A**

**Decision #22-04**

## Decision No. 22-04

**Date:** 6/8/22

**Topics:** Complaints, Sufficiency, Town Officer

**Code Sections:** Section 8, Subsection 2(3)

The Board of Ethics received a report through a e-mail message on its hotline on May 26<sup>th</sup>, which was supplemented by an amended report submitted June 5<sup>th</sup>, 2022. In accordance with its Statement of Procedures and Rules of Conduct, the Board proceeded with a review of the report to determine if it alleged a violation of the Greenwich Code of Ethics.

The first step in any such investigation is for the Board to evaluate whether the report alleges a violation of the Code by a Town Officer and whether the Board has jurisdiction over the subject matter and the person alleged to have violated the Code. In performing this review, the Board considers only the information contained in the report and assumes the truth and completeness of this information without further investigation. After this evaluation, the Board makes a finding as to whether the report (a) makes a complaint that should be further investigated, (b) should be dismissed because it fails to state a specific violation of the Code over which the Board has appropriate jurisdiction or (c) involves issues or circumstances that are not appropriate to be addressed by the Board in light of the remedies available.

### Information Contained in the Report

The report alleged that an employee of the Town of Greenwich also served as the Chair of a Commission for another Town in Connecticut and, as Chair of that Commission, had recommended the use of consultants “we have used in Greenwich” who “know what [the respondent] wants.” The report complained that this created the appearance of an “illegal conflict” and speculated that respondent might have created a “pay to play ecosystem” and received a *quid pro quo* for the referrals in the form of contributions from the consultants to a non-profit the respondent was a manager of or in the form of “conferences, entertainment, holiday gifts, speaking engagements, etc.”

The Board requested additional information concerning the respondent’s financial interest in specific consultants or in transactions with the Town of Greenwich, or as to gifts to the charity or other items of value that might have influenced the respondent with regard to a transaction or action involving the Town of Greenwich, but was unsuccessful in obtaining such specific information in response to its request.

## **Determination and Decision**

The Board found that, as an employee of the Town, the respondent was a Town Officer within the meaning of the Code. Therefore the Board carefully reviewed the report to determine if: 1) it described a possible violation of the Code of Ethics with sufficient specificity to enable the Board to conduct a proper investigation and 2) it involved issues or circumstances that are appropriate to be addressed by the Board in light of the remedies available.

As a result of its review, the Board determined that the report neither alleged specific facts supporting the conclusion that a violation of the Code existed nor involved issues or circumstances that were appropriate to be addressed by the Board in light of the remedies available. The Board made this determination for the following reasons:

- 1) The report did not allege a possible violation of the Code since it did not describe any specific financial interest in, nor the receipt of any specific thing of value in connection with, a Town transaction or action.
- 2) While Section 8 of the Code requires the Board to investigate alleged violations of the Code by officials of the Town of Greenwich, the Code does not authorize the Board to investigate alleged violations of the standards of other municipalities.

Accordingly, the Board dismissed the report submitted because it did not qualify as a complaint that should be investigated under the Code.

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

**DATE: JUNE 8TH, 2022                      2<sup>nd</sup> Special Meeting in Executive Session**

**MOTION/RESOLUTION: (1) TO APPROVE CHANGE IN THE TIME OF THE MEETING FROM 5:15 TO 5:09**

<b>Member</b>	<b>Yea</b>	<b>Nay</b>	<b>Abstain</b>	<b>Absent</b>
<b>Paul de Bary</b>	<b>x</b>			
<b>Jennifer Paul Cohen</b>	<b>x</b>			
<b>Robert Grele</b>	<b>x</b>			
<b>Rev. Stephanie Johnson</b>	<b>x</b>			
<b>Robert Sisca</b>	<b>x</b>			

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

**DATE: JUNE 8TH, 2022      2<sup>nd</sup> Special Meeting in Executive Session**

**MOTION/RESOLUTION: (1) TO APPROVE AND ADOPT DECISION #22-04 IN THE FORM ATTACHED AS EXHIBIT A**

<b>Member</b>	<b>Yea</b>	<b>Nay</b>	<b>Abstain</b>	<b>Absent</b>
<b>Paul de Bary</b>	<b>x</b>			
<b>Jennifer Paul Cohen</b>	<b>x</b>			
<b>Robert Grele</b>	<b>x</b>			
<b>Rev. Stephanie Johnson</b>	<b>x</b>			
<b>Robert Sisca</b>	<b>x</b>			

Exhibit B-3

**GREENWICH BOARD OF ETHICS**

**Minutes of 3rd Special Meeting held in  
Executive Session on June 8<sup>th</sup>, 2022**

**The minutes of the third Board of Ethics special meeting in executive session on June 8th, 2022 have not been posted in accordance with the requirements of Section 1-82a of the Connecticut General Statutes due to an ongoing review.**



## Exhibit B-4

### **GREENWICH BOARD OF ETHICS**

#### **Minutes of Regular Meeting Held on June 8th, 2022**

**Members Present:** Paul de Bary, Chair, Jennifer Cohen, Secretary, Robert Grele, Robert Sisca, Rev. Stephanie Johnson

**Members Absent:** None

**Others Present:** Joe Williams, Deputy Director, Greenwich Library and Joseph Siciliano, Director of Parks and Recreation, and (from 5:41 on) Jackie Budkins, Town Clerk, and Pat Sesto, Director of Environmental Affairs

The executive session was called to order at 5:11 P.M. by the Chair, who noted that a quorum was present. The Chair welcomed the participants and indicated that this was a regular meeting of the Board and an agenda for the meeting had been posted on the Town bulletin board and in the Agenda and Minutes pages on the Town website in accordance with FOIA requirements.

The first order of business was approval of the minutes of the Board's regular meeting on April 6<sup>th</sup>, 2022. The Chair confirmed that all members of the Board had received copies of the draft minutes and asked if there were any comments or corrections. There were no comments or corrections. The Secretary then moved adoption of the minutes and the minutes were adopted unanimously, with the exception of Rev. Johnson abstaining because she had not attended the meeting. The Chair directed that a copy of the final minutes as approved be posted in the Agenda & Minutes Center on the Town Website, attached as an Exhibit to the draft minutes of this meeting when filed with the Town Clerk and posted to replace the draft minutes for the April 6<sup>th</sup> Meeting in the Agenda and Minutes Center.

Chair then reported that he would be sending a reminder notice to Town Officers to file disclosure statements by the end of July that a draft of a presentation containing a flow chart describing the Board's procedures that had been prepared by Board member Jennifer Paul Cohen. The draft presentation had been circulated to all the members for review. The Chair asked each of the members to comment. After a brief discussion, there was a consensus that it would be useful to post the presentation among the Board of Ethics pages on the Town website. On behalf of all the members, the Chair thanked Ms. Paul Cohen for her excellent work.

The Chair then reviewed the progress made by the various Board members in surveying Town Officials to get a better understanding of the Town's practices with respect to referrals and

recommendations. He summarized the Board's results thus far as finding a broad consensus with respect to an unwritten policy not to make specific referrals and

-1-

recommendations. Necessary exceptions had been found, however, in relation to public health and safety emergencies. In some cases, such as the Police Department's duty wrecker assignments, procedures were formalized, but it was appropriate to recognize that in emergency situations, Town representatives needed the freedom to make the decisions they thought practical to address the issue at hand. In addition, an exception was needed for situations where Town employees or agents were used to perform public health and safety functions that were best contracted and paid for by the persons most directly benefitted. There were also situations in which the Town was expected to serve as a resource for information and provide guides and listings, such as the resource guide for seniors prepared by the Commission on Aging or the recent list of vaccination and testing sites for Covid-19 prepared by the Health Department in response to inquiries.

The Chair then thanked the liaisons who were present for attending the meeting and asked for any feedback from them. Mr. Williams indicated that the Library considered it part of its mission to recommend books of topical interest to Town residents and to sponsor book talks and other informational events. Ms. Sesto confirmed that the public expected the Town to assist them, particularly in regard to making applications and seeking approvals. A discussion of the various approaches used by different departments ensued and the question of whether a Town-wide policy would be useful to establish a framework that could protect the Town from possible liability. Ms. Budkins reported that the Clerk's office provided a listing of Constables and Justices of the Peace on its web pages, but did not otherwise make referrals or recommendations. The Chair noted that interagency referrals to other Town departments, as well as federal and state agencies and certain non-profit social services providers, was another exception to the general rule that the Board saw a need for.

After receiving and discussing these comments, the members of the Board thanked the liaisons present for their input and promised to keep them informed about the progress of the project.

The Chair then indicated that all matters listed on the agenda had come before the Board and moved to adjourn the meeting which was approved unanimously at 6 Following the Board's review and discussion of these matters, there was no further business to be dealt with in executive session and the executive session was adjourned by unanimous consent at 6:03 P.M.

Respectfully submitted,



Jennifer Cohen, Secretary

**Exhibit A**  
To 6/8/22 Minutes

**Minutes of Regular Meeting**  
**On**  
**April 6<sup>th</sup>, 2022**

**Were approved in final form at the June 8<sup>th</sup> meeting and are not included to avoid duplication.**

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

**DATE: JUNE 8TH, 2022  
Regular Session**

**MOTION/RESOLUTION: (1) APPROVAL OF MINUTES OF  
REGULAR MEETING ON APRIL 6<sup>TH</sup>, 2022**

<b>Member</b>	<b>Yea</b>	<b>Nay</b>	<b>Abstain</b>	<b>Absent</b>
<b>Paul de Bary</b>	<b>X</b>			
<b>Jennifer Paul Cohen</b>	<b>X</b>			
<b>Robert Grele</b>	<b>X</b>			
<b>Rev. Stephanie Johnson</b>			<b>X</b>	
<b>Robert Sisca</b>	<b>X</b>			

## EXHIBIT C

Below is a link to the Board of Ethics' Statement of Procedures and Rules of  
Conduct

chrome-  
extension://efaidnbmnnnibpcajpcgclefindmkaj/https://www.greenwichct.gov/Doc  
umentCenter/View/3267/Statement-of-Procedures-and-Rules-of-Conduct

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

**DATE: SEPTEMBER 7, 2022**

**MOTION/RESOLUTION: (1) APPROVAL OF THE  
RECOMMENDATION AND REFERRAL POLICY**

<b>Member</b>	<b>Yea</b>	<b>Nay</b>	<b>Abstain</b>	<b>Absent</b>
<b>Paul de Bary</b>	<b>X</b>			
<b>Jennifer Paul Cohen</b>	<b>X</b>			
<b>Robert Grele</b>	<b>X</b>			
<b>Rev. Stephanie Johnson</b>	<b>X</b>			
<b>Robert Sisca</b>				<b>X</b>

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

**DATE: SEPTEMBER 7, 2022**

**MOTION/RESOLUTION: (2) APPROVAL OF 1<sup>ST</sup> EXECUTIVE  
SESSION MINUTES, 2<sup>ND</sup> EXECUTIVE SESSION MINUTES, AND  
REGULAR SESSION MINUTES FROM THE JUNE 8, 2022  
MEETING**

<b>Member</b>	<b>Yea</b>	<b>Nay</b>	<b>Abstain</b>	<b>Absent</b>
<b>Paul de Bary</b>	<b>X</b>			
<b>Jennifer Paul Cohen</b>	<b>X</b>			
<b>Robert Grele</b>	<b>X</b>			
<b>Rev. Stephanie Johnson</b>	<b>X</b>			
<b>Robert Sisca</b>				<b>X</b>

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

**DATE: SEPTEMBER 7, 2022**

**MOTION/RESOLUTION: (3) APPROVAL OF MOTION FOR  
JENNIFER COHEN TO CONTINUE AS SECRETARY**

<b>Member</b>	<b>Yea</b>	<b>Nay</b>	<b>Abstain</b>	<b>Absent</b>
<b>Paul de Bary</b>	<b>X</b>			
<b>Jennifer Paul Cohen</b>			<b>X</b>	
<b>Robert Grele</b>	<b>X</b>			
<b>Rev. Stephanie Johnson</b>	<b>X</b>			
<b>Robert Sisca</b>				<b>X</b>

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

**DATE: SEPTEMBER 7, 2022**

**MOTION/RESOLUTION: (4) APPROVAL OF MOTION FOR PAUL  
DE BARY TO CONTINUE AS CHAIR**

<b>Member</b>	<b>Yea</b>	<b>Nay</b>	<b>Abstain</b>	<b>Absent</b>
<b>Paul de Bary</b>			<b>X</b>	
<b>Jennifer Paul Cohen</b>	<b>X</b>			
<b>Robert Grele</b>	<b>X</b>			
<b>Rev. Stephanie Johnson</b>	<b>X</b>			
<b>Robert Sisca</b>				<b>X</b>

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

**DATE: SEPTEMBER 7, 2022**

**MOTION/RESOLUTION: (5) APPROVAL OF MOTION TO  
CREATE POSITION OF ASSISTANT SECRETARY TO BE FILLED  
BY REV. STEPHANIE JOHNSON**

<b>Member</b>	<b>Yea</b>	<b>Nay</b>	<b>Abstain</b>	<b>Absent</b>
<b>Paul de Bary</b>	<b>X</b>			
<b>Jennifer Paul Cohen</b>	<b>X</b>			
<b>Robert Grele</b>	<b>X</b>			
<b>Rev. Stephanie Johnson</b>			<b>X</b>	
<b>Robert Sisca</b>				<b>X</b>

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

**DATE: SEPTEMBER 7, 2022**

**MOTION/RESOLUTION: (6) APPROVAL OF MOTION TO ADOPT  
REVISED STATEMENT OF PROCEDURES AND RULES OF  
CONDUCT**

<b>Member</b>	<b>Yea</b>	<b>Nay</b>	<b>Abstain</b>	<b>Absent</b>
<b>Paul de Bary</b>	<b>X</b>			
<b>Jennifer Paul Cohen</b>	<b>X</b>			
<b>Robert Grele</b>	<b>X</b>			
<b>Rev. Stephanie Johnson</b>	<b>X</b>			
<b>Robert Sisca</b>				<b>X</b>