

**Town of Greenwich, Connecticut
Board of Ethics**

Complaint

The Board has provided instructions for this form. Please review them carefully before submitting a complaint.

(You may submit anonymously, but the Board's ability to investigate may be limited because it will not be able to contact you for clarification of any necessary details.)

Name of Complainant (optional): _____

Phone and/or email (optional): _____

Address (optional): _____

Name of Respondent(s): _____

Respondent Town Position(s): _____

Code Section Violated (check all that apply): Section 3 ___ Section 4 ___ Section 5 ___

Concisely, but in reasonable detail, please describe the violation you are concerned about below, or attach a statement describing it. Please give complete details of any votes, actions or transactions involved and, for each Town Officer, indicate the Town Officer's financial interest in the matter or thing of value accepted by the Town Officer which might influence the Town Officer's behavior. Include dates, places and corroborating witnesses, documents, photographs or other direct evidence of the facts, if any. Please attach additional sheets if necessary.

NOTICE

By filing a complaint, the complainant acknowledges the confidentiality obligations imposed pursuant to Section 7-324 of the Connecticut General Statutes and agrees to comply with the Statement of Procedures and Rules of Conduct of the Greenwich Board of Ethics.

Greenwich Board of Ethics

Instructions for filing Complaints

Who can file?

Section 2.12(a) of the Greenwich Code of Ethics requires the Board of to investigate complaints made by any person who alleges a violation of the Greenwich Code of Ethics by any Town Officer. The Board is only authorized to investigate specific violations of the Code. Issues related to the general decorum of the Town or violations of Town policies other than the Code should be addressed to the appropriate individuals or entities responsible.

Who is a Town Officer?

For purposes of the Code of Ethics, the term Town Officer includes any official, employee or agent of the Town, any consultant to the Town or any member or employee of any board, department, commission, committee, legislative body or agency of the Town, whether elected or appointed.

Name and contact information

Name and contact information is optional. You may submit an anonymous complaint, but the Board's ability to investigate the complaint may be limited because it will not be able to contact you for clarification of any questions concerning the complaint. The Connecticut Freedom of Information Act requires all Complaints filed with the Board to be made public in the event that a determination of probable cause is made following a preliminary investigation of the complaint or if a submission is found not to meet the requirements for a Complaint.

What are the requirements for a Complaint?

While there are no particular formalities, there are substantive requirements that must be met before information submitted to the Board can be treated as a complaint under the Code. In order for there to be a record of the Complaint, it must be submitted in writing or by way of a recorded telephonic, facsimile or other electronic message that can be transcribed. Oral submissions may only be made to the entire Board at a duly constituted meeting. The Board will do an initial evaluation of each submission to determine if it meets the substantive requirements for a Complaint, including whether (i) each respondent is a Town Officer, (ii) the facts alleged describe one or more violations of the Code with sufficient specificity for the Board to investigate them, and (iii) it involves issues or circumstances that are appropriate to be addressed by the Board in light of the remedies

available or the possibility of interfering with a criminal investigation.

What facts are necessary to allege a violation of the Code?

In its initial evaluation of a submission, the Board will assume that all facts alleged are true pending further investigation. However, in order for the submission to qualify as a Complaint, it cannot consist merely of conclusory statements. Rather each of the underlying facts necessary to establish the violation must be alleged. For example, it is not sufficient to allege that an individual "violated Section 3 of the Code." It is necessary to show the position that makes the individual a Town Officer, the specific official duties whose performance was influenced and the valuable gift, thing, favor, loan or promise that was accepted.

Can documentary or photographic evidence be submitted with a Complaint?

Yes. Particularly in connection with anonymous complaints, the submission of relevant documentary, photographic or other evidence is recommended. This will assist the Board in its preliminary investigation and may also be essential to establish the inclusion of necessary facts in the Complaint.

What are my obligations as a Complainant?

Under State law, the evaluation of complaints and any investigation of a Complaint conducted prior to a finding of probable cause is required to be done on a confidential basis, unless the respondent requests otherwise. During a confidential evaluation or investigation, the allegations in the complaint and any information supplied to or received from the Board may not be disclosed during the investigation to any third party by a complainant, respondent, witness or member of the Board of Ethics. This obligation extends to counsel and is permanent if the case is dismissed. If, after preliminary investigation, there is a finding of probable cause, the proceedings of the Board are to be conducted in public. However, the Board may withhold testimony and evidence developed during its preliminary investigation pending its entry into the record at a public hearing. The Board's policies with respect to confidentiality and its procedures in connection with the evaluation preliminary investigations and hearings with respect to Complaints are contained in its Statement of Procedures and Rules of Conduct.

Where to Submit

Complaints are to be submitted to the Board as follows:

By Mail: Greenwich Board of Ethics
c/o Office of the Town Attorney
Department of Law
Town Hall
Greenwich, Connecticut 06830

NOTE: All information sent via mail should be enclosed in a sealed envelope marked: "CONFIDENTIAL – To be delivered unopened to the Chair of the Greenwich Board of Ethics".

By email: extension.2249@onebox.com

By Telephone or fax: 1 (888) 432-2777

Note: Your e-mail, voicemail or facsimile message will be communicated directly to members of the Board of Ethics via secure means.