



**BOARD OF ETHICS**  
SHELTON, CT  
REGULAR MEETING – FEBRUARY 1, 2007

**MINUTES**

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**Call To Order/Pledge of Allegiance**

Chairman Maria Davis called the meeting of the Board of Ethics to order at 7:35 p.m. in Room 104 at Shelton City Hall. The Pledge of Allegiance was recited.

**Roll Call**

Maria Davis, Chairman – present  
Christine Robinson – present  
Byron Peterson – *absent - excused*

**Also Attending:**

Corporation Counsel Thomas Welch  
Alderman John “Jack” Finn  
Alderman Randy York

**1. Accept the Minutes of the Special Meeting of January 10, 2007**

Motion was made by Christine Robinson, seconded by Maria Davis to accept the minutes of the Special Meeting of January 10, 2007. Passed unanimously **2-0**.

**2. Accept Letter from Alderman Randy York dated January 12, 2007.**

Motion was made by Christine Robinson, seconded by Maria Davis to accept Alderman Randy York's Letter dated January 12, 2007. Passed unanimously **2-0**.

*“January, 12, 2007  
Maria Davis, Chairman  
City of Shelton Board of Ethics*

*Dear Maria,*

*It was a very interesting meeting Wednesday, January 10, 2007. Your board is working very hard on revising Shelton's ethics ordinance and you are all to be commended for the effort you are putting forth on behalf of the people of Shelton.*

*During the course of your meeting it appeared several instances arose where your board requested some further information. Specifically, one issue was how to define “probable cause” and another issue was what our annual financial disclosure form should entail. I believe I might be able to help.*

*I found this website that has a model ordinance for municipalities. If you are not already aware of it, I think you will find it very helpful. It discusses the definition of “probable cause and offers a sample financial disclosure form. I came across it while doing some research on the League of Women Voters, which is also very interested in and active in establishing stronger ethics codes for public officials and public employees. This site is apparently also sanctioned by the State of Connecticut. I reviewed it from end to end. It's like a free lesson in governmental ethics! I strongly recommend it. Here is the website:*

*<http://www.cityethics.org/>*

*While I don't believe that your work on this issue should be unduly influenced by elected officials (the very same people whose behavior this ordinance is attempting to keep upright and trustworthy!), especially when the provisions they might be attempting to have included would be to their benefit - I do have a few personal comments that I hope you will allow me to share with you and your board via this letter. Several months ago I brought a situation to the attention of City Council. I discovered that an individual sat on two commissions, one elected and one appointed. One commission was the Planning and Zoning Commission and the "appointed" Commission was the Shelton Economic Development Commission. Now, on our own website, it stated (not sure if it still does) that in 1992, the Mayor "charged" the SEDC to bring in businesses to Shelton. Personally, I thought it was a conflict that an individual that was charged to bring in business should also sit on a land use board that regulates such businesses. In fact, our charter states clearly that a Planning and Zoning Commissioner cannot hold any other elected or appointed position. So I complained verbally (informally) and asked for an opinion about this from City Counsel. I was told by Counsel that "outsiders" had no power to remove such a person. Any action on the issue had to be initiated by the chairman of the Planning and Zoning Commission. If the Planning and Zoning Commission did not identify this situation as problematic (even though it's clearly against charter), it would simply continue, unaddressed (as it has). I think this is wrong. Do you think it might be possible to address this somehow in our ethics ordinance?*

*Secondly, I would like to suggest that the preliminary investigation of "probable cause" should be dismissed ONLY with a unanimous vote. Every member of the ethics board should be convinced that there is no probable cause. After all, probable cause does not mean the person has been found in violation. There are only three members of the ethics board, which means each member constitutes one third of the vote. Should the vote be two to one, it could be said that one third of the board found probable cause. This is a substantial percentage of the board and, in the case of "ethics", should not be ignored. If the board cannot unanimously agree on a*

*dismissal, I believe the investigation should be held open, more facts obtained under oath, and another vote taken in an attempt to more clearly establish evidence one way or the other to attain a unanimous vote.*

*Lastly, I would ask that your board consider the possibility of the Ethics Board being appointed by the legislative body – in this case the Board of Aldermen - chosen from a list of nominees submitted by any interested party – excluding political parties. The public, non-political citizen groups/clergy/ etc., could be strongly encouraged to offer nominees. I believe that in the court of public opinion, this would lend much credibility to the board of ethics, as opposed to being appointed by the mayor. This is an idea taken from the model ethics ordinance at the above mentioned web site.*

*It is my hope that you will read this letter into the record of your February 1, 2007 meeting and take these suggestions into consideration during your future discussions. Please feel free to call me anytime with any questions you may have. My telephone number is 926-1482. My email address is [royceyork@sbcglobal.net](mailto:royceyork@sbcglobal.net)*

*Thank you and good luck to your board,*

*Randy Ann York  
Alderman, Third Ward”*

### **3. Continued Discussion of Proposed Ethics Ordinance**

Chairman Davis stated she printed out text of the model ethics code. She asked that the clerk make a copy for the members and Attorney Welch and keep a copy in the file. Chairman Davis said at some point you might want to checkout the website.

Mrs. Robinson thanked the clerk for placing a footer on each page of the redlined version of the proposed ordinance. It makes a world of difference.

Chairman Davis asked Attorney Welch if he had any comments. Attorney Welch stated he went through the minutes of the last meeting and brought some cases of the Supreme Court and Appellate Court and some statutes that just sort of wrap it up a little bit.

Attorney Welch said there was a question “**of this part**” to “**of this ordinance**” and it was correct to change it everywhere, which you have done.

Attorney Welch said the next issue was with regards to definition of **probable cause**. As we had talked about, probable cause is really defined by the Supreme Court. It is basically a term of art that has stood the test of time. I will read to you and I will give to you for your file, the most recent one where the State of Connecticut discussed the definition of probable cause. It was in the Supreme Court on July 2006. It is as you would think; reasonable mind is more probable than not, is the simplest. In a case called *Dufrain Vs. The Commission on Human Rights & Opportunities*, the Commission on Human Rights & Opportunities, when they do their initial investigation, they refer to it as reasonable cause before you can go onto the next step. Once you prove reasonable cause, then there is a hearing and in this case it said: “*Probable cause is a bonafide belief in the existence of facts essential under the law for the action and such as would warrant a man of ordinary caution, prudence and judgment, under the circumstances entertained. Probable cause is a flexible, common sense standard that deals with probabilities in the application of the factual and practical considerations of everyday life on which a reasonable and prudent men act.*” It’s still a 50% guideline. Our Supreme Court has determined that reasonable cause is synonymous with a term probable cause. Again, “*a bonafide belief in the existence of facts essential under the law for the action and such as would warrant a man of ordinary caution, prudence and judgment, under the circumstances entertained.*” It’s a flexible, common sense standard.

Attorney Welch said on the criminal side, it’s a little bit different; probably a little clearer. The determination of whether probable cause exists under the Fourth Amendment to the Federal Constitution, and in an Article First of our State Constitution is made “*pursuant to a totality of circumstances test, probable cause exists when the facts*

*and circumstances within the knowledge of the officer and of which he has reasonable trustworthy information are sufficient in themselves to warrant a man of reasonable cautionably that a crime has been committed.”* Again, it’s just reasonable, prudent standards.

Attorney Welch continued, the most recent case was a Superior Court Case from October 2006: *“Probable cause broadly defines comprises such facts as would reasonably persuade an impartial and reasonable mind not merely to suspect or conjecture, but to believe that criminal activity has occurred. Reasonable mind may disagree as to whether a particular set of facts established probable cause. In this case the Commissioner need only have a substantial basis of fact from which it can be inferred that the evidence in the administrative records supported a finding of probable cause.”* As we talked about, Supreme Court has defined what it is.

Mrs. Robinson said this was brought to our attention that we have wonderful definitions throughout, and we are using the statement, probable cause throughout and yet it is not defined. We were asking for your guidance.

Attorney Welch said probable cause is defined. It is what it is. The Supreme Court has told us what it is. You can always decide what your own definition is and if you think it gives more clarity, certainly, it is within your discretion or you can take it right out of what the Supreme Court says. My only comment would be that you want it so that it’s probable cause. There are different standards. You have probable cause for preponderance of the evidence, beyond a reasonable doubt, all going up the scale from 50% to 99.9%. So you want to make sure that your probable cause means more probable than not. That’s the easiest thing and that’s 50.1% as opposed to preponderance of the evidence which is somewhere in the middle and beyond a reasonable doubt, there is no doubt. As long as it is consistent with what the Supreme Court has said. I will give these to the clerk.

Chairman Davis asked is there one definition better than the other? They are all very similar. I know what you are saying how we choose the right one. Mrs. Robinson said we want it to be in the verbiage that we are using and simplified for anyone to follow along and

understand what we are saying. I would say we would have to read them again. Attorney Welch said I can look a little bit deeper to find one that is a little bit simpler in terms of context, but it's clear what reasonable prudent men would consider as ... Mrs. Robinson said right now the statement that we have is "*probable cause suggests that there is sufficient evidence that an ethics violation may have occurred that then calls for an official inquiry.*" Attorney Welch said then someone is going to say define 'sufficient.' So you want to define. If you are going to look at probable cause, look what the Supreme Court says, "Someone of a reasonable, prudent, cautious mind would think that it did happen."

Attorney Welch stated there was another issue about **incompatible offices**. And the Statute reference is 9-210 and in that the State has defined what is incompatible. We were talking about something that was added in here. Your Charter ends up being controlling because your Charter provides you to do certain things. So until the Charter is changed, the only incompatible office is, unless it is prescribed by Charter, prescribed by State Statute, it says no Judge of Probate shall be the Town Clerk, or Town Treasurer or Collector of Taxes. No Town Treasurer shall hold the Office of Collector of Town Taxes during the same year. A Town Clerk or Selectman shouldn't be a Registrar of Voters. No Registrar of Voters shall be a Town Clerk. No Assessor shall act as a member of the Board of Assessment Appeals. No member of the Board of Finance of any town shall hold any salary town office, unless provided by special act. That's it. That's what the State says about Towns. Those town people can't do those type of things.

Mrs. Robinson asked does our Charter take precedence? Attorney Welch replied no, State Statute would control, but in addition, you have the right to prescribe what you think is incompatible by Charter. Some people can't serve in different capacities, people in Article V of the Charter can only serve two other appointed positions and one elected position. Looking for the definition of what is incompatible, I think is always there. State Statute defines it and our Charter defines it. Our Ethics Ordinance can't then say I think that's an incompatible position. Chairman Davis agreed and asked we are not saying that anywhere right now, are we? Attorney Welch replied no.

Attorney Welch mentioned the **reasonable legal expenses** was another area discussed last month. You don't have a budget. If it was determined as to what is legal expenses, it is still probably something that goes before the Board of Aldermen. We can look at it in terms of a determination by here that based upon the facts presented, there is no probable cause and therefore the reasonable costs and expenses – and since there is no money - I think you can make a recommendation or suggestion, based upon a history of a case and time spent seems appropriate. You don't have a budget to pay it. It's a claim against the City and not against the Board of Ethics, so it's written in such a way that they are entitled to it as a matter of law by ordinance. So you only put in there as to the standard rate of the City or as determined by a court of competent jurisdiction. So if someone were to make a claim, just as any other claim against the City, it would go before the Board of Aldermen. I think you would have the best handle on it to say that it appears appropriate based upon the complexity of the case.

Attorney Welch stated the **advisory opinion** issue is fine, but there is no way to have an advisory opinion confidential. An Advisory Opinion would have to be open to the public. Chairman Davis said where we had all advisory opinions will remain confidential, we must cross that out. Attorney Welch agreed.

Attorney Welch said there was a lot of discussion about **enforcement of penalties**. That if you have a penalty, you would have the ability, basically as in any other ordinance if there was a violation, is to inform the police department to issue a citation based upon your determination that there's been a violation of an ordinance. As in anything else, they issue a citation for that.

Chairman Davis noted Page 9, Subsection (c) with the redlines on it, this is where we were just talking about reasonable legal fees, "*the City shall pay the reasonable legal expenses of the respondent...*" We wrote some terminology in there so they couldn't be excessive. Attorney Welch read over the section and said sometimes we hire people who are, because the city rate that is paid to people who do work for the city is substantially lower than the average. You are really just trying to save money. I think it is written very appropriately. They would have to go to the court and explain they

are underpaying for my services. I am entitled to “X” dollars. I think it gives people the knowledge that we pay a lower rate, because you can hire somebody for \$650 an hour and the City pays \$140. I think it makes a lot of sense.

Chairman Davis explained it was Alderman Anglace who brought to our attention from Milford from where they had gotten a really big bill. We don’t want to deny someone their right to a good attorney, but we weren’t really sure how we wrote it if that was appropriate. Attorney Welch said I think it’s appropriate. This says they have the right to go to a court and have a claim against the City for their fees and costs. We hire a lot of people who pay more because of their specialty. Board of Ed, I know, pay their attorneys substantially higher.

Attorney Welch said the **\$100 fine for the violation** the City can now charge up to \$250. They just changed the law back on October 1. The Board of Aldermen have been going through this and actually there is a memo that just went out showing all the fines that we can increase if the Board deems it appropriate. The law was you could only charge for a fine of a city violation a hundred dollars, but now you can charge for a fine of a city violation to two-hundred fifty. Mrs. Robinson said we should change our ordinance to \$250. (Page 10 – 6.(d))

Chairman Davis said under the **Savings Clause** on Page 13, we added some terminology. Chairman Davis asked Attorney Welch if it would be appropriate? Attorney Welch read the change (add “*be less stringent or*”) and said it doesn’t harm because that’s the fact anyway.

Chairman Davis asked Attorney Welch for any overall comments. I don’t know how it read to you. Attorney Welch replied as usual, it’s a work in progress. I see there were no changes to that **Disclosure of Interest**. Mrs. Robinson said we still felt we wanted something, but maybe not at what we had. We were talking about it and should it be more of an acknowledgement. Chairman Davis said we were going to try and combine it and maybe take some of it and put it in more of a questionnaire form. Ask the question, and they would have to answer yes or no, and then maybe we would ask for more information after that. Mr. Peterson had made a good point, they have to acknowledge

yes or no, instead of maybe just not writing something down and saying I didn't really know I was suppose to fill something out.

Chairman Davis said Mr. Peterson had e-mailed us something from his office. Mrs. Robinson shared with Attorney Welch the **disclosure form** Mr. Peterson e-mailed. Mrs. Robinson said we were basically thinking it should be some sort of conflict of interest statement. They read it through and it's a yes or no. I was saying also with what I am doing, once a year I get a statement that I have to sign off on. We were leaning in that direction. Attorney Welch said so if it's yes, you give details. Mrs. Robinson replied yes, exactly. Mrs. Robinson reads from last month's minutes re the Disclosure Form. We all feel there needs to be something, maybe just a statement.

Attorney Welch said we've talked about this before in terms of basically new official/orientation. A lot of people get on boards, whether appointed or elected, and don't have a lot of familiarity with the process. Even if it was something that was done in conjunction with the City Clerk's Office with this Board and the FOI, basically an orientation package that actually includes two hours of classroom, whether it's the same evening as everyone is sworn in. I know a lot of people appointed to Boards and Commissions often influx, but have something that explains here is what you do, here's what your responsibilities are. These people are volunteers and doing the best they can. Mrs. Robinson said that's how I was. Attorney Welch commented on how positive the FOI meeting held a couple of months ago was attended. The problem is you want everyone to do the right thing and not get tripped up unknowingly.

Mrs. Robinson said to do it annually is not such a difficult thing. Most businesses have you do some sort of corporate compliance, or whatever you want to call it, annually. We are leaning in that direction and that would be our next step.

Mrs. Robinson noted there was an article in the CT Post where Stratford Board of Ethics dismissed a whole case because it was put out to the media. It was all breached. I thought it was interesting. We were talking about that. What do you do? Maybe there is validity to that complaint. Chairman Davis said I don't remember reading anything in their ordinance if it was breached, they would throw it out,

so again, we probably don't know all the facts, but they must have had a very good reason.

Attorney Welch asked if anyone had attended the Ethics Seminar in Stratford? Mrs. Robinson replied I did and it was good. It was good from the point of view everybody is all over the place. Nobody is really tight and the bigger thing coming down the pike, in the smaller places where they barely meet, is to develop regional Ethics Commissions, where multiple towns would have one commission for that reason. They just have nothing going on.

Attorney Welch asked do you know where the legislature is in terms of trying to resurrect this? Mrs. Robinson replied all over the place. Attorney Welch asked if they mentioned it that night? Mrs. Robinson replied yes. Still there is no concrete thing out there. I'll be honest with you, we probably do more than anybody else. Some places are barely meeting. Many of them just don't have anything to do. I guess that's a good thing. Chairman Davis commented unless we had this, we wouldn't be meeting. Mrs. Robinson agreed. Attorney Welch stated the dialogue is what's great. Chairman Davis agreed it is good and it's good to just get everyone else to become knowledgeable about it. Attorney Welch said I know the goal is to get this to other boards for comments.

Mrs. Robinson stated I know Alderman Anglace was very concerned if it's breached and what are you going to do about it? Attorney Welch said once it's out there, the first day's story is on the front page and the conclusion is on the last page. Mrs. Robinson asked, is there a time frame that we have to put into place? If this is out X amount of days before it's gotten to us, or if it's after it's gotten to us. We felt at that point if it's a complaint, it may still be valid and maybe we should hear it. When I read that thing about the Stratford one, I thought "whoa." Attorney Welch said I think Alderman Finn made the comment one time where someone two days before they file it go to the press and then file it two days later. Chairman Davis said was that the situation in Stratford? Did they have the complaint and then it was in the paper? Mrs. Robinson replied I think it was after. Chairman Davis said I wonder if their minutes are online. I didn't think to see if there was any further discussion to figure out the

rationale behind that. It would be nice to know in case we ever needed it.

Attorney Welch said as strict as a regulation needs to be, you need to have certain flexibility to make certain determinations as a board. Mrs. Robinson said that is one of the big things that came out in that meeting in Stratford is don't make things too rigid. Make them flexible, reasonable, workable, where a normal person could make sense of it. Attorney Welch commented, probable cause. Chairman Davis said I think that is why Alderman Anglace wanted a definition. Mrs. Robinson said he was right. We have definitions for things that are a whole lot less complicated than probable cause. Attorney Welch added, and as you can imagine, as with every definition, you can define the words in the definition. Mrs. Robinson said that's right and then it goes on and on and on.

Chairman Davis refers to Page 10 of last month's meeting where we discussed **Section 9. Duty to Disclose**. We were talking about adding something. Mrs. Robinson said we talked about knowing that there is a violation you have the responsibility to say you know about this violation. You have the duty to disclose that. That is what this talks about. We don't have written anywhere, I don't think, disclosing if you will be in a conflict of interest. Attorney Welch noted that is covered under **Paragraph 8. Written disclosure of interest; filing requirements** on Page 11. Mrs. Robinson said the part that Alderman Anglace is concerned with is this on Page 11 and it is covered.

Chairman Davis noted that Alderman Anglace inquired about spelling out **Due Process**. Is this another thing that is defined by law? Attorney Welch replied due process is defined by law. Due process is a fair opportunity to be heard. Mrs. Robinson commented it is sort of the same thing as probable cause. I don't have a problem with having a definition. Chairman Davis asked are we limiting ourselves? Attorney Welch said you can set up how you want your hearing schedules to take place. Due process is basically the opportunity to be heard and present your side of the story. Chairman Davis said we can stick it in with the definitions.

Mrs. Robinson said our next part to work is the **Disclosure Statement**. She refers to the sample Mr. Peterson e-mailed the Board

from his place of business. If we like this concept, then we need to go back and put it into the verbiage that suits our needs. We can tighten it or loosen it from there. Chairman Davis said I like the fact that there are yes and no answers. Mrs. Robinson said we can do this individually and then at the next meeting bring it all together. Chairman Davis agreed. Mrs. Robinson said this will give Mr. Peterson the opportunity to put into the wording that suits our needs. He may be able to give us some hints where he is challenged with a part of it.

Mrs. Robinson said I will see if I can get one from my place of employment. Obviously Mr. Peterson's is from a profit point of view and mine would be from a non-profit point of view. Two totally different settings. Then maybe we can make a document that would merge and flow with what we are planning to present. I will try to get my employer's annual statement. If I can e-mail it to you, I will.

Chairman Davis referred to Alderman York's letter to the Board and one of the suggestions she had was that **probable cause should only be dismissed with an unanimous vote**. In theory I agree with it, but I don't really think it's the right thing. Everyone has a difference of opinion and what they end up perceiving and what they believe, you are either going to force one or two people to jump to the other side and I think it's a lot of pressure. If it was a large group it would be harder. With us it's a third. If it's a larger group, it may be 10%, and I can understand the percentages, but I just think it would have undue pressure to whoever is on the other end. Mrs. Robinson said I have the mind of the Democratic process that the majority rules.

Chairman Davis read from Alderman York's letter, "*Lastly, I would ask that your board consider the possibility of the Ethics Board being appointed by the legislative body – in this case the Board of Aldermen - chosen from a list of nominees submitted by any interested party...*" Chairman Davis asked isn't it in the Charter who is designated who goes where? I think it's appointed by the Mayor and approved by the Board of Aldermen. The Board referred to the Charter. Chairman Davis noted it's under Section 5.4. I understand where Alderman York is coming from, but it's not under our jurisdiction to make a change.

Chairman Davis noted there was another question from Alderman York in her letter. Mrs. Robinson read, "***Do you think it might be possible to address this somehow in our ethics ordinance?***" Chairman Davis said it's about someone being on one commission and holding ... it's not our responsibility. I don't know how we can get it in our ordinance. But if it's a violation of the Charter, then someone needs to file a complaint and then we can address it. It can't be addressed in the ordinance. Attorney Welch said I had e-mailed Alderman York this morning that I did not recollect this conversation. Anyway, the conversation took place with Attorney Sous.

Attorney Welch said State Statute says what the Planning and Zoning can and can't do. That's again, incompatibility of offices, and as to what the Charter says certain groups can do. If it's not permitted, they should be informed it's not permitted. If it is permitted, then it's ok. You either can or you can't. Chairman Davis said whoever it is, they would have to rectify it with that department and if that department doesn't work ... Attorney Welch interjected, then you would have to resign.

Chairman Davis asked Alderman York if there is anything else in your letter here that you want to bring to our attention? Alderman York stated the issue about the Commissions really has to do with **initiating the action**, no conflicting positions on commissions and things like that, who can initiate the action? I think Attorney Welch told me he was going to look into that. Chairman Davis said if there is anything else you think of, you can always send us another letter.

Mrs. Robinson noted everyone will read over the Cityethics.org website. If I see anything I will ask it to be put on next month's agenda.

Attorney Welch asked if the Board could take a look at the issue of **Duty to Disclose**. The way it currently is written is that you have a duty to disclose if you have a conflict and are going to participate. It's sort of written in the same way. It says here you have a duty to disclose if you have a financial interest or a personal interest. You only have a personal interest or a financial interest if you are going to participate in the vote and that's a violation of the Ethics. So you are disclosing that I have a violation of the Ethics. I think we should look

at it in terms of when you have a duty to disclose, because the way it now talks about is you have a duty to disclose when you have a financial interest. A financial interest is then defined as if you are going to benefit from it. So if you don't participate in it, you don't have a financial interest. So there is no duty to disclose.

Mrs. Robinson said they are going to be saying I am not going to participate because if I did participate, I would be in conflict. Attorney Welch said right. The way it reads is that you disclose if you have a personal interest or a financial statement, which means you will incur a benefit. You only incur a benefit if you are participating. Attorney Welch said you may just want to reword it a little bit: "Shall not participate in any matter of which you have a personal or a financial interest and shall disclose said personal or financial interest." Something like that. Mrs. Robinson added and you would disclose that you are not going to participate because you would have a financial or personal interest. You should disclose if you participate and you should disclose if you are not going to participate. Attorney Welch added, and the reason why. Mrs. Robinson agreed because the reason why is because you do have a financial interest. I understand. You need to insert the word "participate." You disclose that if you determine that you shall not participate in any vote in which you have a personal or financial interest and shall have a duty to disclose what the said personal or financial interest would have been. Chairman Davis said if someone doesn't go to the meeting because there is something on there that they have a financial interest **OR** they just can't say they are clean because I didn't go and I didn't participate. They have to state why they did not go. Mrs. Robinson said you have to disclose that you are not going to participate because. We have to put a statement in there. Attorney Welch said that is what I believe is the intention. The Board agreed. Chairman Davis commented like Alderman Finn. Alderman Finn wouldn't necessarily need to send us anything because he's not participating. If he's not participating, why is he sending it? We want them to tell us why they are not participating. Mrs. Robinson said exactly right. It's their responsibility to disclose to us why they are not participating.

Alderman Finn asked so I still have to send the letter? The Board replied yes.

**Adjournment**

Christine Robinson moved to adjourn the meeting. Maria Davis seconded. Motion passed unanimously **2-0**.

The Regular Meeting of the Board of Ethics adjourned at 8:35 p.m.

Respectfully submitted,

Cyndee Burke, Clerk