

TOWN OF WOODSTOCK ETHICS BOARD 2024 ANNUAL REPORT

The Ethics and Disclosure Law of the Town of Woodstock (the “Ethics Law”), Section VIII Ethics Board, C Powers and Duties, number 8 requires the Ethics Board to “... prepare and submit an annual report to the Town Board summarizing the activities of the Ethics Board, listing any recommended changes to the text or administration of the Local Law.” Herewith is our 2024 annual report:

CURRENT MEMBERS AS OF JANUARY 20, 2025:

Allison Dodd - Serving 3-year term (2025-27)
Paul Washington – Serving 3-year term (2025-27)
Neil Ratner – Serving 3-year term (2024-26)
Iris York – Serving 3-year term (2023-25)

ELECTION OF OFFICERS:

There is no obligation under the Ethics Law to have a secretary, but we are required to elect a Chairperson. The Ethics Board decided, once again, not to appoint an official Secretary, but to continue rotating the responsibilities for taking minutes and to ask Iris York to be responsible for a number of responsibilities such as interacting with the Town Clerk’s office with respect to scheduling meetings, providing finalized copies of minutes, etc. Paul Washington was re-elected as the Chairperson in January 2024.

ANNUAL DISCLOSURE FORMS:

The Ethics Board performed its review of disclosure forms. The Ethics Board is pleased to report that, as in 2023, all Town Board members and the vast majority of Town Employees submitted completed disclosure forms in 2024. Further, some employees who had failed to submit forms in 2023 did so in 2024.

Attached as Appendix A to this report is the list of Town employees from whom the Ethics Board did not receive disclosure forms during 2024. There are a few employees from whom we did not receive forms in either 2023 or 2024. The Town Board may wish to take into account a repeated failure to submit forms by volunteers when considering the reappointment of these individuals to Town committees, boards, and commissions.

ETHICS INQUIRIES:

The Ethics Board received nine cases during 2024. As of the date of this report, the Ethics Board has resolved all of those cases with a determination that no potential violation of the Ethics Law occurred.

While we did not determine that any violations of the Ethics Law had occurred, we did provide guidance to help Town employees avoid future violations of the Ethics Law. Each instance involved an employee (or potential employee) who had an outside affiliation that could create a reasonable appearance of a conflict of interest.

We noted that the Ethics Law requires Town employees to recuse themselves from matters where there is “a reasonable appearance of a conflict of interest.” A conflict of interest, in turn, is defined by the Ethics Law as including situations where “a person has a *private or personal* interest sufficient to

appear to influence the objective, or a situation that has the potential to undermine the impartiality of the person.” (Emphasis added.)

The Ethics Board has consistently interpreted the Ethics Law to mean that there is no “reasonable appearance” of conflict of interest (and recusal is therefore *not* required) simply because of ordinary friendships, business dealings, and other run-of-the mill interactions. We have also previously determined that having publicly expressed views on a matter that is under consideration by the Town, or having a financial stake in a matter that is broadly shared with others (such as being affected by tax or zoning changes that are widely applicable), does not qualify as a “private or personal” interest that requires recusal.

At the same time, however, if the Town employee also serves in a leadership role at an organization that stands to receive a particular benefit as a result of a Town employee’s action/inaction, it can create a reasonable appearance of a conflict of interest that requires recusal. (And if recusal will be frequently required, then the individual should either resign or not be appointed to the particular Town entity.) The determination of whether such a reasonable conflict of interest exists is fact-specific and depends on the nature of the employee’s role at the outside organization, the extent to which the outside organization may benefit from the employee’s action, and the intersection of the two.

ETHICS LAW UPDATES:

In 2024 there were no changes to the Ethics Law, which was last updated in December 2022.

The Ethics Board did, however, adjust its procedures relating to communications with the Town Board. The Ethics Board now provides printed copies of all communications addressed to the full Board to each individual Town Board member.

Further, the Ethics Board confirmed with the Town Attorney and Town Clerk that the Ethics Board does not play a role in determining whether Ethics Board documents should be disclosed pursuant to a FOIL request. But the Ethics Board has requested that the Town Clerk and Town Attorney keep it informed about the status of FOIL requests for Ethics Board documents.

RECOMMENDATIONS:

As we noted in our annual report to the Town Board for 2023, over time we have received a number of complaints alleging harassing, intimidating, or otherwise inappropriate conduct by elected Town officials. This type of conduct falls outside the scope of the Ethics Law. Further, when engaged in by elected Town officials, this type of conduct also falls outside the scope of the Town’s Employment Practices Compliance Handbook (the “Handbook”), which explicitly excludes elected Town officials. Thus, in last year’s annual report and in our presentation to the Town Board in June 2024, we recommended the Town Board consider adopting a general code of conduct that applies to itself and to other elected Town officials. The Town Supervisor asked the Ethics Board to recommend the topics that could be included in such a code of conduct, and we submitted our recommendations to the Town Board in December 2024.

Further, as we have noted in our reports to the Town Board for the past **six** years (2018, 2019, 2020, 2021, 2022 and 2023), the Ethics Board receives complaints alleging conduct that did not violate the Ethics and Disclosure Law, but that may violate the Handbook.

As we have repeatedly suggested, we strongly encourage the Town to provide training on both the Handbook and the Ethics Law not only to paid employees, but also to those who serve voluntarily on

Town boards, committees, and commissions. This training should explain the different types of conduct covered by the Handbook and the Ethics Law, and the processes for reporting violations of each. As we have stated in the past, the Ethics Board stands ready to work with the Town in developing and assisting in providing this training, which should include specific examples drawn from prior Ethics Board decisions. We provided this training in our presentation to the Town Board in June 2024, but have not been engaged to assist in broader training for Town employees.

2024 MEETINGS:

The Ethics Board met 11 times during 2024: January 23, February 5, February 19, March 25, April 29, May 20, June 17, August 12, September 16, October 21, December 16.

Respectfully submitted by the Woodstock Ethics Board – February 8, 2025

APPENDIX A to 2024 Annual Report of the Ethics Board

Commission for Civic Design

Piotr Worokowicz (form also not received for 2023)

Housing Committee

Rebekah Brooks

Lisa Kirk

Human Rights Commission

Angela Ford Pasternack

Youth Task Force

Jason Glaser

Paula Chandler

Zoning Revision Committee

Michael Castiglione

Dave Menzies (form also not received for 2023)

Town Dispatch

Timothy Olinsky

Kathy Smith

Michelle Bennet

Leanne Buchinger

Jessica Saehloff

Police

Tiffany Claud

Cheryl Benjamin (form also not received for 2023)

Tiffany Crozier (form also not received for 2023)

Phillip Singara, Jr.