

FIFTEEN ROPE FERRY ROAD
WATERFORD, CT 06385-2886



PHONE: 860-442-0553
www.waterfordct.org

Waterford Ethics Commission

At a meeting on September 8, 2025, the Commission concluded its preliminary investigation of Complaints 2025-05-07-1 through -4 and 2025-05-15-1 through -4. The Commission agreed the actions cited in the Complaints might reasonably create a public perception of conflict of interest in Town government; consequently the record of the investigation becomes public. The records are attached.

The Commission will hold a public hearing on October 7, 2025, beginning at 5:30PM at the auditorium at Waterford Town Hall to address the Complaints.

Elizabeth Ritter
Chair, Waterford Ethics Commission

RECEIVED FOR RECORD
WATERFORD, CT
2025 SEP 15 P 3:09
ATTEST:



Complaint of Violation of Code of Ethics

Please provide the information requested below and attach additional sheets if necessary.

1. Identify the person who is alleged to have violated the Ethics Code.

Name: Mary Childs

Title or Position: Member of Representative Town Meeting

2. Specific Code of Ethics Violation: Section 2.50.030A.C [insert applicable subsection's letter]

Go to <https://www.waterfordct.org/> (click on Ordinances/Policies) or contact the Town Clerk for a hard copy of the Ethics Code.

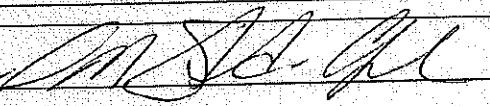
3. Provide a detailed explanation of the nature of the violation. Include dates, places and documents, if any.

At the May 5, 2025 meeting of the RTM, the above named person, an employee of the Board of Education, voted on the Board of Education budget.

Witnesses include the body of the RTM, Town Clerk, First Selectman and other members in attendance.

Attached is the "Town of Waterford Ethics Commission Advisory Opinion" dated September 24, 2021.

Evidence of this action is available on YouTube "May 5 Waterford CT RTM Meeting" recorded by Laurie Wolfley and the audio recording of the May 5, 2025 RTM meeting in the Town Clerk's office.

Signed by: 

Date: 5/17/25 Telephone: (860)287-3222

Email: steward-gelinas@sbcglobal.net

Print Name: Danielle Steward-Gelinas

Address: 31 B Lane Waterford, CT 06385

Acknowledgement: State of Connecticut, County of New London, Town of Waterford

On this the 7th day of May, 2025, before me, the undersigned officer, personally appeared

Danielle Steward-Gelinas, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that (he, she, they) executed the same for the purposes therein contained.

In witness thereof I hereunto set my hand.

Signature: 

Position: Waterford Town Clerk

Print Name: David L. Campa

Witness must be (1) a judge of a court of record, (2) a clerk or deputy clerk of a court having a seal, (3) the town clerk, (4) a notary public, (5) a justice of the peace, or (6) an attorney admitted to the bar of this state.

Submit this complaint in a sealed envelope. Mail or hand-deliver completed form to Ethics Commission c/o Town Clerk, 15 Rope Ferry Rd, Waterford CT 06385. Complaints must be kept strictly confidential to remain viable except upon the request of the respondent.

2025-05-07-1

Ms. Elizabeth Ritter
Chair of the Ethics Committee

May 21, 2025

Dear Ms. Ritter,

Thank you for sending the notification letter as well as the documents that clarify the need for an Ethics Commission as well as potential violations. I would like to share details regarding my circumstance. Would it be possible for me to be heard in person?

If my only opportunity to share is through this letter before the May 22nd deadline, I would share the following statement.

I apologize if I offended anyone with my vote during the RTM budget hearing specifically for the Board of Education total. When I was first appointed to the RTM, I was assured by our Town Legal Counsel that I was permitted to vote on overall budgets. It is for this reason that I felt I could ethically vote instead of abstaining.

Counsel further explained to me that I was not allowed to vote on my Waterford Federation of Classroom Teachers (WFCT) contracts and therefore I have recused myself from the Executive Sessions for discussion of contract negotiations and have abstained from voting on WFCT contracts for the years that I have been on the RTM.

If I am able to speak with the Ethics Commission in person, I welcome the opportunity. If this is not possible and you would like additional information, please contact me. Thank you for your time and attention in this matter.

Sincerely,



Mary Childs
22 Beacon Hill Drive
Waterford CT 06385

860-333-7084



Complaint of Violation of Code of Ethics

Please provide the information requested below and attach additional sheets if necessary.

1. Identify the person who is alleged to have violated the Ethics Code.

Name: Tim Fioravanti

Title or Position: Member of Representative Town Meeting

2. Specific Code of Ethics Violation: **Section 2.50.030 A.C** [insert applicable subsection's letter]

Go to <https://www.waterfordct.org/> (click on Ordinances/Policies) or contact the Town Clerk for a hard copy of the Ethics Code.

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Signed by

Date: 5/7/25 Telephone: (860)287-3222

Print Name: Danielle Steward-Gelinis

Email: steward-gelinis@sbcglobal.net

Address: 31 B Lane Waterford, CT 06385

Acknowledgement: State of Connecticut, County of New London, Town of Waterford

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In witness thereof I hereunto set my hand.

Signature: David L. Campisi

Position: Waterford Town Clerk

Print Name: David L. Campisi

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Complaint of Violation of Code of Ethics

Please provide the information requested below and attach additional sheets if necessary.

1. Identify the person who is alleged to have violated the Ethics Code.

Name: Kristin Gonzalez

Title or Position: Member of Representative Town Meeting

2. Specific Code of Ethics Violation: **Section 2.50.030 A.C** [insert applicable subsection's letter]

Go to <https://www.waterfordct.org/> (click on Ordinances/Policies) or contact the Town Clerk for a hard copy of the Ethics Code.

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Date: 5/7/25 Telephone: (860)287-3222

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Email: steward-gelinas@sbcglobal.net

Address: 31 B Lane Waterford, CT 06385

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Signature: David I. Campa

Position: Waterford Town Clerk

Print Name: David I. Campa

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2025-05-02-4



Complaint of Violation of Code of Ethics

Please provide the information requested below and attach additional sheets if necessary.

1. Identify the person who is alleged to have violated the Ethics Code.

Name: Kayla Mullen

Title or Position: Member of Representative Town Meeting

2. Specific Code of Ethics Violation: Section 2.50.030 A.C [insert applicable subsection's letter]
Go to <https://www.waterfordct.org/> (click on Ordinances/Policies) or contact the Town Clerk for a hard copy of the Ethics Code.

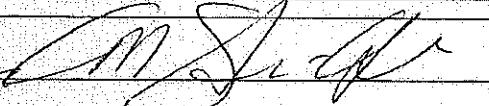
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Signed by: 

Date: 5/7/25 Telephone: (860)287-3222

Print Name: Danielle Steward-Gelinas

Email: steward-gelinas@sbcglobal.net

Address: 31 B Lane Waterford, CT 06385

Acknowledgement: State of Connecticut, County of New London, Town of Waterford

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Signature: 

Position: Waterford Town Clerk

Print Name: David L. Campo

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2025-05-15-1

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RECEIVED IN THE RECORDS
WATERFORD TOWN CLERK

2021 SEP 24 PM 2:09

TOWN OF WATERFORD ETHICS COMMISSION ADVISORY OPINION

TOWN CLERK

The Town of Waterford Ethics Commission presents this Advisory Opinion, which applies to all public officials of the Town of Waterford (defined as members of Boards and Commissions and Town Officials, whether elected or appointed, in concurrence with the Code of Ethics Sec. 2.50.020 H).

As in any small town, public officials may find themselves involved in votes on policies, budgets, and other decisions that may directly affect themselves or their family members. Waterford maintains a Code of Ethics that specifies when a board or commission member should not take official action. Further, the Town of Waterford Ethics Commission previously published advisories about when action by a Town official is ethically improper. Following inquiries and complaints, and in response to a subsequently requested Advisory Opinion to address the relationship conflict question, this Opinion is an effort to state situations in which public officials should refrain from voting.

The Preamble to the Code of Ethics, in Sec. 2.50.010 B, states, "The proper operation of town government requires that all public officials and town employees shall be impartial and responsive to the public interest, that public office and employment should not be used for personal gain or advantage, and that public officials and town employees should not place themselves in positions where private interest conflicts with public duty."

This Advisory Opinion specifically addresses the meaning and intent of the Code in its definition of conflict of interest. It comes as a result of a series of concerns and complaints made by community members over the years. It acknowledges that previous opinions have not explicitly defined instances where a conflict may exist and reflects a desire to ensure confidence in government. This Opinion recognizes that the Waterford Ethics Commission is adjusting its posture on the question of family relative conflicts, and is taking a specific position on this question —one that we have long debated.

Sec. 2.50.030 A of the Code defines the existence of a substantial conflict of interest as follows: "Public officials and town employees have an interest that is in substantial conflict with the proper discharge of duties or employment in the public interest and of responsibilities as prescribed by the laws of this state if they have reason to believe or expect that they, their immediate family, or a business with which they are associated will derive a direct monetary gain or suffer a direct monetary loss, as the case may be, by reason of their official activity." The Code further states, in Sec. 2.50.030 C, that "A public official or town employee may not take official action on any matter in which a substantial conflict (as defined in subsection A of this section) exists. If the conflict is disclosed, a public official or town employee may participate in discussions with or give opinions or recommendations to a town board, agency, commission, committee, department, or another public official or town employee."

2025-05-07-1
Through - 4

These sections of the Code preclude public officials from taking actions where a conflict of interest exists. Such conflict includes circumstances where a benefit - real or perceived - would accrue to the official, their family, or their business relations as result of such action. Public officials take official action when they vote "yes" or "no" where this type of question is before them. This Advisory Opinion does not intend to restrict or limit any representative from full and active discussion and examination of any and all issues that come before them, as is provided in Sec. 2.50.030. It is, however, our opinion that public officials must abstain from voting in situations in which circumstances exist that give rise to a conflict of interest or a public perception of such a conflict. Examples include situations when the Board or Commission member is employed by the Town, has a family member employed by the Town, has a business relationship with the Town, or is in a circumstance that gives rise to a perception of conflict of interest.

It should be noted that this opinion resolves the issue of whether a real or perceived conflict of interest takes precedence over the exception allowed in Sec. 2.50.030 B: "Public officials or town employees do not have an interest that is in substantial conflict...if any benefit or detriment accrues to them, their immediate family, or a business with which they are associated as a member of a profession, occupation, or group to no greater extent than any other member of such profession, occupation, or group." For example, a town official is not immune or exempt from a real or perceived conflict of interest when voting on issues affecting a family member in a collective bargaining unit. Actions taken by public officials that appear to the public as improper will determine the existence of a conflict and, subsequently, determine the appropriateness of the behavior.

This Advisory Opinion is broad and is intended to be applicable to all Town activities, including the Board of Education; public safety and fire services; and the Town's numerous permanent and temporary Boards, Commissions, and committees. It supercedes previous Opinions on this issue and presents a specific position for all future Town activities. It is the result of investigation into a specific complaint and the subsequent request for an Advisory Opinion that followed that investigation. (In accordance with the code 2.50.060 C, it should be noted that the results of our investigation into the complaint may be different if different facts are presented to the Commission at a later date.) This Opinion applies to future situations only; it clarifies the meaning and intent of the Code in its definition of conflict of interest and gives guidance to Officials as they work on behalf of the Town. It is intended to secure and keep public confidence in our volunteer and elected officials.

2025-05-15-1



Complaint of Violation of Code of Ethics

Please provide the information requested below and attach additional sheets if necessary.

1. Identify the person who is alleged to have violated the Ethics Code.

Name: Mary Childs

Title or Position: Member of Representative Town Meeting

2. Specific Code of Ethics Violation: **Section 2.50.030 A.C** [insert applicable subsection's letter]

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Witnesses include the body of the RTM and all others in attendance

Evidence of this action is available on YouTube and on the audio recording of the May 14, 2025 meeting

Signed by:

Date: 5/15/25 Telephone: (860)287-3222

Print Name: Danielle Steward-Gelinas

Email: steward-gelinas@sbcglobal.net

Address: 31 B Lane Waterford, CT 06385

Acknowledgement: State of Connecticut, County of New London, Town of Waterford

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Signature: David L. Campa

Position: Town Clerk

Print Name: David L. Campa

Witness must be (1) a judge of a court of record, (2) a clerk or deputy clerk of a court having a seal, (3) the town clerk, (4) a notary public, (5) a justice of the peace, or (6) an attorney admitted to the bar of this state.

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(Revised Jan. 2025)

P 9/20

2025-05-15-23



Complaint of Violation of Code of Ethics

Please provide the information requested below and attach additional sheets if necessary.

1. Identify the person who is alleged to have violated the Ethics Code.

Name: Tim Fioravanti

Title or Position: Member of Representative Town Meeting

2. Specific Code of Ethics Violation: **Section 2.50.030 A,C** [insert applicable subsection's letter]

Go to <https://www.waterfordct.org/> (click on Ordinances/Policies) or contact the Town Clerk for a hard copy of the Ethics Code.

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Print Name: Danielle Steward-Gelinas

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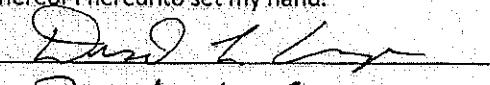
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Signature: 

Position: Town Clerk

Print Name: David L. Camp

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(Revised Jan. 2025)

P 10/30

2025-05-45-3



Complaint of Violation of Code of Ethics

Please provide the information requested below and attach additional sheets if necessary.

1. Identify the person who is alleged to have violated the Ethics Code.

Name: Kristin Gonzalez

Title or Position: Member of Representative Town Meeting

2. Specific Code of Ethics Violation: **Section 2.50.030 A,C** [insert applicable subsection's letter]

Go to <https://www.waterfordct.org/> (click on Ordinances/Policies) or contact the Town Clerk for a hard copy of the Ethics Code.

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Signed by

Date: 5/15/25 Telephone: (860)287-3222

Print Name: Danielle Steward-Gelinas

Email: steward-gelinas@sbcglobal.net

Address: 31 B Lane Waterford, CT 06385

Acknowledgement: State of Connecticut, County of New London, Town of Waterford

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Signature: David L. Camp

Position: Town Clerk

Print Name: David L. Camp

Witness must be (1) a judge of a court of record, (2) a clerk or deputy clerk of a court having a seal, (3) the town clerk, (4) a notary public, (5) a justice of the peace, or (6) an attorney admitted to the bar of this state.

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(Revised Jan. 2025)

2025-05-15- 3

May 22, 2025

Waterford Ethics Commission
15 Rope Ferry Rd.
Waterford, CT 06385

Dear Member of the Ethics Commission,

In response to your letter dated May 15, 2025, naming me as a respondent to an ethics complaint, I would like to state that I will make myself available to answer any questions concerning my vote on the education budget. I was operating with the understanding that the Town Attorney has stated that an employee of the BOE may vote on the BOE budget. Please inform me of next steps as necessary.

Sincerely,

Kristin Gonzalez
Kristin Gonzalez

RTM Member, District 2
5 White Oak Lane
Quaker Hill, CT 06375

2025-05-15-34



Complaint of Violation of Code of Ethics

Please provide the information requested below and attach additional sheets if necessary.

1. Identify the person who is alleged to have violated the Ethics Code.

Name: Kayla Mullen

Title or Position: Member of Representative Town Meeting

2. Specific Code of Ethics Violation: **Section 2.50.030 A.C** [insert applicable subsection's letter]
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Email: steward-gelinus@sbcglobal.net

Address: 31 B Lane Waterford, CT 06385

Acknowledgement: State of Connecticut, County of New London, Town of Waterford

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Signature: David L. Camp

Position: Town Clerk

Print Name: David L. Camp

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(Revised Jan. 2025)

P 13/20

FIFTEEN ROPE FERRY ROAD
WATERFORD, CT 06385-2886



2025-05-07-1
Through - 4
2025-05-15-1
Through 4
PHONE: 860-442-0553
www.waterfordct.org

July 3, 2025

Attorney Rob Avena
Waterford Town Attorney
15 Rope Ferry Road
Waterford, CT 06385

Confidential: Delivered by hand to Attorney Avena on July 3, 2025

Dear Attorney Avena,

Thank you for your time on the telephone yesterday and for your help in answering a few questions for the Waterford Commission on Ethics.

The Commission, on July 1, 2025, in Executive Session, asked that I pose these questions to you as we examine 8 complaints currently before us: 2025-05-07-1 through 4 and 2025-05-15-1 through 4. I enclosed copies of the complaints. We plan to next meet on August 5 and would appreciate a response by that date. The questions:

- Did you advise either directly or indirectly any of the respondents prior to their votes referenced in the complaints regarding their employment and public perceptions of conflict of interest? **Not that I can recall, especially not in the last two years.**
- If so, when and how did that advice occur? **N/A**
- If so, what was the advice you offered? **Last advice to Town Commissions was to follow Advisory Opinion of the Ethics Commission.**
- Was the November, 2021, Advisory Opinion of the Commission on Ethics part of that advice? **Yes**
- Do you feel your advice conflicted with the Advisory Opinion? **No**
- If not, why not? **Advised all town officials and elected members, as well as appointed members, to read the latest Advisory Opinion of the Commission.**

- Do you have suggestions for the Ethics Commission going forward that might help clarify this issue: in this case, specifically, whether a reasonable question of conflict of interest exists if an employee of the Waterford Board of Education votes as an elected RTM member on the budget for the Board of Education? *See below

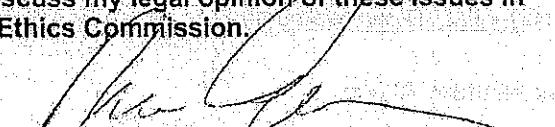
Thank you for your responses. Please contact me with questions or comments at (860) 514-2003. If I cannot personally receive your reply please deliver it to the Waterford Town Clerk appropriately sealed and marked for the Commission.

Sincerely,



Elizabeth B. Ritter
Chair, Waterford Commission on Ethics

* This is a fairly complex issue involving the State statute, Advisory Opinion and Ethics Ordinance. If needed, I would choose to discuss my legal opinion of these issues in an appearance before the members of the Ethics Commission.



8/13/2025

Robert A. Avena
Waterford Town Attorney

FIFTEEN ROPE FERRY ROAD
WATERFORD, CT 06385-2886



PHONE: 860-442-0553
www.waterfordct.org

September 11, 2025

Danielle Steward-Gelinas
31 B Lane
Waterford, CT 06385

Dear Ms. Steward-Gelinas,

The Ethics Commission, at a meeting on September 8, 2025, concluded its preliminary investigations and reached a finding of probable cause that the actions outlined in your Complaints 2025-05-07-1 through 4 and 2025-05-15-1 through 4 constitute a violation of the code. Copies of the Complaints are enclosed. This letter serves as official notice of the finding and outlines the next steps.

The rationale for this finding is in Sec. 2.050.030 A and C of the Waterford Code of Ethics and in the Advisory Opinion issued September 24, 2001. The conclusion is based on our preliminary investigation of the facts and our agreement that these actions might reasonably create a public perception of conflict of interest in Town government.

The Commission will make this opinion and the record of investigation public within five (5) business days of determination unless the respondents choose to postpone that release for a period not to exceed fourteen days for the purpose of reaching a stipulation agreement pursuant to Section 4-177 subsection C of the CT General Statutes.

The Commission must convene a public hearing of the complaints and responses within thirty (30) days of this notice. The hearing date is scheduled for October 7, 2025 beginning at 5:30PM at the auditorium at Waterford Town Hall. The hearing will be continued, if necessary, to accommodate your attendance.

Please feel free to contact the Commission via the Waterford Town Clerk or reach me directly.

Elizabeth Ritter
Chair, Waterford Ethics Commission
24 Old Mill Road
Quaker Hill, CT 06375
(860) 514-2003

FIFTEEN ROPE FERRY ROAD
WATERFORD, CT 06385-2886



PHONE: 860-442-0553
www.waterfordct.org

September 11, 2025

Mary Childs
22 Beacon Hill Road
Waterford, CT 06385

Dear Ms. Childs,

The Ethics Commission, at a meeting on September 8, 2025, concluded its preliminary investigations of Complaints 2025-05-07-1 and 2025-05-15-1 made by Danielle Steward-Gelinas and reached a finding of probable cause that your actions constitute a violation of the code. Copies of the Complaints are enclosed. This letter serves as official notice of the finding and outlines the next steps.

The rationale for this finding is in Sec. 2.050.030 A and C of the Waterford Code of Ethics and in the Advisory Opinion issued September 24, 2021. The conclusion is based on your employment by the Waterford Board of Education at the time of the vote, your decisions to abstain from previous RTM budgets votes, and our agreement that these actions reasonably might create a public perception of conflict of interest in Town government.

You have the right to request the Commission announce its opinion and a summary of its reasons for forming the opinion, at a minimum on the Town website. Regardless, pursuant to Code of Ethics Section 2.50.070(G), the Commission will make this opinion and the record of investigation public within five (5) business days of determination unless you choose to postpone that release for a period not to exceed fourteen (14) days for the purpose of reaching a stipulation agreement pursuant to Section 4-177 subsection C of the CT General Statutes. Please contact me immediately if you wish to engage in such discussions.

The Commission must convene a public hearing within thirty (30) days of this notice. Please be advised that you have ten (10) days from the date of this notice to exercise, in writing, your right to waive that hearing. The hearing date is scheduled for October 7, 2025 beginning at 5:30PM at the auditorium at Waterford Town Hall. The hearing may be continued, if necessary, to accommodate your attendance. Pursuant to Section 2.50.070(J), during the public hearing you have the right to be represented by counsel, to the presence of a union representative, to cross-examine all witnesses, and to present evidence on your behalf.

Please feel free to contact the Commission via the Waterford Town Clerk or reach me directly at (860) 514-2003 with any questions.

Elizabeth B Ritter

Elizabeth Ritter
Chair, Waterford Ethics Commission
24 Old Mill Road
Quaker Hill, CT 06375

FIFTEEN ROPE FERRY ROAD
WATERFORD, CT 06385-2886



PHONE: 860-442-0553
www.waterfordct.org

September 11, 2025

Timothy Fioravanti
10 Paula Lane
Waterford, CT 06385

Dear Mr Fioravanti,

The Ethics Commission, at a meeting on September 8, 2025, concluded its preliminary investigations of Complaints 2025-05-07-2 and 2025-05-15-2 made by Danielle Steward-Gelinis and reached a finding of probable cause that your actions constitute a violation of the code. Copies of the Complaints are enclosed. This letter serves as official notice of the finding and outlines the next steps.

The rationale for this finding is in Sec. 2.050.030 A and C of the Waterford Code of Ethics and in the Advisory Opinion issued September 24, 2021. The conclusion is based on your employment by the Waterford Board of Education at the time of the vote, your decisions to abstain from previous RTM budgets votes, and our agreement that these actions reasonably might create a public perception of conflict of interest in Town government.

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September 11, 2025

Kristin Gonzalez
5 White Oak Lane
Quaker Hill, CT 06375

Dear Ms. Gonzalez,

The Ethics Commission, at a meeting on September 8, 2025, concluded its preliminary investigations of Complaints 2025-05-07-3 and 2025-05-15-3 made by Danielle Steward-Gelinas and reached a finding of probable cause that your actions constitute a violation of the code. Copies of the Complaints are enclosed. This letter serves as official notice of the finding and outlines the next steps.

The rationale for this finding is in Sec. 2.050.030 A and C of the Waterford Code of Ethics and in the Advisory Opinion Issued September 24, 2021. The conclusion is based on your employment by the Waterford Board of Education at the time of the vote, your decisions to abstain from previous RTM budgets votes, and our agreement that these actions reasonably might create a public perception of conflict of interest in Town government.

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Elizabeth B. Ritter

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Chair, Waterford Ethics Commission
24 Old Mill Road
Quaker Hill, CT 06375

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WATERFORD, CT 06385-2886



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September 11, 2025

Kayla Mullen
54 Miner Avenue
Waterford, CT 06385

Dear Ms. Mullen,

The Ethics Commission, at a meeting on September 8, 2025, concluded its preliminary investigations of Complaints 2025-05-07-4 and 2025-05-15-4 made by Danielle Steward-Gelinas and reached a finding of probable cause that your actions constitute a violation of the code. Copies of the Complaints are enclosed. This letter serves as official notice of the finding and outlines the next steps.

The rationale for this finding is in Sec. 2.050.030 A and C of the Waterford Code of Ethics and in the Advisory Opinion issued September 24, 2021. The conclusion is based on your employment by the Waterford Board of Education at the time of the vote and our agreement that these actions reasonably might create a public perception of conflict of interest in Town government.

You have the right to request the Commission announce its opinion and a summary of its reasons for forming the opinion, at a minimum on the Town website. Regardless, pursuant to Code of Ethics Section 2.50.070(G), the Commission will make this opinion and the record of investigation public within five (5) business days of determination unless you choose to postpone that release for a period not to exceed fourteen (14) days for the purpose of reaching a stipulation agreement pursuant to Section 4-177 subsection C of the CT General Statutes. Please contact me immediately if you wish to engage in such discussions.

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Elizabeth B. Ritter

Elizabeth Ritter
Chair, Waterford Ethics Commission
24 Old Mill Road
Quaker Hill, CT 06375