

**Board of Ethics**  
245 deKoven Drive, Room 208  
Middletown, CT 06457-1300

**[Draft] Minutes of Board of Ethics Special Meeting of January 12, 2026**

**Attendance.** Members or alternates present: Gregory Harris (temporary acting chair), Alyx Mark, Maureen O'Connor. Members absent: Sarah Steinfeld and Thomas Hibbard. Others present: Vincent Lofreddo (Common Council member).

**Call to order.** The chair called the meeting to order at 9:01am.

**Recording secretary.** By unanimous consent, the chair appointed Ms. Mark temporary acting secretary for this meeting at 9:01am.

**Public comment.** Mr. Lofreddo, the only member of the public present, chose not to remark.

**Approval of the minutes.** Ms. O'Connor moved to approve the minutes as distributed of the board's special meeting of November 18, 2025. The chair seconded the motion. Absent debate or objection, the chair declared the motion approved and the minutes adopted unanimously. (9:02am)

**Election of Officers (Chairperson, Vice-Chair and Secretary) for Board of Ethics.** By unanimous consent, the Board deferred elections to a future meeting. (9:03am)

**Old business.**

**Request for advisory opinion 2025-01.**

Ms. Mark moved to receive the memo of the General Counsel (12/26/25 memo, RE: **Constraints of Ethics Ordinance Under Labor Law regarding Advisory Opinion 2025-01**). Ms. O'Connor seconded the motion. Absent objection, the chair declared the motion adopted and the memo officially received by the Board at 9:04am.

The Board informally discussed the request for advisory opinion 2025-01 and General Counsel's memo regarding it. After such discussion, Ms. O'Connor moved, and Ms. Mark seconded, the following motion, at 9:42am:

1. It is the opinion of the Board of Ethics that the Mayor has a conflict of interest with respect to his role in the pending interest arbitration with the City of Middletown and UPSEU and Local 6457.
2. It is the further opinion of this board that the conflict can be circumvented if the Mayor removes himself fully from the process, plays no further role after appointing representative(s), and retains no approval, direction, or supervision over the process.

Ms. O'Connor moved to delete the word "and" between "UPSEU" and "Local 6457." Ms. Mark accepted the amendment as friendly, so the motion stood as amended. By unanimous consent the

board proceeded to a vote on the motion as amended. After the vote, the chair declared the motion adopted unanimously.

**New business.** At 9:49am, Mr. Harris initiated discussion regarding the scheduling of upcoming Board of Ethics meetings for the 2026 calendar year. After discussion, Ms. O'Connor moved to schedule the following regular meetings for 2026: the first Wednesday of April, June, August, October, and December. Absent objection, the board moved to a vote on the motion. The chair declared the motion unanimously adopted. (9:57am)

**Other business.** At 9:58am, the chair inquired whether any member had other business to bring before the board. None emerged.

**Adjournment.** There being no further business, the chair inquired whether there was objection to adjournment. There being none, the chair declared the meeting adjourned by unanimous consent at 10:00am.

Respectfully submitted,

Alyx Mark  
Temporary Recording Secretary

Middletown Board of Ethics  
245 deKoven Drive, Room 204  
Middletown, CT 06457

January 14, 2026

Mayor Gene Nocera  
City of Middletown  
245 deKoven Drive, Room 209  
Middletown, CT 06457

RE: Follow Up to Request for Advisory Opinion

Dear Mayor Nocera,

Enclosed is a copy of the Board of Ethics draft minutes of our meeting of January 12, 2026 at which we adopted the resolution set forth therein. The gist is that there is a conflict of financial interest, but it can be circumvented by the appointment of one or more representatives, as long as you fully recuse yourself and take no further part in the collective bargaining process.

We considered and rejected the possibility that the financial conflict of an appointing authority would be automatically imputed to the person(s) appointed. If that were the case, we reasoned, it would leave the City without representation, and that would not be a reasonable interpretation of the collective bargaining scheme. But we did conclude that there would have to be a "Chinese wall" between you and the bargaining process, including any arbitration, once you appointed representatives for the City, or else the conflict would remain.

We also discussed whether the matter was moot because of the family member's retirement, and concluded that it was not, because the contract would be retroactive and could affect retiree's treatment as well.

We did not feel we could opine on what you should do, only whether there exists a conflict of interest and, if so, whether designating a representative would cure it under any conditions. We express no opinion with respect to the named possible representatives (General Counsel and Human Relations).

I mention that you have the right to appeal and the right to request further opinions on related or unrelated matters.

I close by thanking you for having General Counsel supply us with background material to help us consider the matter, and we thank Mr. Smith as well for the memorandum he produced.

Respectfully yours,  
Gregory M. Harris  
Temporary Acting Chair  
Middletown Board of Ethics



Kristin Holden On Behalf of Mr. Harris

CC: Jeannette Blackwell, Acting President, Middletown Common Council  
Vincent Loffredo, Member, Middletown Common Council  
Members of the Board of Ethics