



Town Hall
238 Danbury Road
Wilton, CT 06897

Council on Ethics:
Thanh Tsoi, Chair
Elizabeth Edwards, Vice Chair
Rhonda Brown, Secretary
Tamara Conway

October 2, 2023

Lori A. Bufano
[REDACTED]

Dear Mr. Bufano,

We received your request for an advisory opinion received by the Town Clerk on August 8, 2023 and disclosing a potential conflict of interest.

Sincerely,

Thanh Tsoi
Chair, Council on Ethics

Lori A. Bufano
TOWN CLERK

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WILTON, CT.
2023 OCT - 3 P 12: 14

**Advisory Opinion
Wilton Council on Ethics
September 29, 2023**

**Re: Conflict of Interest Question Concerning Board of Education
Candidates/Members Whose Partners Work at the Wilton Schools**

Summary: On August 7, 2023, the Wilton Council on Ethics (the "Council") received a formal request for an Advisory Opinion, from Lori A. Bufano, a candidate for the Wilton Board of Education (the "BOE" or "Board"). Ms. Bufano's partner, to whom she is not married, is an individual who works as a substitute teacher at the Wilton Public Schools. The couple do not commingle their finances. The partner is retired; his substitute compensation "does not materially impact his financial status." Ms. Bufano requested a finding confirming that, should she be elected to the BOE, her service would not conflict with the requirements of the Code of Ethics for the Town of Wilton (the "Code").

It is the opinion of the Council that, based on the definitions in the Code, service on the BOE, under the facts presented in Ms. Bufano's letter, would not present a potential Financial Conflict of Interest or a potential Personal Conflict of Interest.

Code of Conduct Provisions: In Section 3-3(A), the Code defines Financial Interest as "Any interest representing an actual or potential economic gain or loss, which is neither de minimis nor shared by the general public, that accrues to an official or employee, to a relative, or to a business" and Personal Interest as "Any interest representing an actual or potential noneconomic benefit or detriment, which is neither de minimis nor shared by the general public, that accrues to an official or employee, to a relative, or to a business." A Relative is defined in the Code as "Any person related to an official or employee by blood, adoption, or marriage."

Analysis:

The Council does not find a potential financial conflict of interest in this case. Because Ms. Bufano and her partner do not commingle their finances there is no potential financial benefit that would accrue to her even if she were to serve on the BOE, and while in that position, make a decision that impacted her partner's compensation or other terms of his employment at the Wilton schools. The finding of no financial conflict of interest is bolstered by the fact here that Ms. Bufano's partner's compensation as a substitute does not have a material impact on his financial status so any change in his compensation resulting from a BOE vote would not significantly impact him.

The Council does not find that a potential personal conflict of interest is present either under these facts. Ms. Bufano's partner is not a Relative as defined in the Code. Accordingly, even if there were decisions that Ms. Bufano might make as a BOE member that affected her partner's work at the Wilton schools, they would not create a conflict as defined in the Code.

Accordingly, the Council has determined that so long as the facts of Ms. Bufano's and her partner's relationship remain the same as described in her August letter, her service on the BOE, should she be elected, would not conflict with the requirements of the Code.

Sources:

Town of Wilton, Code of Ethics: <https://www.wiltonct.org/home/links/code-ethics>

Submitted on behalf of the Wilton Council on Ethics

A handwritten signature in black ink, appearing to read 'Thanh Tsoi', is written over a horizontal line.

Chair:

Thanh Tsoi

Members:

Rhonda Brown

Tamara Conway

Elizabeth A. Edwards