



TOWN OF SOUTHBURY

ETHICS COMMISSION
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Advisory Opinion Case No. 25-001a

Ms. Kelly Keenan, a newly elected Selectwoman for the Board of Selectman (BOS) here in Southbury has asked the Ethics Commission for an Advisory Opinion concerning a potential conflict of interest that might exist between her current and ongoing activities as a contract teacher of art classes for the Southbury Parks and Recreation Department (P&R) and its compatibility with her new role as an elected official on the BOS.

Ms. Keenan's role at P&R as a teacher of art classes is a part-time non-employee contractor role which she has held for several years. She receives a small amount of remuneration from the town in the form of a 1099-style payment to conduct these very successful and well attended art classes. She is also the President of the Southbury Arts and Culture Alliance (SACA), a local 501(c)(3) organization.

Our advice is for her to no longer accept any remuneration for her role for the already scheduled art classes this December that she plans to teach, but to conduct them. We further advise that she discontinue teaching any new unscheduled classes during the remainder of her tenure on the BOS as a Selectwoman. This should avoid any perceived conflict of interest going forward.

She is still required to disclose her contractual teaching relationship and her membership in the external SACA 501(c)(3) group as per Section C of the Code of Ethics by informing the BOS in writing of her activity and having it entered into the minutes of a meeting of the BOS to provide public awareness of the relationship. If there are ever any instances when the SACA 501(c)(3) organization she leads derives any financial benefit from the Town of Southbury and a vote is taken by the BOS, she should recuse herself from these votes.

By
The Ethics Commission for the Town of Southbury

Joseph R. Ruggiero

Joseph R. Ruggiero Chairperson

12/10/2025

Date