

November 18, 2025

Mr. Stephen A. Jennings
Chair, Board of Ethics
City of Watertown
245 Washington St., Suite 302
Watertown, NY 13601

Dear Chairman Jennings and Members of the Board of Ethics:

As part of a recent Freedom of Information Law (FOIL) request, the City's legal counsel identified concerning correspondence involving Councilman Clifford Olney and Councilwoman Lisa Ruggiero.

These emails were brought to our attention on October 17, 2025. To avoid any appearance of political motivation, we waited until after the November 4, 2025 City elections before referring this matter to you.

We have individually reviewed the enclosed, consulted with legal counsel and are concerned that these materials represent a violation of the City's Code of Ethics. Now that the election has concluded, we respectfully request that the Board of Ethics review the enclosed materials. The correspondence includes, but is not limited to, the following:

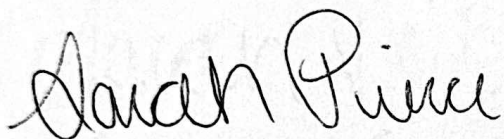
- Forwarding confidential legal advice related to litigation involving a local developer and his companies.
- Sharing internal emails regarding the Watertown Golf Club sale, prior to and after the City's purchase, with local developers who had involvement in and benefited from the transaction.
- Forwarding constituent communications to a local developer and blind carbon copying that developer on responses to those constituents.
- Forwarding internal City staff communications to local developers.

- Forwarding confidential legal communications to the press.
- Requesting confidential legal opinions from legal counsel while blind carbon copying a local developer.

Again, given the nature of these actions, we are concerned that they may constitute violations of the City's Code of Ethics. We therefore request that the Board of Ethics conduct a review, issue an advisory opinion, and report its findings to the City Council.

Thank you for your time and attention to this matter.

Sincerely,

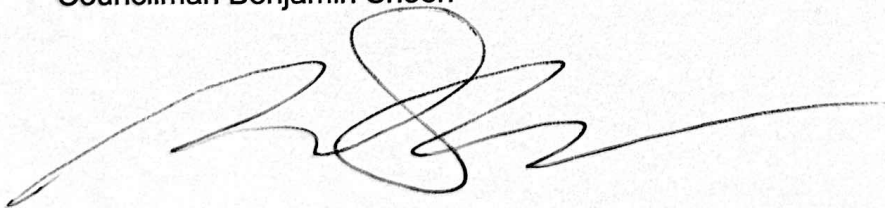
A handwritten signature in cursive script, appearing to read "Sarah Pierce".

Mayor Sarah Pierce

A handwritten signature in cursive script, appearing to read "Robert Kimball".

Councilman Robert Kimball

Councilman Benjamin Shoen

A handwritten signature in cursive script, appearing to read "Benjamin Shoen".

Enc.