



March 23, 2017

(VIA ELECTRONIC MAIL ONLY - - iecinfo@state.co.us)

Constantinos Ioannides
Executive Director
Colorado Independent Ethics Commission
1300 Broadway, Suite 240
Denver, CO 80203

Re: Comments on a draft position statement concerning the implementation of Position Statement 16-01

Dear Mr. Ioannides:

The Town of Windsor, a Colorado home rule municipality, submits the comments below for the Commission's consideration.

As a home rule municipality, the Town of Windsor re-affirms its objections to Position Statement 16-01, submitted to the Commission on July 28, 2016. The Town maintains that the IEC lacks legal authority over standards of ethical conduct already addressed in the Town's Home Rule Charter as authorized in Article XXIX, Section 7 of the Colorado Constitution. Although the Town accepts that the IEC has adopted Position Statement 16-01, the Town questions the IEC's authority over Town officials and employees.

The Town urges the IEC to refrain from adopting further policy that relies on Position Statement 16-01.

If you or the Commissioners have any questions, please feel free to contact me.

Sincerely,

TOWN OF WINDSOR, COLORADO

Ian D. McCargar, Town Attorney

IDM

pc: Colorado Municipal League
Kelly Arnold, Town Manager