



Monroe County Legislature

RACHEL BARNHART
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Via Electronic Mail

Monroe County Board of Ethics
C/O County Attorney Matthew Schwartz
39 W. Main St.
Rochester, NY 14614

May 14, 2026

RE: Supplemental Submission — Baxter & Barnes Leadership

Board of Ethics Members:

I write to supplement my letter of this date with additional facts that have come to my attention concerning Baxter & Barnes Leadership (“BBL”) and Sheriff Todd Baxter’s outside consulting activities.

Additional Facts

- A review of Erie County vendor check records dated April 10, 2025 reflects a payment of \$1,800 to Baxter and Barnes Leadership, coded to Jail Management under Public Safety. A neighboring county's jail operation has paid Sheriff Baxter's consulting firm directly.¹
- BBL's public Facebook page documents that the firm delivered its "Transforming Jail Culture" program to Jefferson County, with over 90% of that county's command staff participating. The program is not a generic leadership offering. It is built around the operational realities of running a county jail. Sheriff Baxter knows those realities because Monroe County taxpayers pay him to manage one.²
- BBL's program catalog includes an offering titled "Leadership Essentials for the Newly Promoted," explicitly designed for officers seeking promotion to Sergeant, Lieutenant, or Captain. Sheriff Baxter controls promotion and advancement decisions within the Monroe County Sheriff’s Office. The firm is therefore

¹ See: <https://www4.erie.gov/comptroller/sites/www4.erie.gov/comptroller/files/2025-04/vendor-checks-ending-april-11-2025.pdf>

² See: <https://www.facebook.com/61561108817903/posts/proud-to-wrap-up-transforming-jail-culture-training-in-jefferson-countythe-sheri/122193338738370293/>

marketing leadership and promotional training in the same professional sphere over which Sheriff Baxter exercises official authority.

Together, these facts raise substantial questions under Sections 45-8 and 45-13 of the Monroe County Code of Ethics concerning incompatible outside employment, use of office for private gain, and conduct creating an appearance of improper influence or conflict with official duties.

I further ask the Board to consider whether the conduct implicates the principles reflected in Public Officers Law §74, which the Board cited and relied upon in its 2023 opinion. In that opinion, the Board treated the standards embodied in §74 and the County Ethics Code as closely related ethical obligations intended to preserve public confidence in government and prevent the use of public office for private advantage.

Sincerely,

A handwritten signature in cursive script that reads "Rachel Barnhart".

Rachel Barnhart – Legislator District 17