



# CONNECTICUT DEPARTMENT OF CONSUMER PROTECTION

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BRYAN T. CAFFERELLI | COMMISSIONER

## DEPARTMENT OF CONSUMER PROTECTION CODE OF ETHICS

### **General Ethics Policy**

In addition to the State Code of Ethics for Public Officials and State Employees, the Department of Consumer Protection (DCP) expects all employees to adhere to the following:

- (a) No DCP employee shall willfully or knowingly use or distribute state equipment, state assigned vehicles, state identification or badges, or any other state supplies or materials for any purpose not directly connected to official state business.
- (b) No DCP employee shall use or distribute personal or confidential information at or in the possession of DCP, except when directly connected to the administration of DCP services and activities.
- (c) No DCP employee shall willfully or knowingly use their position at DCP to enable themselves, family members or friends to benefit from DCP programs or services where an identical benefit or opportunity is not open, available, or provided to the general public.
- (d) Employees who are engaged, or may be engaged, in an employment relationship or business partnership with another person, firm, organization, business entity or corporation must notify the agency's Ethics Liaison Officer, Julianne Avallone via e-mail at [julianne.avallone@ct.gov](mailto:julianne.avallone@ct.gov) or via facsimile at (860) 706-5385, of their prospective or actual employment or business partnership with such person, firm, organization, business entity or corporation. The written notification will provide an opportunity for further review by agency officials and/or the Office of State Ethics of the degree of potential conflict of interest, if any, and permit appropriate actions where necessary. Agency employees may be asked to sign a statement indicating that there is no violation of the State of Connecticut and/or DCP's Code of Ethics or policies.
- (e) No DCP employee shall willfully or knowingly allow any employment or enterprise to take precedence over their responsibility to the State of Connecticut and to DCP.
- (f) No DCP employee shall willfully or knowingly allow any personal relationship or private

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obligation to impact such employee's professional judgment or obligation to carry out their duties for the benefit of the State of Connecticut and DCP.

(g) No DCP employee shall remove personal effects from the workspace of another employee without permission from the other employee, a DCP Director or DAS Human Resources.

(h) A DCP employee shall comply with the Acceptable Use of State Systems Policy set forth by the Connecticut Office of Policy and Management.

(i) No DCP employee shall use or replicate any state or DCP seal or emblem without the express authorization of their direct supervisor.

(j) No DCP employee shall inspect or investigate a facility owned, operated by or managed by a family member without express authorization of their direct supervisor.

(k) Employees who are investigating or inspecting an individual, or a business entity owned or managed by such individual, with whom they have a family or friendly relationship shall notify their direct supervisor as soon as the relationship is identified. An employee with a potential conflict based on a pre-existing relationship must receive written approval from their direct supervisor, or division director, prior to investigating or inspecting such individual or business entity after the potential conflict is identified.

### **Gaming Policy**

Any DCP employee who has the authority to make gaming related decisions, or whose public position exposes them to confidential information, which may be used to obtain financial gain when participating in certain gaming activities, is prohibited from participating in such activities. The reason for this prohibition is to prevent any conflicts of interest and to avoid any appearance of impropriety.

#### **Prohibitions on Gaming Activity**

The following activities are prohibited for the job classifications listed below, as well as any immediate family member of the employee (related by blood, marriage or adoption, or person engaged in domestic partnership) domiciled in the employee's household:

Lottery: Purchase of or prize payout from any Lottery ticket issued by the Connecticut Lottery Corporation, including online lottery.

Off Track Betting (OTB): Participation in any gambling activities conducted at any OTB facility or offered online or telephonically through an OTB operator licensed in Connecticut.

Casino: Participation in any gaming activities, excluding non-gaming entertainment or Bingo, online or at either of the casinos whether on or off duty.

Fantasy Sports and Sports Wagering: Participation in any paid fantasy contest or wagering on

sports wagering, at a retail location or online, offered by a DCP licensed online gaming operator.

These gaming prohibitions apply to the following job classifications, as well as any immediate family member of the employee (related by blood, marriage or adoption, or person engaged in domestic partnership) domiciled in the employee's household:

- Division Director (Gaming);
- Assistant Division Director (Gaming);
- Administrative Assistant (Gaming);
- State Program Manager (Gaming);
- Secretary 1 (assigned to Gaming);
- Office Assistant (assigned to Gaming);
- Gaming Regulation Supervisor;
- Gaming Regulation Officer;
- Lottery Drawing Officers;
- Lead Gaming Investigator;
- Gaming Investigator;
- Special Investigator (assigned to Gaming);
- Research Analyst (assigned to Gaming);
- License and Applications Supervisor (assigned to Gaming).
- License and Application Analyst (assigned to Gaming);
- Processing Technician (assigned to Gaming);
- Supervising Accounts Examiner (assigned to Gaming);
- Associate Accounts Examiner (assigned to Gaming);
- Accounts Examiner (assigned to Gaming);
- Accounting Careers Trainee (assigned to Gaming);
- Legal Director;
- Assistant Legal Director;
- Legal Program Director (Legal Division, assigned to Gaming);
- State Program Manager (Legal Division, assigned to Gaming);
- Staff Attorneys (Levels I, II and III, Legal Division, assigned to Gaming);
- Paralegal Specialist 1 (Legal Division, assigned to Gaming); and
- Paralegal Specialist (Legal Division, assigned to Gaming).

These gaming prohibitions do not include non-gaming entertainment or Bingo. DCP employees engaged in the inspection or investigation of gaming activity overseen by DCP may participate in prohibited gaming activity solely in the course of their work responsibilities.

No DCP employee identified in the Gaming Policy section of this Code of Ethics may be licensed or employed within any legalized gambling operation regulated by the DCP, sell lottery tickets, or own stocks in any business involved in gaming activities in Connecticut. These provisions shall apply to the individuals in the named positions, as well as any individuals in successor or reclassified positions having the same job duties and responsibilities.

All DCP employees are prohibited from participating in gaming activities while on duty, regardless of the division to which they are assigned or their job classification. Any permissible DCP employee who chooses to participate in gaming activities while they are off-duty must do so without any visible DCP identification (such as an identification badge or uniform).

Pursuant to CGS 21a-421dd, no DCP employee who carries out the licensing, inspection, investigation, enforcement or policy decisions authorized by the Regulation of Adult-Use Cannabis Act (RERACA) may:

- Directly or indirectly, have any management or financial interest, as defined in CGS 21a-420, in the cultivation, manufacture, sale, transportation, delivery or testing of cannabis in Connecticut;
- Receive any commission or profit from, nor have any interest in, purchases or sales made by persons authorized to make such purchases or sales pursuant to RERACA; or
- Apply, either individually or with a group of individuals, for a cannabis establishment license for two years after leaving state service.

The aforementioned General Ethics, Cannabis and Gaming policies and provisions apply to all employees of the DCP, except as expressly limited in the sections dealing with Cannabis and Gaming activity, and it shall be the responsibility of each employee to be familiar with them and to comply with them.

Evidence of non-compliance or violation of the DCP's Ethics Policies may subject the employee(s) to disciplinary action up to and including dismissal from State service.

Questions concerning the DCP Code of Ethics may be directed to:

Julianne Avallone, Ethics Liaison Officer,  
Department of Consumer Protection  
e-mail: [julianne.avallone@ct.gov](mailto:julianne.avallone@ct.gov)

Questions about the State Code of Ethics for Public Officials and State Employees may be directed to:

Office of State Ethics  
18-20 Trinity Street, Suite 205  
Hartford, Connecticut 06106-1660 e-mail: [Ethics.Code@ct.gov](mailto:Ethics.Code@ct.gov) telephone:  
(860) 263-2400