



STATE OF CONNECTICUT

OFFICE OF STATE ETHICS

**THE SUBCOMMITTEE ON AUDIT PROCESS REVIEW
CITIZEN'S ETHICS ADVISORY BOARD
OFFICE OF STATE ETHICS
18-20 Trinity Street, Hartford, CT 06106**

MINUTES OF THE MARCH 12, 2020 SPECIAL MEETING

The Citizen's Ethics Advisory Board ("Board") of the Office of State Ethics ("OSE") held a Special Meeting on Thursday, March 12, 2020, in the 5th Floor Conference Room, 18-20 Trinity Street, Hartford, CT 06106.

Chair Dena Castricone called the meeting to order at 10:01 a.m.

The following Subcommittee members were present by teleconference:

Dena Castricone, Chair

Beth Cook

The following staff members of the OSE were present:

Peter Lewandowski, Executive Director

Malissa Hurry, Paralegal Specialist

Mark Wasielewski, Ethics Enforcement Officer

Melissa Hamilton, Paralegal Specialist/Clerk to the Board

Marc Crayton, Deputy Ethics Enforcement Officer

The following topics were addressed during the meeting:

1. Deputy Enforcement Officer Marc Crayton provided an overview report on the lobbyist audit procedures. The subcommittee members expressed gratitude for Mr. Crayton's work on the lobbyist audit procedures.
2. The Subcommittee members discussed the current status of the lobbyist audit procedures and opportunities to achieve productive audits within a reasonable amount of time and stricter penalties for recordkeeping violations. Ms. Cook presented the option of formalized policymaking and its ability to establish stricter consequences should lobbyists violate the lobbyist audit process and/or recordkeeping requirements. She also presented the possibility of adding authority for "subpoena" practice in order to compel the production of records when necessary. Executive Director Peter Lewandowski recommended

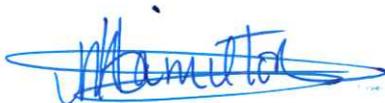
the creation of internal policies such as, lobbyist education and the expansion of the responsible party (referred to as "Authorized agent" at the meeting) list. Mr. Crayton proposed, the revision of the lobbyist registration form to include a notice that states "State law requires registered lobbyists to maintain lobbying financial reports for a period of three years and will be subject to random audits."

3. For immediate goals, the subcommittee members agreed to:

- review and revise the Lobbyist Guides (referred to as "Manual" at the meeting) to include process flows, deadlines, repercussions and the expansion of the responsible party list;
- provide Lobbyist training about Lobbyist Guides, Recordkeeping and Random Audits; and
- revision to the lobbyist registration platform to inform registrants of lobbying reporting obligations and linking the Lobbyist Guides for review and awareness of records retention policy and consequences of non-compliance

The meeting was adjourned at 10:47 a.m.

Respectfully submitted by,



Melissa Hamilton
Paralegal Specialist/Clerk to the Citizen's Ethics Advisory Board
Office of State Ethics

Date approved
(By the Citizen's Ethics Advisory Board)