



# STATE OF CONNECTICUT

## OFFICE OF STATE ETHICS

**CITIZEN'S ETHICS ADVISORY BOARD**  
**OFFICE OF STATE ETHICS**  
**165 Capitol Avenue, Suite 1200, Hartford, CT 06106**

### **MINUTES OF THE JULY 21, 2022 REGULAR MEETING**

The Citizen's Ethics Advisory Board ("Board") of the Office of State Ethics ("OSE") held a Regular Meeting on Thursday, July 21, 2022.

Chair of the Board, Dena Castricone, called the meeting to order at 1:01 p.m.

#### **The following Board members were present:**

Dena Castricone, Chair (virtual)  
Nichelle Mullins, Vice Chair (virtual)  
Mary Bigelow  
Charles Chiusano

Karen Christiana (telephone)  
Cheryl Lipson (virtual)  
Laura Schuyler (virtual)

#### **The following staff members of the OSE were present:**

Peter Lewandowski, Executive Director  
Brian O'Dowd, General Counsel  
Mark Wasielewski, Ethics Enforcement Officer  
Marianne Sadowski, Deputy General Counsel  
(virtual)  
Marc Crayton, Deputy Ethics Enforcement  
Officer

Diane Buxo, Assistant General Counsel  
(virtual)  
Jennifer Montgomery, Assistant Ethics  
Enforcement Officer (virtual)  
Melissa Hamilton, Paralegal & Clerk of the  
Board

#### **The following topics were addressed during the meeting:**

1. The minutes of the June 16, 2022 Regular Meeting were presented to the Board for approval.

**On the motion of Mr. Chiusano, seconded by Vice Chair Mullins, the Board voted six to zero, with Ms. Lipson abstaining, to approve the minutes of the June 16, 2022 Regular Meeting.**

2. The minutes of the June 21, 2022 Special Meeting for the Subcommittee on Municipal Ethics were presented to the Board for approval.

**On the motion of Ms. Lipson, seconded by Mr. Chiusano, the Board voted three to zero to approve the minutes of the June 16, 2022 Special Subcommittee Meeting.**

3. Chair Castricone presented her Chairperson's report, reminding the Board that Uniform Administrative Procedure Act ("UAPA") hearings are not conducted in August. UAPA Hearings will resume in September. Chair Castricone volunteered to serve as the September 8, 2022 Hearing Officer and Ms. Lipson volunteered to serve as an alternate Hearing Officer. The Board was informed of the need to form the Nominating Committee to manage the nominations of the Chair and Vice-Chair positions of the Board. This committee must consist of at least two board members who are not running for either position and the executive director serving as an ex officio member. Board members Bigelow, Lipson and Chiusano volunteered to serve as members of the Nominating Committee.

**On the motion of Vice Chair Mullins, seconded by Ms. Christiana, the Board voted seven to zero to establish the Nominating Committee.**

4. General Counsel Brian O'Dowd made a comprehensive training presentation on the Code of Ethics for Public Officials (the "Code") outside employment provisions. This was a detailed oral presentation, accompanied by a PowerPoint summary.
5. General Counsel O'Dowd presented the Petition for Declaratory Ruling submitted by Michael E. Festa for the Board's consideration. In his Petition, Mr. Festa asked a series of questions that call for interpretations of various statutes and regulations outside of the Code. General Counsel O'Dowd recommended that the Board deny Mr. Festa's Petition.

**On the motion of Mr. Chiusano, seconded by Ms. Schuyler, the Board voted seven to zero to deny the Petition for Declaratory Ruling submitted by Michael E. Festa.**

6. General Counsel O'Dowd presented the Legal Division report. He noted two things: 1) that the division is still not in receipt of the Petition for Declaratory Ruling from the Metropolitan District Commission ("MDC"); and 2) that the Attorney General's office has not yet issued an opinion in response to OSE's request for one, involving the Connecticut Port Authority and the filing of Statements of Financial Interests ("SFIs") by certain members of its board of directors. Mr. O'Dowd informed the Board that if the Petition for Declaratory Ruling by MDC is received before the next board meeting, he will not only present the Petition to the Board at its August meeting, but he will also present a draft of the ruling for the Board's review and consideration. The Board was also notified that it will be informed of any updates from the Attorney General's office concerning OSE's request for an opinion.
7. Ethics Enforcement Officer Mark Wasielewski presented the Enforcement Division report. He highlighted that the Division has completed the enforcement of the late filings of Statements of Financial Interests ("SFI") and the second quarter lobbyist reports (ETH-2C and ETH-2D). Mr. Wasielewski also noted that the Division resolved Docket No. 2020-15 for \$10,000. In Docket No. 2020-15 the Respondent company admitted to violating the Code of Ethics by providing gifts and other items of value to Connecticut Port Authority employees and a board

member while the Respondent was “doing” or “seeking to do” business with the Port Authority.

8. Deputy Ethics Enforcement Officer Marc Crayton presented the lobbyist audit report for Connecticut Center for Advanced Technology, Inc., requesting approval of the audit and its findings. Mr. Crayton reported that the audit consisted of two findings: an overstated payment of \$2,000 to the client lobbyist’s communicator in its 2019 financial report; and an understatement of payment in the amount of \$4,000 to the communicator lobbyist in 2020. In both instances, the client lobbyist has amended its reports to correct the overstatement and understatement.

**On the motion of Mr. Chiusano, seconded by Ms. Lipson, the Board voted seven to zero to approve the audit report for Connecticut Center for Advanced Technology, Inc.**

9. Executive Director Peter Lewandowski presented the Education and Communications report, noting that the office continues to provide educational trainings, although summer months are usually less busy. Two trainings were performed during this board package period. The office is in the process of scheduling in-person trainings with the Office of Early Childhood, and the General Assembly’s legislative staff. The office is also working with legislative management to schedule the mandatory four-year training for the General Assembly.
10. Executive Director Lewandowski presented the Executive Director’s report, highlighting the following items:
  - a. In personnel matters, OSE, in collaboration with Executive Director Colleen Murphy of the Freedom of Information Commission (“FOIC”), submitted specification of the reclassified Director of Education and Communications positions at both agencies to the Department of Administrative Services (“DAS”). DAS has returned a reconfigured draft of the position consisting of OSE and FOIC proposals. Also, following discussion with Ethics Enforcement Officer Wasielewski about the needs of the enforcement division, it was decided that OSE would benefit more from an Associate Accounts Examiner position in order to increase audits of the required filings and provide investigative support in the review of financial documents and evidence;
  - b. OSE is currently updating its lobbyist and SFI forms; and
  - c. The State Auditors of Public Accounts audit of the Office of State Ethics for the fiscal years ending June 30, 2020 and 2021, is ongoing.
11. Executive Director Lewandowski provided preliminary remarks prior to the discussion of the notification process involving SFI filers who depart state service, by outlining OSE’s current procedures, which involve certified mailing of written notice to the SFI filer’s primary address once OSE has learned from an agency ethics liaison of the filer’s departure. Suggestions

regarding notification and exit interview checklist were discussed. The OSE staff will explore the viability of these suggestions.

**On the motion of Mr. Chiusano, seconded by Vice Chair Mullins, the Board voted seven to zero to adjourn the meeting.**

The meeting was adjourned at 2:16 p.m.

Respectfully submitted by,



Melissa Hamilton  
Clerk of the Citizen's Ethics Advisory Board  
Office of State Ethics  
August 18, 2022  
Date approved  
(By the Citizen's Ethics Advisory Board)