

C O N F I D E N T I A L

CONNECTICUT STATE ETHICS COMMISSION
20 TRINITY STREET
HARTFORD, CONNECTICUT 06106-1660
Telephone Number 566-4472

COMPLAINT

The State Ethics Commission Issues A Complaint Alleging A
Violation Of:

_____ The Code Of Ethics For Public Officials And State
Employees, Chapter 10, Part I, General Statutes
X
_____ The Code Of Ethics For Lobbyists, Chapter 10,
Part II, General Statutes

Time and Date Matters Complained of Occurred:

1998 through 2000

Place Violation Occurred:

Connecticut

Persons Involved:

Glen Carberry and Keystone Venture Capital Management Co.

Witnesses:

List to be provided at least 10 days prior to any hearing in this matter.

Circumstances Which Indicate That The Code of Ethics Designated
Above Was Violated Are As Follows (A Short, Plain Statement
Alleging A Violation of Chapter 10, General Statutes):

Please see attached.

(over)

[Handwritten Signature]

Signature

5/1/00

Date

Complainant's Name And Address:

State Ethics Commission
20 Trinity Street
Hartford, CT 06106-1660

Complainant's Telephone Number:

566-4472



STATE OF CONNECTICUT

STATE ETHICS COMMISSION

CONFIDENTIAL

DOCKET NUMBER 2000-12

STATE ETHICS COMMISSION

IN THE MATTER OF A

20 TRINITY STREET

COMPLAINT AGAINST

HARTFORD, CT 06106

GLEN CARBERRY

May 1, 2000

COMPLAINT

1. During calendar years 1998, 1999 and 2000, Glen Carberry ("The Respondent"), on behalf of Tobin, Carberry, O'Malley, Riley & Selinger, P.C.(the business organization), was a party to an agreement with Keystone Venture Capital Management Co. ("Keystone").
2. Under the terms of the agreement described in paragraph 1 above, the Respondent agreed to receive a fee equal to one percent of any management fees received as a result of capital contributions made by the Office of the Treasurer of the State of Connecticut into a fund managed by Keystone (the "Fund").
3. Pursuant to the agreement described in paragraphs 1-2 above, the Respondent contacted the Office of the Treasurer to solicit capital contributions for investment in the Fund.
4. The Office of the Treasurer invested in the Fund.
5. The Respondent received payments pursuant to the agreement identified in paragraphs 1-2, above.
6. Pursuant to Conn. Gen. Stat. §1-91(a), administrative action includes any action or non-action of any executive agency of the state regarding a contract of that agency.
7. Pursuant to Conn. Gen. Stat. §1-91(k), lobbying means communicating directly or soliciting others to communicate with any official or his staff in the executive branch of government for the purpose of influencing any administrative action.

Phone: (860) 566-4472 Fax: (860) 566-3806
20 Trinity Street - Hartford, Connecticut 06106-1660
Website: <http://www.state.ct.us/eth>
An Equal Opportunity Employer

8. Pursuant to Conn. Gen. Stat. §1-94(1), a lobbyist shall register with the State Ethics Commission if he receives or agrees to receive compensation or reimbursement for actual expenses, or both, in a combined amount of two thousand dollars or more in a calendar year for lobbying.
9. The Agreement described in paragraphs 1-2, above, is an agreement to engage in administrative lobbying to enter into and/or maintain a contract with the Office of the Treasurer.
10. The Respondent registered for calendar years 1998, 1999 and 2000.
11. Pursuant to Conn. Gen. Stat. §1-95(a)(1), when registering as a lobbyist, the registrant must disclose the terms of the compensation, reimbursement or agreement.
12. When registering as a lobbyist for calendar year 1998, the Respondent described the terms of compensation for lobbying as a fixed retainer and did not disclose the contingent fee payment arrangement described in Paragraphs 1-2 above.
13. When registering as a lobbyist for calendar years 1999 and 2000, the Respondent described the terms of compensation for lobbying as a fixed retainer and did not disclose the contingent fee arrangement described in Paragraphs 1-2 above.
14. The failure to disclose the actual terms of compensation in calendar year 1998 with Keystone is a violation of Conn. Gen. Stat. §1-95(a)(1).
15. The failure to disclose the actual terms of compensation in calendar years 1999 and 2000 with Keystone is a violation of Conn. Gen. Stat. §1-95(a)(1).
16. Pursuant to Conn. Gen. Stat. Section 1-97(b), no person shall be employed as a lobbyist for compensation, which is contingent upon the outcome of any administrative action.
17. The agreement described in paragraphs 1-2 above is an agreement in violation of Conn. Gen. Stat. §1-97(b).
18. The receipt of each contingent fee payment by the Respondent is a violation of Conn. Gen. Stat. Section 1-97(b).

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DOCKET NO. 2000-12

STATE ETHICS COMMISSION

IN RE: COMPLAINT AGAINST

20 TRINITY STREET

GLENN T. CARBERRY

HARTFORD, CT 06106

NOVEMBER 13, 2002

STIPULATION AND ORDER

Pursuant to Connecticut General Statutes §4-177(c), the State Ethics Commission (the "Commission") and Respondent Glenn T. Carberry agree to settle this matter in the manner described below:

1. To facilitate settlement of this matter, the Complaint has, this day, been amended as set forth in Attachment "A" to this Stipulation.
2. The Respondent enters into this Stipulation and Order without admitting that he has violated any law, or otherwise committed any improper act, and expressly contests the probable cause determination of the Commission. The Respondent indicates that he is entering this Stipulation and Order for the sole purpose of avoiding the time and expense of litigation. This Stipulation and Order is not to be construed by any party as an admission of guilt, liability or wrongdoing on the part of the Respondent.
3. The Commission finds that the Respondent violated the Code Of Ethics For Lobbyists as alleged in the Amended Complaint. Said finding is, however, based solely on the Commission's probable cause determination made at the close of the preliminary hearing conducted in this matter.

4. The Respondent waives any rights he may have under Conn. Gen. Stat. §§1-80, 1-93, 1-93(a), 1-98 and 4-183(f), including the right to a hearing or appeal in this case.

5. This Stipulation and Order concludes the Commission's investigation into the conduct of the Respondent with regard to this matter, and constitutes the final penalties against the Respondent.

WHEREFORE, the State Ethics Commission enters, and the Respondent agrees to, the following orders in lieu of any other action the Commission is authorized to take with regard to this matter.

1. The Respondent shall pay a civil penalty of \$2,000 within 30 days of the signing of this Stipulation by the Respondent.

2. The Respondent has made and will make no claim for those funds and accrued interest being held in escrow pursuant to Keystone Venture Capital Management Co. ("Keystone") Stipulation and Order of May 11, 2001 with the Commission.

3. The Respondent agrees that within 30 days of his signing of this Stipulation he shall pay to the CRPTF \$25,313.00. Said monies represent 50% of the net after-tax total paid by Keystone under the December 30, 1998 contract.

4. The Commission agrees, in settlement of this matter, to release any claim it may have to the remaining funds paid by Keystone under the December 30, 1998 contract.

5. The Respondent agrees to henceforth comply with the requirements of The Code Of Ethics For Lobbyists.

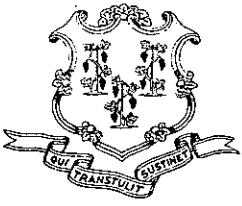
Dated: November 15, 2007

Glenn T. Carberry
Glenn T. Carberry

Dated: 19 Nov 07

[Signature]
State Ethics Commission
By Its Chairperson

10681-1/344077



STATE OF CONNECTICUT

STATE ETHICS COMMISSION

ATTACHMENT A

DOCKET NUMBER 2000-12

STATE ETHICS COMMISSION

IN THE MATTER OF A

20 TRINITY STREET

COMPLAINT AGAINST

HARTFORD, CT 06106

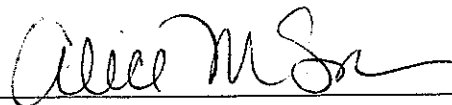
GLENN T. CARBERRY

NOVEMBER 19, 2002

AMENDED COMPLAINT

1. In September, 1998, Glenn Carberry (the "Respondent") entered into an agreement ("September, 1998 agreement") with Keystone Venture Capital Management Co. ("Keystone").
2. Under the terms of the September, 1998 agreement, the Respondent was to lobby the Office of the Treasurer of the State of Connecticut (the "Treasurer"), for which he was to be paid \$6,250 per month for twenty-four months with two early-cancellation dates -- one after four months and the second after twelve months. The purpose of said lobbying was to solicit a capital contribution from the Treasurer for a fund managed by Keystone (the "Fund").
3. Pursuant to the September, 1998 agreement, the Respondent contacted the Treasurer and the Treasurer invested in the Fund.
4. In December, 1998, subsequent to the Treasurer's investment in the Fund, the September, 1998 agreement was cancelled. Thereafter, in December, 1998, the Respondent entered into a second lobbying agreement with Keystone providing for compensation of \$250,000 to be paid in quarterly installments over two years ("December, 1998 agreement").
5. The total compensation to be paid to the Respondent under the September, 1998 and December, 1998 agreements (\$275,000) was equal to one percent of the capital commitment (27.5 million dollars) obtained by the Respondent from the Treasurer.
6. Pursuant to Conn. Gen. Stat. §1-91(a), administrative action includes any action or non-action of any executive agency of the state regarding a contract of that agency.
7. Pursuant to Conn. Gen. Stat. §1-91(k), lobbying means communicating directly or soliciting others to communicate with any official or his staff in the executive branch of government for the purpose of influencing any administrative action.

8. Pursuant to Conn. Gen. Stat. §1-94(l), a lobbyist shall register with the State Ethics Commission if he receives or agrees to receive compensation or reimbursement for actual expenses, or both, in a combined amount of two thousand dollars or more in a calendar year for lobbying.
9. Pursuant to Conn. Gen. Stat. §1-95(a)(1), when registering as a lobbyist, the registrant must disclose the terms of compensation, reimbursement or agreement.
10. Pursuant to the September, 1998 agreement the Respondent registered to lobby for calendar year 1998. Pursuant to the December, 1998 agreement the Respondent registered to lobby for calendar years 1999 and 2000.
11. When registering as a lobbyist for 1999 and 2000, the Respondent described the terms of compensation as a fixed retainer and did not disclose that, in fact, the \$250,000 in compensation was a success fee for his work in obtaining the Treasurer's capital commitment in the Fund.
12. The Respondent's failure to disclose the actual terms of compensation for calendar years 1999 and 2000 with Keystone is a violation of Conn. Gen. Stat. §1-95(a)(1).
13. Pursuant to Conn. Gen. Stat. §1-97(b), no person shall be employed as a lobbyist for compensation, which is contingent upon the outcome of any administrative action.
14. The December, 1998 agreement described in paragraph 4, supra, is an agreement in violation of Conn. Gen. Stat. §1-97(b).
15. The receipt of each contingent fee payment under the second agreement is a violation of Conn. Gen. Stat. §1-97(b).



Alice M. Sexton
Principal Attorney
State Ethics Commission
20 Trinity Street, Suite 205
Hartford, CT 06106
(860) 566-4472

11 / 19 / 02

Date