



DOCKET NUMBER 2014-02	:	OFFICE OF STATE ETHICS
	:	
IN THE MATTER OF A	:	18-20 TRINITY STREET
	:	
COMPLAINT AGAINST	:	HARTFORD, CT 06106
	:	
SANDY BRESLIN	:	SEPTEMBER 18, 2014

### **STIPULATION AND CONSENT ORDER**

Pursuant to the Code of Ethics, General Statutes §§ 1-79, *et seq.*, Thomas K. Jones, Ethics Enforcement Officer for the Office of State Ethics (“OSE”), issued a Complaint against the Respondent, Sandy Breslin (“Breslin” or “Respondent”) for violations of the Code of Ethics for Lobbyists, Connecticut General Statutes §§ 1-91, *et seq.* Based on the investigation by the Enforcement Division of the OSE, the Office of State Ethics finds there is probable cause to believe that the Respondent violated the Code of Ethics for Lobbyists by failing to timely register as required by General Statutes §§ 1-94 and 1-95, and failing to timely file a financial report with the Office of State Ethics, as required by General Statutes § 1-96.

The Parties have entered into this Stipulation and Consent Order following the issuance of the Complaint, but without any adjudication of any issue of fact or law herein.

#### **I. STIPULATION**

The Office of State Ethics and the Respondent stipulate to the following facts:

1. Beginning no later than January 1, 2013, and continuing until no earlier than the date of this Stipulation and Consent Order, Sandy Breslin was a “communicator lobbyist” in the State of Connecticut, as that term is defined by General Statutes § 1-91 (v).

2. Beginning no later than January 1, 2013, Respondent received or agreed to receive two thousand dollars (\$2,000.00) or more for lobbying or in furtherance of lobbying.

3. As a communicator lobbyist, pursuant to General Statutes § 1-94, Respondent was required to register with the Office of State Ethics.

4. As a communicator lobbyist, pursuant to General Statutes § 1-95, Respondent was required to register “on or before January fifteenth of [2013] or prior to the commencement of lobbying whichever is later.”

5. In 2013, Respondent did not register to lobby with the Office of State Ethics until March 26, 2013.

6. As a communicator lobbyist, pursuant to General Statutes § 1-96 (b), Respondent was required to file a financial report with the Office of State Ethics “between the first and tenth of January [2014] . . . reporting the amounts of compensation and reimbursement received from each of his clients during the previous year.”

7. In 2014, Respondent did not file a financial report with the Office of State Ethics until February 24, 2014.

8. Although Respondent has been a communicator lobbyist during the period, Respondent has not timely filed a financial report with the Office of State for over five years, and has not timely registered with the Office in either of the last two registration periods.

9. Respondent admits to the facts as set forth herein and admits that such facts constitute violations of the Code of Ethics for Lobbyists.

## **II. JURISDICTION**

1. The Ethics Enforcement Officer is authorized to investigate the Respondent's acts as set forth herein, and to issue a Complaint against the Respondent.

2. The Office of State Ethics, through the Citizen's Ethics Advisory Board, is authorized to enter into this Stipulation and Consent Order.

3. The provisions of this Stipulation and Consent Order apply to and are binding upon the Respondent.

4. The Respondent hereby waives all objections and defenses to the jurisdiction of the Ethics Enforcement Officer over matters addressed in this Stipulation and Consent Order.

5. The Respondent waives any rights she may have under General Statutes §§ 1-91, 1-93, 1-93a, 1-98, 1-99 and 4-183, including the right to a hearing or appeal in this case, and agrees with the Office of State Ethics to an informal disposition of this matter as authorized by General Statutes § 4-177 (c).

6. Except as otherwise expressly set forth herein, the Respondent consents to jurisdiction and venue in the Connecticut Superior Court, Judicial District of Hartford, in the event that the State of Connecticut seeks to enforce this Stipulation and Consent Order. The Respondent recognizes that the Connecticut Superior Court has the authority to specifically enforce the provisions of this Stipulation and Consent Order, including the authority to award equitable relief.

7. The terms set forth herein are in addition to, and not in lieu of, any other existing or future statutory, regulatory, or other legal obligation that may be applicable to the Respondent.

8. The Respondent understands that this Stipulation and Consent Order is subject to the approval of the Citizen's Ethics Advisory Board and is not final until signed. If the Citizen's Ethics Advisory Board does not approve this Stipulation and Consent Order, and this matter proceeds to a hearing before the Board, Respondent expressly waives any objection she may have to the Board presiding over a hearing in this matter based on the Board's previous consideration of this Stipulation and Consent Order.

9. The Respondent understands that she has the right to be represented by legal counsel and has expressly waived her right to be represented by counsel throughout the investigation of the Complaint, and the negotiation of this Stipulation and Consent Order.

### **III. ORDER**

**NOW THEREFORE**, pursuant to General Statutes § 4-177 (c), the Office of State Ethics hereby **ORDERS**, and the Respondent agrees, that:

1. Pursuant to General Statutes § 1-99 (a) (1), the Respondent will heretofore cease and desist from any future violation of General Statutes § 1-94.

2. Pursuant to General Statutes § 1-99 (a) (1), the Respondent will heretofore cease and desist from any future violation of General Statutes § 1-95.

3. Pursuant to General Statutes § 1-99 (a) (1), the Respondent will heretofore cease and desist from any future violation of General Statutes § 1-96 (b).

4. Pursuant to General Statutes §§ 1-94 and 1-95, Respondent will timely register with the Office of State Ethics for any period in she receives or agrees to receive two thousand dollars (\$2,000.00) or more for lobbying or in furtherance of lobbying in any calendar year.

5. Pursuant to General Statutes § 1-96 (b), Respondent will timely file accurate financial reports with the Office of State Ethics for any period in which she is registered as a communicator lobbyist.

6. Pursuant to General Statutes § 1-99 (a) (3), the Respondent will pay civil penalties to the State in the amount of two thousand and three hundred dollars (\$2,300) for her violations of the Code of Ethics for Lobbyists as set forth in the Complaint.

**WHEREFORE**, the Ethics Enforcement Officer and the Respondent hereby execute this Stipulation and Consent Order dated September 18, 2014.

Dated: 9/4/14

  
**Sandy Breslin**  
Respondent

Dated: 09/18/2014

  
**Charles Chiusano, Chairman**  
Citizen's Ethics Advisory Board  
Connecticut Office of State Ethics  
18-20 Trinity Street  
Hartford, CT 06106