

DOCKET NUMBER 2007-13 ) OFFICE OF STATE ETHICS  
 )  
IN THE MATTER OF A ) 18-20 TRINITY STREET  
 )  
COMPLAINT AGAINST ) HARTFORD, CT 06106  
 )  
LOUIS DELUCA ) NOVEMBER 17, 2008

**STIPULATION AND CONSENT ORDER**

Pursuant to the Code of Ethics, General Statutes §§ 1-79, et seq., Nancy DiNardo, a member of the public, filed a complaint (“Complaint”) with the Office of State Ethics against the Respondent Louis DeLuca (“DeLuca” or “Respondent”) alleging violations of the Code of Ethics. Based on the investigation by the Enforcement Division of the OSE, the Ethics Enforcement Officer finds there is probable cause to believe that the Respondent, while serving as an elected official of the state of Connecticut, solicited and accepted a gift in the form of proposed services from a person who was acting on behalf of a registered lobbyist, thereby violating the Code of Ethics for Public Officials, Connecticut General Statutes section 1-84(j).

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

**I. STATE’S POSITION**

Based upon the Ethics Enforcement Officer’s investigation, the Ethics Enforcement Officer was prepared to demonstrate at a probable cause hearing:

1. At all times relevant hereto, Louis C. DeLuca (hereinafter “DeLuca” or “Respondent”) was employed by the State of Connecticut as a Senator in the Connecticut General Assembly, holding the position of Minority Leader, and was a “Public Official” as that term is defined in Connecticut General Statutes §§1-79(k) and 1-91(p).

2. At all times relevant hereto, James Galante (hereinafter “Galante”) owned, operated and/or controlled numerous trash hauling entities and related companies based in Connecticut, including Automated Waste Disposal Incorporated, Diversified Waste Disposal Incorporated, Danbury Carting Company, P&G Sanitation Incorporated, Superior Waste Disposal Incorporated, Recycling Technologies Incorporated, and Transfer Systems Incorporated (“Galante’s Companies”).

3. At all times relevant hereto, Galante’s Companies were registered lobbyists in the state of Connecticut, and were “Registrants,” as that term is defined by Connecticut General Statutes §§1-79(r) and 1-91(q).

4. During the period relevant hereto, Galante engaged in “lobbying” as that term is defined in General Statutes §1-91(k), on behalf of Galante’s Companies and/or Galante’s other private business interests.

5. At all times relevant hereto, the Respondent knew that Galante owned, operated and/or controlled Galante’s Companies; that some or all of Galante’s Companies were Registrants; and, that Galante was engaged in lobbying.

6. On or about April of 2005, the Respondent met with Galante to discuss an issue that the Respondent had with the now husband of Respondent’s granddaughter.

7. In that discussion, Galante offered, and the Respondent accepted, to have an associate of Galante “visit” the husband. Respondent and Galante both understood that the “visit” could entail threatening the granddaughter’s now husband.

8. Although the “visit” never, in fact, occurred, the Respondent’s acceptance of services from Galante, as set forth herein, represents acceptance of a “gift” as that term is defined in Connecticut General Statutes §1-79(e).

9. Connecticut General Statutes §1-84(j) states in pertinent part:

No public official, [or] state employee ... shall knowingly accept any gift, as defined in subsection (e) of section 1-79, from a person known to be a registrant or anyone known to be acting on behalf of a registrant.

10. By knowingly accepting Galante’s offer of a “visit,” the Respondent knew or should have known that an associate of Galante would threaten the now husband of the Respondent’s granddaughter, and the Respondent thereby knowingly accepted a gift from a person he knew to be a Registrant or a person known by the Respondent to be acting on behalf of a Registrant, thereby violating Connecticut General Statutes §1-84(j).

## **II. RESPONDENT’S POSITION**

1. The Respondent denies that his conduct violated Connecticut General Statutes §1-84(j) and he is entering into this Stipulation and Consent Order solely to avoid the cost and uncertainty of litigation.

2. Respondent’s acceptance of Galante’s offer to “visit” Respondent’s granddaughter’s now husband stemmed from a concern that the now husband of his granddaughter was engaged in abusive behavior toward her.

3. Respondent denies that Galante’s offered “visit” constituted a gift and, because the “visit” never occurred, Respondent denies that he accepted a gift.

**NOW THEREFORE**, the Connecticut Office of State Ethics and the Respondent hereby enter into this Consent Order and hereby agree as follows:

### III. JURISDICTION

1. The Ethics Enforcement Officer is authorized to investigate the conduct alleged in the Complaint and the Amended Complaint, to issue an Amended Complaint against the Respondent, and to enter into this Consent Order on behalf of the Office of State Ethics.

2. The Respondent agrees that the provisions of this Consent Order apply to and are binding upon him and the Respondent hereby waives all objections and defenses to the jurisdiction of the Ethics Enforcement Officer and the Office of State Ethics over matters addressed in this Consent Order.

3. The Respondent waives any rights he may have under General Statutes sections §§ 1-80, 1-82, 1-82a, 1-87 and 1-88, including the right to a hearing or appeal in this case, and agrees with the Ethics Enforcement Officer to an informal disposition of this matter.

4. 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 Consent Order. The Respondent recognizes that the Connecticut Superior Court has the authority to specifically enforce the provisions of this Consent Order, including the authority to impose sanctions, issue contempt citations, and award equitable relief.

5. The Respondent understands that he has the right to counsel and has been represented by Attorney Craig A. Raabe throughout the OSE's investigation and in connection with this Stipulation and Consent Order.

**IV. ORDER**

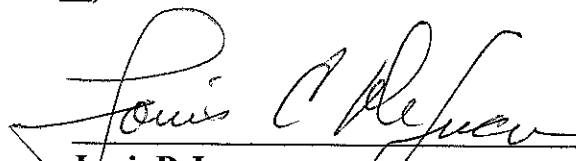
**NOW THEREFORE**, pursuant to General Statutes section 4-177(c), the Office of State Ethics hereby **ORDERS**, and the Respondent agrees, that:

1. The Respondent shall cease and desist from any future violation of General Statutes section 1-84(j).

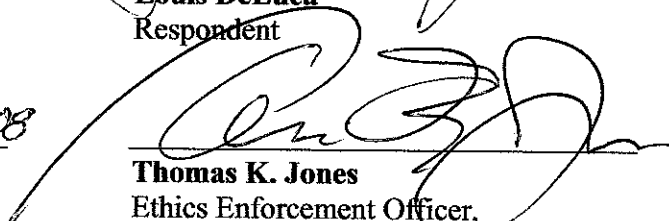
2. The Respondent shall pay a civil penalty to the State in the amount of two thousand five hundred dollars (\$2,500.00) for his alleged violation of General Statutes section 1-84(j).

**WHEREFORE**, the Ethics Enforcement Officer and the Respondent hereby execute this Consent Order dated November 17, 2008.

Dated: November 15, 2008

  
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**Louis DeLuca**  
Respondent

Dated: November 17, 2008

  
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**Thomas K. Jones**  
Ethics Enforcement Officer,  
Office of State Ethics  
18-20 Trinity Street  
Hartford, CT 06106  
(860) 263-2390