



OFFICE OF STATE ETHICS

DOCKET NUMBER 2016-44 :
: **18-20 TRINITY STREET**
IN THE MATTER OF A :
: **HARTFORD, CT 06106**
COMPLAINT AGAINST :
: **AUGUST 16, 2017**
STEPHEN KELLER :

STIPULATION AND CONSENT ORDER

Pursuant to the Code of Ethics, General Statutes §§ 1-79, *et seq.*, Thomas Jones, Ethics Enforcement Officer, filed a Complaint against Stephen Keller (“Mr. Keller” or “Respondent”), alleging violations of the Code of Ethics for Public Officials. Based on the investigation by the Enforcement Division of the Office of State Ethics (“OSE”), the OSE finds that there is probable cause to believe that Mr. Keller violated the Code of Ethics as further set forth herein.

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

I. STIPULATION

The Ethics Enforcement Officer and the Respondent stipulate to the following facts:

1. From on or around 2012 through on or about October 2016, the Respondent was employed as an Occupational Therapy Supervisor at the Southeastern Mental Health Authority in

Norwich, a state facility operated by the Department of Mental Health and Addiction Services (“DMHAS”).

2. At all times relevant hereto, the Respondent was a “State Employee” as that term is defined in General Statutes § 1-79 (13).

3. From on or about 2012 through on or about October 2016, in addition to performing duties on behalf of the state, the Respondent conducted outside employment in his private capacity by providing consultant work to another state agency for financial gain.

4. The outside employment work that the Respondent performed was not related to the Respondent’s state job duties.

5. At all times relevant hereto, the Respondent used state resources, including an assigned DMHAS computer and the state email system, as well as a state fax machine, to conduct work related to his outside employment. The Respondent conducted outside work on state time, and was compensated by the state for such time.

6. General Statutes § 1-84 (c) states in pertinent part:

No public official or state employee...shall use his public office or position or any confidential information received through his holding such public office or position to obtain financial gain for himself . . .

7. The Respondent, by using the resources provided by virtue of his state position for outside work, for which he was compensated financially, used his state position to obtain financial gain for himself, in violation of General Statutes § 1-84 (c).

8. Each time the Respondent used the resources provided by virtue of his state position for outside work purposes constitutes a separate and distinct violation of General Statutes §1-84 (c).

9. The Respondent admits to the foregoing facts and admits that such facts constitute

violations of the Code of Ethics for Public Officials as set forth herein.

II. JURISDICTION

1. The Ethics Enforcement Officer is authorized to investigate the Respondent's acts as set forth herein, and to enter into this Stipulation and Consent Order.

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

3. 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.

4. The Respondent waives any rights he may have under General Statutes §§ 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 as authorized by General Statutes § 4-177 (c).

5. 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.

6. 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.

7. The Respondent understands that he has a right to counsel and has been represented by counsel during the OSE's investigation and in connection with this

Stipulation and Consent Order.

III. ORDER

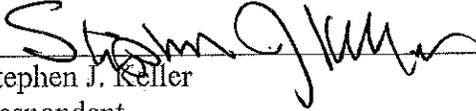
NOW THEREFORE, pursuant to General Statutes § 4-177 (c), the Office of State Ethics hereby ORDERS, and Mr. Keller agrees, that:

1. Pursuant to General Statutes § 1-88 (a) (1), Mr. Keller will cease and desist from any future violation of § 1-84 (c).

2. Pursuant to General Statutes § 1-88 (a) (3), Mr. Keller will pay civil penalties to the State in the amount of one thousand dollars (\$1,000.00) for his violation of General Statutes § 1-84 (c) as set forth in the Complaint and herein.

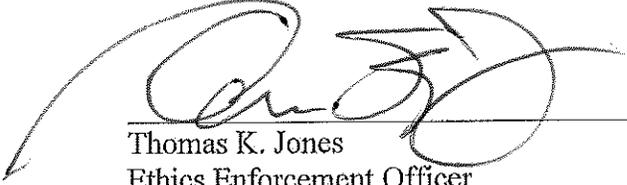
WHEREFORE, the Ethics Enforcement Officer and Mr. Keller hereby execute this Stipulation and Consent Order dated August 16, 2017.

Dated: 8.23.17



Stephen J. Keller
Respondent

Dated: 8/28/17



Thomas K. Jones
Ethics Enforcement Officer
Connecticut Office of State Ethics
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Hartford, CT 06106
(860) 263-2390