

# Annual Report to the Governor Calendar Year 2022



**Office of State Ethics**  
Peter Lewandowski, Executive Director



2022  
Annual Report to the Governor

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**Message from Executive Director Peter Lewandowski**



The Connecticut Office of State Ethics is committed to serving the citizens of Connecticut. There is nothing more important to the democratic process than having a government that maintains the highest ethical standards.

Ethical questions and issues will inevitably arise and when they do, the Office of State Ethics is available to assist. Our mission is to encourage accountability and integrity throughout state government. We do this by providing legal advice, guidance and education to public officials, state employees and lobbyists; by sensibly interpreting and, when necessary, fairly and impartially enforcing applicable laws; and by ensuring required disclosure through the administration of the lobbyist and financial filing systems.

***Remember our Number One Rule: Always Get Advice!***

**VISION**

The Office of State Ethics will work to enable Connecticut state government to embrace an ethical culture.

**MISSION**

The Office of State Ethics practices and promotes the highest ethical standards and accountability in state government by providing education and legal advice, ensuring disclosure, and impartially enforcing the Codes of Ethics.

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**OFFICE OF STATE ETHICS**

**Introduction**

Created on July 1, 2005, under Public Act 05-183, the Office of State Ethics (“OSE”) is an independent regulatory agency charged with administering and enforcing the Connecticut Codes of Ethics (“Ethics Codes”), which are found in Chapter 10 of the Connecticut General Statutes.

The OSE accomplishes its mission to ensure honesty, integrity and accountability in state government through education of all those covered by the Ethics Codes; providing information to the public; interpretation and application; and investigation of violations and enforcement of the Ethics Codes.

The OSE’s jurisdiction:

- Part I**            Code of Ethics for Public Officials  
General Statutes §§ 1-79 to 1-90a
  
- Part II**            Code of Ethics for Lobbyists  
General Statutes §§ 1-91 to 1-101a
  
- Part III**            Lobbying: Miscellaneous Provisions  
General Statutes §§ 1-101aa and 1-101bb
  
- Part IV**            Ethical Considerations Concerning Bidding and State Contracts  
General Statutes §§ 1-101mm to 1-101rr

The OSE Executive Director has overall responsibility for the welfare and effectiveness of the OSE, which has three divisions - the Legal Division, the Enforcement Division, and the Administrative Division.

**Staff and Budget**

The OSE consists of 14 employees. These employees work in three separate divisions, under the leadership of the Executive Director, Peter Lewandowski, who is appointed by the Citizen’s Ethics Advisory Board.

**HIGHLIGHTS**  
The OSE operates at a cost of approximately \$0.43 per citizen of Connecticut.

The agency’s managerial staff includes General Counsel Brian O’Dowd; Ethics Enforcement Officer Mark Wasielewski; and Director of Education and Communications Nancy Nicolescu<sup>1</sup>.

<sup>1</sup> With the departure of Ms. Nicolescu on January 27, 2022, the Director of Education and Communications position remained vacant for most of calendar year 2022.

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The OSE had a Fiscal Year 2022 appropriation of \$1,626,228. Actual expenditures for Fiscal Year 2022 were \$1,590,602.64. This expenditure amount translates to a cost of approximately \$0.43 for each citizen of Connecticut<sup>2</sup>.

### CITIZEN'S ETHICS ADVISORY BOARD

The OSE's governing body is the Citizen's Ethics Advisory Board ("CEAB"), which has nine members appointed by the Governor and legislative leadership. The CEAB holds monthly meetings that are open to the public.

CEAB Members also:

- Appoint and evaluate the Executive Director of the OSE
- Issue advisory opinions to persons subject to the Ethics Codes
- Serve as Hearing Officers for non-confidential hearings
- Attend hearings to determine if violations occurred and, if so, assess penalties
- Oversee the legislative agenda

### CITIZEN'S ETHICS ADVISORY BOARD MEMBERS

The members are appointed by the Governor and legislative leadership for staggered four-year terms. The CEAB members who served during calendar year 2022 are:

- ❖ **Dena Castricone of North Haven – Chair**  
Appointed by Governor Ned Lamont for a four-year term expiring on September 30, 2026
- ❖ **Nichelle Mullins of Farmington – Vice Chair**  
Appointed by House Majority Matthew Ritter for a four-year term expiring on September 30, 2023
- ❖ **Mary Bigelow of Northford**  
Appointed by Senate Majority Leader Bob Duff for a four-year term expiring on September 30, 2025
- ❖ **Charles F. Chiusano of Fairfield**  
Appointed by Senate Minority Leader Kevin Kelly for a four-year term expiring on September 30, 2025
- ❖ **Karen Christiana of Old Saybrook**  
Appointed by Speaker of the House Joe Aresimowicz for a four-year term expiring on September 30, 2023
- ❖ **Jason K. Farrell of West Hartford**  
Appointed by Governor Ned Lamont for a four-year term expiring on September 30, 2024
- ❖ **Kevin P. Johnston of Pomfret Center**  
Appointed by Senate President Pro Tempore Martin Looney for a four-year term expiring on September 30, 2022
- ❖ **Cheryl Lipson of Woodbridge**  
Appointed by House Republican Leader Themis Klarides for a four-year term expiring on September 30, 2023
- ❖ **Laura A. Schuyler of West Simsbury**  
Appointed by Governor Ned Lamont for a four-year term expiring on September 30, 2024

<sup>2</sup> 2022 population estimate July 1, 2022, 3,626,205 from the United States Census Bureau.

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**LEGAL DIVISION: ADVICE AND OPINIONS**

The Legal Division provides advice and opinions regarding the Ethics Codes to the regulated community, which includes approximately 44,000 public officials and state employees, nearly 2,000 lobbyists, and all state contractors. The Division consists of a General Counsel, who also serves as counsel to the CEAB, a Deputy General Counsel, an Assistant General Counsel, and a Paralegal.

**OPINIONS**

In calendar year 2022, the OSE received 791 requests for advice about the application of the Ethics Codes. The Division staff issued 511 written staff opinions during the reporting period and handled 280 other requests for advice over the telephone or in face-to-face meetings.

**2022 ADVISORY OPINION SUMMARY**

**[Advisory Opinion No. 2022-1](#) Application of the Code of Ethics’ Revolving Door Provisions to a Former Employee of the Connecticut Department of Transportation**

The Citizen’s Ethics Advisory Board concluded that a former employee of the Connecticut Department of Transportation (“DOT”) may accept employment with a DOT contractor without violating § 1-84b (f) and may, under an existing, undisputed contract between the contractor and the DOT concerning which he had no involvement in the negotiation or award (be it before or after leaving state service), interact with DOT employees within a year of leaving state service solely to perform technical work on that contract.

**[Advisory Opinion No. 2022-2](#) Application of the Code of Ethics to several members of Capital Region Development Authority**

The Citizen’s Ethics Advisory Board concluded that if CRDA board members adhere to the advice provided, the fact that they are executive officers at corporate entities that may invest in projects under CRDA’s Private Investment Partnership presents no concerns under §§ 1-84 (i), 1-85, § 1-86 (a), and 1-84 (c). Furthermore, because the City of Hartford, a municipality, is not a “business with which [the Mayor] is associated,” he may take official action, in his CRDA capacity, involving the Private Investment Partnership, even if it affects the City’s financial interests, provided that such action would not likewise affect his personal financial interests or the financial interests of the family members listed in those provisions.

**FREEDOM OF INFORMATION (FOI) LAW**

In 2022, the OSE responded to 33 FOI Law requests.

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**INFORMATION TECHNOLOGY – FILING SYSTEMS**

The OSE continued in 2022 to make improvements to the public official and lobbyist online filing systems. These improvements brought the filing systems up to current technological standards and provided users with simple, intuitive processes. The enhancements to the systems also improved the quantity and variety of information accessible to the public in real time from the filed data.

The Office of State Ethics upgraded Lobbyist and Statements of Financial Interests (SFIs) filing systems on DAS-BITS servers. The OSE transitioned to completely electronic filing of SFIs and continued to optimize operational performance of the Case Management System.

**STATEMENTS OF FINANCIAL INTERESTS**

The Code of Ethics for Public Officials § 1-83 (a) (1) requires elected officers, members of the General Assembly, and certain other state officials and employees to file yearly SFIs electronically with the OSE. The Governor’s Office also issues an annual standard that designates appointed officials and additional state employees in the Executive Branch who must file these financial disclosure statements. The SFIs include information such as names of all associated businesses, sources of income over \$1,000, and a list of all real property, as well as any creditors.

**HIGHLIGHTS**

The 2022 SFI filing season was first for exclusively electronic filings.

The SFIs serve two purposes. First, they provide a checklist or reminder to state officials and employees to be mindful of potential conflicts of interest. Second, the SFIs, which are available to the public, serve as a tool to maximize public confidence in governmental decision making. In 2022, out of 2,521 required filers, 98% filed their SFI on time. Sixty-four percent of our Agencies, Offices, Commissions and Quasi-Public Agencies achieved 100% timely compliance. Thirteen percent of agencies earned the Commitment to Excellence - those that were unable to meet 100% timely filing threshold by one (1) filing only.

**LOBBYIST FILINGS AND DISCLOSURE**

During the 2021-2022 biennial lobbyist registration period, the OSE processed, via its electronic filing system, thousands of financial reports filed by business organizations (firms that employ communicator lobbyists), client lobbyists, and in-house communicator lobbyists.

The 2,140 lobbyist registrations in Calendar Year 2021 generated \$1,351,125 in fees, collected by the OSE and deposited into the state’s General Fund.

The 315 lobbyist registrations in Calendar Year 2022 generated \$73,875 in fees, collected by the OSE and deposited into the state’s General Fund.



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**ENFORCEMENT AND AUDITS**

The Enforcement Division investigates and prosecutes violations of the Ethics Codes. The Division consists of the Ethics Enforcement Officer, one Deputy Ethics Enforcement Officer, one Assistant Ethics Enforcement Officer, one Legal Investigator, and one Paralegal Specialist.

**ENFORCEMENT STATISTICS**

The Enforcement Division conducted a total of 145 matters and reviews of potential violations of the Ethics Codes during 2022. The Division resolved 78 matters in 2022 by consent order or other resolution, resulting in the collection of a total of \$34,070.00 in penalties. The penalties include monies paid in 64 cases by lobbyists who failed to register in a timely manner or who were delinquent in filing required financial reports.

Also included are 4 settlements of alleged Ethics Code violations such as conflicts of interest and impermissible use of office for financial gain and 10 matters against public officials for failure to timely file their SFIs as required by law.

In 2022, the Division opened 115 matters under the Uniform Administrative Procedure Act (UAPA) regarding failure to timely file financial reports or other required filings. Of these, all were resolved informally prior to hearing. No UAPA hearings were conducted in 2022.

In 2022, the Division opened 30 confidential evaluations and filed or received 15 complaints regarding alleged violations of the Ethics Codes committed by public officials, state employees, lobbyists or contractors. Of the complaints, 13 came from external sources, and the Division filed the remaining 2 on its own initiative, following investigation. In addition, the Division received multiple “tips” regarding alleged violations of the Ethics Codes that, after review, proved to be outside of the jurisdiction of the OSE.

**2022 LOBBYIST AUDITS**

The Citizen’s Ethics Advisory Board approved 10 audits of registered client and communicator lobbyists in 2022. Six (or 60%) of the approved audits contained adverse findings, compared to 90% in 2021. Corrective action was not imposed in any audits in 2022.

**BACKGROUND CHECKS**

In 2022, the OSE conducted 44 background checks, typically relating to individuals being considered for appointive office.

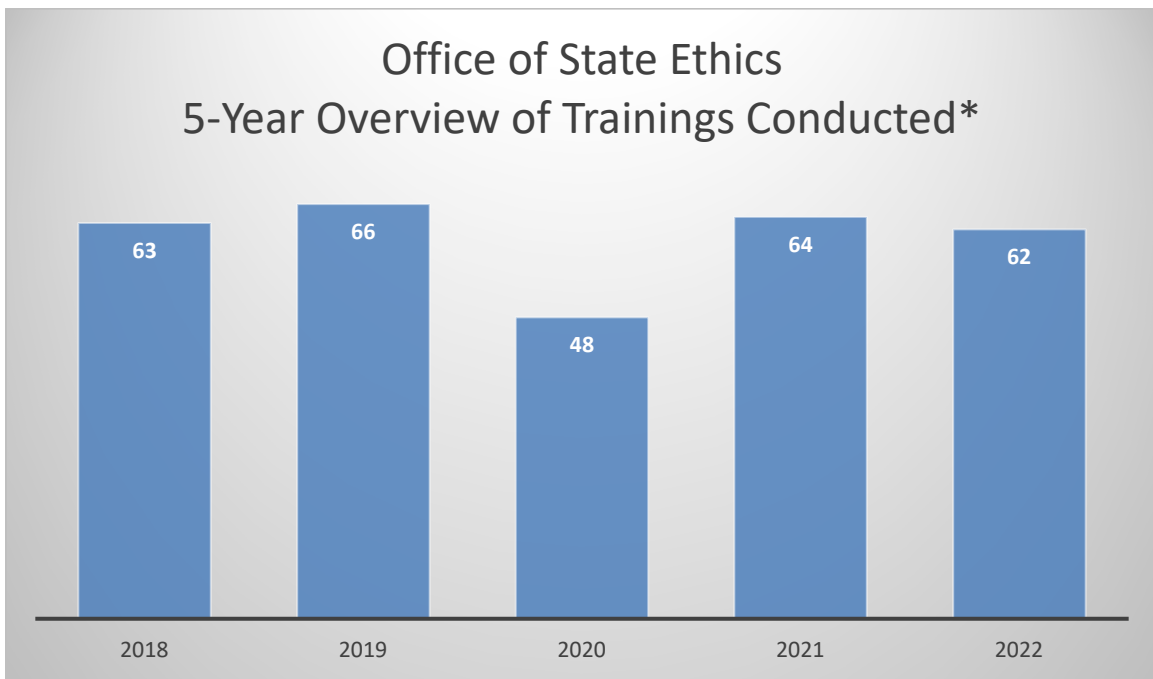


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**EDUCATION AND OUTREACH**

In accordance with § 1-81c of the Connecticut General Statutes the Office of State Ethics administers a program of mandatory training, for all members of the General Assembly every four years and upon first election. The Office of State Ethics completed 13 trainings in the first quarter, 22 in the second quarter, 6 in the third quarter and 21 trainings in the fourth quarter. A total of 62 trainings were conducted in 2022.

**TRAININGS**



*\*Data includes in-person and virtual/online trainings.*

The OSE conducts Code of Ethics trainings for Public Officials, State Employees, Lobbyists and Contractors, and we offer trainings that are tailored to address agency-specific needs.

During 2022, the OSE continued to offer the self-service on-line training program, in-person, online, and hybrid trainings to provide option and opportunity to any resident, official and/or state agency that requested training. This flexibility has allowed the OSE to continue to effectively meet its mandate to provide yearly training to all state employees. Since training drives compliance by increasing accessibility and awareness, so increased the requests for advice and filing of complaints. OSE constantly strives to expand training offerings.

Consistent with the goal of being accessible and increasing awareness, the OSE fosters strong partnerships with ethics liaisons from every state agency and branch of state government. Our monthly electronic newsletter was distributed to a list of 142 individuals in 2022, including all the agency ethics liaisons and compliance officers.

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**MEDIA**

The OSE continued its proactive media approach in 2022 with the goal of providing Connecticut citizens with information to enhance their confidence in state government. Specifically, the agency:

- Maintained its media list of 150 contacts;
- Disseminated 6 press releases.

**PARTNERSHIPS**

The OSE regularly collaborates with outside partners to further the confidence of Connecticut citizens in state government. The OSE strives to broaden its educational reach, creating an increased awareness of agency services through its no-cost activities.

**PROPOSED LEGISLATION**

The OSE submitted the following legislative proposals for consideration during the 2022 Regular Session of the Connecticut General Assembly:

1. An Act Concerning Municipal Ethics
2. An Act Concerning Conflicts of Interest

During the 2022 regular session of the Connecticut General Assembly there were no agency proposals that were passed.

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**CONTACT US**



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