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# ANNUAL REPORT TO THE GOVERNOR CALENDAR YEAR 2024 OFFICE OF STATE ETHICS

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## Table of Contents

<b>Executive Director’s Message</b>	2
OSE Mission	2
Agency Jurisdiction	2
<b>Introduction</b>	3
Staff and Budget	3
<b>Citizen’s Ethics Advisory Board</b>	4
CEAB Members	4
<b>Legal Advice, Legislation and Regulations</b>	5
Opinions	5
2024 Advisory Opinion Summary	5
Freedom of Information (FOI) Law	5
<b>Information Technology – Filing Systems</b>	6
Statements of Financial Interests	6
Lobbyist Filings and Disclosure	6
<b>Enforcement and Audits</b>	7
Enforcement Statistics	7
Lobbyist Audit Program	7
Background Checks	7
<b>Education and Outreach</b>	8
Trainings	8
Outgoing Communications	8
Partnerships	9
<b>Agency Proposed Legislation</b>	9
Public Act 24-128 Summary	9
<b>Contact Information</b>	10

## Message from Executive Director Peter Lewandowski



The Connecticut Office of State Ethics is committed to serving the citizens of Connecticut. A government that maintains the highest ethical standards is integral to a well-functioning democracy.

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 transparency, accountability, and integrity throughout state government. We do this by providing legal advice, guidance and education to public officials, state employees, contractors 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.

### ***OSE's Number One Rule: Always Get Advice!***

#### Office of State Ethics' 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.

#### Agency's Jurisdiction

The Office of State Ethics has broad authority over statewide elected officials, members of the General Assembly, officials and employees in all three branches of state government (except judges), registered lobbyists and state contractors.

## 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.

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

## Staff and Budget

The OSE consists of 16 employees. These employees work in three separate divisions - Legal, Enforcement, and the Administrative Division - under the leadership of the Executive Director, Peter Lewandowski, who is appointed by the Citizen’s Ethics Advisory Board. The OSE Executive Director has overall responsibility for the welfare and effectiveness of the OSE.

The agency’s managerial staff includes General Counsel Brian O’Dowd; Ethics Enforcement Officer Mark Wasielewski; and Director of Education and Communications Sarah Clark.

The OSE had a Fiscal Year 2024 appropriation of \$1,935,050. Actual expenditures for Fiscal Year 2024 were \$1,904,567. This expenditure amount translates to a cost of approximately \$0.52<sup>1</sup> for each citizen of Connecticut.

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<sup>1</sup> 2024 population estimate July 1, 2024, 3,675,069 from the United States Census Bureau.  
2024 Annual Report to the Governor – Office of State Ethics

## Citizen’s Ethics Advisory Board (CEAB)

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 Membership

The nine members are appointed by the Governor and legislative leadership for staggered four-year terms. By September of 2024, the CEAB was operating as a minimum membership following three vacancies created by departing members. ***Currently without all 6 remaining members in attendance, the board cannot achieve a quorum to conduct business.*** The CEAB members who served during calendar year 2024 are:

- **N. Beth Cook of West Hartford - Chair**  
Appointed by Senate President Pro Tempore Martin Looney for a four-year term expiring on September 30, 2026
- **Charles F. Chiusano of Fairfield – Vice Chair**  
Appointed by Senate Republican Leader Kevin Kelly for a four-year term expiring on September 30, 2025
- **Mary Bigelow of Northford**  
Appointed by Senate Majority Leader Bob Duff for a four-year term expiring on September 30, 2025
- **Dena Castricone of North Haven**  
Appointed by Governor Ned Lamont for a four-year term expiring on September 30, 2026
- **Jason K. Farrell of West Hartford**  
Appointed by Governor Ned Lamont for a four-year term expiring on September 30, 2024  
***(Departed September 2024)***
- **Thomas K. Jones of West Hartford**  
Appointed by Speaker of the House Matthew Ritter for a four-year term expiring on September 30, 2027 ***(Departed in August 2024)***
- **Cheryl Lipson of Orange**  
Appointed by House Republican Leader Vincent Candelora for a four-year term expiring on September 30, 2027
- **Karreem Mebane of West Haven**  
Appointed by House Majority Leader Jason Rojas for a four-year term expiring on September 30, 2027 ***(Departed in January 2024)***
- **Laura A. Schuyler of West Simsbury**  
Appointed by Governor Ned Lamont for a four-year term expiring on September 30, 2028

## Legal Division

The Legal Division provides advice and opinions regarding the Ethics Codes to the requesting public and the regulated community, which includes approximately 33,000<sup>2</sup> public officials and state employees, over 2,620 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 Associate General Counsel, an Assistant General Counsel, and a Paralegal.

### Opinions

In calendar year 2024, the OSE received 555 requests for advice about the application of the Ethics Codes. The Division staff issued 367 written staff opinions during the reporting period and handled 188 other requests for advice over the telephone or in face-to-face meetings.

### 2024 Advisory Opinion Summaries

#### **Advisory Opinion No. 2024-1 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, non-senior-level employee of the Connecticut Department of Transportation ("DOT") may, under an existing, undisputed contract between the contractor and the DOT, concerning which he had no involvement in the negotiation or award, interact with DOT employees within a year of leaving state service, solely to perform technical work on that contract, without running afoul of General Statutes § 1-84b (b), the Code's one-year cooling off provision.

#### **Advisory Opinion No. 2024-2 Application of a new Code of Ethics' Gift Exception to a Member of the Investment Advisory Council**

Under a new gift exception, the Chief Investment Officer for an out-of-state university may, if appointed as a public member of the IAC, accept items that are usually and regularly made available by asset managers at meetings or events that are unrelated to lobbying and in which he is expected to participate by virtue of his university job responsibilities, including travel expenses, lodging, food, beverage, and other items that facilitate his participation in the employment-related events at issue.

#### **Advisory Opinion No. 2024-3 Application of the Code of Ethics to a Department of Energy and Environmental Protection Employee's Outside Employment**

The Citizen's Ethics Advisory Board concluded that the petitioner, a Compliance Specialist II for the Pesticide Management Program ("PMP") at the Department of Energy and Environmental Protection, may not receive compensation to teach a structural pest control course, outside of her state position, to individuals who are seeking occupational licensure from PMP and who, once licensed, will be directly regulated by the petitioner and PMP.

### Freedom of Information (FOI) Compliance

In calendar year 2024, the OSE responded to 32 FOI requests.

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<sup>2</sup> Data as of Feb. 3, 2025 at <https://data.ct.gov/stories/s/Connecticut-State-Workforce/3hd7-ujh3/>  
2024 Annual Report to the Governor – Office of State Ethics

## Information Technology – Filing Systems

Another way that the OSE supports compliance with the Codes of Ethics is through documentation and disclosure. The agency administers systems for these purposes not only for the regulated community, but for the agency’s internal functions as well. The OSE has two IT specialists which split their time between OSE and the Freedom of Information Commission via a Memorandum of Understanding.

The OSE continued in 2024 to make improvements to the public official, lobbyist and Case Management System online filing systems. Although OSE continually strives to bring the filing systems up to current technological standards and provide users with simple, intuitive processes, the rapidly changing technology will require an overhaul of the filing systems to bring them ahead of the changes. The OSE will seek funding through bonding to make comprehensive upgrades to the filing systems, including substantial improvements to the quantity, variety and accessibility of information available to the public in real time from the filed data.

### Statement of Financial Interests (SFI)

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 a standard that designates appointed officials and additional state employees in the Executive Branch who must file these financial disclosure statements and charges agency heads to determine who else among their staff and attached boards should also file.

SFI filings 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. The SFI filings are completed entirely electronically.

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 transparency and public confidence in governmental decision making. In 2024, out of 2,876 required filers, 99% filed their SFI on time. Out of 96 Agencies, Offices, Commissions and Quasi-Public Agencies, seventy-four percent achieved 100% timely compliance. An additional ten percent of agencies earned the “Commitment to Excellence” designation, meaning they were unable to meet 100% timely filing threshold by one (1) filing only.

### Lobbyist Filing and Disclosure

During the 2023-2024 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 411 lobbyist registrations in Calendar Year 2024 generated \$57,750.00 in fees collected by the OSE and deposited into the state’s General Fund.

## 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 administered a total of 162 new matters and reviews of potential violations of the Ethics Codes in 2024. The Division resolved 95 matters in 2024 by consent order or other resolution, resulting in the collection of a total of \$8,635.00 in penalties. The penalties include monies paid in 62 cases by lobbyists who failed to register in a timely manner or who were delinquent in filing required financial reports.

Also included are 9 matters against public officials for failure to timely file their SFIs as required by law.

In 2024, the Division opened 95 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 2024.

In 2024, the Division opened 67 confidential evaluations and filed or received 29 complaints regarding alleged violations of the Ethics Codes committed by public officials, state employees, lobbyists or contractors. Of the complaints, 26 came from external sources, and the Division filed 3 complaints on its own initiative. In addition, the Division received multiple leads regarding alleged violations of the Ethics Codes that, after review, proved to be outside of the jurisdiction of the OSE.

### 2024 Lobbyist Audits

The Citizen's Ethics Advisory Board approved 51 total audit reports of registered client lobbyists and communicator lobbyists in 2024. Of the 26 approved client reports, 14 (or 54 %) contained adverse findings, compared to 72% in 2023. None of the approved communicator audit reports contained adverse findings. Corrective action was not imposed in any audits in 2024.

### Background Checks

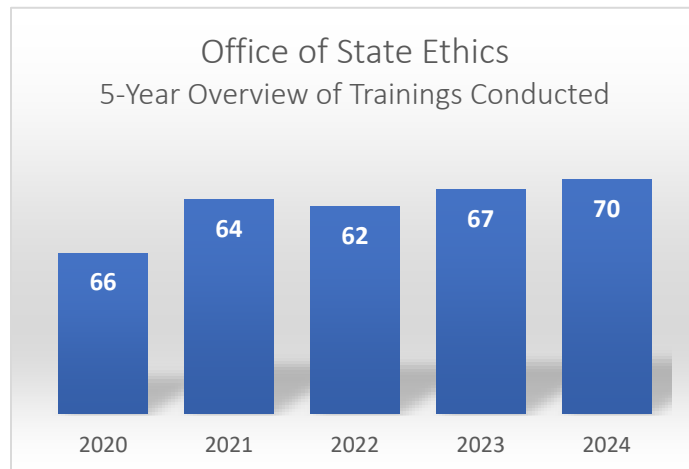
In 2024, the OSE conducted 53 background checks, typically relating to individuals being considered for appointive office.

## Education and Outreach

The Office of State Ethics works toward the goal of “**compliance through education**” by making an earnest, daily effort to make information available to the regulated community and the public.

### Training

The OSE conducts Code of Ethics training for public officials, state employees, lobbyists and contractors, and each training is individually tailored to address agency or office-specific needs and requirements. The Office of State Ethics completed 20 trainings in the first quarter, 16 in the second quarter, 10 in the third quarter and 24 trainings in the fourth quarter. A total of **70 trainings** were conducted in 2024.



Ethics training is required for all newly hired state employees. Additionally, in accordance with § 1-81c of the Connecticut General Statutes, the OSE administers a program of mandatory training for all members of the General Assembly every four years and upon first election. In 2024, OSE continued efforts to reach out and train the lobbyist community.

During 2024, 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 employee that requested training. This flexibility has allowed the OSE to continue to effectively meet its mandate to provide yearly training to all state employees. The OSE constantly strives to expand training offerings.

### Outgoing Communications

Consistent with the goal of being accessible and increasing awareness, the OSE fosters strong partnerships with designated ethics liaisons from every state agency and branch of state government. Nearly 150 **Ethics Liaisons** receive one of OSE’s two **electronic newsletters** which provides timely and helpful information regarding aspects of the Code, best practices for SFI filings and updates on recent commission decisions and frequently asked questions.

In 2024 OSE sent a quarterly newsletter to the **lobbyist community**, which reaches nearly 1500 emails registered in the OSE lobbyist filing system. This proactive communication provides helpful resources, plain-speak explanations on provisions of the Code of Ethics, offers training for offices at their request and provides needed filing guidance and deadline reminders.

**Our website** ([ct.gov/ethics](https://ct.gov/ethics)) is continually updated and improved to ensure easy access to important information for members of the regulated communities and the public.

OSE issued press releases and e-alerts to a contact list of **state and local media** outlets announcing the annual Lobbyist Audit Lottery, adoption of Advisory Board Opinions, Declaratory



Rulings, and enforcement action settlements. Additionally, we regularly received requests for information and background information from members of the press and responded quickly and thoroughly.

## 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.

**A highlight of 2024 was working with the Governor’s Office to have an email sent to all state employees reminding them of the important point of the Code of Ethics during National Ethics Awareness Month.**

Additionally, OSE has been contacted by a number of municipalities to provide “best practices” training for their local ethics authorities and by non profit organizations to help them train their lobbyists. These trainings are provided at no cost to these offices.

## Proposed Legislation

The OSE submitted the following legislative proposals for consideration during the 2024 Regular Session of the Connecticut General Assembly:

1. An Act Defining “Dependent Child” for Purposes of the State Code of Ethics for Public Officials and Concerning the Exercise of Jurisdiction over Nonresidents by the Office of State Ethics – *Public Act No. 24-128 (Summary below)*
2. An Act Concerning Conflicts of Interest Due To an Employer Other Than the State under the State Code of Ethics for Public Officials (S.B. 260) – *Passed in the Senate; did not advance in the House*
3. An Act Concerning Statements of Financial Interests under the State Code of Ethics for Public Officials (S.B. 261) – *Passed in the Senate; did not advance in the House*
4. An Act Concerning Contracting with Quasi-Public Agencies under the State Code of Ethics (S.B. 259) – *Passed in the Senate; did not advance in the House*
5. An Act Concerning the Adoption of Municipal Conflict of Interest Provisions (S.B. 255) – *proposed legislation did not pass either chamber*

## Public Act 24-128 Summary

**[Public Act No. 24-128](#)** makes the following changes to the Code of Ethics for Public Officials:

- defines a “dependent child” in the state’s Code of Ethics for Public Officials as a covered official’s son, daughter, or stepchild who qualifies as the official’s dependent child under federal tax law. Generally, to qualify as a dependent child under federal tax law, a child must (1) share a principal residence with the official; (2) be under age 19 (or 24 if a student); (3) have provided less than half of their own support for the year; and (4) not have filed a joint return with their spouse. Although the Code of Ethics did not previously

define a “dependent child,” under it public officials have a substantial conflict of interest if their dependent child will get a direct monetary gain or suffer a direct monetary loss because of their official activity (unless it accrues to the child as a member of a profession, occupation, or group to no greater extent than other members of that profession, occupation, or group) (CGS § 1-85). Public officials in certain positions must also include specified information about their dependent children in the statements of financial interest they must file (CGS § 1-83).

- specifies that under the state laws on ethical considerations for bidding and state contracts, the Office of State Ethics’ (OSE) long-arm jurisdiction over out-of-state residents or their agents is limited to those who (1) pay money or give anything of value to a public official or state employee to obtain a competitive advantage, solicit non-public information, or unduly influence the award of certain state contracts or (2) are, or are seeking to become, prequalified state contractors or substantial subcontractors.

## Contact Information



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Business Hours: 8:30 am to 5:00 pm