

STATE OF CONNECTICUT

OFFICE OF STATE ETHICS

CITIZEN'S ETHICS ADVISORY BOARD OFFICE OF STATE ETHICS 165 Capitol Avenue, Suite 1200, Hartford, CT 06106

MINUTES OF THE JULY 18, 2024 REGULAR MEETING

The Citizen's Ethics Advisory Board ("Board") of the Office of State Ethics ("OSE") held a Regular Meeting on Thursday, July 18, 2024.

Chair of the Board, Dena Castricone, called the meeting to order at 1:05 p.m.

The following Board members were present:

Dena Castricone, Chair N. Beth Cook, Vice-Chair Charles Chiusano Jason Farrell (virtual) Thomas Jones (virtual) Laura Schuyler

The following staff members of the OSE were present:

Peter Lewandowski, Executive Director Brian O'Dowd, General Counsel Mark Wasielewski, Ethics Enforcement Officer Sarah Clark, Director of Education & Communications Marianne Sadowski, Deputy General Counsel (virtual) Marc Crayton, Deputy Ethics Enforcement Officer Jennifer Montgomery, Associate General Counsel (virtual) Diane Buxo, Assistant General Counsel (virtual) Carol Langevin, Associate Accounts Examiner Malissa Hurry, Paralegal Melissa Hamilton, Paralegal & Clerk of the Citizen's Ethics Advisory Board

The following topics were addressed during the meeting:

1. The minutes of the June 20, 2024 regular meeting were presented to the Board for approval.

On the motion of Ms. Schuyler, seconded by Vice-Chair Cook, the Board voted six (6) to zero (0) to approve the Minutes of the June 20, 2024 regular meeting.

2. The minutes of the June 27, 2024 special meeting were presented to the Board for approval.

On the motion of Mr. Chiusano, seconded by Ms. Schuyler, the Board voted six (6) to zero (0) to approve the Minutes of the June 27, 2024 special meeting.

3. Chair Castricone presented the chairperson's report reminding the Board that no hearing officer is required for the month of August (because Uniform Administrative Procedure Act ("UAPA") hearings are not held in the month) and then seeking an officer for UAPA hearings in the month of September.

Vice-Chair Cook volunteered. Chair Castricone also informed the Board of the annual formation of the Nominating Committee to manage nominations and the selection of the chair and vice-chair of the Board. She shared with the Board her decision not to seek reelection as Chairperson but, rather, to join the Nominating Committee in its selection of the Board's chair and vice-chairpersons for the next term. Board members Chiusano and Schuyler joined Chair Castricone in forming the Nominating Committee.

On the motion of Vice-Chair Cook, seconded by Mr. Chiusano, the Board voted six (6) to zero (0) to approve the establishment of the annual Nominating Committee.

4. General Counsel Brian O'Dowd presented the Petition for Declaratory Ruling submitted by Mary Bagnaschi-County. He recommended that the Board deny the Petition based upon the clear and unambiguous statutory definitions outlined in his letter to the Board accompanying the Petition.

On the motion of Vice-Chair Cook, seconded by Mr. Chiusano, the Board voted six (6) to zero (0) to deny the Petition for Declaratory Ruling submitted by Mary Bagnaschi-County based on General Counsel's recommendation outlined in the letter to the Board dated July 16, 2024.

- 5. The Legal Division report was presented by General Counsel O'Dowd. Mr. O'Dowd provided an update on draft Advisory Opinion 2024-3, which involves a Petition submitted by Wendy Martel.
- 6. Ethics Enforcement Officer Mark Wasielewski presented the Enforcement Division's report, highlighting the following items:
 - The first quarter financial disclosure filing initiative for client lobbyists and municipal clients concluded with the Division collecting a total of \$1,545 in penalties for untimely filing of reports. Paralegal Malissa Hurry played a significant role in resolving matters.
 - The second quarter financial disclosure filing initiative for client lobbyists and municipal clients is underway. Nine matters were immediately noticed for UAPA hearings.
 - > Currently, one matter is on the UAPA hearing calendar for September 12, 2024.
- Associate Accounts Examiner Carol Langevin briefly discussed an upcoming update to the audit report template. Ms. Langevin then presented the client lobbyist audit report for *Cigna Corporate Services LLC ("Cigna")*, and *Cigna's* response letter to the audit. The audit contained findings.

On the motion of Mr. Chiusano, seconded by Ms. Schuyler, the Board voted six (6) to zero (0) to approve the audit report for Cigna.

8. Deputy Ethics Enforcement Officer Marc Crayton provided an update on the audit for client lobbyist *NTE Energy.*

Following the update, Mr. Crayton presented the communicator lobbyist audits of *Reynolds Strategy Group, LLC, Strategic Outreach Solutions, LLC*, and *Camilliere, Cloud & Kennedy*, none of which contained findings.

<u>On the motion of Vice-Chair Cook, seconded by Ms. Schuyler, the Board voted six (6) to zero (0)</u> to approve the audit report for Reynolds Strategy Group, LLC.

On the motion of Mr. Chiusano, seconded by Vice-Chair Cook, the Board voted six (6) to zero (0) to approve the audit report for Strategic Outreach Solutions, LLC.

On the motion of Ms. Schuyler, seconded by Mr. Chiusano, the Board voted six (6) to zero (0) to approve the audit report for Camilliere, Cloud & Kennedy.

- 9. Director of Education and Communications Sarah Clark presented the Education and Communications report, and highlighted the following from her written report:
 - > The development of a new online training module for state employees and public officials is complete. The rollout of the module is anticipated to occur in the next month. (Other training resources are being refined.)
 - > Nine in-person and on-line training sessions are scheduled to be held over the next month.
- 10. The Executive Director's report was presented by Executive Director Peter Lewandowski, who noted, among other things, the following:
 - The preparation of OSE's two-year budget: fiscal years 2026 and 2027 is underway. OSE plans to seek additional funding for upgrades to its filing systems – i.e., the Statement of Financial Interest and Lobbyist filing systems.
 - > An update concerning OSE's audit report from the state auditors.
 - > A staffing update concerning the open position in the Enforcement Division.
 - The registration for the Council on Governmental Ethics Laws ("COGEL") 2024 conference, to be held in Los Angeles, is open.
- 11. Adjournment

On the motion of Mr. Chiusano, seconded by Vice-Chair Cook, the Board voted six (6) to zero (0) to adjourn the meeting.

The meeting was adjourned at 1:35 p.m.

Respectfully submitted by,

Melissa Hamilton Clerk of the Citizen's Ethics Advisory Board Office of State Ethics

<u>August 15, 2024</u> Date approved. (By the Citizen's Ethics Advisory Board)