



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 JANUARY 18, 2024 REGULAR MEETING

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

Vice-Chair of the Board, N. Beth Cook, called the meeting to order at 1:03 p.m.

The following Board members were present:

Dena Castricone, Chair (virtual)
N. Beth Cook, Vice-Chair
Mary Bigelow
Charles Chiusano

Jason Farrell (virtual)
Thomas Jones
Cheryl Lipson (virtual)
Laura Schuyler (virtual)

The following staff members of the OSE were present:

Peter Lewandowski, Executive Director
Brian O'Dowd, General Counsel
Mark Wasielewski, Ethics Enforcement Officer
Marianne Sadowski, Deputy General Counsel
(virtual)
Marc Crayton, Deputy Ethics Enforcement Officer
Jennifer Montgomery, Associate General Counsel
(virtual)

Diane Buxo, Assistant General Counsel (virtual)
Adrian Baron, Assistant Ethics Enforcement Officer
Carol Langevin, Associate Accounts Examiner
Sarah Clark, Director of Education & Communications
Melissa Hamilton, Paralegal & Clerk of the Citizen's
Ethics Advisory Board
Malissa Hurry, Paralegal

The following topics were addressed during the meeting:

1. The minutes of the December 14, 2023 regular meeting were presented to the Board for approval.

On the motion of Ms. Lipson, seconded by Chair Castricone, the Board voted eight (8) to zero (0) to approve the Minutes of the December 14, 2023 regular meeting.

2. The minutes of the January 10, 2024 special meeting of the Subcommittee on Administrative Lobbying were presented to the subcommittee for approval.

On the motion of Mr. Jones, seconded by Chair Castricone, with Mr. Chiusano abstaining, the Subcommittee voted three (3) to zero (0) to approve the Minutes of the January 10, 2024 special meeting of the Subcommittee on Administrative Lobbying.

3. Vice-Chair Cook presented the chairperson's report on behalf of Chair Castricone, who attended the meeting remotely.

The Board was reminded that Board member Jones will serve as the Uniform Administrative Procedure Act ("UAPA") Hearing Officer on February 8, 2024. Board member Chiusano volunteered to serve as the March 14, 2024 UAPA Hearing Officer.

The Executive Director's goals and objectives for 2024 were presented, and the goals and strategies set by the Executive Director Annual Evaluation Subcommittee, comprising Chair Castricone, Vice-Chair Cook, and Mr. Chiusano, were discussed. Executive Director Peter Lewandowski clarified questions concerning the ongoing nature of proposed 2024 goal #6, "Work with the State Librarian to update records retention schedules so they accurately reflect [the] agency's paper and electronic files," and the more comprehensive updates of goal #7, "... updates to Statement of Financial Interests ('SFI') Filing System once additional funding is secured," as opposed to the technical updates performed by in-house Information Technology personnel in 2023.

On the motion of Chair Castricone, seconded by Ms. Lipson, the Board voted eight (8) to zero (0) to approve the Executive Director's Goals and Objectives for 2024 with revisions to items 6 and 7.

4. General Counsel O'Dowd presented the Petition for Declaratory Ruling submitted by James Bolger Hemingway and recommended that the Board deny the Petition on the grounds that the issues raised in it are outside the jurisdiction of the OSE.

On the motion of Mr. Jones, seconded by Ms. Bigelow, the Board voted eight (8) to zero (0) to deny the Petition for Declaratory Ruling submitted by James Bolger Hemingway on the grounds of lack of jurisdiction.

5. General Counsel O'Dowd presented the Legal Division's report. He thanked the staff for their hard work during the reporting period, particularly given that the Division was short-staffed due to the holidays.

Mr. O'Dowd responded to a question regarding an informal staff opinion issued to a DOT employee concerning his potential post-state employment with a vendor of his agency.

6. Ethics Enforcement Officer Mark Wasielewski presented the Enforcement Division's report, highlighting that January begins the Division's active season enforcing lobbyist financial reports. As of the date of the Board meeting, 10 immediate Notices of Hearing had been issued, and 128

grace period notices had been extended. Mr. Wasielewski, Deputy Ethics Enforcement Officer Marc Crayton, and Accounts Examiner Carol Langevin will be participating in the OSE's lobbyist trainings scheduled for next week. Lastly, Mr. Crayton and Ms. Langevin were recognized by Mr. Wasielewski for their work and dedication conducting lobbyist audits and reports.

- Ms. Langevin presented the client lobbyist audit reports for Day Kimball Healthcare, Inc., and CT Nursery and Landscape Association, Inc., and requested the Board's approval of the audit reports and their findings.

It was reported that the audit for Day Kimball Healthcare, Inc., contained two findings: (1) overstated payments to its communicators in 2020, totaling \$12,500.01; and (2) two late filings of lobbyist financial reports: the late filing of its 2020 combined third/fourth quarter ETH-2D by 22 days; and the late filing of its 2022 first quarter ETH-2D by 8 days. Day Kimball Healthcare, Inc., amended its report to correct the overstated error.

On the motion of Mr. Chiusano, seconded by Chair Castricone, the Board voted eight (8) to zero (0) to approve the audit report for Kimball Healthcare, Inc.

Concerning the audit for CT Nursery and Landscape Association, Inc., Ms. Langevin reported no findings.

On the motion of Ms. Bigelow, seconded by Chair Castricone, the Board voted eight (8) to zero (0) to approve the audit report for CT Nursery and Landscape Association, Inc.

The final client lobbyist audit report for this reporting period involving Dandelion Energy was presented by Mr. Crayton, who requested the Board's approval of the audit and its findings. The audit consisted of three findings: (1) a late filing of its 2020 ETH-1B Client Lobbyist Registration; (2) three late filings of lobbyist financial reports: the late filing of its 2020 second quarter ETH-2D by 910 days; the late filing of its 2020 combined third/fourth quarter ETH-2D by 1 day; and the late filing of its 2021 combined third/fourth quarter ETH-2D by 25 days; and (3) an understated payment to its communicators in 2020, by \$7,500. Dandelion Energy amended its report to correct the understated errors.

On the motion of Mr. Jones, seconded by Mr. Chiusano, the Board voted eight (8) to zero (0) to approve the audit report for Dandelion Energy.

- Mr. Crayton presented the communicator lobbyist audit reports for Gaffney, Bennett & Associates, TCORS Capitol Group LLC, and Kozak and Salina LLC, and requested approval of each audit report.

Mr. Crayton reported that each of the three communicator lobbyist audits for Gaffney, Bennett & Associates, TCORS Capitol Group LLC, and Kozak and Salina LLC contained no findings.

On the motion of Chair Castricone, seconded by Mr. Jones, the Board voted eight (8) to zero (0) to approve the audit report for Gaffney, Bennett & Associates.

On the motion of Mr. Chiusano, seconded by Ms. Lipson, the Board voted eight (8) to zero (0) to approve the audit report for TCORS Capitol Group LLC.

Lastly, on the motion of Mr. Chiusano, seconded by Mr. Jones, the Board voted eight (8) to zero (0) to approve the audit report for Kozak and Salina LLC.

9. Director of Education and Communications Sarah Clark presented the Education and Communications report, and provided the following updates:
- (a) Trainings/Presentations – Several trainings have been scheduled for the upcoming month, including a training for the City of West Haven at the request of Mayor Borer. In addition, there will be a lobbyist training series at the Legislative Office Building this Monday and Wednesday. The lobbyist trainings will include multiple sessions, and presentations from Ms. Clark and Mr. Lewandowski (on the Code of Ethics and filing requirements), Ms. Ann Morgan, Information Technology Analyst III, (on filing reports within the filing system), and Mr. Wasielewski, Mr. Crayton, and Ms. Langevin (on enforcement processes and audit preparation). The office plans to hold this lobbyist training annually and at the beginning of each legislative session. Other requests for trainings continue to flow into the office.
 - (b) COGEL – Ms. Clark has joined the Council on Government Ethics Laws (“COGEL”)’s Communications Committee, and anxiously awaits instructions on ways she can be of service to the organization.
 - (c) Lobbying – The new combined Lobbyist Guide is in the final stages of approval. The Guide will serve, combinedly, the client and communicator lobbyists. This combined approach was decided because many communicator lobbyists handle the administrative responsibilities (including completing and filing financial reports to OSE) for their client lobbyists.
 - (d) Communications – The newsletters for January are being drafted; SFI support for Ethics Liaisons continues, as well as the office’s transparency and access to the media. The Board and staff were reminded that the deadline to file their SFIs is only 105 days away.
10. Mr. Lewandowski presented five legislative proposals for the Board’s consideration and expressed that there will likely be additional proposals presented at the February board meeting as legislative language is being crafted and discussions are being held with stakeholders. Moreover, the Subcommittee on Municipal Ethics met immediately before this meeting and will be presenting proposals to the full board at its next meeting in February.

Once the proposals are approved, they will be presented to the Government Administration and Elections Committee.

On the motion of Mr. Chiusano, seconded by Mr. Jones, the Board voted eight (8) to zero (0) to approve the five Legislative Proposals.

11. The Executive Director report was presented by Mr. Lewandowski, and the following updates were provided:

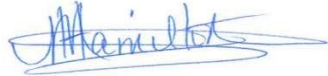
- (a) Concerning the status of the remediation and construction at OSE due to water leaks, the outdoor work has commenced and depending on the scope of the interior work, a decision will be made at that time if in-office work will be suspended.
- (b) Lobbyist Reporting and Registration – Mr. Lewandowski expressed sincere thanks to the staff for fielding telephone calls and legal questions from the lobbyist community regarding lobbyist filings that were due on January 10. Positive feedback from lobbyists was shared with the Board regarding their interactions with staff members. For the remainder of January and early February, the office anticipates an uptick in lobbyist registrations and badge requests.
- (c) The City of West Haven Training – Mr. Lewandowski provided background on the upcoming ethics training, noting the fact that the State board that oversees the finances of the City of West Haven approached OSE to work with the City of West Haven to help craft a Code of Ethics.

12. Adjournment

On the motion of Mr. Chiusano, seconded by Chair Castricone, the Board voted eight (8) to zero (0) to adjourn the meeting.

The meeting was adjourned at 1:48 p.m.

Respectfully submitted by,



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

January 18, 2024

Date approved
(By the Citizen's Ethics Advisory Board)