



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 DECEMBER 14, 2023 REGULAR MEETING

The Citizen's Ethics Advisory Board ("Board") of the Office of State Ethics ("OSE") held a Regular Meeting on Thursday, December 14, 2023.

Chair of the Board, Dena Castricone, called the meeting to order at 1:02 p.m.

The following Board members were present:

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

Thomas Jones
Cheryl Lipson
Karreem Mebane
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 (virtual)
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
Sarah Clark, Director of Education & Communications
Melissa Hamilton, Paralegal Specialist and Clerk of the Board

The following topics were addressed during the meeting:

1. The minutes of the November 16, 2023 regular Meeting were presented to the Board for approval.

On the motion of Ms. Lipson, seconded by Ms. Bigelow, with Ms. Schuyler abstaining, the Board voted eight (8) to zero (0) to approve the Minutes of the November 16, 2023 regular Meeting.

2. Chair Castricone presented the chairperson's report. A volunteer to serve as the February 8, 2024 Uniform Administrative Procedure Act ("UAPA") Hearing Officer was sought, and Mr. Jones volunteered, if an afternoon (specifically 2:00 PM) start time is possible. The Executive Director's annual evaluation process, including goals; objectives; the necessity to seek stakeholder feedback for 2024; and, the steps and timelines for the completion of the 2023 evaluation were discussed. Also, an invitation to join the Executive Director Evaluation subcommittee was extended to the Board. Vice-Chair Cook expressed interest in joining the subcommittee. The subcommittee will be comprised of Chair Castricone, Mr. Chiusano, and Vice-Chair Cook.

Chair Castricone asked board members and OSE staff who attended and participated at this year's Council on Governmental Ethics Laws ("COGEL") conference for feedback. Mr. Chiusano, Mr. Jones, and Mr. Mebane shared their individual perspectives on this year's conference, and inquiries from other state ethics offices. Executive Director Peter Lewandowski and Ethics Enforcement Officer Mark Wasielewski shared their accounts as presenter, moderator, and attendee of program sessions, as well as some interests they received about OSE's processes and firewall between compliance and enforcement, and the possibility of using our systems as benchmarks. In addition, Mr. Wasielewski thanked Legal Investigator Garritt Kelly for serving in a panelist role; and shared his experience serving on this year's programming committee; what he learned from other jurisdictions; and that he was selected to now serve on COGEL's Board of Directors. He encouraged board members and other staff members to become more involved in COGEL.

3. Prior to today's meeting, the Board was notified of a new Petition for Declaratory Ruling for its consideration, necessitating the amendment of the agenda to add said Petition.

On the motion of Vice-Chair Cook, seconded by Ms. Lipson, the Board voted nine (9) to zero (0) to amend today's meeting Agenda to add the Consideration of the Petition for Declaratory Ruling submitted by Vasean Daniels.

4. General Counsel O'Dowd presented the Petition for Declaratory Ruling submitted by Vasean Daniels, a former employee of Eastern Connecticut State University ("ECSU"). In his Petition, Mr. Daniels asked whether a contract signed by Mr. Daniels, a union representative, and ECSU's Chief Human Resources Officer "is subject to the statute of limitations of most contracts in Connecticut (6 years) [pursuant to Connecticut General Statutes § 52-584a] given that there is no date of expiration listed on the contract itself. And if this contract is subject to the statute of limitations on contracts in Connecticut, if a breach of this contract would result in the remedies written therein?" Mr. O'Dowd recommended that the Board deny Mr. Daniels' Petition, for both § 52-584a and the contractual issues raised in the petition are outside the jurisdiction of the OSE.

On the motion of Mr. Jones, seconded by Mr. Chiusano, the Board voted nine (9) to zero (0) to deny the Petition for Declaratory Ruling submitted by Vasean Daniels for the lack of jurisdiction.

5. General Counsel Brian O'Dowd presented the Legal Division's report, providing an update to the potential Petition for Advisory Opinion discussed at last month's meeting involving a state university and its use of a private entity's donation to create an awards program wherein individuals of the university may be selected and awarded cash. He also informed the Board of a possible Advisory Opinion from the Department of Agriculture with respect to outside employment issues and the involvement of farm owning employees regulating farming activities.
6. Ethics Enforcement Officer Mark Wasielewski presented the Enforcement Division's report, and looks forward to welcoming new staff attorney Adrian Baron, who officially starts on December 15.
7. Associate Accounts Examiner Carol Langevin presented the client lobbyist audit reports for Christian Healthcare Ministries, Inc.; CT Community Nonprofit Alliance; and Governor's Prevention Partnership. She requested the Board's approval of the audits and their findings.

Ms. Langevin reported that the audit for Christian Healthcare Ministries, Inc. contained two findings: understated payments to its communicators in 2020, totaling \$3,120.69; and an overstated payment to its communicators in 2021 by \$3,000. Christian Healthcare Ministries, Inc. amended its reports to correct the errors.

On the motion of Mr. Jones, seconded by Ms. Lipson, with Vice-Chair Cook abstaining, the Board voted eight (8) to zero (0) to approve the audit report for Christian Healthcare Ministries, Inc.

Concerning the audit for CT Community Nonprofit Alliance, Ms. Langevin reported two findings: an understated payment to its communicators in 2020, in the amount \$949.72; and an understated payment to its communicators in 2021, in the amount of \$455.87. For both findings, CT Community Nonprofit Alliance amended its reports to correct the errors.

On the motion of Mr. Chiusano, seconded by Vice-Chair Cook, the Board voted nine (9) to zero (0) to approve the audit report for CT Community Nonprofit Alliance.

Finally, Ms. Langevin reported that the audit for the Governor's Prevention Partnership consisted of three findings: a late filing of its 2021 first quarter ETH-2D Client Lobbyist Final Report by three days; an understated payment to its communicators in 2020, by \$2,500; and an understated payment to its communicators in 2021, by \$2,500. The Governor's Prevention Partnership amended its report to correct the understated errors.

On the motion of Mr. Jones, seconded by Mr. Mebane, the Board voted nine (9) to zero (0) to approve the audit report for the Governor's Prevention Partnership.

8. Deputy Ethics Enforcement Officer Marc Crayton presented the communicator lobbyist audit report for Global Strategy Group and requested approval of the audit. Mr. Crayton reported that the audit consisted of no findings.

On the motion of Vice-Chair Cook, seconded by Mr. Jones, the Board voted nine (9) to zero (0) to approve the audit report for Global Strategy.

In addition, Mr. Crayton presented the communicator lobbyist audit report for Powers, Griffin & Hill, LLC, and requested approval of the audit. He reported that the audit contained no findings.

On the motion of Ms. Lipson, seconded by Ms. Bigelow, the Board voted nine (9) to zero (0) to approve the audit report for Powers, Griffin & Hill, LLC.

Lastly, the communicator lobbyist audit report for Sullivan & LeShane, Inc. was presented by Mr. Crayton, and requested for approval. He reported that the audit consisted of no findings.

On the motion of Mr. Mebane, seconded by Mr. Chiusano, the Board voted nine (9) to zero (0) to approve the audit report for Sullivan & LeShane, Inc.

9. Director of Education and Communications Sarah Clark presented the Education and Communications report, and provided updates on the following:
 - (a) The December Agency Ethics Liaisons and Lobbyists newsletters are being finalized. Included in the lobbyists' newsletter will be the agenda for the January 2024 group trainings. To manage registration and customize training sessions, an online platform will be launched at the time of the lobbyist newsletter distribution. This online platform will allow lobbyists to register for the January trainings and provide preemptive feedback.
 - (b) Trainings/Presentations – Trainings for state agencies, small lobbyist groups and quasi-public agencies, continue to occur. This month, the OSE conducted a training for the Senate Republican Caucus' staff.
 - (c) COGEL – The OSE was well represented at COGEL. Not only did OSE's staff and board members attend and participate, much of the staff in attendance led presentations and discussions, providing great representation for our office and its operations.
 - (d) 2024 Lobbyist Audit Documentation – Ms. Clark has been working with the audit team to update the documents to request 2024 lobbyist audit materials, to refresh the training they provide annually to selectees, and to provide an online tool to collect RSVPs and questions for the January 2024 lobbyist training sessions.
10. Executive Director Lewandowski presented the Executive Director report, highlighting the following:

- (a) The status of the remediation and construction at OSE due to water leaks. Two bids for remediation and restoration work were received, and a contractor has been selected. Due to the current, supple ground conditions, the work will begin outdoors. The office continues the suspension of in-person services to the public and regulated community and has reverted to remote services for the duration of this work. Since work will commence outdoors, staff will continue with a hybrid schedule unless the outdoor work becomes disruptive, at which point, the office will revert to 100% telework for the remainder of the construction.
- (b) With the start of new staff attorney Mr. Adrian Baron's employment tomorrow, OSE is officially fully staffed. All allocated positions for OSE will be filled.

11. Legislative Proposal

The internal review of legislative proposals has begun. To assist the Board with discussion of potential legislative initiatives, Mr. Lewandowski presented a list of proposed legislative concepts the office is considering. The Board may too, consider these items or alternatively raise other ideas or suggestions.

12. Adjournment

On the motion of Ms. Lipson, seconded by vice-Chair Cook, the Board voted nine (9) to zero (0) to adjourn the meeting.

The meeting was adjourned at 2:03 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)