



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 17, 2025 REGULAR MEETING

The Citizen's Ethics Advisory Board (Board) of the Office of State Ethics (OSE) held a Meeting on Thursday, July 17, 2025.

Chair of the Board, N. Beth Cook, called the meeting to order at 1:06 p.m.

The following Board members were present:

N. Beth Cook, *Chair*
Charles Chiusano, *Vice-chair*
Karess Cannon (virtual)
Dena Castricone (virtual)

Meaghan Cooper
Kenneth Greenberg
Cheryl Lipson
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*
Sarah Clark, *Director of Education & Communications*
Marianne Sadowski, *Deputy General Counsel*
Marc Crayton, *Deputy Ethics Enforcement Officer* (virtual)
Jennifer Montgomery, *Associate General Counsel* (virtual)
Diane Buxo, *Assistant General Counsel* (virtual)
Sam Rosengren, *Assistant Ethics Enforcement Officer*
Garritt Kelly, *Legal Investigator*

Carol Langevin, *Associate Accounts Examiner*
Ann Morgan, *Information Technology (IT) Analyst III*
(virtual) (joined at 1:27 pm)
Alaaeldin Ali, *Information Technology (IT) Analyst II* (virtual)
(joined at 1:14 pm)
Henry Herschkorn, *Fiscal Administrative Officer* (virtual)
(joined at 2:12 pm)
Melissa Hamilton, *Paralegal Specialist* (Legal Division) &
Clerk of the Citizen's Ethics Advisory Board
Malissa Hurry, *Paralegal Specialist* (Enforcement Division)

The following topics were addressed during the meeting:

1. The Minutes of the June 12, 2025 Regular meeting were presented to the Board for approval.

On the motion of Mr. Greenberg, seconded by Ms. Lipson, the Board voted eight (8) to zero (0) to approve the Minutes of the June 12, 2025 Regular meeting.

2. The Minutes of the June 11, 2025 Special meeting were presented to the Board for approval.

On the motion of Vice-chair Chiusano, seconded by Ms. Cooper, and with Mr. Greenberg abstaining, the Board voted seven (7) to zero (0) to approve the Minutes of the June 11, 2025 Special meeting.

3. The Minutes of the June 30, 2025 Special meeting of the Board Policies Committee were presented to the Board for approval.

On the motion of Vice-chair Chiusano, seconded by Mr. Greenberg, the Board Policies Committee voted three (3) to zero (0) to approve the Minutes of the June 30, 2025 Special meeting.

4. Chair Cook presented the chairperson's report, discussing the upcoming nominations of Board officers. She noted that (1) the terms of all Board members run from October 1st to September 30th pursuant to General Statutes § 1-80, (2) General Statutes § 1-80 (d) requires members of the Board to elect a Chairperson and Vice-chairperson to serve as officers of the Board, and (3) Policy #1 of the existing Board Policies provides that the officers of the Board shall be elected annually to a one year term, and a Nominating Committee must be established no later than the Board's July meeting and consisting of two members elected by the Board and the OSE's Executive Director serving as an ex-officio member of the Committee to manage nominations and the selections of the Chair and Vice-chair positions of the Board. Chair Cook expressed interest in remaining Chair of the Board and thus cannot serve on the Committee. Vice-chair Chiusano also expressed interest in remaining Vice-chair of the Board, and he too cannot serve on the Committee. Board members Castricone and Schuyler volunteered to serve on the Nominating Committee.

The Board voted unanimously to approve the formation of a Nominating Committee with Ms. Castricone and Ms. Schuyler as the members of the Committee.

Further, Chair Cook reminded the Board of today's ethics training presentation, and then she requested a volunteer to serve as the Uniform Administrative Procedure Act Hearing Officer on September 11, 2025. Vice-chair Chiusano volunteered.

5. Associate Accounts Examiner Langevin presented seven (7) client lobbyist audit reports to the Board for approval:

- (i) Charter Communications, Inc.

Ms. Langevin noted that Charter Communications, Inc., changed its name to Charter Communications Operating, LLC, after its selection for audit and before the date of today's audit report. She further noted that a representative from Charter Communications Operating, LLC, has joined today's meeting, and Chair Cook invited the representative to present remarks, but no remarks were made.

On the motion of Vice-chair Chiusano, seconded by Mr. Greenberg, the Board voted eight (8) to zero (0) to approve the audit report for Charter Communications, Inc.

- (ii) The DaVita Health Care Partners, Inc.

On the motion of Vice-chair Chiusano, seconded by Mr. Greenberg, and with Chair Cook abstaining, the Board voted seven (7) to zero (0) to approve the audit report for DaVita Health Care Partners, Inc.

- (iii) American Property Casualty Insurance Association (APCIA)

On the motion of Ms. Lipson, seconded by Vice-chair Chiusano, the Board voted eight (8) to zero (0) to approve the audit report for APCIA.

- (iv) National Insurance Crime Bureau

On the motion of Mr. Greenberg, seconded by Vice-chair Chiusano, the Board voted eight (8) to zero (0) to approve the audit report for the National Insurance Crime Bureau.

- (v) Constellation Energy Generation, LLC

On the motion of Mr. Greenberg, seconded by Vice-chair Chiusano, the Board voted eight (8) to zero (0) to approve the audit report for Constellation Energy Generation, LLC.

- (vi) United Therapeutics

On the motion of Vice-chair Chiusano, seconded by Mr. Greenberg, the Board voted eight (8) to zero (0) to approve the audit report for United Therapeutics.

- (vii) SAM Advocacy dba CTVotersFirst.org

On the motion of Ms. Lipson, seconded by Vice-chair Chiusano, the Board voted eight (8) to zero (0) to approve the audit report for SAM Advocacy dba CTVotersFirst.org.

6. General Counsel O'Dowd presented the Legal Division report, expressing his appreciation to the Legal Division team and Deputy General Counsel Marianne Sadowski for the smooth operation of the Division during his absence. Further, Mr. O'Dowd discussed a possible request for an advisory opinion concerning a revolving-door provision.

Chair Cook asked Mr. O'Dowd to share with the Board the origins of his report on Nepotism highlighted in this month's Legal Division report. Mr. O'Dowd replied by describing the 2017 inquiry from the University of Connecticut (UConn) that resulted in a new Code provision (which applies only to "a state employee who is employed at a constituent unit of the state system of higher education and a member of the immediate family of such state employee") and in the Superior Court's overturning of OSE's Advisory Opinion (which was in response to UConn's 2017 inquiry and premised on agency precedent), and shared OSE's plan to pursue a legislative solution to the current state of the law concerning family members working in the same state agency.

7. Ethics Enforcement Officer Wasielewski presented the Enforcement Division report, highlighting a recent Consent Order in Docket No. 2024-27. Mr. Wasielewski noted that this matter was handled well by Assistant Ethics Enforcement Officer Sam Rosengren. Additional highlights of the Division this month include:

- addressing late filing of lobbyist reports that were due on July 10, 2025. Nine (9) matters were immediately noticed for a hearing, and \$170 was collected in penalties.
- the rescheduling of the Probable Cause hearing.

- a counteroffer presentation (concerning the Statement of Financial Interest (SFI)) for the Board's consideration, to be held later in today's meeting.

8. Before the discussion of the counteroffer, September hearing officer Vice-chair Chiusano and procedural attorneys Sadowski and Montgomery excused themselves from the discussion.

In the Matter of Shay Ajayi - Docket No. 2025-03 UP, Mr. Wasielewski presented the counteroffer submitted by Mr. Ajayi for the Board's consideration. Mr. Ajayi was invited to present additional details, but he was not present at the meeting. After review, discussion, and inquiries, the Board decided to postpone the matter until the August meeting to obtain further details. Specifically, the Board requested a timeline representing the following details:

- (i) The date on which Mr. Ajayi became an SFI filer.
- (ii) The date on which Mr. Ajayi reached out to OSE for assistance with his SFI filing.
- (iii) The date(s) on which the OSE contacted Mr. Ajayi and/or assisted Mr. Ajayi with his SFI filing.
- (iv) The date(s) on which OSE provided notice to Mr. Ajayi about the filing and/or late filing of his SFI filing.

Following the counteroffer discussion, Vice-chair Chiusano and procedural attorneys Sadowski and Montgomery rejoined the meeting.

9. Education & Communications Director Sarah Clark provided a written report and specifically noted that while ethics training was the primary focus for the past month, recognition is in order, for the Legal Division for its professionalism. She shared that as a representative of OSE, she is well received by the regulated community, due to the community's interactions with the Legal Division.

10. Executive Director Lewandowski presented his report, addressing the following items:

- **Personnel Matters.** Ms. Bigelow will not seek reappointment to her position on the Board once it expires on September 30, 2025, and Mr. Lewandowski has contacted the appointing authority to appoint a new member, as well as the Connecticut League of Women Voters for any interested persons to serve on the Board. Mr. Lewandowski informed the Board of the passing of former Board member Dennis Riley this week. Mr. Riley served on the Board from February 2006 to September 2014.
- **Budget.** The new fiscal year (2026) has begun. Preparations for the fiscal year 2027 budget will begin soon. Any adjustments to the budget must be submitted to the Office of Policy and Management by the end of August.
- **COGEL.** Mr. Lewandowski provided the summer programming of COGEL Connect events.
- **Save the Date.** A reminder of the Board's annual luncheon was provided. The luncheon is set to take place in September, immediately before the September Regular Board meeting on September 18, 2025. Further details are forthcoming.

Mr. Chiusano provided an overview to the Board of a recent COGEL Connect event, Ethics in Focus: The Case Against Michael J. Madigan.

11. Executive Director Lewandowski presented updates to the Board policies. He shared that on June 30, 2025, the Board Policies Committee met to discuss the existing policies and to determine whether updates were necessary. During the meeting the Committee recommended changes, which are being presented to the Board today for consideration.

On the motion of Vice-chair Chiusano, seconded by Mr. Greenberg, the Board voted eight (8) to zero (0) to approve the updates to the Citizen's Ethics Advisory Board Policies with an amendment to Policy #3, noting that the Office of State Ethics' Agency Ethics Policy is incorporated herein by reference.

At 2:05 p.m., a short recess was held. During this time, Ms. Castricone left the meeting, permanently.

At 2:12 p.m., the meeting resumed.

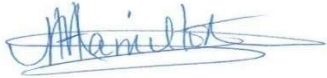
12. Ms. Clark provided an in-depth training course on the Code of Ethics for Public Officials and State Employees for the Board and the staff of the OSE.

13. Adjournment.

On the motion of Vice-chair Chiusano, seconded by Mr. Greenberg, the Board voted seven (7) to zero (0) to adjourn the meeting.

The meeting was adjourned at 2:47 p.m.

Respectfully submitted by,



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

August 21, 2025

Date approved.

(By the Citizen's Ethics Advisory Board)