

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 AUGUST 21, 2025 REGULAR MEETING

The Citizen's Ethics Advisory Board (Board) of the Office of State Ethics (OSE) held a Meeting on Thursday, August 21, 2025.

Chair of the Board, N. Beth Cook, called the meeting to order at 1:02 p.m.

The following Board members were present:

N. Beth Cook, *Chair* Charles Chiusano, *Vice-chair* Karess Cannon (virtual) Kenneth Greenberg Cheryl Lipson 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 (virtual)

Diane Buxo, Assistant General Counsel (virtual) (joined at 1:42 pm)

Sam Rosengren, Assistant Ethics Enforcement Officer Carol Langevin, Associate Accounts Examiner 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 July 17, 2025 Regular meeting were presented to the Board for approval.

On the motion of Mr. Greenberg, seconded by Ms. Lipson, the Board voted six (6) to zero (0) to approve the Minutes of the July 17, 2025 Regular meeting.

2. Chair Cook presented the chairperson's report, reminding the Board that electronic communications concerning OSE business are subject to the Freedom of Information Act.

Further, she shared that the Nominating Committee met on August 18, 2025, and welcomed Ms. Schuyler to present the Committee's report. After discussing how the Committee polled nominations for the slate of officers for the 2025-2026 term for Board officers, Ms. Schuyler presented the following slate of nominations:

Page 2 August 21, 2025

Charles Chiusano – Vice-Chair

Chair Cook welcomed nominations from the floor and none were provided.

On the motion of Ms. Schuyler, seconded by Mr. Greenberg, the Board voted six (6) to zero (0) to adopt the slate of nominations as presented for one year term on the Citizen's Ethics Advisory Board commencing on October 1, 2025.

- 3. Associate Accounts Examiner Langevin presented two (2) client lobbyist audit reports to the Board for approval:
 - (i) Michaud Law Group, LLC

On the motion of Vice-chair Chiusano, seconded by Ms. Lipson, the Board voted six (6) to zero (0) to approve the audit report for Michaud Law Group, LLC.

(ii) CTEC

On the motion of Vice-chair Chiusano, seconded by Mr. Greenberg, the Board voted six (6) to zero (0) to approve the audit report for CTEC.

4. General Counsel O'Dowd presented the Petition for Advisory Opinion submitted by Cynthia Cartier, a staff attorney with the Department of Social Services, and recommended that the Board approve the Petition.

On the motion of Ms. Lipson, seconded by Vice-chair Chiusano, the Board voted six (6) to zero (0) to approve the Petition for Advisory Opinion submitted by Cynthia Cartier.

- 5. Mr. O'Dowd presented the Legal Division report, noting the surge in requests during this reporting period, which he described as normal as the summer months wane. He also addressed two questions from Ms. Schuyler concerning informal staff opinions, RAO 21412 and RAO 21413.
- 6. A summary of the Lobbyist Code on Administrative Lobbying & State Contracting was presented to the Board by Mr. O'Dowd. Mr. Greenberg suggested the addition of a disclaimer, noting that the guide is not to be read as a substitute for legal advice, especially since scenarios are fact based, and the guidance may differ based upon the facts provided.
- 7. Ethics Enforcement Officer Wasielewski presented the Enforcement Division report, highlighting the following items:
 - ➤ On July 31, 2025, Docket No. 2025-7 was resolved in the amount of \$7,000. The respondent, the former Chief State's Attorney, settled the matter, but did not admit to misconduct.
 - ➤ Docket No. 2024-37 is back on the calendar and is scheduled for a probable case hearing on September 11, 2025.

Page 3 August 21, 2025

Three (3) Uniform Administrative Procedure Act (UAPA) matters are on the calendar for hearing on September 11, 2025. Two (2) matters involve the late filing of client lobbyist financial disclosure reports (ETH-2D). The third matter is the subject of a counteroffer.

➤ The Division has collected \$1,795 in penalties for late filings of lobbyist financial disclosure reports.

Mr. Wasielewski requested a board member to serve as the October 9, 2025 UAPA hearing officer, and Chair Cook volunteered.

8. At 1:25 pm, and prior to the counteroffer discussion, September UAPA hearing officer, Vice-chair Chiusano, and procedural attorney, Deputy General Counsel Sadowski excused themselves from the meeting.

The Board discussed the counteroffer of the subject Shay Ajayi in the matter of Docket No. 2025-03 UP, as well as a memorandum provided to the Board by Mr. Wasielewski which included a timeline of communications with the subject of this matter. In addition, Mr. Wasielewski shared with the Board that while Ms. Cooper was unable to attend today's meeting, she provided an email, in advance, that explained her opinion on the counteroffer which he read to the Board. After review, discussion, and inquiries, each member present at today's meeting provided their individual response to Mr. Ajayi's counteroffer. Mr. Wasielewski thanked the Board members for their input.

Following the counteroffer discussion, at 1:34 pm, Vice-chair Chiusano and Attorney Sadowski rejoined the meeting.

- 9. Education & Communications Director Sarah Clark provided a written report and noted that she is expanding access and options for training this fall. She shared how she will pre-record a training session for the Department of Public Health due to the TEAMs platform's inability to host the agency's entire staff in one session. This video can be replayed as necessary by the agency. Separately, Ms. Clark has created a new online training option for state employees and public officials that provides an assessment for those taking part and tracks participation. This link is posted on OSE's website. Ms. Clark is grateful to have support from the OSE Information Technology (IT) staff, as well as other state agencies' IT units and external connections with the Council of Governmental Ethics Laws (a/k/a COGEL).
- 10. Executive Director Lewandowski presented his report, addressing the following items:
 - Personnel Matters. Ms. Bigelow shared that she will not attend the remaining meetings in her term due to her health and medical treatment plan and expressed gratitude for the support she received from the Board and OSE staff, and the opportunity to work with very talented, smart and caring people. She wishes everyone the best.
 - ➤ <u>Budget</u>. Although fiscal year 2026 has recently begun, adjustments to fiscal year 2027 budget are currently being prepared to be submitted by the end of August.
 - ➤ <u>Legislative Proposals</u>. In September, an internal review and discussions will commence regarding OSE's legislative proposals which will be presented for the Board's consideration later in the fall.

Page 4 August 21, 2025

➤ <u>Upcoming Events</u>. The Freedom of Information Commission Annual Conference (on October 3, 2025) and the Citizen's Ethics Advisory Board Annual Luncheon (on September 18, 2025).

11. Adjournment

On the motion of Ms. Lipson, seconded by Mr. Greenberg, the Board voted six (6) to zero (0) to adjourn the meeting.

The meeting was adjourned at 1:50 p.m.

Respectfully submitted by,

Melissa Hamilton

Clerk of the Citizen's Ethics Advisory Board

Office of State Ethics

September 18, 2025

Date approved.

(By the Citizen's Ethics Advisory Board)