



STATE OF CONNECTICUT
STATE ETHICS COMMISSION

94-5

July 7, 1995

P R E S S R E L E A S E

On March 24, 1995, Ethics Commission Attorney Brenda M. Bergeron filed an Amended Complaint (Docket No. 94-5) against Minnesota Mining and Manufacturing Company ("3-M"), alleging among other things that, in 1992, 3-M failed to register or report as a client lobbyist although it made expenditures for lobbying and in furtherance of lobbying in excess of the statutory threshold of \$1000.00, including expenditures for the benefit of certain public officials and state employees. The Amended Complaint also alleges that, in 1993 and 1994, when 3-M had registered as a lobbyist, the company failed, among other things, to report various expenditures, including expenditures for the benefit of certain public officials and state employees.

On July 7, 1995, the Ethics Commission and 3-M settled this matter by entering into a Stipulation and Order. Under the settlement, the Commission found that 3-M violated the Code of Ethics for Lobbyists as alleged, and 3-M agreed to pay a civil penalty of \$20,000 and to file all financial reports, amended financial reports and/or other documents required by the Commission.

Copies of the Stipulation and Order and the Amended Complaint are attached.

FOR FURTHER INFORMATION CALL:

Alan S. Plofsky
Executive Director and General Counsel
566-4472

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STATE OF CONNECTICUT
STATE ETHICS COMMISSION

DOCKET NUMBER 94-5) STATE ETHICS COMMISSION
 IN THE MATTER OF A) 20 TRINITY STREET
 COMPLAINT AGAINST) HARTFORD, CT 06106
 MINNESOTA MINING AND) JULY 7, 1995
 MANUFACTURING COMPANY)

STIPULATION AND ORDER

1. The Commission finds that the Respondent ("3M") violated the Code of Ethics for Lobbyists, Conn. Gen. Stat. §1-91 et seq., as alleged in the attached Amended Complaint, dated March 24, 1995.

2. The Respondent states that there was never any intention to violate the Code of Ethics as alleged in the Amended Complaint, specifically, §1-94, which requires registration of lobbyists with the Commission, and §§1-96(a) and (e), which require lobbyists to file accurate periodic financial reports.

3. The Respondent waives any rights it may have under Conn. Gen. Stat. §§1-93, 1-93a, 1-98 and 1-80, including the right to a hearing or appeal in this case, and agrees with the Commission to an informal disposition of this matter as authorized by Conn. Gen. Stat. §4-177(c).

NOW THEREFORE, pursuant to Connecticut General Statutes §4-177(c), the State Ethics Commission and the Respondent 3M agree to settle this matter in the manner described below:

1. The Ethics Commission orders, and the Respondent agrees to pay to the Commission, a civil penalty of \$20,000.00 within thirty days, and henceforth to commit no further violations of the Code of Ethics for Lobbyists.

2. The Ethics Commission orders, and the Respondent agrees to submit to the Commission within thirty days, financial reports, amended financial reports, and any other documents required by the Commission for calendar years 1992, 1993 and 1994.

Brydell C. Sant
RESPONDENT 3M

June 30, 1995
DATE

Walter Hestey
CHAIRPERSON
STATE ETHICS COMMISSION

7/7/95
DATE

RECEIVED

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STATE OF CONNECTICUT
STATE ETHICS COMMISSION

C O N F I D E N T I A L

DOCKET NUMBER 94-5) STATE ETHICS COMMISSION
 IN THE MATTER OF A) 20 TRINITY STREET
 COMPLAINT AGAINST) HARTFORD, CT 06106
 MINNESOTA MINING AND) MARCH 24, 1995
 MANUFACTURING COMPANY)

AMENDED COMPLAINT

COUNT ONE

1. Connecticut General Statutes §1-94 states in part that "[a] lobbyist shall register with the commission pursuant to this part if it ... [m]akes or incurs an obligation to make expenditures of one thousand dollars or more in a calendar year for lobbying.

2. In calendar year 1992, the Respondent Minnesota Mining and Manufacturing Company ("3-M") spent over \$1000.00 for lobbying and in furtherance of lobbying, but did not register with the State Ethics Commission.

3. The Respondent 3-M's failure to register as a client lobbyist in 1992 violated Conn. Gen. Stat. §1-94.

COUNT TWO

1. Connecticut General Statutes §1-96(a) requires client lobbyist registrants to file cumulative financial reports in April, July and in January of the following year, as well as monthly-reports for months in which the lobbyist expends or agrees to expend one hundred dollars or more and the legislature is in regular session.

2. The Respondent 3-M failed to file any of the required financial reports for calendar year 1992.

3. Each and every failure to file a required financial report is a violation of Conn. Gen. Stat. §1-96(a).

COUNT THREE

1. Connecticut General Statutes §1-96(e) in part requires a client lobbyist to include in its financial reports an itemized statement of each expenditure of ten dollars or more for the benefit of a public official in the legislative or executive branch, or a member of his or her staff.

2. The Respondent 3-M should have been registered as a client lobbyist in 1992, and was registered as client lobbyist in 1993 and 1994.

3. At least 25 times in 1992, 34 times in 1993 and two times in 1994, the Respondent 3-M expended ten dollars or more for the benefit of a public official or a member of his or her staff, but did not report same to the Ethics Commission.

3. Each and every failure to report is a violation of Conn. Gen. Stat. §1-96(e).

COUNT FOUR

1. Connecticut General Statutes §1-96(e) in part requires client lobbyists to file periodic financial reports which accurately reflect the lobbyists' expenditures for lobbying and in furtherance of lobbying.

2. In 1993 and 1994, the Respondent 3-M was a registered client lobbyist.

3. Although the Respondent 3-M filed the required periodic financial reports in 1993 and 1994, the reports omit certain expenditures (in addition to the itemizations described in Count Three) which 3-M made for lobbying and in furtherance of lobbying.

4. Each and every report filed by the Respondent 3-M in 1993 and 1994 which does not accurately reflect 3-M's expenditures for lobbying and in furtherance of lobbying in those years is a violation of Conn. Gen. Stat. §1-96(e).

COUNT FIVE

1. Connecticut General Statutes 1-96(e) in part requires client lobbyists to report the fundamental terms of any contract to make expenditures in furtherance of lobbying on the monthly, quarterly, or post-termination report next following the entering into of such a contract.

2. Section 1-92-48(e), Regulations of Connecticut State Agencies states in part that fundamental terms of contract include the terms of compensation between a client lobbyist and the individual who acts as its communicator lobbyist.

3. In 1992, the Respondent 3-M should have been registered as client lobbyist.

4. In 1993 and 1994, the Respondent 3-M was registered as a client lobbyist.

5. In 1992, 1993 and 1994, one Ambrose Murphy performed lobbying and activities in furtherance of lobbying on behalf of the Respondent 3-M. Nonetheless, the Respondent 3-M did not report its terms of compensation with Mr. Murphy.

6. Each and every failure to report the fundamental terms of the contract between the Respondent 3-M and Mr. Murphy is a violation of Conn. Gen. Stat. 1-96(e).

3/24/95
DATE

Brenda M Bergeron
BRENDA M. BERGERON
ETHICS COMMISSION ATTORNEY

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