

DOCKET NUMBER 2002-2)	OFFICE OF STATE ETHICS
)	
IN THE MATTER OF A)	20 TRINITY STREET
)	
COMPLAINT AGAINST)	HARTFORD, CT 06106
)	
LINDA A. KOWALSKI)	November 28, 2005

STIPULATION AND ORDER

Pursuant to Connecticut General Statutes § 4-177(c), the Office of State Ethics (“OSE”) and the Respondent, Linda A. Kowalski, agree to settle this matter on the terms and conditions described below:

WHEREAS, the former State Ethics Commission found that there was probable cause that the Respondent committed the violations of the Code of Ethics for Lobbyists alleged in the Fourth Amended Complaint. That finding was made solely on the basis of the Commission’s staff investigation into this matter, and is not admissible in, nor shall be deemed to prejudice, any subsequent civil or criminal proceeding against the Respondent or any other person; and

WHEREAS, the Respondent, desiring to avoid the emotional burden and expense of a contested hearing, does not contest the Commission’s probable cause finding. The OSE agrees to settle this case to save the parties additional dollars, hardship, time, and cost of litigation; and

WHEREAS, the Respondent waives any rights she 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 Office to an informal disposition of this matter as authorized by Conn. Gen. Stat. §4-177(c);

NOW THEREFORE, the OSE enters, and Linda A. Kowalski agrees, to the following orders in lieu of any other action it is authorized to take with respect to Respondent:

1. The Respondent shall pay a civil penalty of twenty-five thousand dollars (\$25,000.00), which is due and payable in full within thirty days of the date that the Citizen's Ethics Advisory Board (the "Board") votes to approve this Stipulation.

2. The OSE is aware that the Respondent has placed in escrow approximately twenty thousand dollars in funds relating to an ongoing dispute between the Respondent and the Connecticut Resource Recovery Authority ("CRRA") over certain expenses. This Stipulation does not cover, relate to or in any way constitute an admission by the Respondent that these funds are due and owing to CRRA. These funds are not part of this settlement, and whether or not the Respondent is required to pay any amounts to CRRA by court order disposition of the escrowed funds will not affect the Respondent's payment to the Office set forth in paragraph 1 of this Stipulation.

3. For a period of three (3) years from the date the Board approves this Stipulation, the Respondent shall maintain, or cause to be maintained, a record of all expenditures made by her individually, or by the Kowalski Group LLC, or by any other business entity of which the Respondent is the principal lobbyist, which expenditures were made for the benefit of a public official in the legislative or executive branch or for the benefit of a member of such official's staff or immediate family, regardless of

the amount of the expenditure and whether the expenditure was reimbursed. Such record shall include, with respect to each expenditure, the following information:

i) The name of each public official, staff or family member who benefited from the expenditure;

ii) If the amount of an expenditure has been determined by dividing the total cost of an expense (e.g., food and drink at a restaurant) by the number of individuals who benefited from the expense, some of whom are not public officials, staff or family members, the Respondent shall report the name of each individual who benefited from the expense, regardless of whether or not the individual is a public official, staff or family member;

iii) The date, amount and nature of the expenditure;

iv) The individual or entity on whose behalf the expenditure was made;

v) If the expenditure was reimbursed, the name of the individual or entity that made the reimbursement.

On or before January 31 and June 30 of each year in which such record must be maintained pursuant to this Stipulation, the Respondent shall file a true and accurate copy of such record with the OSE, using the form attached hereto as Exhibit A. The Respondent shall maintain the receipts or other documents evidencing the expenditures reported pursuant to this Stipulation.

4. The Respondent agrees that the OSE has the right to review and audit any and all records relevant to lobbying and/or to activities in furtherance of lobbying

for the Kowalski Group, LLC and/or Linda Kowalski, at any time, with or without prior notice.

5. The terms and conditions of this Stipulation are in addition to, not in lieu of, all existing or future statutory and regulatory obligations applicable to the Respondent.

6. If the Respondent fails to comply with the terms of this Stipulation, the OSE shall have the right to enforce its terms, to assess the Respondent for any costs and reasonable attorneys' fees associated with any such enforcement action, and to assess any penalty referenced in General Statutes § 1-99 (effective July 1, 2005), including ordering the Respondent to: (i) Cease and desist the violation of the Stipulation; (ii) file any report, statement or other information as required by this Stipulation; or (iii) pay a civil penalty in accordance with General Statutes § 1-99. If the OSE finds that any failure to comply with the terms of this Stipulation is intentional, the OSE may also take any action permitted in accordance with General Statutes § 1-99 or General Statutes § 1-100.

7. The OSE shall have original jurisdiction to enforce this Stipulation. In any such enforcement action, the Respondent agrees to waive the requirement of a preliminary investigation and probable cause finding. The Respondent further agrees that the OSE may commence any such enforcement action by sending written notice to the Respondent at her personal abode or place of business, via certified or registered mail, which notice shall contain: 1) a brief and concise statement of the Respondent's alleged breach(es) of the Stipulation; and 2) a date for the initiation of a hearing, which

date shall not be less than thirty (30) days from the date the notice is mailed. In all other respects, any such enforcement action, and any appeal by the Respondent therefrom, shall proceed in conformance with the procedures set forth in General Statutes § 1-93(b) (effective July 1, 2005) and General Statutes § 4-183.

8. The failure of the OSE to enforce the Stipulation in any particular instance shall not constitute a waiver of its right to enforce the OSE in the event of a future breach.

9. This Stipulation represents a negotiated settlement between the parties. Nothing herein shall be admissible in any court, administrative proceeding or any other tribunal. This Stipulation constitutes a full and complete resolution of all matters encompassed by the six amended complaints filed on behalf of the State Ethics Commission, and the said complaints are hereby dismissed with prejudice and shall not be reopened unless the Respondent fails to comply with the term of this Stipulation by paying the sums set forth in paragraph 1 hereof within thirty days.

Linda A. Kowalski
Respondent

Linda A. Kowalski

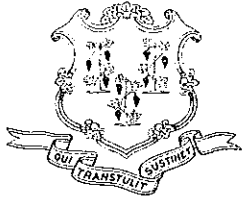
(Individually and on behalf of the Kowalski Group LLC)

Nov. 29, 2005
Dated

Patricia T. Heudol
Chairperson

Citizen's Ethics Advisory Board of the
Office of State Ethics

Nov. 28, 2005
Dated



STATE OF CONNECTICUT
STATE ETHICS COMMISSION

CONFIDENTIAL

DOCKET NUMBER 2002-02

STATE ETHICS COMMISSION

IN THE MATTER OF A

20 TRINITY STREET

COMPLAINT AGAINST

HARTFORD, CT 06106

LINDA KOWALSKI

AUGUST 11, 2004

FOURTH AMENDED COMPLAINT
COUNT ONE
(FILING OF FALSE REPORTS)

1. During the calendar years 1999, 2000, 2001 and 2002, (hereinafter throughout the complaint the "relevant time period") Linda Kowalski ("Respondent") was a communicator lobbyist, as that term is defined in Conn. Gen. Stat. §§1-91(l) and 1-91(v), and a registrant, as that term is defined in Conn. Gen. Stat. §1-91(q). During that time period, the Respondent was registered for a number of client lobbyist registrants, as defined in Conn. Gen. Stat. §§1-91(q) and 1-91(u), including but not limited to, one or more of the following clients: American Management Systems, Inc. ("AMS"); AT&T; Connecticut Association of Optometrists; Connecticut Chiropractic Association; Distilled Spirits Council of the United States ("DISCUS"); DynTek Services, Inc., a.k.a. DynCorp; Logisticare; New England Development Corporation; PPL Corporation; Johnson Controls, and; Microsoft Corporation (hereinafter "client lobbyist registrants").

2. During the relevant time period, the Respondent was also registered as a communicator lobbyist for the Connecticut Resources Recovery Authority (hereinafter "CRRA"), a "quasi-public agency" as that term is defined in Conn. Gen. Stat. §1-79(l).

3. Pursuant to Conn. Gen. Stat. §§1-96(a) and (b), both client and communicator registrants are required to file with the Ethics Commission periodic financial reports concerning lobbying activities, submitted under penalty of false statement.

4. On one or more occasions during the relevant time period, the Respondent or an agent acting on behalf of the Respondent (hereinafter throughout the complaint "her agent"), filed a periodic financial report, required pursuant to Conn. Gen. Stat. §1-96(a), as a service to her client.

5. Pursuant to Conn. Gen. Stat. §1-96(a), as the communicator lobbyist for CRRA, the Respondent was required to file on behalf of CRRA, the periodic financial reports described in Paragraph 3, above.
6. On one or more occasions during the relevant time period, the Respondent or her agent filed a periodic financial report on her own behalf, as required pursuant to Conn. Gen. Stat. §1-96(b).
7. On one or more occasions, the Respondent, or her agent, filed a report on behalf of the Respondent, CRRA and/or one of the Respondent's client lobbyist registrants, which report the Respondent knew to be false in that the report was intentionally incomplete, inaccurate and/or misleading. These occasions include, but may not be limited to, one or more of the following:
 - CRRA Third/Fourth Quarter Report for 1999;
 - AT&T April and Second Quarter Reports for 2000;
 - DISCUS February and First Quarter Reports for 2000;
 - CRRA March and First Quarter Reports for 2000;
 - CRRA May and Second Quarter Reports for 2000;
 - CRRA Third/Fourth Quarter Report for 2000;
 - Respondent's own Reports for 2000;
 - CRRA February and First Quarter Report for 2001;
 - CRRA May and Second Quarter Report for 2001;
 - CRRA's Third/Fourth Quarter Report for 2001;
 - Respondent's own Reports for 2001;
 - PPL Corporation's Third/Fourth Quarter Report for 2001
 - AMS February and First Quarter Report for 2002;
8. Each and every report filed by the Respondent or her agent which the Respondent knew to be false constitutes a violation of Conn.Gen. Stat. §§1-96(a) and/or 1-96(b).

COUNT TWO
(FAILURE TO MAINTAIN PROPER RECORDS/CLIENT LOBBYIST
REGISTRANTS)

1. Paragraph One of Count One is hereby incorporated as Paragraph One of Count Two.
2. Pursuant to Conn. Gen. Stat. §1-96, registrants are required to file with the Ethics Commission periodic financial reports concerning lobbying activities, submitted under penalty of false statement. Such reports must, in general, include a statement, itemized by date, beneficiary, amount and circumstances, of each expenditure of ten dollars or more per person made by the reporting registrant for the benefit of a public official, or for a member of the staff or immediate family of a public official. (Reporting this detailed

information is known as "itemizing" an expenditure, and the individuals benefited are hereinafter known as "itemizable persons.")

3. Pursuant to Conn. Gen. Stat. §1-96a(a) and Regulations of Connecticut State Agencies §§1-92-49(a) and 1-92-55(b), for each expenditure for the benefit of an itemizable person of ten dollars or more, and for all other expenditures costing \$50 or more in the aggregate in any calendar year, each registrant must obtain and preserve all documents which will provide the necessary information from which the financial reports required by §1-96 may be verified, explained, clarified and checked for accuracy and completeness. These documents must be preserved for a period of three years from the date of the filing of the report referring to such financial matters.

4. Pursuant to Conn. Gen. Stat. §§1-91(g)(9), 1-91(g)(16) and 1-97(a), a registrant is subject to the gift limits of the Code of Ethics, which limit the amount of benefits that a registrant may provide to a state employee, public official or member of such employee's or official's immediate family. The gift limits restrict food and drink from any one source to an aggregate total of less than \$50 in any calendar year, and limit tangible items from any one source to an item worth less than \$10, up to an aggregate annual total of \$50.

5. On one or more occasions during the relevant time period, the Respondent or her agent submitted an invoice for a meal and/or other expenditure to a client lobbyist registrant, which invoice contained false and/or misleading information regarding the number and/or names of the recipients of the expenditure, and/or the per person value of the expenditure.

6. On one or more occasions during the relevant time period, the Respondent or her agent on behalf of a client lobbyist registrant and, in other cases, the client lobbyist registrant itself, filed a periodic financial report as required by §1-96, which report was based on the false and/or misleading information supplied by the Respondent.

7. On one or more occasions during the relevant time period, the Respondent made expenditures for meals and other benefits on behalf of a client lobbyist registrant, using her lobbying business credit card, but failed to maintain the documents necessary to substantiate the periodic financial report filed, pursuant to §1-96, by or on behalf of the client lobbyist registrant.

8. On information and belief, the Respondent does not have the documents necessary to substantiate one or more of the periodic financial reports filed, pursuant to §1-96, by or on behalf of a client lobbyist registrant, including the documents necessary to verify that the aggregate annual expenditures made on behalf of a reportable individual during the relevant time period did not exceed the legal gift limits.

9. On information and belief, the Respondent does not have the documents necessary to substantiate one or more of the expenditures made by her, by or on behalf of a client lobbyist registrant as required pursuant to §1-96a(a) and Regulations of Connecticut State Agencies §§1-92-49(a) and 1-92-55(b).

These expenditures include, but may not be limited to, one or more of the following:

- Max Amore, 8/4/99, \$44.60, DynTek/DynCorp;
- Dakota's, 8/24/99, \$56.18, DynTek/DynCorp;
- Jacoby's, 8/26/99, \$66.20, DynTek/DynCorp;
- Breakwater Café, 10/99, \$86.85, AT&T;
- Hot Tomatos, 2/23/00, \$179.40 (\$154.40), DISCUS;
- Marriott Hotel, 2/26/00, \$1120.65, CRRA;
- Legislative Office Building, 3/24/00, \$47.51, DISCUS;
- Vito's Restaurant, 4/27/00, \$85.60, CT Chiropractic Association;
- Aiello's Restaurant, 4/28/00, \$250, AT&T;
- First and Last Tavern, 5/2/00, \$59.31, CT Chiropractic Assoc.;
- Chuck's Steak House, 5/9/00, \$77.25, DynTek/DynCorp;
- Jacoby's, 1/9/01, AMS;
- Chucks Steak House, 4/17/01, \$175, Johnson Controls;
- Caucus Spring Fling tickets (10), 4/25/01, Johnson Controls;
- Hot Tomatos, 5/23/01, \$80.25, AMS;
- Hot Tomatos, 5/31/01, \$95.15, Logisticare;
- Max Amore, 6/4/01, \$97.73, Johnson Controls;
- "Business dinner," 6/01, \$156.88,AMS;
- Butterfly Restaurant, 6/5/01, \$900, AT&T;
- End of Session Party tickets, \$99.99, Johnson Controls;
- End of Session 2001 food and drink, \$862.94, DISCUS;
- J. Soleos Restaurant, 7/10/01, \$490, AMS;
- ALEC Annual Meeting, Marriott Marquis, NY, 8/4/01, \$470.58, AMS;
- Caucus Room, 2/23/02, \$364.22 (\$319.22), AMS.

10. Each and every failure by the Respondent to obtain and preserve the documents necessary to substantiate a report filed by or on behalf of one of her client lobbyist registrants constitutes a violation of Conn. Gen. Stat. §1-96a(a).

11. On information and belief, one or more of the violations referenced in Paragraph 10 was a knowing and intentional violation by the Respondent.

COUNT THREE
(FAILURE TO MAINTAIN PROPER RECORDS/CRRA)

1. Paragraph Two of Count One is hereby incorporated as Paragraph One of Count Three.
2. Pursuant to Conn. Gen. Stat. §1-96, registrants are required to file with the Ethics Commission periodic financial reports concerning lobbying activities, submitted under penalty of false statement. Such reports must, in general, include a statement, itemized by date, beneficiary, amount and circumstances, of each expenditure of ten dollars or more per person made by the reporting registrant for the benefit of a public official, or for a member of the staff or immediate family of a public official. (Reporting this detailed information is known as "itemizing" an expenditure, and the individuals benefited are hereinafter known as "itemizable persons.")
3. Pursuant to Conn. Gen. Stat. §1-96(a), as the communicator lobbyist for CRRA, the Respondent was required to file on behalf of CRRA, the periodic financial reports described in Paragraph 2, above.
4. Pursuant to Conn. Gen. Stat. §1-96a(a) and Regulations of Connecticut State Agencies §§1-92-49(a) and 1-92-55(b), for each expenditure for the benefit of an itemizable person of ten dollars or more, and for all other expenditures costing \$50 or more in the aggregate in any calendar year, each registrant must obtain and preserve all documents which will provide the necessary information from which the financial reports required by §1-96 may be verified, explained, clarified and checked for accuracy and completeness. These documents must be preserved for a period of three years from the date of the filing of the report referring to such financial matters.
5. Pursuant to Conn. Gen. Stat. §§1-91(g)(9), 1-91(g)(16) and 1-97(a), the Respondent was subject to the gift limits of the Code of Ethics, which limited the amount of benefits that she could provide to a state employee, public official or member of such employee's or official's immediate family on behalf of CRRA. The gift limits restrict food and drink from any one source to an aggregate total of less than \$50 in any calendar year, and limit tangible items from any one source to an item worth less than \$10, up to an aggregate annual total of \$50.
6. On one or more occasions during the relevant time period, the Respondent or her agent submitted an invoice for a meal and/or other expenditure to CRRA, which invoice contained false and/or misleading information regarding the number and/or names of the recipients of the expenditure, and/or the per person value of the expenditure.

7. On one or more occasions during the relevant time period, the Respondent or her agent on behalf of CRRA filed a periodic financial report as required by §1-96, which report was based on the false and/or misleading information described in Paragraph 5.

8. On one or more occasions during the relevant time period, the Respondent made an expenditure for a meal or other benefit using her lobbying business credit card, on behalf of CRRA, but failed to maintain the documents necessary to substantiate the periodic financial report filed, pursuant to §1-96, by her or her agent on behalf of CRRA.

9. On information and belief, the Respondent did not obtain and/or preserve the documents necessary to substantiate one or more of the periodic financial reports filed, pursuant to §1-96, by her or her agent on behalf of CRRA, including the documents necessary to verify that the aggregate annual expenditures made on behalf of a public official, state employee or member of his or her immediate family during the relevant time period did not exceed the legal gift limits as outlined in Paragraph 5.

10. On information and belief, the Respondent did not obtain and/or preserve the documents necessary to substantiate one or more of the expenditures made by her on behalf of CRRA as required pursuant to §1-96a(a) and Regulations of Connecticut State Agencies §§1-92-49(a) and 1-92-55(b). These expenditures include, but may not be limited to, one or more of the following:

- Sheraton, Burlington, VT, 8/10/99, \$296.30;
- Opryland Hotel, 8/13/99, \$794.37;
- Chuck's Steakhouse, 3/29/00, \$77.15;
- Aiello's Restaurant, 10/20/00, \$477;
- Saddlebrook Resorts, 11/19/00, pool bar bill \$106.68;
- Capital Grille, 2/25/01, \$914.20;
- Ramiro's Restaurant, 5/10/01, \$355.15;
- Neptune Restaurant, 4/2/01, \$30.75;
- Hot Tomatos, 5/24/01, \$521.00;
- Max Amore, 6/1/01, \$174.32;
- Butterfly Restaurant, 6/4/01, \$900;
- Sorrentos, 6/5/01, \$553.85;
- Capital Grille, Rhode Island, 8/5/01, \$240.10;
- Legal Sea Foods, 8/6/01, \$67.19;
- RiRa Irish Pub, 8/7/01, \$64.87;
- Waters Edge, 8/28/01, \$123.85;
- Aiellos Kitchen, 10/18/01, \$450.

11. Each and every failure by the Respondent to obtain and/or preserve the documents necessary to substantiate a report filed constitutes a violation of Conn. Gen. Stat. §1-96a(a).

12. On information and belief, one or more of the violations referenced in Paragraph 11 was a knowing and intentional violation by the Respondent.

COUNT FOUR
(FAILURE TO FILE REPORTS/RESPONDENT)

1. During the relevant time period, Linda Kowalski ("Respondent") was a communicator lobbyist, as that term is defined in Conn. Gen. Stat. §§1-91(l) and 1-91(v), and a registrant, as that term is defined in Conn. Gen. Stat. §1-91(q).

2. Pursuant to Conn. Gen. Stat. §1-96, registrants are required to file with the Ethics Commission periodic financial reports concerning lobbying activities, submitted under penalty of false statement. A communicator lobbyist registrant must file an end-of-year financial report, and must also file periodic financial reports if he or she has made unreimbursed expenditures for the benefit of a public official of ten dollars or more. Such reports must, in general, include a statement, itemized by date, beneficiary, amount and circumstances, of each unreimbursed expenditure of ten dollars or more per person made by the reporting registrant for the benefit of a public official, or for a member of the staff or immediate family of a public official. (Reporting this detailed information is known as "itemizing" an expenditure, and the individuals benefited are hereinafter known as "itemizable persons.")

3. Pursuant to Conn. Gen. Stat. §1-96(b), as a communicator lobbyist registrant, the Respondent was required to file the periodic financial reports described in Paragraph 2.

4. On one or more occasions during the relevant time period, the Respondent made an unreimbursed expenditure for the benefit of an itemizable person of ten dollars or more, but failed to file the financial report required by Conn. Gen. Stat. §1-96(b). These expenditures include, but may not be limited to, one or more of the following:

- Caucus Room, 10/25/01, Sid Holbrook;
- Dillard's Sunglasses, 12/20/00, State of CT-Bovonor.

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

6. On information and belief, one or more of the violations referenced in Paragraph 5 was a knowing and intentional violation by the Respondent.

COUNT FIVE
(FAILURE TO MAINTAIN PROPER RECORDS/RESPONDENT)

1. During the relevant time period, Linda Kowalski ("Respondent") was a communicator lobbyist, as that term is defined in Conn. Gen. Stat. §§1-91(l) and 1-91(v), and a registrant, as that term is defined in Conn. Gen. Stat. §1-91(q).

2. Pursuant to Conn. Gen. Stat. §1-96, registrants are required to file with the Ethics Commission periodic financial reports concerning lobbying activities, submitted under penalty of false statement. A communicator lobbyist registrant must file an end-of-year financial report, and must also file periodic financial reports if he or she has made unreimbursed expenditures for the benefit of a public official of ten dollars or more. Such reports must, in general, include a statement, itemized by date, beneficiary, amount and circumstances, of each unreimbursed expenditure of ten dollars or more per person made by the reporting registrant for the benefit of a public official, or for a member of the staff or immediate family of a public official. (Reporting this detailed information is known as "itemizing" an expenditure, and the individuals benefited are hereinafter known as "itemizable persons.")

3. Pursuant to Conn. Gen. Stat. §§1-91(g)(9), 1-91(g)(16) and 1-97(a), the Respondent was subject to the gift limits of the Code of Ethics, which limited the amount of benefits that she could provide to a state employee, public official or member of such employee's or official's immediate family. The gift limits restrict food and drink from any one source to an aggregate total of less than \$50 in any calendar year, and limit tangible items from any one source to an item worth less than \$10, up to an aggregate annual total of \$50.

4. Pursuant to Conn. Gen. Stat. §1-96(b), as a communicator lobbyist registrant, the Respondent was required to file the periodic financial reports described in Paragraph 2.

5. Pursuant to Conn. Gen. Stat. §1-96a(a) and Regulations of Connecticut State Agencies §§1-92-49(a) and 1-92-55(b), for each expenditure for the benefit of an itemizable person of ten dollars or more, and for all other expenditures costing \$50 or more in the aggregate in any calendar year, each registrant must obtain and preserve all documents which will provide the necessary information from which the financial reports required by §1-96 may be verified, explained, clarified and checked for accuracy and completeness. These documents must be preserved for a period of three years from the date of the filing of the report referring to such financial matters.

6. On one or more occasions during the relevant time period, the Respondent made an unreimbursed expenditure for a meal or other benefit of \$10 or more per person, using her lobbying business credit card or other method of payment, but failed to maintain the documents necessary to substantiate the periodic financial report filed, pursuant to §1-96(b), on her behalf. On one or more occasions during this time period, the Respondent

also made an unreimbursed expenditure for a meal or other benefit of less than \$10 per person, but failed to keep track of those expenditures as is necessary to avoid violating the gift limits outlined in Paragraph 3.

7. On one or more occasions during the relevant time period, the Respondent or her agent filed a financial report on her behalf, as required pursuant to §1-96(b).

8. On information and belief, the Respondent did not obtain and/or preserve the documents necessary to substantiate one or more of the periodic financial reports referenced in Paragraph 7, including the documents necessary to verify that the aggregate annual expenditures made on behalf of a public official, state employee or member of his or her immediate family during the relevant time period did not exceed the legal gift limits as outlined in Paragraph 3.

9. On information and belief, the Respondent did not obtain and/or preserve the documents necessary to substantiate one or more of the unreimbursed expenditures referenced in Paragraph 6, as required pursuant to §1-96a(a) and Regulations of Connecticut State Agencies §§1-92-49(a) and 1-92-55(b). These expenditures include, but may not be limited to, one or more of the following:

--Respondent's purchase by check for \$1212.29, dated December 17, 2001, of Christmas gifts from Munson's Chocolates:

--Respondent's use of cash in 1999, 2000 and 2001 at various out-of-state events at which public officials and/or state employees were also in attendance:

--Respondent's unreimbursed expenditures made on her American Express and Visa credit cards in 1999, 2000 and 2001, including one or more of the following:

- The Wine Shoppe, 7/23/99, \$46.06;
- Lenox Wine Cellar, 7/29/99, \$51.97
- St. Regis Hotel, New York City, 8/2/99, \$483.31;
- Sheraton, South Burlington, Vt, 8/11/99, \$386.81;
- The Wine Shoppe, 8/21/99, \$54.00;
- Cheese n' Stuff, 9/24/99, \$54.00;
- Samoset Resort, 10/5/99, \$632.80;
- The Wine Shoppe, 11/06/99, \$37.07;
- Swisshotel, Boston, 11/10/99, \$653.84;
- Cheese n' Stuff, 11/22/99, \$115.38;
- Bishops Orchards, 1/26/00, \$42.50;
- Capital Grille, 2/26/00, \$103.31;
- Willard InterCont Wash, 2/27/00, \$67.00;
- Gordon Bonetti Florists, 3/28/00, \$37.05;

- First and Last Tavern, 4/18/00, \$227.32;
- Nejaimes Lenox Wine, 4/21/00, \$53.96;
- Hot Tomatos, 4/24/00, \$132.65;
- Vitos, 4/27/00, \$82.42;
- First and Last Tavern, 4/28/00, \$44.73;
- A & P Liquors, 4/29/00, \$80.04;
- Hot Tomatos, 5/2/00, \$33.90;
- Hot Tomatos, 5/31/00, \$25.50;
- Max Amore, 6/7/00, \$65.55;
- Gathering Place, 6/9/00, \$35.67;
- National Governors Association, 6/27/00, \$780.00;
- Sounding Lounge, Mystic, 7/12/00, \$76.40;
- Delta Halifax Hotel, 7/19/00, \$282.92;
- Gathering, 7/25/00, \$44.58;
- Embassy Suites, 8/4/00, \$1082.40;
- Jacoby's, 8/8/00, \$45.75;
- Circuit City, 8/12/00, \$693.18;
- Nejaimes Lenox Wine, 8/23/00, \$75.94;
- State House Museum, 9/14/00, \$30.50;
- Harry and David's, 9/22/00, \$59.30;
- Chuck's Steak House, 9/27/00, \$50.35;
- Chuck's Steak House, 10/25/00, \$73.85;
- Gathering, 10/29/00, \$44.36;
- Vinny's Deli, 11/06/00, \$103.67;
- Republican Governors Conference, "Gift Items", 11/6/00, \$350.00;
- Archie Moore's, 11/10/00, \$26.68;
- Wild Oats, 11/14/00, \$44.21;
- Saddlebrook Golf "Miscellaneous Apparel", 11/17/00, \$115.00;
- Archie Moore's, 11/27/00, \$61.73;
- Munsons, 12/4/00, \$26.51;
- Max Amore, 12/5/00, \$35.88;
- Nejaimes Lenox Wine, 12/10/00, \$210.79;
- The Wine Shoppe, 12/14/00, \$188.60;
- City Fish Market, 12/16/00, \$55.85;
- Dillard's Sunglasses to "State of CT-Bovenor", 12/20/00, \$85.40;
- Cappriccio's, two bills on 1/3/01, \$64.25 and \$268.75;
- Jacobys, 1/9/01, \$42.05;
- Lenas First and Last, 4/20/01, \$67.30;
- Chilis, 4/25/01, \$42.52;
- Lenas First and Last, 5/2/01, \$30.20;
- Chuck's Steakhouse, 5/2/01, \$86.58;
- Hyatt Hotel Dorado, Puerto Rico, 5/12/01, 3 expenditures:
 - \$419.00
 - \$286.00
 - \$55.00;

--Ritz Carlton, Puerto Rico, 5/14/01, "personal expense", \$923.27;
--Hot Tomatos, 5/17/01, \$166.05;
--Wallingford Wine, 5/26/01, \$73.21;
--DAprile Package Store, Hartford, 6/5/01, \$125.81;
--Nejaimes Lenox Wine, 6/13/01, \$113.93;
--Sheraton Hotel and Towers, 6/16/01, \$280.83;
--First and Last Tavern, 6/28/01, \$41.01;
--Chuck's Steakhouse, 6/29/01/ \$55.93;
--Trumbull Kitchen, 6/30/01, \$36.04;
--Gathering Place, Milford, 7/3/01, \$47.13;
--Chuck's Steakhouse, 7/11/01, \$106.54;
--Sam's Dockside, 7/11/01, \$56.92;
--Shops at Somerset, 8/11/01, \$32.32;
--Archie Moores, 8/20/01, \$32.77;
--The Wine Shoppe, 8/25/01, \$34.96;
--Max Amore, 8/30/01, \$36.85;
--Lenox Wine and Cheese, 10/13/01, \$51.96;
--Chuck's Steakhouse, 10/15/01, \$92.87;
--Occidental Grille, 10/24/01, \$283.15;
--Harry and Davids, 10/27/01, \$62.65;
--Chilis, 11/6/01, \$33.44
--Gifts, Atlanta, 11/7/01, \$46.26;
--MGM Grand Hotel, Las Vegas, 11/11/01, \$1877.89;
--Hot Tomatos, 11/15/01, \$149.00;
--DAprile Package Store, 11/15/01, \$445.00;
--First Choice Gifts and Cards, 12/5/01, \$319.83;
--Todays Traveller Luggage, 12/7/01, \$542.85;
--Briccos, 12/11/01,\$48.95;
--Shellys, NY NY, 12/14/01, \$166.97;
--The Wine Shoppe, 12/24/01, \$205.58;
--Harry and Davids, 12/28/01, \$59.20;
--Rustic Oak, 1/4/02, \$54.76;
--Casual Curtain, 1/10/02, \$455.62;
--Playwright, NH, 1/14/02, \$113.43;
--Chucks Steakhouse, 1/17/02, \$79.20;
--Pottery Barn, 1/02, \$50.86, \$50.88;
--Corner Bakery, 2/25/02, \$20.96;
--Rustic Oak, 2/28/02, \$107.22;
--Smith & Hawken, 3/2/02, \$79.49;
--Shellys, NY, NY, 3/8/02, \$148.39;
--Hot Tomatos, 3/11/02, \$126.80;
--Chucks Steakhouse, 3/13/02, \$52.89;
--J. Soleos, 3/19/02, \$20.25;
--Ritz Carlton, 3/25/02, \$1044.22;
--Wild Oats Market, 4/4/02, \$68.00.

10. Each and every failure to obtain and preserve the documents necessary to substantiate a report filed by the Respondent constitutes a violation of Conn. Gen. Stat. §1-96a(a).

11. On information and belief, one or more of the violations referenced in Paragraph 10 was a knowing and intentional violation by the Respondent.

COUNT SIX
(FAILURE TO ITEMIZE EXPENDITURES FOR THE BENEFIT OF PUBLIC
OFFICIALS ET AL/CLIENT LOBBYIST REGISTRANT REPORT)

1. Paragraph One of Count One is hereby incorporated as Paragraph One of Count Six.
2. Pursuant to Conn. Gen. Stat. §1-96(e) and Regulations of Connecticut State Agencies §1-92-48(b), the periodic financial reports of a client lobbyist registrant must include a detailed statement of each expenditure valued at ten dollars or more per person or occasion or transaction, made for the benefit of a public official or a member of a public official's staff or immediate family (Reporting this detailed information is known as "itemizing" an expenditure, and the individuals benefited are hereinafter known as "itemizable persons.")
3. On one or more occasions during the relevant time period, the Respondent made an expenditure for the benefit of an itemizable person, on behalf of one or more of her client lobbyist registrants.
4. On one or more occasions during the relevant time period, the Respondent or her agent submitted an invoice to one of her client lobbyist registrants, which invoice contained false and/or misleading information regarding one or more expenditure, including information regarding the recipient of the expenditure, and/or the per person value of the expenditure. These occasions include, but may not be limited to, one or more of the following:

- AMS, 5/23/01, Hot Tomatos, \$80.25;
- AMS, 6/01, Business Dinner, \$156.88;
- AMS, 7/10/01, J.Soleos, \$490.00;
- AMS, 2/23/02, Caucus Room, \$319.22;
- AT&T, 4/28/00, Aiellos, \$250.00;
- AT&T, 6/5/01, Butterfly, \$900.00;
- Connecticut Chiropractic Association, 4/27/00 Vitos meal, \$85.60;
- DISCUS, 2/23/00, Hot Tomatos, \$179.40;
- DISCUS, 2/24/00, LOB, \$47.51;
- DynTek/DynCorp, 8/30/00, Hot Tomatos, \$28.15

5. Although, during the relevant time period, the Respondent or her agent filed a periodic financial report on behalf of one or more of her client lobbyist registrants, on one or more of these reports, she failed to accurately report an expenditure for the benefit of an itemizable person, in violation of Conn. Gen. Stat. §1-96(e).
6. On information and belief, one or more of the violations referenced in Paragraph 5 was a knowing and intentional violation by the Respondent.

COUNT SEVEN
(FAILURE TO ITEMIZE EXPENDITURES FOR THE BENEFIT OF PUBLIC
OFFICIALS ET AL./CRRA REPORT)

1. During the relevant time period, Linda Kowalski ("Respondent") was a communicator lobbyist, as that term is defined in Conn. Gen. Stat. §§1-91(l) and 1-91(v), and a registrant, as that term is defined in Conn. Gen. Stat. §1-91(q). During the relevant time period, the Respondent was also registered as a communicator lobbyist for the Connecticut Resources Recovery Authority (hereinafter "CRRA"), a quasi-public agency as that term is defined in Conn. Gen. Stat. §1-79(l).
2. Pursuant to Conn. Gen. Stat. §1-96(a), a communicator lobbyist for a quasi-public agency must file the periodic financial reports required of a client lobbyist registrant using the client lobbyist reporting schedule. Pursuant to Conn. Gen. Stat. §1-96(e) and Regulations of Connecticut State Agencies §1-92-48(b), the periodic financial reports of a communicator lobbyist for a quasi-public agency, must include a detailed statement of each expenditure valued at ten dollars or more per person or occasion or transaction, made for the benefit of a public official or a member of a public official's staff or immediate family (Reporting this detailed information is known as "itemizing" an expenditure, and the individuals benefited are hereinafter known as "itemizable persons.")
3. On one or more occasions during the relevant time period, the Respondent made expenditures for the benefit of itemizable persons on behalf of CRRA.
4. On one or more occasions, the Respondent or her agent submitted an invoice to CRRA, which invoice contained false and/or misleading information regarding the recipient of an expenditure, and/or the per person value of the expenditure.
5. Although, during the relevant time period, the Respondent or her agent filed periodic financial reports as the communicator lobbyist for CRRA, on one or more report, she failed to report an expenditure for the benefit of an itemizable person, in violation of Conn. Gen. Stat. §1-96(a) and Regulations of Connecticut State Agencies §1-92-48(b). These expenditures include, but may not be limited to, one or more of the following:

- 8/6/99 meal with Robert Wright;
- 3/29/00 meal at Chucks Steakhouse with Sid Holbrook;
- 3/22/00 meal at Polo Grille with Christopher DePino;
- 5/22/00 meal at Chucks Steakhouse, \$269.26, up to 9 people;
- 10/20/00 meal from Aiello's for members of the Governor's Office and other public officials or state employees, \$477;
- 2/25/01 meal at Capital Grille in Washington, D.C., \$914.20;
- 6/1/01 meal at Max Amore with one or more members of the Governors Office, \$174.32;
- 6/4/01 meal from Butterflies to members of the Governors Office and other public officials or state employees, \$900.00;
- 6/5/01 meal from Sorrentos to members of the Governors Office and/or other public officials or state employees, \$553.85;
- 5/24/01 meal from Hot Tomatos to members of Governors Office and/or other public officials or state employees, \$521.00;
- 8/5/01 meal at Capital Grille, RI, with Christine Corey and others, \$240.10;
- 10/18/01 meal from Aiellos to members of Governor's Office and/or other public officials or state employees, \$450.00.

6. On information and belief, one or more of the violations referenced in Paragraph 5 was a knowing and intentional violation by the Respondent.

COUNT EIGHT
(FAILURE TO ITEMIZE EXPENDITURES FOR THE BENEFIT OF PUBLIC
OFFICIALS ET AL./ RESPONDENT REPORT)

1. During the relevant time period, Linda Kowalski ("Respondent") was a communicator lobbyist, as that term is defined in Conn. Gen. Stat. §§1-91(l) and 1-91(v), and a registrant, as that term is defined in Conn. Gen. Stat. §1-91(q).
2. Pursuant to Conn. Gen. Stat. §1-96(b) and Regulations of Connecticut State Agencies §1-92-48(b), a communicator lobbyist must file an end-of-the year financial report, as well as on or more of the periodic financial reports required of a client lobbyist registrant using the client lobbyist reporting schedule, if the communicator lobbyist has made an unreimbursed expenditure of ten dollars or more. The periodic financial reports of a communicator lobbyist registrant who is not reimbursed by a client must include a detailed statement of each expenditure valued at ten dollars or more per person or occasion or transaction, made for the benefit of a public official or a member of a public official's staff or immediate family (Reporting this detailed information is known as "itemizing" an expenditure, and the individuals benefited are hereinafter known as "itemizable persons.")

3. On one or more occasions during the relevant time period, the Respondent made an expenditure for the benefit of an itemizable person, which expenditure was not listed on an invoice to any of her clients.
4. On information and belief, on one or more occasions, the Respondent made an expenditure for the benefit of a public official of \$10 or more, did not seek reimbursement from any client lobbyist registrant, and did not report the unreimbursed expenditure on her communicator lobbyist registrant periodic financial report, as required by Conn. Gen. Stat. §1-96(b).
5. Although, during the relevant time period, the Respondent or her agent filed the end-of-the-year periodic financial reports required of her as a communicator lobbyist registrant, on one or more occasions, she failed to report one or more of her unreimbursed expenditures for the benefit of an itemizable person, in violation of Conn. Gen. Stat. §1-96(b). These expenditures include, but may not be limited to, one or more of the following:
 - 12/20/00, Dillard's Sunglasses, Florida, State of CT-Bovenor, \$85.40;
 - One or more of the expenditures listed in Count Five.
6. On information and belief, one or more of the violations referenced in Paragraph 5 was a knowing and intentional violation by the Respondent.

COUNT NINE
(FAILURE TO TIMELY REPORT UNREIMBURSED EXPENDITURES)

- 1-2. Paragraphs One and Two of Count One are hereby incorporated as Paragraph One and Two of Count Nine.
3. Pursuant to Conn. Gen. Stat. §1-96(b), an individual communicator lobbyist registrant must file a periodic financial report, signed under penalty of false statement, within the time frame set by §1-96(a) if he or she has made any expenditure for the benefit of an itemizable person of \$10 or more, and that expenditure is unreimbursed.
4. On one or more occasions during the relevant time period, the Respondent made an expenditure for the benefit of an itemizable person, which expenditure remained unreimbursed at the time that the Respondent should have filed a periodic financial report, yet the Respondent did not file any such report. These occasions include, but may not be limited to, one or more of the following:
 - 3/29/00, Chuck's Steakhouse, Sid Holbrook, CRRRA paid 7/13/00;
 - 5/2/00, Chuck's Steakhouse, Kate Kiernan, Sid Holbrook, Kyra Pishtey, Robert Hammersley, Brenda Sisco, CRRRA paid 7/13/00;

- 5/17/00, Polo Grille, Rep. Christopher DePino, CRRA paid 7/13/00;
- 2/25/01, Capital Grille, Washington, Dean Pagani, Donald Downes, Sid Holbrook, Lise Kaufman, CRRA paid 4/12/01;
- 3/8/01, Aiello's Kitchen, various members of Governor's staff and other public officials and/or state employees, CRRA paid 4/12/01;
- 5/10/01, Ramiro's Restaurant, Sid Holbrook and others, CRRA paid 6/14/01;
- 5/24/01, Hot Tomatos, Christine Corey and approximately 14 other public officials or state employees, \$521.00, CRRA paid 7/19/01;
- 6/5/01, Sorrentos, Christine Corey, Dean Pagani, Brenda Sisco, Kate Kiernan, Kathleen Mengacci, Robert Hammersley and other state employees and/or public officials, \$553.85, CRRA paid 9/6/01.

5. Each and every failure to file such a report constitutes a violation of Conn. Gen. Stat. §1-96(b).

COUNT TEN
(PROVISION OF BENEFITS IN EXCESS OF LEGAL LIMIT)

1-2. Paragraphs One and Two of Count One are hereby incorporated as Paragraphs One and Two of Count Ten.

3. Pursuant to Conn. Gen. Stat. §1-97(a), no registrant or anyone acting on behalf of a registrant may knowingly give a gift, as defined in §1-91(g), to any state employee, public official, candidate for public office or a member of any such person's staff or immediate family (hereinafter "prohibited gift recipients").

4. Pursuant to Conn. Gen. Stat. §1-91(g), "gift" includes food or beverage or both costing fifty dollars or more in the aggregate per recipient in a calendar year. "Gift" also includes anything having a value of ten dollars or more.

5. On one or more occasions during the relevant time period, the Respondent, on behalf of CRRA, on behalf of a client lobbyist registrant and/or on behalf of herself as a communicator lobbyist registrant, provided a benefit in excess of the annual legal limit, i.e., a gift, to one or more prohibited gift recipients. These benefits include, but may not be limited to, one or more of the following:

- 2000, Sunglasses \$85.40 to "State of CT-Bovenor";
- 2000, Aggregate meals in excess of \$50, Christine Corey;
- 2000, Aggregate meals in excess of \$50, Sid Holbrook;
- 2001, Aggregate meals in excess of \$50, Sid Holbrook;
- 2001, Aggregate meals in excess of \$50, Christine Corey;
- 2001, Aggregate meals in excess of \$50, Dean Pagani;
- 2001, Meal in excess of \$50, Donald Downes;
- 2001, Meal in excess of \$50, Lise Kaufman.

6. Each and every provision of a gift constitutes a violation by the Respondent of Conn. Gen. Stat. §1-97(a).
7. On information and belief, one or more of the violations referenced in Paragraph 6 was a knowing and intentional violation by the Respondent.

COUNT ELEVEN
(FAILURE TO REPORT ACCURATE COMPENSATION AND EXPENSE
REIMBURSEMENTS)

1. During the relevant time period, the Respondent Linda Kowalski was a communicator lobbyist, as that term is defined in Conn. Gen. Stat. §§1-91(l) and 1-91(v), and a registrant, as that term is defined in Conn. Gen. Stat. §1-91(q).
2. Pursuant to Conn. Gen. Stat. §1-96(b), as a communicator lobbyist registrant, the Respondent was required to file end-of-the year financial reports, signed under penalty of false statement, reporting the amount of compensation and expense reimbursement received from each of her clients during the previous year.
3. On one or more occasions during the relevant time period, the Respondent received and reported as an expense reimbursement money which did not accurately reflect actual expenses incurred by the Respondent. These occasions include, but may not be limited to, one or more of the following:
 - PPL Corporation, every report from March 2000 to December 2001;
 - Johnson Controls, all reports;
4. Each and every failure of the Respondent to file an accurate report constitutes a violation of Conn. Gen. Stat. §1-96(b).
5. On information and belief, one or more of the violations referenced in Paragraph 4 was a knowing and intentional violation by the Respondent.

COUNT TWELVE
(FAILURE TO MAINTAIN PROPER RECORDS/ EXPENSE REIMBURSEMENTS)

1. Paragraph One of Count One is hereby incorporated as Paragraph One of Count Twelve.
2. Paragraph Two of Count One is hereby incorporated as Paragraph Two of Count Twelve.

3. Pursuant to Conn. Gen. Stat. §1-96a(a) and Regulations of Connecticut State Agencies §§1-92-49(a)(4) and 1-92-55(b), for each expenditure costing \$50 or more in the aggregate in any calendar year, each registrant must obtain and preserve all documents which will provide the necessary information from which the financial reports required by §1-96 may be verified, explained, clarified and checked for accuracy and completeness. These documents must be preserved for a period of three years from the date of the filing of the report referring to such financial matters.

4. On one or more occasions during the relevant time period, the Respondent submitted an invoice to a client requesting an expense reimbursement (e.g., "telephone/ fax/ cell/ etc...", "travel/meeting/tel/cell etc...") which was then reported on the client's periodic financial report and/or on the Respondent's periodic financial report, as required by §1-96. These occasions include, but may not be limited to, one or more of the following:

- AMS, 2000, 2001, February 2002, undocumented expenses claimed, various reports;
- DynTek/DynCorp, 1999, 2000, 2001, undocumented expenses claimed, various reports;
- Johnson Controls, 2001, undocumented expenses claimed, various reports;
- Logisticare, 2001, undocumented expenses claimed, various reports;
- Microsoft, 2001, 2002, undocumented expenses claimed, various reports;
- PPI Corporation, 2000, 2001, undocumented expenses claimed, various reports.

5. On information and belief, the Respondent failed to maintain the documents necessary to substantiate one or more of the expense reimbursements which she reported on her lobbyist financial reports during the relevant time period.

6. Each and every failure by the Respondent to obtain and preserve the documents necessary to substantiate the reports filed constitutes a violation of Conn. Gen. Stat. §1-96a(a).

7. On information and belief, one or more of the violations referenced in Paragraph 6 was a knowing and intentional violation by the Respondent.

COUNT THIRTEEN
(FAILURE TO PROVIDE STATUTORY NOTIFICATIONS)

1. Paragraph One of Count One is hereby incorporated as Paragraph One of Count Thirteen.

2. Paragraph Two of Count Two is hereby incorporated as Paragraph Two of Count Thirteen.

3. Pursuant to Conn. Gen. Stat. §1-96(a), 1-96(b) and 1-96(e), and Regulations of Connecticut State Agencies §1-92-48(b), the periodic financial reports of (1) a client lobbyist registrant, (2) a communicator lobbyist registrant who is not reimbursed by a client, and (3) a communicator lobbyist for a quasi-public agency, must include a detailed statement of each expenditure valued at ten dollars or more per person or occasion or transaction, made for the benefit of a public official or a member of a public official's staff or immediate family (Reporting this detailed information is known as "itemizing" an expenditure, and the individuals benefited are hereinafter known as "itemizable persons.")


4. Under Conn. Gen. Stat. §1-97(d), a registrant who is required to itemize an expenditure for the benefit of a public official, state employee or member of any such person's staff or immediate family must, not later than ten days after the event, must notify each recipient by giving him or her "a written report stating the name of the donor, a description of the item or items given, the value of such items, and the cumulative value of all items given to such recipient during the calendar year."

5. On one or more occasions during the relevant time period, the Respondent on behalf of herself, CRRA, and/or a client lobbyist registrant, made an expenditure for the benefit of a public official or a member of the public official's staff or immediate family, which expenditure required the Respondent to notify the recipient in accordance with Conn. Gen. Stat. §1-97(d). These occasions include, but may not be limited to, one or more of the following:

- 3/22/00, Polo Grille, CRRA, Rep. Christopher DePino;
- 3/29/00, Chuck's Steakhouse, CRRA, Sid Holbrook;
- 4/27/00, Vito's, CT Chiropractic Association, at least one reportable individual;
- 5/2/00, First and Last Tavern, CT Chiropractic Association, at least one reportable individual;
- 4/28/00, Aiello's, AT&T, more than one reportable individual;
- 5/2/00, Chuck's Steakhouse, CRRA, 9 reportable individuals;
- 10/20/00, Aiello's, CRRA, more than one reportable individual;
- 2/25/01, Capital Grille, CRRA, 4 reportable individuals;
- 5/10/01, Ramiros, CRRA, at least one reportable individual;
- 5/24/01, Hot Tomatos, CRRA, at least 16 reportable individuals;
- 6/1/01, Max Amores, CRRA, at least 2 reportable individuals;
- 6/4/01, Butterfly Restaurant, CRRA, more than one reportable individual;

- 6/5/01, Sorrentos, CRRA, more than one reportable individual;
- 7/01, J. Soleo's Restaurant, AMS, at least 3 reportable individuals;
- 8/5/01, Capital Grille, RI, CRRA, at least one reportable individual;
- 10/18/01, Aiello's, CRRA, at least 5 reportable individuals;
- 2/23/02, Caucus Room, AT&T, at least one reportable individual.

6. On one or more occasions during the relevant time period, the Respondent failed to send out the required notification.
7. Each and every failure to provide notification constitutes a violation of Conn. Gen. Stat. §1-97(d).
8. On information and belief, one or more of the violations referenced in Paragraph 7 was a knowing and intentional violation by the Respondent.


Brenda M. Bergeron
Commission Attorney

8-11-04
Dated