

OFFICE OF STATE ETHICS

DOCKET NUMBER 2021-50 : 165 CAPITOL AVENUE

IN THE MATTER OF A : SUITE 1200

COMPLAINT AGAINST : HARTFORD, CT 06106

LEMBE TIKY : SEPTEMBER 25, 2025

STIPULATION AND CONSENT ORDER

Pursuant to the Code of Ethics, General Statutes §§ 1-79, et seq., Mark Wasielewski, Ethics Enforcement Officer, issued a Complaint against Lembe Tiky (hereinafter "Tiky" or "Respondent"), alleging violations of the Code of Ethics. Based on the investigation by the Enforcement Division of the Office of State Ethics ("OSE"), the Ethics Enforcement Officer finds that there is probable cause to believe that Respondent violated General Statutes § 1-84 (b) and (c) of the Code of Ethics, as further set forth herein.

The Parties have entered into this Consent Order following the issuance of the Complaint, but without any adjudication of any issue of fact or law herein.

I. STIPULATION

The Ethics Enforcement Officer and Respondent stipulate to the following facts:

1. From in or around 2015 through in or around January 2022, Respondent was

employed by the University of Connecticut (hereinafter, the "University") as a Research Associate II in the Department of International Studies Association (hereinafter "ISA").

- 2. At all times relevant hereto, Respondent was a "state employee" as that term is defined in General Statutes § 1-79 (13).
- 3. From in or around September 2021 through at least January 2022, in addition to his state employment, Respondent was employed on a full-time basis by a university located in Fairfield, Connecticut (hereinafter "Fairfield Employer"), and was compensated for this work.
- 4. The work that Respondent performed for the Fairfield Employer was not related to Respondent's state job duties.
- 5. In 2021, Respondent performed work for the Fairfield Employer while on state time and was compensated by the state for such time.
- 6. In 2021, on multiple occasions, Respondent submitted time records in order to be compensated by the state for time spent working for the Fairfield Employer.
 - 7. General Statutes § 1-84 (c) states in pertinent part:

 No public official or state employee ... shall use his public office or position ... to obtain financial gain for himself[.]
- 8. Respondent, by using state time to work for his non-state employer and by submitting time records to be compensated by the state for time spent working for his non-state employer, used his public office or position to obtain financial gain for himself, in violation of General Statutes § 1-84 (c).
- 9. Each time Respondent used his state position, and resources provided therefrom, for outside work purposes as stated above constitutes a separate and distinct violation of General Statutes § 1-84 (c).
 - 10. Respondent accepted employment with the Fairfield Employer while he was a

state employee.

- 11. On multiple occasions in 2021, Respondent, in actions related to his employment with the Fairfield Employer, violated University and/or state work rules and/or terms of employment.
 - 12. General Statutes § 1-84 (b) states in pertinent part:
 - No public official or state employee shall accept other employment which will ... impair his independence of judgment as to his official duties or employment[.]
- 13. By acting in the manner described above, Respondent accepted other employment that impaired his independence of judgment as to his official duties, in violation of General Statutes § 1-84 (b).

II. RESPONDENT'S POSITION

- 1. Respondent states that based on a previous outside employment arrangement, he believed at the time of the alleged conduct that he was permitted by management to accept and attend to his outside position in the manner described above.
- 2. Respondent states that he chooses to resolve this matter solely to avoid the significant time and financial expense related to litigation.

III. JURISDICTION

- The Ethics Enforcement Officer is authorized to investigate Respondent's acts as set forth herein, and to enter into this Stipulation and Consent Order.
- 2. The provisions of this Stipulation and Consent Order apply to and are binding upon Respondent.
- 3. Respondent hereby waives all objections and defenses to the jurisdiction of the Ethics Enforcement Officer over matters addressed in this Stipulation and Consent Order.

- 4. Respondent waives any rights he may have under General Statutes §§ 1-80, 1-82, 1-82a, 1-87, and 1-88, including the right to a hearing or appeal in this case, and agrees with the Ethics Enforcement Officer to an informal disposition of this matter as authorized by General Statutes § 4-177 (c).
- 5. Respondent consents to jurisdiction and venue in the Connecticut Superior Court, Judicial District of Hartford, in the event that the State of Connecticut seeks to enforce this Stipulation and Consent Order. Respondent recognizes that the Connecticut Superior Court has the authority to specifically enforce the provisions of this Stipulation and Consent Order, including the authority to award equitable relief.
- 6. The terms set forth herein are in addition to, and not in lieu of, any other existing or future statutory, regulatory, or other legal obligation that may be applicable to Respondent.
- 7. Respondent understands that he has a right to counsel during OSE's investigation and in connection with this Stipulation and Consent Order; and Respondent states that he has elected not to be represented.

IV. ORDER

NOW THEREFORE, pursuant to General Statutes § 4-177 (c), OSE hereby ORDERS, and Respondent agrees, that:

- 1. Pursuant to General Statutes § 1-88 (a) (1), Respondent will cease and desist from any future violations of General Statutes § 1-84 (c).
- 2. Pursuant to General Statutes § 1-88 (a) (1), Respondent will cease and desist from any future violations of General Statutes § 1-84 (b).
- 3. Pursuant to General Statutes § 1-88 (a) (3), Respondent will pay a civil penalty to the state in the amount of seven hundred fifty dollars (\$750.00) for his violations of General

Statutes § 1-84 (c) as set forth in the Complaint and herein.

4. Pursuant to General Statutes § 1-88 (a) (3), Respondent will pay civil penalties to the State in the amount of seven hundred fifty dollars (\$750.00) for his violations of General Statutes § 1-84 (b) as set forth in the Complaint and herein.

WHEREFORE, the Ethics Enforcement Officer and Respondent hereby execute this Stipulation and Consent Order dated September 25, 2025.

	0	20	1	ハつオ
Dated: _	٠	68.	6	025

Lembe Tiky

Dated: 10, 2, 25

Mark E. Wasielewski

Ethics Enforcement Officer

Juris No. 423766

Office of State Ethics

165 Capitol Avenue, Suite 1200

Hartford, CT 06106

Tel.: (860) 263-2398