

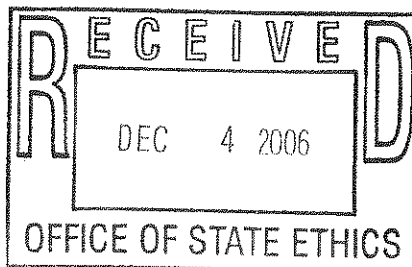


Office of Secretary of the State
State of Connecticut
P.O. Box 150470, Hartford, CT 06115-0470

Susan Bysiewicz
Secretary of the State

Lesley D. Mara
Deputy Secretary of the State

Ms. Meredith Trimble
Director of Education
Office of State Ethics
18-20 Trinity St.
Suite 205
Hartford, CT 06106



November 30, 2006

Meredith
Dear Ms. Trimble,

I am forwarding you a copy of the Office of the Secretary of the State's ethics policy for your review and consideration. Please feel free to contact me with any questions you may have. My direct line is 509-6110.

Sincerely,

Lev
Lewis Button, III Esq.
Staff Attorney

SECRETARY OF THE STATE'S OFFICE
CODE OF ETHICS, PROFESSIONAL CONDUCT AND POLITICAL ACTIVITY

Although the Secretary of the State is an elected official and this office is a partisan political office, the overwhelming majority of employees hold classified positions and are hired and retained based upon merit rather than political affiliation. The office has significant official duties affecting businesses, elections, campaign finances and political organizations. Its mission to provide a wide range of services to the people and businesses of Connecticut is an important one, requiring the highest level of ethical standards to succeed.

Under state law, employees are free to participate in political campaigns, but must exercise good judgment and discretion, avoid potential conflicts of interest and comply with the written policies of this office, the State Code of Ethics and the State Personnel Act. The State Personnel Act, CGS Section 5-266a through 5-268 and Sections 1-84 and 1-85 of the Code of Ethics set forth what constitutes a conflict of interest.

The Office of the Secretary of the State has a zero tolerance policy for violation of the governing statutes or of this policy. Listed below are specific policies of the Office of the Secretary of the State in regard to ethics, professional conduct and political activity. These policies are intended to ensure the proper discharge of employees' official duties by establishing high standards of honesty, impartiality and integrity for all employees of the Office of the Secretary of the State.

For the purpose of this policy, the following statutory definitions apply: "Employee" or "state employee" means any person holding a position in state service subject to appointment by an appointing authority; "State service" means occupancy of any office or position or employment in the service of the state, but not of local government subdivisions, for which compensation is paid.

1. No political activities of any kind are to take place during office hours, while an employee is on duty or performing their job and being compensated by the State of Connecticut.
2. No office equipment, facilities or personnel are to be used for such activities. No state funds, supplies, vehicles or facilities shall be utilized for such activities.
3. In any political activity, an employee must refrain from referring to their official position in order to avoid the appearance of purporting to represent this Office or the State.
4. Employees may not use their official position to interfere with or influence a nomination or election for public office or coerce anyone for political actions, including contributions and service.
5. No employee may accept, request or pay anything of value for influence in securing an appointed position or with the understanding that one's official action would be influenced thereby.
6. Employees are prohibited from accepting any gift or gifts from:
 - one known to be a registered lobbyist or lobbyist's representative; or
 - any person doing business with, seeking to do business with or directly regulated by the Office of the Secretary of the State.

7. An employee may not accept any fee or honorarium given in return for a speech or appearance made or article written in one's official capacity.
8. No employee may engage in any lobbying activities, except in connection with their official duties and with the prior approval of the Deputy Secretary of the State.
9. An employee may not interfere with or solicit lobbying contracts for any person.
10. No employee shall enter into contracts with the State valued at \$100 or more, unless the contract has been awarded through an open and public process.
11. Employees may not represent another for compensation or be a member of a business which represents a client for compensation, before: Banking Department; Connecticut Siting Council; Department of Environmental Protection; Claims Commissioner; office within Consumer Protection Department which carries out duties of the former Department of Liquor Control, Connecticut Real Estate Commission; Department of Public Utility Control; Department of Motor Vehicles; Insurance Department; State Insurance Purchasing Board; Gaming Policy Board; Division of Special Revenue; and Office of Health Care Access.
12. Employees may not use their position titles in connection with political endorsements of themselves or others.
13. Employees must not coerce, or attempt to coerce, command, intimidate, or advise directly or indirectly another state employee to pay, lend, "volunteer" or contribute anything of value to a party, committee, organization, agency, candidate or person for political purposes or financial gain.
14. The Deputy Secretary of the State should be notified at least 30 days before an employee becomes a candidate for elected office.
15. You must receive written confirmation from the Deputy Secretary of the State that your seeking or holding a public office will not conflict with your assigned duties.
16. Any employee who accepts elective state office shall resign from state service upon taking such office.
17. Employees will not have any financial interest in, or engage in, any business, employment, transaction or professional activity that is in substantial conflict with the proper discharge of their duties or employment in the public interest and of their responsibilities as prescribed in state law.
18. No employee shall accept other employment that will either impair their independence of judgment as to their official duties of employment or require them, or induce them, to disclose confidential information acquired by them in the course of and by reason of their official duties or position.
19. No employee shall willfully and knowingly disclose for financial or personal gain to any person confidential information acquired by them in the course of, and by reason of their official duties or employment. No employee will use any confidential information acquired

through their position to obtain financial gain for their self, spouse, child, child's spouse, parent, brother, sister or business with which they are associated.

20.

Certain staff members must file annually with the ^{GSE} Ethics Commission by May 1 statements of financial interests held during the previous year.

21. Before accepting employment with the State, interviewees will be given information regarding their general ethical duties as a state employee or public official. Each new employee will be given a summary of the State Code of Ethics, a copy of this agency's ethics statement and a letter from Governor Rell outlining state employees' ethical requirements. New employees will be required to sign a statement acknowledging receipt of such information and agreeing to comply with the requirements of state ethics laws.
22. Upon separation from state employment, individuals will be provided a copy of the "Ethics Code Provisions Applicable To Those Leaving State Or Quasi-Public Agency Service" and be required to sign a statement acknowledging receipt of such information and agreeing to comply with the provisions.

This "Code of Ethics, Professional Conduct and Political Activity" applies the existing ethics laws and regulations, along with personnel laws and regulations, to employment with the Office of the Secretary of the State. It does not supersede or exempt employees from the statutes governing said activities in the State Code of Ethics or State Personnel Act (Section 1-79 through 1-90 and 5-266a through 5-268 of the Connecticut General Statutes). Employees are strongly encouraged to consult their supervisors about any questions they may have concerning these regulations. Failure to comply with these requirements may subject an employee to enforcement procedures and/or civil penalties.