

Communicator Lobbyist Guide to the Code of Ethics



Office of State Ethics

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Communicator Lobbyist Guide to the Code of Ethics

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- | | |
|--|--|
| ➤ Legal Advice Regarding Code of Ethics | ethics.code@ct.gov |
| ➤ Lobbyist Filing/Reporting Questions | lobbyist.ose@ct.gov |
| ➤ Public Official Filing/Reporting Questions | sfi.ose@ct.gov |
| ➤ Enforcement/Filing a Complaint | ethics.enforcement@ct.gov |
| ➤ All Other Inquiries | ose@ct.gov |

[Staff Phone Number Listing](#)

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OFFICE OF STATE ETHICS

Created on July 1, 2005, under Public Act [05-183](#), the Office of State Ethics (“OSE”) is an independent agency charged with administering and enforcing the Connecticut Codes of Ethics (“Ethics Codes”), which are found in Chapter 10 of the Connecticut General Statutes.

The OSE’s duties include educating all those covered by the Ethics Codes; interpreting and applying the Ethics Codes; investigating violations of, and otherwise enforcing, the Ethics Codes; and providing information to the public.

The OSE’s jurisdiction:

- | | |
|-----------------|---|
| Part I | Code of Ethics for Public Officials
General Statutes §§ 1-79 to 1-90a |
| Part II | Code of Ethics for Lobbyists
General Statutes §§ 1-91 to 1-101a |
| Part III | Lobbying: Miscellaneous Provisions
General Statutes §§ 1-101aa and 1-101bb |
| Part IV | Ethical Considerations Concerning Bidding and State Contracts
General Statutes §§ 1-101mm to 1-101rr |

The OSE Executive Director has overall responsibility for the welfare and effectiveness of the OSE, which has three divisions, the legal division, the enforcement division, and the administrative division.

The OSE’s governing body is the Citizen’s Ethics Advisory Board (“CEAB”), which has nine members appointed by the Governor and legislative leadership. The CEAB holds monthly meetings that are open to the public. A schedule of CEAB meeting dates, times, and locations is available at www.ct.gov/Ethics.

CEAB Members:

- Attend monthly CEAB meetings
- Appoint and evaluate the Executive Director of the OSE
- Issue advisory opinions to persons subject to the Ethics Codes
- Serve as a Hearing Officer for non-confidential hearings held under the Uniform Administrative Procedures Act, General Statutes § [4-166](#) *et. seq.*
- Attend hearings to determine if violations occurred and, if so, assess penalties
- Attend special meetings if necessary
- Oversee legislative agenda

ARE YOU A LOBBYIST?

Definitions.

Lobbyist is any person who either expends or agrees to expend, or receives or agrees to receive, \$3,000 or more in a calendar year to communicate directly or to solicit others to communicate with any public official or their staff in the legislative or executive branch, or in a quasi-public agency, in an effort to influence legislative or administrative action. General Statutes [§§ 1-91 \(11\) and \(12\)](#).

Lobbyists are covered by Part II of the Code of Ethics. (Part I of the Code of Ethics covers public officials and state employees.) Each state agency also has its own ethics policy, which may be more restrictive than what follows, particularly in connection with which benefits a lobbyist may provide to public officials and state employees. Be sure to obtain a copy of the state agency's policy before you engage in any lobbying with any agency official or employee.

What type of lobbyist are you?

Client Lobbyist is the individual or entity *paying* for lobbying services. In other words, the client lobbyist is expending or agreeing to expend the threshold amount of \$3,000 or more in a calendar year. A Client Lobbyist may utilize in-house communicator lobbyists as well as outside communicator lobbyists to conduct its lobbying activities. General Statutes [§ 1-91 \(21\)](#).

Communicator Lobbyist is the individual who *receives payment* and does the actual lobbying (i.e., communicating or soliciting others to communicate). A communicator lobbyist receives or agrees to receive \$3,000 or more for lobbying activities in a calendar year. General Statutes [§ 1-91 \(22\)](#).

A communicator lobbyist can be:

1. An individual;
2. A member of a Business Organization (i.e., a firm or association that is owned by or employs a number of lobbyists), General Statutes [§ 1-91 \(20\)](#); or
3. An in-house communicator (a lobbyist who is a paid employee of a client lobbyist).

<p>Note: This guide speaks specifically to statutes and regulations regarding communicator lobbyists. There is a separate guide written specifically for client lobbyists which is available on our website.</p>

DO YOU NEED TO REGISTER AS A LOBBYIST?

You are required by law to register as a lobbyist with the Office of State Ethics if you:

- Expend or agree to expend \$3,000 or more in a calendar year for lobbying and activities in furtherance of lobbying; *OR*
- Receive or agree to receive \$3,000 or more in a calendar year for lobbying and activities in furtherance of lobbying (including any reimbursements).

The \$3,000 registration threshold applies to any combination of the following activities:

Legislative Lobbying is any lobbying to affect legislation, including any matter within the cognizance of the legislature, even if you contact an executive branch official as part of your efforts.

Administrative Lobbying is any lobbying to affect the rules or regulations of an executive agency or any other matter within the official cognizance of that agency, also including lobbying to affect the actions of an executive or quasi-public agency regarding a contract, grant, award, purchasing agreement, etc.

See also the exceptions to the requirement to register as an administrative lobbyist, Regulations of Connecticut State Agencies [§ 1-92-42a](#).

Activities in Furtherance of Lobbying are expenditures for research, reports, polls, media buys, activities fostering good will, office expenses, secretarial or paralegal salaries, etc.; essentially the activities that support the actual lobbying efforts.

Once you meet the definition of a communicator lobbyist, and you meet the above monetary threshold, you must register with the OSE on or before January 15 or prior to the commencement of lobbying. During an odd-numbered year, the registration fee is \$250 and the registration is valid for the biennium (i.e., until the end of the next even-numbered year). Registration in an even-numbered year is valid until the end of that even-numbered year and costs \$125. General Statutes [§ 1-95](#).

Note: Certain Exceptions

Lobbying does not include communications by a party, its representative or an intervenor in a contested case before an executive agency or quasi-public agency; communications by a representative of a vendor acting as a salesperson and not otherwise engaging in administrative lobbying; and communications by attorneys made while engaging in the practice of law and not concerning legislative actions or changes to rules or regulations. General Statutes [§ 1-91 \(11\)](#).

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ONLINE LOBBYIST FILING SYSTEM

General Statutes [§ 1-96b](#) requires online filing. In order to file electronically, you must become a registered user by requesting a username and password for the lobbyist filing system.

Note: If you already have a username and password (Hint: Your e-mail address is your username) you do not need to create a new username and account; you may proceed to Registration, or click “Forgot Password?” A temporary password will be sent to your e-mail.

New Users - Create a User Account

STEP 1

Visit our website at www.ct.gov/Ethics. Select “Lobbyist Filing & Information” from the left hand navigation panel, and then select “Registration” located to the right of “New Users.”

LOBBYIST FILING SYSTEM – [New Users - Registration](#)

Select “Create User Account” and select “You are an outside communicator lobbyist (business organization.)”

The screenshot shows the 'Office of State Ethics' website interface. At the top, there is a navigation bar with 'Lobbyist Registration Portal', 'Guide', 'FAQ's', and 'OSE Home'. Below the navigation bar, the main heading is 'I would like to become a Registered User'. The text explains the legal requirements for registration: 'You are required by law to register as a lobbyist with the Office of State Ethics (OSE) if you expend or agree to expend \$3,000 or more in a calendar year on lobbying (i.e. client lobbyist), or receive or agree to receive compensation or reimbursement for actual expenses, or both, in a combined amount of \$3,000 or more in a calendar year for lobbying (i.e., communicator lobbyist). You must complete a request for User ID/Password to register and file reports electronically by submitting either an ETH-4B (for use by Client Lobbyist/In-House Communicator) or ETH-4A (for use by Outside Communicators Lobbyists- Business Organization)..'

The 'WHO ARE YOU?' section is divided into two columns:

- You are a client lobbyist if:**
 - You are a party or organization on behalf of whom lobbying takes place.
 - You make expenditures or agree to make expenditures for \$3,000 or more in a calendar year for lobbying and in furtherance of lobbying.
 - You employ in-house communicator(s).
- You are an outside communicator lobbyist (business organization) if:**
 - You are a party or organization who lobbies on behalf of a client.
 - You receive or agree to receive compensation or reimbursement for actual expenses, or both, in a combined amount of \$3,000 Or more in a calendar year for lobbying.
 - You are not a client lobbyist.

Each column has a 'Create User Account' button. An orange arrow points to the 'Create User Account' button in the 'outside communicator lobbyist' column. A 'Back' button is located at the bottom center. At the very bottom, a grey bar contains the text: 'IF YOU ARE UNSURE OF WHO YOU ARE, PLEASE CONTACT THE OFFICE OF STATE ETHICS AT (860) 263-2400'.

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STEP 2

Verify that you are not creating a duplicate user account and assign or enter an Authorized Agent.

When creating a new user account, the registration system requires you to search to ensure that you are not already in the system as a Communicator Lobbyist. It also requires you to search for an authorized agent, who is either the registrant or another individual who is authorized to make changes to the account and to submit required financial statements. If the registrant is not an individual, an authorized officer or agent of the registrant shall sign the form. General Statutes [§ 1-95\(a\)](#)

Client Lobbyist - ETH 4B

Search for Client Lobbyist:

(If the name of the Client Lobbyist is not found, enter new Client Lobbyist name below.)

New Client Lobbyist: *

Search for Authorized Agent by Last Name:

New Authorized Agent:


Last Name: *

First Name: *

Phone Number: * () - ext:



Email Address: *

Confirm Email Address: *


Enter the security code shown:

[Regenerate Image](#)

By submitting this authorization form/application for username and password, you agree that you will not use the Office of State Ethics lobbyist Electronic Filing System for information and services related thereto for any unlawful purpose. Unauthorized use or attempts to upload or change information stored in this system may result in civil penalties or criminal prosecution or both.

 **Office of State Ethics** Lobbyist Registration Portal 

[Guide](#) [FAQ's](#) [OSE Home](#)

An email containing your username and password was sent to your provided email address.

After creating a User Account, you will receive an e-mail containing a username and temporary password, which will allow you to log in to the lobbyist filing system to continue to the registration process.

Note: Creating a username and account is **not** a registration.

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STEP 3

Retrieve your temporary password from email notification and log in to the [Lobbyist Filing System](#). After you log in, using the temporary password, you will be asked to create a new password.

E-Mail Notification with Temporary Password that you will receive

Dear Communicator Lobbyist,

The Office of State Ethics has received a request from *Business Organization / Communicator Lobbyist* to become a named user for the lobbying filing system.

Your username is: (Your E-Mail Address)

Your temporary password is: IK5hJl5C

By logging in, you agree not to use this system for unlawful purposes. Unauthorized use or attempts to upload or change information stored in this system may result in civil penalties or criminal prosecution or both.

To login click the following link:

<https://www.oseapps.ct.gov/NewLobbyist/security/loginhome.aspx>

Sincerely,
Office of State Ethics

(This message was sent to you by an automated e-mail system. Please don't reply to it).

STEP 4

Enter Information for your personal profile and for your business profile.

PERSONAL PROFILE Welcome! Client Lobbyist

Update Your Profile

Last Name *	<input type="text" value="Lobbyist"/>
First Name *	<input type="text" value="Client"/>
Street Address 1 *	<input type="text"/>
Street Address 2	<input type="text"/>
City *	<input type="text"/>
State *	CONNECTICUT
Zip *	<input type="text"/>
Phone Number *	860 - 263 - 2397 - <input type="text"/>
Facsimile Number	<input type="text"/> - <input type="text"/> - <input type="text"/>

Congratulations! You have successfully created an account and are ready to proceed to registration.

REGISTRATION

Which form should you use to register?

One or more individuals collectively engaged in the business of lobbying on behalf of others must register by completing the [ETH-1A](#). Each individual member must certify the registration submitted by the business organization and the registration fee must be paid for each lobbyist. These forms are located and can be accessed by logging in to the [Lobbyist Filing System](#).

Client lobbyists and in-house communicator lobbyists register by completing the [ETH-1B](#).

Note: Municipal Entity Lobbyist Registration

A communicator lobbyist registered for a municipal entity must register by completing the [ETH-1A](#) but must file monthly and quarterly [ETH-2C](#) financial reports in accordance with the *client lobbyist's* filing schedule. General Statutes [§ 1-96 \(a\)](#).

Any changes in the terms of compensation must be filed as an amendment to the registration.

On-Line Registration

STEP 1 – Log in

Visit our website at www.ct.gov/Ethics. Select “Lobbyist Filing & Information” from the left hand navigation panel then select “[Log-In to Filing System](#).” Log in by entering your Username and Password in the log in box on the right hand side of the screen.

The screenshot displays the 'Office of State Ethics' website. On the left, there is a 'Registration Statistics: 2019-2020' table:

Category	Count
Client Lobbyists	356
In-House Communicators	263
Business Organizations	53
Communicator Lobbyists	117

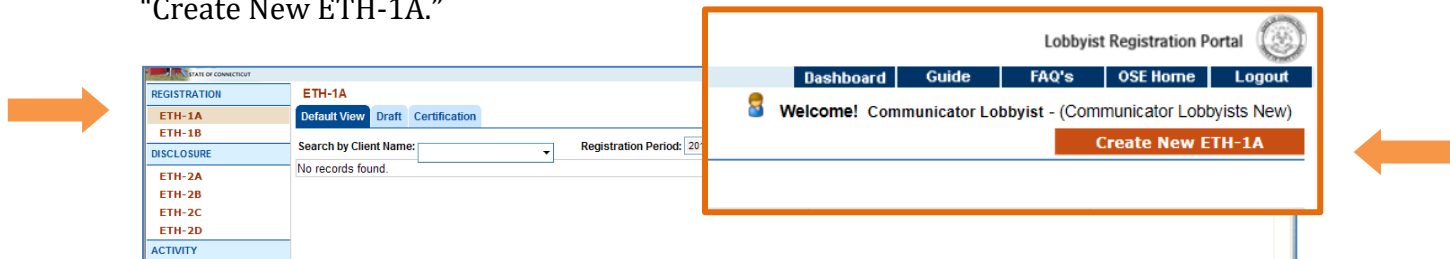
The main content area features a 'Welcome to State of Connecticut, Office of State Ethics Lobbyist Registration' message and a reminder: 'Reminder: 2018 3/4 Qtr ETH-2D (Client) and 2018 ETH-2A (Communicator) are due on or before Jan 10, 2019. Be sure to file them to State and Status.' Below this is a 'Public Reports' section with a search bar and a 'Support' section with an email address: lobbyist.OSE@ct.gov and a phone number: [860-263-2400](tel:860-263-2400).

An inset box highlights the 'Lobbyist Registration Portal' login form, which includes a navigation menu (Guide, FAQ's, OSE Home), a login section with 'Username:' and 'Password:' fields, 'Login' and 'Clear' buttons, and links for 'New User?' and 'Forgot Password?'. An orange arrow points to the right side of the login form.

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STEP 2 – Create a Registration (ETH-1A)

From the main Dashboard screen, select ETH-1A from the left hand navigation panel. The screen below will appear. Click on the orange button on the right that says “Create New ETH-1A.”



STEP 3 – Part I – Business Organization/Communicator Tab

Enter your business organization/communicator information and select the registration period for which you are registering, and then click “Continue.” Red asterisks * indicate a required entry. You may return to an earlier screen by clicking on the tabs at the top or by clicking the “back” button on the bottom of the screen. If you are unable to complete your report, click on “save draft,” and you will be able to return later to complete the report.



STEP 3 – Part II – Subcontractor

If you are providing services to a Business Organization as a subcontractor, click “yes,” you will then be required to search and enter the Business Organization name and the Client.



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STEP 4 –Member Tab

List the business organization members lobbying on behalf of the client. Search by last name, select member and click on “Add Members” once a selection is complete. When complete, click “Continue.” Only enter information if the member does not appear as a selection in the search results.

The screenshot shows the 'Office of State Ethics' website interface. The top navigation bar includes 'Dashboard', 'Guide', 'FAQ's', 'OSE Home', and 'Logout'. The main content area is titled 'Business Organization Members' and contains a search form. The form has the following fields: 'Search by Last Name' (text input), 'Last Name: *' (text input), 'First Name: *' (text input), 'Email Address: *' (text input), and 'Date Lobbying Commenced: *' (calendar icon). Below the form are buttons for 'Continue', 'Save Draft', 'Back', 'Clear', 'Cancel', and 'Add Members'. A blue arrow points to the 'Add Members' button.

STEP 5 – Client Tab

Provide client lobbyist information.

Note: You will need to create and enter a separate ETH-1A and ETH-2A for each client.

Search by client name, select client, and the fields will auto populate data from the client registration. Search for the name of the person for the client with whom the communicator has contact.

The screenshot shows the 'Office of State Ethics' website interface. The top navigation bar includes 'Dashboard', 'Guide', 'FAQ's', 'OSE Home', and 'Logout'. The main content area is titled 'Client Lobbyist Information (Use separate registration for each client)'. The form has the following fields: 'Search by Client Name' (text input with an orange arrow), 'Client Name: *' (text input), 'Street Address 1: *' (text input), 'Street Address 2' (text input), 'City: *' (text input), 'State: *' (dropdown menu showing 'CONNECTICUT'), 'Zip: *' (text input), 'Nature of clients Business' (text input), 'Name of person at client with whom such communicator lobbyist has contact' (text input), 'Search by Last Name' (text input with an orange arrow), 'Last Name: *' (text input), 'First Name: *' (text input), 'Business Address 1: *' (text input), 'Business Address 2' (text input), 'City: *' (text input), 'State: *' (dropdown menu showing 'CONNECTICUT'), 'Zip: *' (text input), 'Phone Number: *' (text input with format () - - ext), 'Facsimile Number: *' (text input with format () - -), and 'Email Address: *' (text input). Below the form are buttons for 'Continue', 'Save Draft', 'Back', 'Clear', 'Cancel'. Orange arrows point to the search fields.

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STEP 6 – Compensation Terms Tab

Enter the terms of compensation for the registration period. Click on “Add Term.” Remember, if registering in an odd-numbered year, you should enter the contract amount for two years, unless you only intend to represent the client for a single year.

The screenshot shows the 'Office of State Ethics' website with the 'Lobbyist Registration Portal' header. The user is logged in as 'Communicator Lobbyist - (Communicator Lobbyists New)'. The navigation menu includes 'Business Org', 'Member', 'Client', 'Compensation Terms', 'Subcontractor', 'Lobbying Targets', 'Issues', 'Review', 'Payment', and 'Certification'. The 'Compensation Terms' tab is active. The form contains the following fields and options:

- Business Organization Terms of Compensation**
- Please check (if applicable): Sales Tax Expense Reimbursement
- Amount: * \$ [input] Annual Monthly Hourly Retainer Other Describe: [input]
- Time Period: * From [input] To [input]
- Total Anticipated * \$ [input]
- Categories of Work (other than lobbying): Expert witness or consultant Grass-roots (i.e., direct mail or phone solicitation) Media (print or electronic advertising) Polling Other [input]
- Buttons: [Continue](#), [Save Draft](#), [Back](#), [Clear](#), [Cancel](#), [Add Term](#)

An orange arrow points to the 'Add Term' button.

STEP 7 – Subcontractor Tab

This applies if a communicator lobbyist subcontracts with or through another individual or business organization (i.e., a subcontractor) to lobby on the client’s behalf. Enter any subcontractor(s) who will provide lobbying for the client. Enter the terms of compensation for the subcontractor(s) for the registration period. Click on “Add Term,” and then click “Continue.”

The screenshot shows the 'Office of State Ethics' website with the 'Lobbyist Registration Portal' header. The user is logged in as 'Communicator Lobbyist - (Communicator Lobbyists New)'. The navigation menu includes 'Business Org', 'Member', 'Client', 'Compensation Terms', 'Subcontractor', 'Lobbying Targets', 'Issues', 'Review', 'Payment', and 'Certification'. The 'Subcontractor' tab is active. The form contains the following fields and options:

- Are you paying another Business to lobby on behalf of the client? * Yes No
- Subcontractor (if applicable)**
- Subcontractor Type: * Business Organization Individual
- Search by Name: [input]
- Business Name: * [input]
- Business Address 1: * [input] Business Address 2: [input]
- City: * [input] State: * CONNECTICUT [dropdown] Zip: * [input]
- Email Address: * [input]
- Terms of Compensation**
- Please check (if applicable): Sales Tax Expense Reimbursement
- Amount: * \$ [input] Annual Monthly Hourly Retainer Other Describe: [input]
- Time Period: * From [input] To [input]
- Total Anticipated * \$ [input]
- Categories of Work (other than lobbying): Expert witness or consultant Grass-roots (i.e., direct mail or phone solicitation) Media (print or electronic advertising) Polling Other [input]
- Buttons: [Add Next Subcontractor](#), [Continue](#), [Save Draft](#), [Back](#), [Clear](#), [Cancel](#), [Add Term](#)

An orange arrow points to the 'Add Term' button.

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STEP 8 – Lobbying Targets Tab

Enter the type of lobbying you are registering for: “Administrative, Legislative or Both.” Identify the agencies that you plan to lobby and indicate if you are soliciting state contracts or procurement awards with any agency. Click on “Add Agency,” and on “Add Contract/Award,” and then click “Continue.”

Office of State Ethics
Lobbyist Registration Portal
Dashboard Guide FAQ's OSE Home Logout
Welcome! Communicator Lobbyist - (Communicator Lobbyists New)

Business Org Member Client Compensation Terms Subcontractor **Lobbying Targets** Issues Review Payment Certification

Activities Registering for: Administrative Legislative Both

Executive and Quasi - Public Agency being lobbied
Indicate the Executive and Quasi-Public Agencies you intend to lobby.
Search by Executive and Quasi-Public Agencies: * [Add Agency](#)

Soliciting State Contracts or Procurement Awards
If you are soliciting state contracts or procurement awards, please identify each agency you intend to solicit and each contract or procurement award you intend to solicit.
Search by Agencies: * [Add Contract/Award](#)

Contract or Procurement Award Soliciting: [Add Contract/Award](#)

[Continue](#) [Save Draft](#) [Back](#) [Clear](#) [Cancel](#)

STEP 9 – Issues Tab

Check all issues on which you expect to lobby for the client. Click “Continue.”

Office of State Ethics
Lobbyist Registration Portal
Dashboard Guide FAQ's OSE Home Logout
Welcome! Communicator Lobbyist - (Communicator Lobbyists New)

Business Org Member Client Compensation Terms Subcontractor Lobbying Targets **Issues** Review Payment Certification

Issues in which you expect to Lobby
Find: [Search](#) [Check All](#) | [Check all highlighted](#) | [Clear All](#)

<input type="checkbox"/> Aging	<input type="checkbox"/> Environment - recycling, packaging, pollution, waste	<input type="checkbox"/> Labor and Public employees - salaries and wages, collective bargaining, unions
<input type="checkbox"/> Agriculture, horticulture, farming, livestock	<input type="checkbox"/> Equal rights, civil rights, minority affairs	<input type="checkbox"/> Legal organizations and services
<input type="checkbox"/> Alcohol	<input type="checkbox"/> Food and beverage - industry and services	<input type="checkbox"/> Licenses, permits
<input type="checkbox"/> Athletics and sports	<input type="checkbox"/> Gaming - casinos, gambling, amusements, games	<input type="checkbox"/> Manufacturing - distribution and services
<input type="checkbox"/> Automotive	<input type="checkbox"/> Government - agencies, associations, organizations	<input type="checkbox"/> Marine and fisheries
<input type="checkbox"/> Banking, finance, lending, investment	<input type="checkbox"/> Government - financing, taxation, revenue, budget, appropriations, bids, fees, funds, contracts	<input type="checkbox"/> Pharmaceuticals, Pharmacy
<input type="checkbox"/> Biotechnology	<input type="checkbox"/> Government, municipal and special districts	<input type="checkbox"/> Public lands, parks, recreation
<input type="checkbox"/> Business	<input type="checkbox"/> Health and hospitals, health care systems, medical organizations	<input type="checkbox"/> Public safety - police, fire, law enforcement, other
<input type="checkbox"/> Chemical	<input type="checkbox"/> Higher education and employment advancement	<input type="checkbox"/> Real Estate - development, property
<input type="checkbox"/> Conservation, zoning, land and water use	<input type="checkbox"/> Housing and construction codes	<input type="checkbox"/> Technology
<input type="checkbox"/> Consumer affairs	<input type="checkbox"/> Human Services - adult, families, and children	<input type="checkbox"/> Tobacco
<input type="checkbox"/> Economic and community development	<input type="checkbox"/> Insurance - auto, home, life, other	<input type="checkbox"/> Transportation - air, sea, land, rail
<input type="checkbox"/> Education - institutions, services, programs	<input type="checkbox"/> Insurance - medical, dental, mental health	<input type="checkbox"/> Travel, tourism, culture
<input type="checkbox"/> Elections, campaigns, voting, political parties, ethics	<input type="checkbox"/> Insurance - unemployment insurance, public assistance, worker's compensation	<input type="checkbox"/> Utilities/telecommunications - gas, electricity, cable, telephone, television, radio, newspaper
<input type="checkbox"/> Energy	<input type="checkbox"/> Judiciary - courts, judges, crimes, prisons	<input type="checkbox"/> Veterans affairs

[Continue](#) [Save Draft](#) [Back](#) [Clear](#) [Cancel](#)

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STEP 10 – Review Tab

When reviewing your registration, click the blue “back” button on the bottom of the screen to update/change any information you entered. You may also click on the arrows across the top of the screen to return to a particular section.

ETH-1A Communicator Lobbyists New 2015 - 2016

Business Org Member Client Compensation Terms Subcontractor Lobbying Targets Issues Review Payment Certification

Business Organization Information

Registration Number: 5171

Business Organization:	Communicator Lobbyists New	Registration Period:	2015-2016		
Business Address 1:	20 Trinity Street	Business Address 2:	2ed 205		
City:	Hartford	State:	CT	Zip:	06106

Are you providing services to a Business Organization as a subcontractor? No

Business Organization Members

Full Name	Email Address	Status
Morgan Ann	ann.morgan@ct.gov	Pending

Client Lobbyist Information

Continue Save Draft Back Cancel

STEP 11 – Payment Tab

Select your Payment Method: Check or Credit Card.

Registration occurs biennially (every two years). During an odd-numbered year, the registration fee is \$250 and the registration is valid for the biennium (i.e., until the end of the next even-numbered year). Registration in an even-numbered year is valid until the end of that even-numbered year and costs \$125.

Note: A registration is not final and submitted until payment is received by the Office of State Ethics.

ETH-1A Communicator Lobbyists 2012

Business Org Member Client Compensation Terms Subcontractor Lobbying Targets Issues Review Payment Certification

WELCOME! Communicator Lobbyist - (Communicator Lobbyists)

PAYMENT METHOD

Business Organization:	Communicator Lobbyists
Client:	Lobbyist Client
Registration Number:	4749
Name of Authorized Communicator/Member of Business Organization:	1 Communicator Lobbyist
Fee required:	\$ 125.00
Date:	09/14/2012
Payment Method:	Credit Card

Credit Card Details:

The State of Connecticut only accepts the following Credit Cards: Visa or Master Card

Card Number: *	
Expiration Date: *	09 2012
CVV Code(Card Verification Value): *	
Name as on Credit Card: *	
Payment Amount:	\$ 125.00

Continue Back Clear Cancel

Communicator Lobbyist Guide to the Code of Ethics

STEP 12 – Certification Tab

You must certify the registration under penalty of false statement, before filing to the state. Check the box next to “I have read and agree to all above certifications” and click the “File to State” box. Payment, certification and filing registration to the state must occur before you can lobby.

Note: You are obliged by law to amend your ethics filings to ensure that they are current and accurate. Lobbying by member(s) who have not certified this registration may result in penalties of up to \$10,000.

The screenshot shows the 'Office of State Ethics' website interface. At the top, there is a navigation bar with 'Dashboard', 'Guide', 'FAQ's', 'OSE Home', and 'Logout'. Below this is a breadcrumb trail: 'Business Org' > 'Member' > 'Client' > 'Compensation Terms' > 'Subcontractor' > 'Lobbyist Targets' > 'Issues' > 'Review' > 'Payment' > 'Certification'. The main content area is titled 'CERTIFICATION' and contains the following text:

I do hereby swear or affirm, under penalty of false statement that:

- I am authorized to file this registration with the Office of State Ethics on behalf of this Business Organization, with the understanding that this registration is not final and submitted until the named member(s) of the Business Organization has (have) certified this registration.
- I have personally reviewed the information herein and the information contained in any attachments hereto.
- The information contained in this form and all of the attachments hereto (if any) is true, correct, and complete to the best of my knowledge, information, and belief.
- If, at any point in time, I/we become aware to the information contained herein, or on any attachment hereto, is inaccurate or incomplete I/we will timely amend the form so that the information is true correct and complete.
- Any reports required to be filed during the period for which this registration is active will be true, correct, and complete to time best of my/our knowledge, information and belief.

Below the list is a text input field with the value 'Communicator Lobbyist' and a label 'Name:'. To the right of the input field is a checkbox with the text 'I have read and agree to all above certifications.' An orange arrow points to this checkbox. Below the checkbox is a warning message: 'YOU ARE OBLIGED BY LAW TO AMEND YOUR ETHIC FILING TO ENSURE THEY ARE CURRENT AND ACCURATE. LOBBYING UNDERTAKEN BY MEMBER(S) WHO HAS(HAVE) NOT CERTIFIED THIS REGISTRATION MAY RESULT IN PENALTIES OF UP TO \$10,000.' Below the warning message are two buttons: 'File to State' and 'Cancel'. An orange arrow points to the 'File to State' button.

Congratulations! You have completed your registration as a communicator lobbyist.

Badges

Each individual who is a lobbyist shall, while engaged in lobbying, wear a distinguishing badge which shall identify him as a lobbyist. General Statutes [§ 1-101](#).

Replacement Badges

Replacement badges may be purchased for \$1.00 *cash only*. The fee is collected when you pick up your badge at the Office of State Ethics. Log-in to the [Lobbyist Filing System](#) and select “Request Badges” from your Dashboard.

The screenshot shows the 'Office of State Ethics' dashboard. At the top, there is a navigation bar with 'Dashboard', 'Guide', 'FAQ's', 'OSE Home', and 'Logout'. Below this is a breadcrumb trail: 'Welcome! Nancy Nicolescu - (2016 Client Lobbyist Guide)'. The main content area is titled 'DASHBOARD for 2016 Client Lobbyist Guide' and contains the following sections:

- REGISTRATION**: ETH-1B, ETH-2A, ETH-2B, ETH-2D
- DISCLOSURE**: My Message
- ACTIVITY**: Registrations Awaiting Your Certification
- ADMINISTRATION**: Draft Filings
- My Statistics**: Outside Communicators (0), Registered in-House Lobbyists (1), My Pending Certification (0)
- Request Badges**: A button highlighted with an orange box and an orange arrow pointing to it.
- Set Default View**: Personal Profile
- REPORTS**: Compiled Reports

REGISTRATION AMENDMENTS / TERMINATIONS

Step 1

To amend or terminate a registration, log in to the [Lobbyist Filing System](#), and from the DASHBOARD select the ETH-1A.



REGISTRATION	DASHBOARD for Communicator Lobbyists		Welcome! Communicator Lobbyist - (Communicator Lobbyists)
ETH-1A	My Message Please note: as of June 8, 2010 Lobbyist Registrations Fees for Odd years are now \$250.00 and \$125.00 for even years. Reminder: Monthly filings are due by the 10th of each month. Third/Fourth quarterly ETH2D financial reports are due Jan. 10, 2011. abcdef	My Statistics	
ETH-1B		Registered Clients	1
DISCLOSURE		Registered Communicator Lobbyists	1
ETH-2A		My Pending Certification	0
ETH-2B	Registrations Awaiting Your Certification		
ETH-2C	No records found.		
ETH-2D			
ACTIVITY	Draft Filings		
Awaiting Certification	No records found.		
ADMINISTRATION			
Authorized Agent			
PERSONALIZATION			
Set Default View			
Personal Profile			
Business Profile			
REPORTS			
Compiled Reports			

Step 2

Select the client for which you are registered and click on “amend” to amend the registration. Click on “Terminate” to terminate a communicator lobbyist for that client or to terminate the entire registration.

REGISTRATION	ETH-1A		Welcome! Communicator Lobbyist - (Communicator Lobbyists)
ETH-1A	Default View	Draft	Certification
ETH-1B	Create New ETH-1A		
DISCLOSURE	Search by Client Name:	Registration Period: 2011 - 2012	Search View All
ETH-2A	Select	Client Name	Registration Period
ETH-2B		Lobbyist Client	2012
ETH-2C			Date Registered
ETH-2D			09/14/2012
ACTIVITY			Status
Awaiting Certification			Original
ADMINISTRATION	View Summary	Amend	Terminate
Authorized Agent	View History	Displaying 1 of 1 records	

Amendments must be filed if there is a change in your lobbying activities, such as: (a) changes to fundamental contract terms or agreements to subcontract lobbying work; and (b) additions or deletions of communicator lobbyists. After your amendment has been filed to the State, the online system will show the date and time of the amendment, as well as the person who made the amendment.

You must file a notice of termination within 30 days after you cease the activity that first triggered registration. In doing so, you must certify that you do not intend to resume such lobbying activity for the remainder of the 2-year registration period. General Statutes [§ 1-95 \(c\)](#).

Communicator Lobbyist Guide to the Code of Ethics

Step 3

Select the communicator lobbyist that you want to terminate for the client you selected in the previous screen. Click the blue “Terminate Users” box.

Registered Users	Address	User Roles
<input type="checkbox"/> Communicator Lobbyist	20 Trinity Street Hartford	Communicator Lobbyist
<input type="checkbox"/> Lobbyist Client (Terminate complete recent ETH 1A Registration)		

Confirm that the termination is for the correct communicator lobbyist. Provide a reason for termination, read and check the certification box. Click on “Terminate.”

Are you sure to terminate? Communicator Lobbyist

Please provide reason for termination:

NOTICE OF TERMINATION

Termination is being submitted for communicator lobbyist Communicator Lobbyist, member of Business Organization Communicator Lobbyists, for Client Lobbyist Lobbyist Client for the 2012 registration period

I, the undersigned, do hereby swear under penalty of false statement that:

1. I am authorized to file this Notice of Termination with the Office of State Ethics on behalf of Communicator Lobbyist, member of the Business Organization Communicator Lobbyists, for Client Lobbyist Lobbyist Client for the 2012 registration period.
2. I understand by terminating there are no intentions to resume such lobbying activity for the remainder of the 2-year registration period.
3. I understand that termination does not relieve Communicator Lobbyist of the reporting requirements for the period preceding the date that the notice of termination is received by the Office of State Ethics or for the period commencing on such date and ending on December thirty-first of the year in which termination occurs.
4. I understand that there are post-termination filing requirements that will apply to Communicator Lobbyist.

Name: Communicator Lobbyist
Date of filing: 09/14/2012

I have read and certify the above information.

Termination Filing Requirements

It is important to remember that a post-termination report is due between January 1 and January 10 of the year following your termination, whether or not you engage in lobbying activities or make expenditures during that period. This report covers the period from the termination date through December 31 of the year in which termination took place. General Statutes [§ 1-96 \(d\)](#). For example, even if you terminate your registration on June 1, 2020, you still must file a post-termination report between January 1 and January 10 of 2021.

Note: If you have terminated and, subsequent to your termination, expend monies incident to prior lobbying or expend \$10 or more for the benefit of a public official, their staff or family member(s) within six months of terminating, you must file an ETH-2B with the OSE within 30 days. General Statutes [§ 1-96 \(g\)](#).

Communicator Lobbyist Guide to the Code of Ethics

In [Advisory Opinion No. 2008-7](#), the Citizen's Ethics Advisory Board concluded that a communicator lobbyist who terminates his or her registration during a calendar year is no longer a registrant, but remains a communicator lobbyist for the remainder of that year for the purposes of the elections statutes.

Reporting

Once registered, you have filing responsibilities (see page 23.) You must file all reports, amendments and terminations online.

Electronic Signatures

An electronic signature satisfies the signature requirement of the Code of Ethics. Registrants who file online reports and who submit electronic signatures are considered to have duly "signed" the report. (Pursuant to [§§ 1-272 \(d\)](#), [1-274 \(a\)](#) and [1-276](#) of the Connecticut Uniform Electronic Transactions Act.)

Public Information

All disclosed information is available to the public in a variety of formats. Access to this information is available from our website in the lobbyist registration portal. Commonly requested reports include the lobbyist list, terms of compensation, concern/interest grouping, expenditures for the benefit of a public official, client financials, and client demographics.

Document Preservation for Audit Purposes

You are required to keep all accounts, bills, receipts and any and all other documents necessary to substantiate your reports for a period of **three years** from the date that the report is filed with the Office of State Ethics, pursuant to General Statutes [§ 1-96a \(a\)](#). It is also a good idea to keep copies of the filed reports. General Statutes [§ 1-96a](#). Annually, the OSE randomly selects up to forty (40) registrants to be audited. You will be required to provide to the OSE documents that substantiate your financial reports when one of your clients is selected to be audited. General Statutes [§ 1-96a \(b\)](#). Failure to provide substantiating documentation may lead to investigation and prosecution for violations under the Code.

For more detailed information, please reference our publication [Procedures Manual for Lobbyist Record Keeping and Audit](#), as well as other resources found at the Lobbyist Corner on OSE's website.

<p>Note: The statute of limitations is five years for violations of the code. General Statutes § 1-93 (d). Therefore, you may wish to retain documents for an additional two years, beyond what is required in General Statutes § 1-96a (a).</p>

Audits

Pursuant to General Statutes [§ 1-96a \(b\)](#) and Regulations of Connecticut State Agencies [§ 1-92-56 \(a\)](#), the Chair of the Citizen's Ethics Advisory Board shall periodically and randomly select client registrants to be audited by the Office of State Ethics. Selection ceremonies are open and publicly noticed. The purpose of the audit is to determine whether information reported to the Office of State Ethics is timely, accurate and complete; Regs. of Connecticut State Agencies [§ 1-92-57](#); with the primary goal being "to ensure compliance with the Ethics Codes." Regs. of Connecticut State Agencies [§ 1-92-61](#). When a client registrant is selected, the records of any communicator lobbyists used by the client during the relevant time period are audited as well. Regs. of Connecticut State Agencies [§§ 1-92-56](#) and [1-92-57](#).

The audit process culminates in a public report issued by the Office of State Ethics; corrective action by the registrant, if necessary; and verification and review of such corrective action. Regs. of Connecticut State Agencies [§§ 1-92-57](#) and [1-92-59](#). Because the primary goal of any audit by the Office of State Ethics is to ensure compliance with the Ethics Codes, the Office of State Ethics will take no formal action, as the result of an audit, against a registrant for negligent failure to comply with the law, provided that the registrant takes the necessary corrective action. Regs. of Connecticut State Agencies [§ 1-92-61 \(a\)](#). However, when a review of a registrant's records reveals an intentional or grossly negligent failure to comply with the law, or when the registrant fails to take the corrective action required as a result of the audit, the Office of State Ethics may file a complaint pursuant to General Statutes [§ 1-93](#). Regs. of Connecticut State Agencies [§ 1-92-61 \(a\)](#).

COMMUNICATOR LOBBYIST FINANCIAL REPORTING

What financial reports do you need to file and when?

In addition to the registration form(s), registered lobbyists need to file periodic financial reports.

Communicator Lobbyists file the **ETH-2A** and **ETH-2B** forms. If you are the authorized agent for a client and have agreed to complete their financial reports you will also need to file ETH-2D forms. Instructions for this disclosure are contained in our [Client Lobbyist Guide to the Code of Ethics](#).

The **ETH-2A** records compensation, reimbursements from the client lobbyist and sales tax. The filing deadline for the **ETH-2A** for *each* client is due on or before **January 10** of each year.

The **ETH-2B** records unreimbursed expenditures of \$10 or more for the benefit of a public official, their staff or immediate family. This form also records payments of necessary expenses of \$10 or more. Filing an ETH-2B must be made according to the paying *client lobbyist's* filing calendar (either monthly or quarterly.)

The **ETH-2C** is filed by the communicator lobbyist and records compensation, reimbursement and sales tax made by a municipal governmental entity to communicator lobbyists registered for the municipal governmental entity. It also gathers information such as money expended in connection with lobbying, expenditures benefitting a public official, staff or immediate family. Filing an ETH-2C must be made according to the *client lobbyist's* filing calendar below.

Client Lobbyist Filing Calendar

Client Lobbyist Quarterly Reporting Schedule	Due Dates
January 1- March 31 (First Quarter Report)	April 10
April 1 - June 30 (Second Quarter Report)	July 10
July 1 - December 31 (Third and Fourth Quarters Combined)	January 10

Client Lobbyist Monthly Reporting Schedule	Due Dates
January 1 - January 31	February 10
February 1 - February 29	March 10
March 1 - March 31 1st Quarter Report	April 10
April 1 - April 30	May 10
May 1 - May 31	June 10
June 1 - June 30 2nd Quarter Report	July 10

HOW TO FILE YOUR FINANCIAL REPORT – ETH 2A

STEP 1 – Log in

Visit our website at www.ct.gov/Ethics. Select “Lobbyist Filing & Information” from the left hand navigation panel and select the [Lobbyist Filing System](#) link to log-in.

The screenshot shows the Office of State Ethics website. On the left, there is a navigation menu with options like 'Compiled Reports', 'Lobbyist Filings', and 'Support'. The main content area displays 'Registration Statistics: 2015 - 2016' with a table:

Registration Statistics: 2015 - 2016	
Client Lobbyists	1000
In-House Communicators	586
Business Organizations	114
Communicator Lobbyists	211

On the right, there is a 'Lobbyist Registration Portal' login box with fields for 'Username' and 'Password', and buttons for 'Login' and 'Clear'. There are also links for 'New User?' and 'Forgot Password?'.

Log in by entering your Username and Password in the log in box on the right hand side of the screen.

Your e-mail address is your username.

Click: “Forgot Password?” To have a temporary password sent to your e-mail.

STEP 2 – Create a New ETH-2A

You must create an ETH-2A for each client. The filing deadline for the ETH-2A for each client is due on or before **January 10** of each year.

From the main Dashboard screen, select “ETH-2A” from the left hand navigation panel. The screen below will appear; click on the orange button on the right that says “Create New ETH-2A.”

The screenshot shows the Lobbyist Registration Portal dashboard. On the left, there is a navigation menu with categories like 'REGISTRATION', 'DISCLOSURE', 'ACTIVITY', 'ADMINISTRATION', 'PERSONALIZATION', and 'REPORTS'. The 'ETH-2A' option is highlighted under 'DISCLOSURE'. The main content area shows a search bar for 'Communicator Lobbyists' and a 'Filing Year' dropdown. A prominent orange button labeled 'Create New ETH-2A' is visible on the right side of the dashboard.

Communicator Lobbyist Guide to the Code of Ethics

STEP 3 – Communicator Tab

Search by Client Name. Select Client and Filing Year, then click “Continue.”

Office of State Ethics
Lobbyist Registration Portal

ETH-2A Communicator Lobbyist Report of Annual Compensation, Sales Tax and Reimbursement

Communicator Compensation Subcontractor Review Certification

Important: Failure to file a timely and accurate report may subject the registrant to penalties of up to \$10,000 for each delinquent report

Please consult the [guide to the code of Ethics for Client Lobbyist](#) and [guide to the code of Ethics for Communicator Lobbyist](#) regarding your duties as a registrant. If you have any further questions, please feel free to contact the legal division of the act. The legal division staff will assist you with any matter concerning the application of the code of Ethics for Lobbyists.

Search by Client Name: Client Name:

Select Filing Year: Business Organization: Communicator Lobbyists New

Members

Continue Save Draft Clear Cancel

STEP 4 – Compensation Tab

Select month and report compensation, sales tax and reimbursement received for either **administrative and/or legislative lobbying** or work in furtherance of lobbying, click on “Add Month” for each entry.

Outside Communicator Lobbyist filing as an individual communicator:

Report compensation, sales tax collected and any expense reimbursements.

Outside Communicator Lobbyist filing as a Business Organization

Report the total compensation, sales tax and any expense reimbursements your organization received from the client. There is no requirement to apportion this amount among members of the business organization.

In-House Communicator for Client

Report compensation as the dollar value of the time you actually spent lobbying and / or in furtherance of lobbying. **Example:** Your annual salary is \$30,000 and you spend 50% of your time on lobbying related activities, report \$15,000. Use the expense reimbursement column to report amounts reimbursed for lobbying related expenditures.

Communicator Compensation Subcontractor Review Certification

Month	Category	Compensation Amount	Sales Tax	Expense Reimbursement	Total	Actions
January	Legislative:	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>	Add Month Clear
January	Administrative:	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>	
February						
March						
April						
May						
June						
July						
August						
September						
Total Legislative		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total Administrative		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Continue Save Draft Back Cancel

STEP 5 – Subcontractor Tab

Screen I

Are you paying another business to lobby on behalf of a client? Select “Yes” and then select a subcontractor from the drop down or click on “Add Subcontractor” to add a subcontractor that does not appear on the drop down menu. Note: Adding a subcontractor will automatically amend your ETH-1A to include the subcontractor for the client. If you do not employ subcontractors for the client click “Continue.”

Screen II - Add Subcontractor

If applicable, enter the business organization or individual lobbyist that has a subcontract to lobby on behalf of the client. Enter the terms of compensation and click on “Add Term” for each subcontractor and on “Add Next Subcontractor” for additional subcontractors.

Subcontractor Tab (Continued)

Screen III - Certify

Each subcontractor entry must be certified by the communicator lobbyist. Click “I have read and agree to all above certifications.” Click “Continue.”

Communicator Lobbyist Guide to the Code of Ethics

E-mail Notification

When adding a subcontractor for a client; the subcontractor will receive the following e-mail:

The Office of State Ethics has received an ETH-1A Communicator Lobbyist Registration on behalf of the Client Lobbyist for calendar year 2020, on which you are identified as a subcontractor.

If you receive or agree to receive \$3000 or more in a calendar year to lobby on behalf of this client lobbyist, you must register with the Office of State Ethics by filing an ETH-1A Registration.

Please visit our website to become a registered user and file your registration.

If you need further assistance, please refer to our Client and Communicator Lobbyist Guide, or e-mail us at lobbyist.ose@ct.gov.

Sincerely,
Office of State Ethics

Screen IV - Report Compensation, Reimbursement & Sales Tax

Select the subcontractor from the drop down list, select month and report compensation, sales tax and reimbursement paid for either **administrative and/or legislative lobbying**, click on “Add Month” for each entry. When complete click “Continue.”

Communicator Compensation Subcontractor Review Certification

Do you use Subcontractors? Yes No Of the money reported on the previous page, enter on this page how much was paid to the subcontractors.

Select a Subcontractor: -Select- **Add Subcontractor**

Month	Category	Compensation Amount	Sales Tax	Expense Reimbursement	Total	Actions
	Legislative:	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>	\$ 0.00	Add Month Clear
	Administrative:	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>	\$ 0.00	

Subcontractor Name	Category	Compensation Amount	Sales Tax	Expense Reimbursement	Total
	Total Legislative		\$0.00	\$0.00	\$0.00 \$0.00
	Total Administrative		\$0.00	\$0.00	\$0.00 \$0.00
	Total		\$0.00	\$0.00	\$0.00 \$0.00

Continue **Save Draft** **Back** **Cancel**

Communicator Lobbyist Guide to the Code of Ethics

STEP 6 – Review Tab

When you are reviewing the ETH-2A form, click the blue “Back” button on the bottom of the screen to update/change information you entered. You may also click on the arrows across the top of the screen to return to a particular section.

Business Organization / Communicator Lobbyist Information Filing No: 14649

Business Organization:	Communicator Lobbyists	Filing Year:	2012
Client Name:	Lobbyist Client		

Business Organization Members

Communicator	Email	Termination Date
Lobbyist Communicator	u10falcongiris@gmail.com	

Compensation, Sales Tax and Reimbursement

Month	Category	Compensation Amount	Sales Tax	Expense Reimbursement	Total

Summary of Compensation, Sales Tax and Reimbursement

	Total Administrative	Total Legislative
Compensation Amount	\$0.00	\$0.00
Sales Tax	\$0.00	\$0.00
Expense Reimbursement	\$0.00	\$0.00
Total	\$0.00	\$0.00

Buttons: Continue, Save Draft, Back, Cancel

STEP 7 – Certification Tab

Under penalty of false statement, certify your ETH-2A report. Click the box next to “I have read and agree to all above certifications” and then click “File to State.”

Name of Communicator Lobbyist(s): 1. Lobbyist Communicator

I do hereby certify under penalty of false statement that I make this report in accordance with the requirements of Chapter 10, Part II, General Statutes, and that this is a complete itemized statement which contains all the information required by said Part for the period shown.

Name: Communicator Lobbyist

I have read and agree to all above certifications.

Buttons: File To State, Back, Cancel

Congratulations! Your form ETH-2A has been successfully filed.

Financial Report Amendments

To amend your ETH-2A financial report, log in to your account and pick the appropriate client report form from your dashboard. Select “Amend.” You may also select “View Summary” or “View History” from this screen.

Default View | Draft | Create New ETH-2A

Communicator Lobbyists

Search by Client Name: [dropdown] Filing Year: 2012 [dropdown] Search View All

Select	Client Name	Filing Year	Date Filed	Status
<input type="radio"/>	Lobbyist Client	2012	10/15/2012	Original

Buttons: View Summary, Amend, View History

Displaying 1 of 1 records

COMMON TRANSACTIONS

Valuation of Expenditures

In general, the value of an expenditure equals its cost to the lobbyist.

Expenditure = Actual Cost; or

When the cost of an expenditure is artificially low (e.g., a registered lobbyist receives a free ticket to an event, which is then given to a public official), the value of the expenditure is equal to the fair market value of the benefit (e.g., the cost to the public).

Artificially Low Expenditure = Fair Market Value

The value of food and beverage provided to a public official (or members of their staff or immediate family), is calculated by dividing the total expenditure by the number of individuals attending the meal or event.

Food and Beverage Value = Total Cost ÷ Number of Individuals Present

EXCEPT:

- When the actual amount expended was based on an anticipated number of attendees, one or more of whom did not attend, you may divide the total expenditure by the number of individuals originally expected; or
- In a restaurant setting, with stated menu prices and individual orders, you may determine the actual benefit received by each individual.

Regulations of Connecticut State Agencies [§ 1-92-48 \(c\)](#).

General Itemization

Each expenditure of \$10 or more for the benefit of a public official, his or her staff or immediate family member (except for legislative receptions, and charitable/civic events, see page 29) must be itemized on your financial reports. Specifically, the report requires the following information:

- The nature of the benefit (e.g., a meal) and its date;
- Circumstances (attending lobbyists' names);
- Exact dollar amount expended; and
- Name, title and agency of individual receiving the benefit.

Expenses under \$10 that are related to lobbying are included in the aggregate amount. (General Statutes [§ 1-96 \(e\)](#).)

Notification Requirements

In addition to the notification requirements for legislative receptions and necessary expenses, if you give a reportable person (public official, state employee, candidate for public office or a candidate's staff or immediate family member) anything of value that is subject to itemization (i.e., \$10 or more), you must, within 10 days, provide a written report to the recipient, stating your name, a description of the item, the value of the item, and the cumulative value of all items provided to the same recipient in that calendar year. This provides a valuable check or reminder for both parties of the Code's aggregate limits. General Statutes [§ 1-97 \(d\)](#).

Note: The 10-day notification is not required when a lobbyist pays or reimburses necessary expenses for a public official's or state employee's active participation in his or her official capacity. See [Advisory Opinion No. 2008-2](#).

Reimbursement

An expenditure does not have to be reported if the recipient reimburses you within 30 days or prior to the due date of your next report, whichever is earlier. Reimbursements should be made by check to ensure verification upon audit. Regulations of Connecticut State Agencies [§ 1-92-54 \(c\)](#).

Splitting Costs

Two or more lobbyists may split the cost of a meal worth **up to \$49.99** for a public official or state employee. Similarly, lobbyists may split the cost of a gift worth **up to \$10**.

It is not permissible to circumvent the food and beverage or other gift exception limitations by splitting the cost of more expensive meals or items.

NECESSARY EXPENSES

General Statutes [§ 1-84 \(k\)](#) – the “necessary expenses” provision – prohibits a state employee or official from accepting a fee or honorarium for participating at an event *in his or her official capacity*.

Providing Necessary Expenses

However, a state employee or official may receive payment or reimbursement for “necessary expenses” if – in his or her official capacity – the employee or official actively participates in the event (for example, gives a speech or runs a workshop).

“Necessary expenses” are not considered gifts and may include the cost of:

- Travel (coach);
- Lodging (standard room for the night before, of, and immediately following the event);
- Meals (non-lavish); and
- Conference or seminar registration fees.

“Necessary expenses” **do not** include the cost of entertainment (tickets to sporting events, golf outings, night clubs, etc.) or payments of expenses for family members or other guests.

Only the sponsor of the event may pay for or reimburse a participating state employee or official’s.” [Advisory Opinion No. 2012-9](#).

Within 30 days of receiving payment or reimbursement of “necessary expenses” for **lodging or out-of-state travel**, the employee or official must file an ETH-NE form with the OSE. General Statutes [§ 1-84\(k\)](#).

Example:

Question: A restricted donor is hosting an out-of-state conference and would like a legislator to come and give a speech in his official capacity. The restricted donor has offered to pay the legislator’s travel and lodging expenses, to waive his conference registration fee, and to give him a \$500 honorarium. Permissible?

Answer: The legislator may not accept the \$500 honorarium (because he is participating in his official capacity), but may accept payment or reimbursement for “necessary expenses,” which include coach-class travel, standard lodging for the nights before, of and after the speech, and waiver of the conference registration fee.

Note: For additional information please see: [Necessary Expenses & Gifts to the State: A Guide for Public Officials and State Employees](#).

LEGISLATIVE RECEPTIONS

What are Legislative Receptions?

Registered lobbyists may hold one legislative reception per year for General Assembly members, in accordance with the gift exceptions discussed below. General Statutes [§ 1-91 \(7\) \(J\) and \(K\)](#).

There are two types of legislative receptions. Lobbyists may choose to hold **one or the other** per calendar year – not both.

- The first type is a publicly-noticed legislative reception to which all members of the General Assembly are invited and the cost for food and beverage may not exceed \$49.99 per person.
- The second type is a regional reception to which all General Assembly members from a particular region in the state are invited and the cost for food and beverage may not exceed \$49.99 per person.

Related Itemization on Financial Reports

Legislative receptions must be itemized by listing all attendees on lobbyist financial reports when the cost per person is \$30 or more and does not exceed \$49.99. This holds true for both types of receptions described above. General Statutes [§ 1-96 \(e\)](#).

Associated Notification Requirements

If you know that a legislative reception will result in an itemization that totals \$30 or more per person, you must include on the invitation or published notice that the event is expected to be reportable as such. General Statutes [§ 1-96d](#).

Note: The requirement that legislative receptions be “publicly noticed” is satisfied by publishing the event in the Connecticut General Assembly Bulletin or in the Interim Bulletin. When those options are not available, notice should be published in a newspaper, circulating either statewide or regionally, depending on the nature of the event. See [Advisory Opinion No. 2007-3](#).

Note: A **charitable or civic event** at which a state servant participates in his or her official capacity carries identical itemization and notification requirements. General Statutes [§ 1-96 \(e\)](#).

GIFTS

Giving Gifts to State Personnel

As a registered lobbyist, you are considered to be a **restricted donor**. In general, public officials or state employees may not accept gifts from restricted donors.

A **gift** is defined as anything of value that is directly and personally received *unless* consideration of equal or greater value is provided.

General Statutes [§ 1-91 \(7\)](#).

Gift Exceptions

There are, however, certain exceptions to this definition of “gift.” Not all exceptions are covered below; see General Statutes [§§ 1-91 \(7\) \(A\) – \(Q\)](#) for the complete list.

Token Items – Items valued less than \$10 (such as a pen or mug), provided the annual aggregate of such items from a single source is \$50 or less.

General Statutes [§ 1-91 \(7\) \(P\)](#).

Food and Beverage – Up to \$50 in food/beverage annually, provided the donor or a representative is in attendance when it is being consumed.

General Statutes [§ 1-91 \(7\) \(I\)](#).

Major Life Events – Individual communicator lobbyists are the only restricted donors who may make use of this exception. There is a \$1,000 limit on a gift a registered lobbyist gives to a public official, state employee or a member of that official’s or employee’s family for the following major life events: wedding, funeral, birth or adoption of a child, ceremony commemorating induction into religious adulthood, or retirement from state service. General Statutes [§ 1-91 \(7\) \(L\)](#) and Regulations of Connecticut State Agencies [§ 1-92-53](#).

Gifts to the State – Goods or services given to a state entity. The gift must facilitate state action, and must (1) be for use on state property (e.g., a computer), (2) support a state event (e.g., funds to support an agency event), or (3) support the participation by a state employee or official at an event (e.g., funds for an agency employee to attend an educational conference relevant to his state duties).

General Statutes [§ 1-91 \(7\) \(E\)](#).

Other Exceptions – There are a total of 17 separate gift exceptions in the Code. Also exempt from the definition of gift are items such as informational materials germane to state action; ceremonial plaques or awards costing less than \$100; or promotional items, rebates or discounts that are available to the general public.

POLITICAL CONTRIBUTIONS

Permissible Contributions

There are certain exceptions to the definition of gift. Items noted in these exceptions are permissible and may be accepted from restricted as well as non-restricted sources. Among these exceptions are two that pertain to political contributions:

- A political contribution otherwise reported as required by law or a donation or payment as described in General Statutes [§ 9-601a \(b\) \(9\) or \(10\)](#); and
- Volunteer services to aid or promote the success or defeat of any political party, any candidate(s) for public office or the position of convention delegate, town committee member or any referendum question.

Prohibitions and Considerations

- It is not permissible to offer or give a public official, state employee or candidate for public office (or such candidate's family member or associated business) anything of value, including a political contribution, with the understanding that a vote, official action or judgment of the recipient would be (or had been) influenced by the contribution. General Statutes [§ 1-84 \(f\)](#).
- It is not permissible for a public official, state employee or candidate for public office to solicit or accept anything of value, including a political contribution, with the understanding that a vote, official action or judgment of the recipient would be (or had been) influenced by the contribution. General Statutes [§ 1-84 \(g\)](#).
- The State Treasurer may neither pay nor enter into a contract with an investment services firm if a political committee established by the firm or a principal of the firm has made a contribution to (or solicited a contribution for) an exploratory or candidate committee established by the State Treasurer as a candidate for nomination or election to the Office of State Treasurer. General Statutes [§ 1-84 \(n\)](#).

Sessional Ban on Lobbyist Contributions

Please be aware that there is a ban on campaign contributions and the solicitation of such contributions by registered lobbyists and their affiliated political committees to the General Assembly and statewide candidates and their affiliated political committees during the legislative session. General Statutes [§ 9-610 \(e\)](#).

Note: This provision falls outside of OSE's jurisdiction but is within the jurisdiction of the State Elections Enforcement Commission.

POLITICAL CONVENTIONS

Benefits Received at Conventions

Generally, the Ethics Code's gift and reporting provisions apply with equal effect to political and nonpolitical events and to in-state and out-of-state events. [Advisory Opinion No. 2004-12](#) addresses a number of hypothetical questions regarding the acceptance of meals or other benefits provided to public officials (e.g., legislators) at *national* legislative organizations or *national* political conventions. Specifically, benefits may be offered by the following sources, with the accompanying outcomes:

- Restricted donor (i.e., registered lobbyist; entity regulated by, doing business with or seeking to do business with official's agency; etc.)
 - Any benefit received must fall within one of the gift exceptions in General Statutes [§ 1-91 \(7\) \(A\) - \(Q\)](#); for example, the \$50 annual limit on food and beverage.
- Non-restricted donor (e.g. out-of-state lobbyist whose employer does not have a Connecticut lobbyist):
 - If a benefit is offered by virtue of one's public position, benefit must be limited to less than \$100. [Advisory Opinion No. 2003-13](#).
 - If the benefit is strictly personal, e.g., an out-of-state lobbyist and legislator are longtime friends, no limit exists.

<p>Note: If the recipient is at the conference because of his or her public office, the presumption is that any benefit provided is offered by virtue of his or her position.</p>
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- Restricted donor listed as a sponsor of the event:
 - If the convention is *generally* sponsored or underwritten by a corporation, and its funds are not earmarked for an event with Connecticut attendees, there is a \$100 limit to the benefits a legislator or public official may receive.
 - If a corporation provides funds with the explicit understanding that the monies will be used to underwrite an event at which Connecticut officials will be in attendance, the Code's gift restrictions apply.
- National legislative organization providing travel scholarships (funded by corporate contributions) for legislators:
 - Whether or not a scholarship account is funded by lobbyist contributions, a legislator or public official may accept travel expenses and accommodations (and other "necessary expenses") for an article, appearance or speech, or for participation at an event in one's official capacity.
 - Within 30 days of receiving reimbursement of necessary expenses for lodging or out-of-state travel, a public official/state employee must file an [ETH-NE](#) form with the Office of State Ethics.

Charitable Events at Conventions

[Advisory Opinion No. 2004-10](#) contemplates whether public officials and state employees may accept free tickets to a charitable event held in conjunction with a convention under the charitable event gift exception. In general, for this exception to apply (i.e., for the free ticket to be permissible):

- The official or employee must be invited to participate in his or her official capacity;
- Admission must be provided by the primary sponsoring entity (e.g., the charity, as [Advisory Opinion No. 2004-10](#) concluded); and
- Benefits may only include event admission and food and beverage (no travel or other tangible gifts over \$10).

<p>Note: There is nothing that would prohibit the official or employee from paying to attend the event in question.</p>
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Restrictions and Reporting for Lobbyists

As addressed in [Advisory Opinion No. 2000-19](#), the Lobbyist Code's gift restrictions and reporting requirements apply to expenditures for food and drink or entertainment made at the two major party political conventions.

- These restrictions and reporting requirements apply whether expenditures are made in or outside of CT and whether the purpose of the event is in furtherance of or unrelated to lobbying.
- Likewise, the provisions apply whether expenditures are made directly by the CT lobbyist or indirectly by a national association or business entity "on behalf of" the CT lobbyist.
- Further, the same requirements apply to convention events underwritten by a lobbyist, if its donations to the political convention committees were made with the explicit understanding that the monies would be used to pay for an event at which CT officials would be in attendance.

OTHER CONSIDERATIONS AND CODE REQUIREMENTS

Prohibited Activities: General Statutes [§ 1-97](#).

Contingency Fees – No person may be employed as a lobbyist for compensation that is contingent upon the outcome of any administrative or legislative action.

General Statutes [§ 1-97 \(b\)](#).

Public Official's Personal Obligation – No lobbyist may do anything with the purpose of placing any public official under personal obligation.

General Statutes [§ 1-97 \(c\) \(1\)](#).

Lobbyist Employment – No lobbyist may attempt to influence any legislative or administrative action for the purpose of thereafter being employed to secure its defeat. General Statutes [§ 1-97 \(c\) \(2\)](#).

Communication/Information – No lobbyist may cause any communication to be sent to a public official in the name of any other individual except with the consent of such individual. General Statutes [§ 1-97 \(c\) \(3\)](#). Further, no person shall take or threaten to take official action against an individual for disclosing information to the Office of State Ethics.

Retained by State or Quasi-Public Agency – No lobbyist may be retained as a lobbyist by a state or quasi-public agency.

Penalties: General Statutes [§ 1-99](#).

Individuals may be subject to a penalty of \$10,000 for each violation of the Code of Ethics. Failure to file required reports can result in a fine of up to \$10,000, accrued at a rate of up to \$10 per day for each delinquent report.

Intentional violation of the Code of Ethics can result in a prohibition from engaging in the profession of lobbyist for a period of up to two years. The Citizen's Ethics Advisory Board may also report its findings to the Chief State's Attorney for any additional actions deemed necessary. General Statutes [§ 1-99\(c\)](#).