



## STATE OF CONNECTICUT OFFICE OF STATE ETHICS

FOR IMMEDIATE RELEASE

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### **Office of State Ethics Enters into \$10,000 Settlement with a New York-based Company which Provided Impermissible Gifts to Employees and a Board Member of the Connecticut Port Authority**

**Hartford, CT** – Seabury PFRA, LLC (“Seabury”), a New York-based company, violated Section 1-84 (m) of the Code of Ethics when it gave gifts to employees and a board member of the Connecticut Port Authority (“CPA”), a state quasi-public agency, in 2017 and 2019. Section 1-84 (m) prohibits any person from knowingly giving, directly or indirectly, gifts to a public official or state employee when that person is doing business or seeking to do business with that public official or state employee’s agency or department.

Throughout 2017, in addition to submitting responses to CPA requests for proposals and qualifications, Seabury was also seeking to develop a business advisory relationship with the CPA. During this time period, Seabury provided gifts totaling around \$800.00, including food, drinks and a leather personal accessory to a CPA employee and the employee’s spouse at a charity event in May; food, drinks, and an overnight stay at a Greenwich club to that same CPA employee and spouse in August; and, food and drinks to a CPA board member on the same date in August of that year.

During the relevant time period in 2019, Seabury was under contract to advise the CPA and, in addition, was seeking additional contracts with the CPA when it provided gifts totaling around \$2,300.00, including food, drinks, and a leather handbag to a CPA employee and the CPA employee’s spouse at a charity event in April 2019; and, food, drinks, and tickets to a National Hockey League game to two CPA employees in May 2019.

Under the terms of the Stipulation and Consent Order, Seabury agreed to pay a civil penalty of \$10,000 (\$2,500.00 for the 2017 violations and \$7,500.00 for the 2019 violations) to settle this matter. Of note, prior to the initiation of this Ethics matter, Seabury received reimbursement from the recipients for the cost of the hockey tickets and the May 9, 2019 food and drinks. However, because these items were not reimbursed within 30 days of receipt, as required by § 1-92-54 (c) of the Regulations of Connecticut State Agencies, these items were attributed to Seabury. The other gifts from Seabury in 2017 and 2019 were not reimbursed by the recipients.

“Private companies that seek to engage state and quasi-public agencies for contracts must understand that fostering good will with state officials and employees cannot involve provision of impermissible gifts.” said Executive Director Peter Lewandowski. “Violation of the Code’s gift laws will be forcefully prosecuted by the Office of State Ethics.”

Seabury cooperated with this Office’s investigation and admitted to violations as alleged in the Complaint.

View: [Stipulation and Consent Order: 2020-15](#)

*The Connecticut Office of State Ethics mission is to ensure honesty, integrity and accountability in state government through education, interpretation and enforcement of the State of Connecticut Code of Ethics. To contact us please visit our website at [www.ct.gov/ethics](http://www.ct.gov/ethics) or call us at (860) 263-2400.*