



OFFICE OF STATE ETHICS

EXISTING POSITIONS AT CERTAIN REGULATORY AGENCIES SUBJECT TO POST-STATE EMPLOYMENT PROHIBITIONS

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Contact Information

Connecticut Office of State Ethics
Peter Lewandowski, Executive Director

Address: 165 Capitol Avenue
Suite 1200
Hartford, CT 06106

Telephone: 860-263-2400 Main Line
OR [Staff Phone Number Listing](#)

Facsimile: 860-263-2402

Website: ct.gov/ethics

Business Hours: 8:30 am to 5:00 pm

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

Introduction

The Code of Ethics for Public Officials generally prohibits public officials and state employees in certain regulatory agencies who hold positions with significant decision-making or supervisory responsibilities from accepting employment for one year after leaving state service with a business subject to regulation by their former agency. The prohibition is two years for certain employment in the gaming industry.

[Public Act 21-164](#) requires that by November 1, 2021, and at least annually from then on, the heads of certain executive branch regulatory agencies or their designees electronically submit to the Office of State Ethics (OSE) designations of all existing positions that are subject to these restrictions. They must do so in a manner the Citizen's Ethics Advisory Board prescribes and must make these designations in consultation with the OSE.

The agency head or designee must submit any newly created positions that are subject to these provisions, but not included in the annual submission to OSE, within 30 days after the position's creation. OSE is required to maintain a list of all designated positions and post it on its website.

The designation requirement applies to the Office of Health Strategy's Health Systems Planning Unit; Connecticut Siting Council; Department of Banking; Insurance Department; Department of Emergency Services and Public Protection; Liquor Control Division within the Department of Consumer Protection; the Public Utilities Regulatory Authority, including the Office of Consumer Counsel; and the Department of Consumer Protection.

Designated Positions - Section 1-84b (c)

SECTION 1-84b (c) DESIGNATIONS

Connecticut General Statutes [Section 1-84b \(c\)](#) provides as follows:

(c) The provisions of this subsection apply to present or former executive branch public officials or state employees of an agency who hold or formerly held positions which involve significant decision-making or supervisory responsibility. Such positions shall be designated as such by the agency concerned, in consultation with the Office of State Ethics, except that such provisions shall not apply to members or former members of the boards or commissions who serve ex officio, who are required by statute to represent the regulated industry or who are permitted by statute to have a past or present affiliation with the regulated industry. On or before November 1, 2021, and not less than annually thereafter, the head of each agency concerned, or his or her designee, shall submit the designation of all positions in existence on such date that are subject to the provisions of this subsection to the office electronically, in a manner prescribed by the Citizen's Ethics Advisory Board. If an agency creates such a position after its annual submission under this subsection, the head of such agency, or his or her designee, shall submit the designation of the newly created position not later than thirty days after the creation of such position. As used in this subsection, "agency" means the Health Systems Planning Unit of the Office of Health Strategy, the Connecticut Siting Council, the Department of Banking, the Insurance Department, the Department of Emergency Services and Public Protection, the office within the Department of Consumer Protection that carries out the duties and responsibilities of sections 30-2 to 30-68m, inclusive, the Public Utilities Regulatory Authority, including the Office of Consumer Counsel, and the Department of Consumer Protection and the term "employment" means professional services or other services rendered as an employee or as an independent contractor.

(1) No public official or state employee in an executive branch position designated pursuant to the provisions of this subsection shall negotiate for, seek or accept employment with any business subject to regulation by his agency.

(2) No former public official or state employee who held such a position in the executive branch shall, within one year after leaving an agency, accept employment with a business subject to regulation by that agency.

(3) No business shall employ a present or former public official or state employee in violation of this subsection.

Designated Positions by Agency – Section 1-84b (c) Designations (1 of 2)

Department of Banking

- Banking Commissioner
- Deputy Banking Commissioner
- Director of Financial Institutions
- Director of Securities & Business Investments Division
- Director of Consumer Credit Division
- Director of Government Relations and Consumer Affairs
- General Counsel & Chief of Staff
- Fiscal Administrative Manager 1
- Senior Assistant Division Director for Financial Institutions

Insurance Department

- Commissioner
- Deputy Commissioner
- Director of Property & Casualty Division
- Director of Life & Health Division
- Director of Legal Division
- Director of Financial Analysis
- Director of Financial Examination
- Director of Market Conduct/Fraud Investigation & Licensing Division
- Chief Insurance Actuary
- Insurance Program Manager – Captive Insurance

The Health Systems Planning Unit of the Office of Health Strategy

- Executive Director
- Chief of Staff
- Director of Legislation and Regulation
- Agency Legal Director
- Planning Specialist
- Manager, Research and Planning

Connecticut Siting Council

- Members Appointed by the Governor (5)
- Member Appointed by President Pro Tempore of the Senate
- Member Appointed by Speaker of the House
- Executive Director

Designated Positions by Agency – Section 1-84b (c) Designations (2 of 2)

Public Utilities Regulatory Authority

- Chairperson
- Vice-Chairperson
- Commissioner
- Office Director (Legal)
- Public Utility Chief of Utility Regulation
- Director of Legislation, Regulations and Communications
- Public Utilities Director of Utility Regulation
- Procurement Manager
- Director of Adjudications
- Chief of Staff (Chairperson)

Department of Consumer Protection

- Commissioner
- Deputy Commissioner
- Legal Director

Liquor Control Division, Department of Consumer Protection

- Chairman
- Commissioners
- CP Division Director for Liquor

Department of Emergency Services and Public Protection

- Commissioner
- Deputy Commissioner (Colonel) of the Division of State Police
- Deputy Commissioner of the Division of Emergency Management and Homeland Security
- Director of the Division of Statewide Emergency Telecommunications
- Chief of Staff & Special Counsel
- Counsel to the Commissioner
- Agency Legal Director

Office of Consumer Counsel

- Consumer Counsel
- Agency Legal Director & Regulatory Director
- Supervisor of Utility Financial Analysis

Designated Positions – Section 1-84b (d) Designations

SECTION 1-84b (d) DESIGNATIONS

Connecticut General Statutes [Section 1-84b \(d\) - \(e\)](#) provides as follows:

(d) The provisions of subsection (e) of this section apply to (1) present or former Department of Consumer Protection public officials or state employees who hold or formerly held positions which involve significant decision-making or supervisory responsibility and designated as such by the department, in consultation with the Office of State Ethics, and (2) present or former public officials or state employees of other agencies who hold or formerly held positions which involve significant decision-making or supervisory responsibility concerning the regulation or investigation of (A) any business entity (i) engaged in Indian gaming operations in the state, and (ii) in which a federally-recognized Indian tribe in the state owns a controlling interest, or (B) a governmental agency of a federally-recognized Indian tribe engaged in Indian gaming operations in the state, which positions are designated as such by the agency concerned, in consultation with the Office of State Ethics. On or before November 1, 2021, and not less than annually thereafter, the Commissioner of Consumer Protection and the head of each agency concerned, or their designees, shall submit designations of all positions in existence on such date that are subject to the provisions of this subsection to the office electronically, in a manner prescribed by the Citizen's Ethics Advisory Board. If the department or agency concerned creates such a position after its annual submission under this subsection, the Commissioner of Consumer Protection or the head of such agency, as applicable, or their designees, shall submit the designation of the newly created position not later than thirty days after the creation of such position.

(e) (1) No Department of Consumer Protection public official or state employee or other public official or state employee described in subdivision (2) of subsection (d) of this section shall negotiate for, seek or accept employment with (A) a business entity (i) engaged in Indian gaming operations in the state, and (ii) in which a federally-recognized Indian tribe in the state owns a controlling interest, or (B) a governmental agency of a federally-recognized Indian tribe engaged in Indian gaming operations in the state.

(2) No former Department of Consumer Protection public official or state employee or other former public official or state employee described in subdivision (2) of subsection (d) of this section, who held such a position shall, within two years after leaving such agency, accept employment with (A) a business entity (i) engaged in Indian gaming operations in the state, and (ii) in which a federally-recognized Indian tribe in the state owns a controlling interest, or (B) a governmental agency of a federally-recognized Indian tribe engaged in Indian gaming operations in the state.

(3) As used in this subsection, “employment” means professional services or other services rendered as an employee or as an independent contractor.

Existing Positions at Certain Regulatory Agencies
Subject to Post-State Employment Prohibitions

Designated Positions by Agency – Section 1-84b (d) Designations

Department of Consumer Protection – Gaming

- Legal Director
- Legal Program Director overseeing gaming enforcement
- CP Division Director – Gaming
- Gaming Division Assistant Director (State Program Manager)
- CP Gaming Regulation Supervisor (Foxwoods Casino)
- CP Gaming Regulation Supervisor (Mohegan Sun Casino)
- CP Gaming Regulation Supervisor supervising Tribal casino staff
- Supervising Accounts Examiner (Casinos)
- License and Applications Supervisor (Casinos)

Department of Emergency Services and Public Protection

- Commissioner
- Deputy Commissioner (Colonel) of the Division of State Police