

**Office of State Ethics – Annual Report to the Governor  
Calendar Year 2025**



*Office of State Ethics (OSE) respectfully submits its Annual Report for Calendar Year 2025. This report outlines OSE’s **structure, statutory responsibilities, operational activity, and legislative proposals**, and reflects the agency’s continued commitment to promoting ethical conduct, transparency, and accountability in Connecticut state government.*

**Connecticut Office of State Ethics**

165 Capitol Avenue, Suite 1200  
Hartford, CT 06106

Telephone: 860-263-2400

Facsimile: 860-263-2402

Website: [ct.gov/ethics](http://ct.gov/ethics)

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

## 1. OSE Structure

### **Mission and Authority**

OSE practices and promotes the highest ethical standards and accountability in state government. It fulfills this mission by providing education and legal advice, ensuring meaningful financial disclosure, and impartially enforcing Connecticut's Codes of Ethics.

OSE administers Chapter 10 of the Connecticut General Statutes, including:

- Part I – Code of Ethics for Public Officials
- Part II – Code of Ethics for Lobbyists
- Part III – Lobbying: Miscellaneous Provisions
- Part IV – Ethical Considerations Concerning Bidding and State Contracts

OSE's statutory responsibilities fall into four principal categories: education, interpretation, enforcement, and disclosure.

OSE provides education, guidance, and advice to state employees, public officials, lobbyists, and state contractors. The Citizen's Ethics Advisory Board (CEAB) adjudicates cases brought under the Codes of Ethics, makes findings of violations, and issues advisory opinions interpreting the Codes as applied to specific circumstances. All investigations and prosecutions are the responsibility of the Ethics Enforcement Officer.

### **Organizational Structure**

OSE is headed by the nine-member Citizen's Ethics Advisory Board and the Executive Director. The agency is organized into three divisions: Legal, Enforcement, and Administrative.

### **Citizen's Ethics Advisory Board**

CEAB members are appointed by the Governor and legislative leadership for staggered four-year terms. The following members served during calendar year 2025:

- **N. Beth Cook** (West Hartford) – Chair  
Appointed by Senate President Pro Tempore Martin Looney (term expires September 30, 2026)
- **Charles F. Chiusano** (Fairfield) – Vice Chair  
Appointed by Senate Republican Leader Stephen Harding (term expires September 30, 2029)
- **Karess Cannon** (Meriden)  
Appointed by House Majority Leader Jason Rojas (term expires September 30, 2027)
- **Meaghan Cooper** (Hartford)  
Appointed by Speaker Matthew Ritter (term expires September 30, 2027)
- **Kenneth Greenberg** (Greenwich)  
Appointed by Governor Ned Lamont (term expires September 30, 2028)

- **Cheryl Lipson** (Orange)  
Appointed by House Republican Leader Vincent Candelora (term expires September 30, 2027)
- **Kevin Profit** (Bridgeport)  
Appointed by Senate Majority Leader Bob Duff (term expires September 30, 2029)
- **Laura A. Schuyler** (West Simsbury)  
Appointed by Governor Ned Lamont (term expires September 30, 2028)

One gubernatorial appointment is vacant as of December 31, 2025.

Board transitions during 2025 included:

- **Mary Bigelow** (Northford) – Appointed by Senate Majority Leader Bob Duff; term expired September 30, 2025
- **Dena Castricone** (North Haven) – Appointed by Governor Ned Lamont; resigned September 2025

### Staff and Budget

OSE employs 16 staff members across its three divisions under the leadership of Executive Director Peter Lewandowski, who is appointed by CEAB and is responsible for the overall welfare and effectiveness of the agency.

OSE managerial staff includes:

- General Counsel Brian O'Dowd
- Ethics Enforcement Officer Mark Wasielewski
- Director of Education and Communications Sarah Clark

As an independent watchdog agency, OSE maintains its own IT staff and systems separate from BITS. OSE also shares dedicated human resources and fiscal staff with the Freedom of Information Commission and the State Elections Enforcement Commission.

For Fiscal Year 2025:

- Appropriation: \$2,030,223
- Actual expenditures: \$2,020,421

This expenditure represents an approximate cost of \$0.55 per Connecticut resident<sup>1</sup> to administer and enforce the State's ethics laws.

<sup>1</sup>Calculation based on U.S. Census Bureau population estimate for Connecticut as of July 1, 2025 at 3,688,496

## 2. OSE Functions

### Legal Division

The Legal Division provides advice and opinions regarding the Ethics Codes to the regulated community and the public. This community includes approximately 33,000 public officials and state employees, more than 3,158 lobbyists, and all state contractors.

The Division consists of a General Counsel (who also serves as counsel to CEAB), three staff attorneys, and a paralegal.

In calendar year 2025:

- 534 requests for advice were received
- 371 written staff opinions were issued
- 159 additional requests were handled via telephone or in-person meetings

### Advisory Opinions issued in 2025

#### [Advisory Opinion No. 2025-1](#) **Application of the Code of Ethics to a Workers' Compensation Commission Administrative Law Judge's Uncompensated Service on a Local Board of Finance**

The Citizen's Ethics Advisory Board concluded that Section 5-266a-1 of the regulations—which bars certain persons in state service from holding elective municipal office in certain instances—would not apply to the petitioner in his capacity as an Administrative Law Judge on the Workers' Compensation Commission.

#### [Advisory Opinion No. 2025-2](#) **Application of General Statutes § 1-83 (a) (1) to the Members of the Boards of Directors of the Connecticut Arts Council and the Connecticut Arts Council Foundation**

The Citizen's Ethics Advisory Board concluded that (1) board members of the Connecticut Arts Council are required to file a Statement of Financial Interests under § 1-83 (a) (1) if the Department of Economic and Community Development Commissioner determines that they meet the Governor's Standard; and (2) board members of the Connecticut Arts Council Foundation are not required to do so, because they are not "members of the Executive Department" or "employees of quasi-public agencies", and are thus not subject to the Governor's Standard.

#### [Advisory Opinion No. 2025-3](#) **Application of the Code's outside-employment provisions to a staff attorney of the Department of Social Services**

The Citizen's Ethics Advisory Board concluded that the petitioner may, in her private capacity, provide (1) mediation services in family law matters through her business, CT Mediation & Arbitration Services, LLC, and (2) legal drafting services (wills, powers of attorney, etc.), if she abides by certain restrictions.

#### [Advisory Opinion No. 2025-4](#) **Application of the Code's requirements on Statements of Financial Interests (SFI) from specific members of the Board of Regents**

The Citizen's Ethics Advisory Board concluded that the student members of the Board of Regents are not required to file an SFI, and that the faculty member and OPM Undersecretary are required to file,

in their capacity as members of the Board of Regents, only if, as non-voting members, they are deemed by the chairperson of the Board of Regents to meet the Governor's Standard and are thus designated to file.

### **Freedom of Information (FOI) Compliance**

OSE responded to 36 Freedom of Information requests in 2025.

### **Disclosure and Information Technology**

OSE Compliance with the Codes of Ethics depends in large part on accurate documentation and transparent disclosure. OSE administers electronic systems for SFIs, lobbyist registrations and reports, and internal case management.

OSE employs two IT specialists who divide their time between OSE and the Freedom of Information Commission pursuant to a Memorandum of Understanding.

In 2025, OSE:

- Continued improvements to public official, lobbyist, and case management filing systems
- Designed and launched a new ethics training system with an interactive dashboard
- Expanded access to online module training, live training requests, training history review, and completion certificate generation
- Updated the agency website and brought it into compliance with the Americans with Disabilities Act

Although OSE continually works to improve usability and functionality, rapidly changing technology necessitates a comprehensive modernization of filing systems. OSE intends to seek bonding support for substantial system upgrades, including enhanced real-time public access to filed data.

### **Statement of Financial Interests (SFI)**

Pursuant to CGS § 1-83(a)(1), elected officials, members of the General Assembly, and designated state officials and employees must file annual SFIs electronically with OSE. The Governor's Office establishes a standard designation of additional executive branch filers, and agency heads determine further designations among staff and board members.

SFI disclosures include associated businesses, sources of income exceeding \$1,000, real property interests, and creditors.

In 2025:

- 2,984 individuals were required to file
- 98% filed on time
- Of 94 Agencies, Offices, Commissions, and Quasi-Public Agencies, 72% achieved 100% timely compliance
- An additional 2% earned "Commitment to Excellence" designation, missing full compliance by only one filing

SFIs serve both as a conflict-prevention tool for officials and as a transparency mechanism for the public.

### **Lobbyist Filing System**

During the 2025–2026 biennial registration period, OSE processed thousands of financial reports filed electronically by business organizations, client lobbyists, and in-house communicator lobbyists.

In 2025:

- 2,330 lobbyist registrations were processed
- \$968,750 in registration fees was collected and deposited into the General Fund

### **Enforcement**

The Enforcement Division investigates and prosecutes alleged violations of the Ethics Codes. The Division consists of the Ethics Enforcement Officer, two staff attorneys, one legal investigator, and one paralegal.

In 2025:

- 151 matters and reviews of potential violations were conducted
- 65 matters were resolved by consent order or other resolution
- \$28,095 in penalties was collected

These penalties included payments in 51 matters involving late lobbyist registrations or delinquent financial reports and 17 matters involving public officials who failed to file SFIs timely.

### **UAPA Matters**

- 87 matters were opened under the Uniform Administrative Procedure Act
- All were resolved informally prior to hearing
- No UAPA hearings were conducted in 2025

### **Complaints and Evaluations**

- 64 confidential evaluations were opened
- 41 complaints were filed or received
  - 33 from external sources
  - 8 initiated by the Division

OSE also received multiple tips that, upon review, were outside agency jurisdiction.

### **Background Checks**

OSE conducted 50 background checks in 2025, typically relating to individuals under consideration for appointive office.

## **Audits**

OSE employs one auditor to conduct statutorily defined audits of registered client lobbyists and their associated communicators. Audit subjects are selected through a lottery process at the CEAB's November meeting. In 2024 and 2025, OSE increased the annual client selection pool by 30 percent (from 20 to 30 clients).

In 2025:

- 32 audit reports were approved
- 31 client audits were approved; 17 (55%) contained adverse findings (compared to 54% in 2024)
- 1 communicator audit was approved and contained no adverse findings
- No corrective actions were imposed

## **Education and Outreach**

OSE advances its goal of *"compliance through education"* by providing written guidance, individualized training, and proactive communication.

### **Training**

OSE conducted 72 trainings in 2025 for public officials, state employees, lobbyists, and contractors. Each session was tailored to address agency- or office-specific needs.

OSE administers:

- Mandatory ethics training for newly hired state employees
- Mandatory legislative training every four years and upon first election pursuant to CGS § 1-81c
- Expanded training outreach to lobbying firms and similar organizations

OSE continues to offer self-service online training, in-person sessions, online sessions, and hybrid options to ensure accessibility and flexibility.

### **Newsletters**

OSE distributes two electronic newsletters:

- One to nearly 150 designated ethics liaisons and state contacts
- One to more than 1,500 emails registered in the lobbyist filing system

These newsletters provide updates on advisory opinions, filing guidance, best practices, enforcement developments, and training opportunities.

OSE's website ([ct.gov/ethics](http://ct.gov/ethics)) is continually updated to ensure public accessibility and usability.

### **Media and Partnerships**

OSE issued press releases and e-alerts regarding advisory opinions, declaratory rulings, and enforcement settlements and responded promptly to media inquiries.

OSE also collaborates with municipal organizations and external stakeholders seeking best-practice guidance and remains committed to expanding educational outreach statewide.

### **3. Proposed Legislation**

During the 2025 Regular Session of the Connecticut General Assembly, OSE submitted the following proposals:

- **S.B. 1430** – An Act Implementing the Recommendations of OSE for Revisions to the State Code of Ethics
  - Passed the Senate; did not advance in the House
- **S.B. 1296** – An Act Concerning Statements of Financial Interests
  - Did not advance in the Senate
- **H.B. 6931** – An Act Concerning Conflicts of Interest Due to an Employer Other Than the State
  - Did not advance in the House