

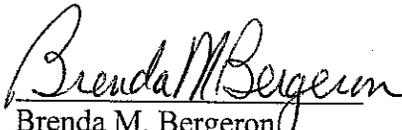
COUNT TWO

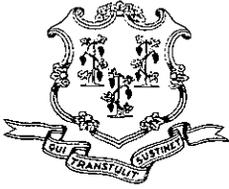
1. Paragraph One of Count One is hereby incorporated as Paragraph One of Count Two.
2. Under Conn. Gen. Stat. §1-96(e), a client registrant is required to file an accurate itemized statement of each expenditure of ten dollars or more per person per occasion made by the reporting registrant for the benefit of a public official, a member of his or her staff and /or a member of his or her immediate family.
3. Although UDV did provide an itemization of the Luncheon, it relied on an unsubstantiated number of attendees to calculate the per person cost. Therefore, UDV cannot establish that the amount reported per person, \$41.39, is accurate.
4. The failure of UDV to file a financial report for the 3-4th quarter of 2000 which accurately reflected these expenditures violated Conn. Gen. Stat. §1-96.

COUNT THREE

1. Paragraph One of Count One is hereby incorporated as Paragraph One of Count Three.
2. Under Conn. Gen. Stat. §1-96a(a), a registrant is required to obtain all documents necessary to substantiate the financial reports required by Conn. Gen. Stat. §1-96 for a period of three years from the date of the filing of such reports.
3. UDV violated Conn. Gen. Stat. §1-96a(a) by failing to maintain records to substantiate the financial reporting made in connection with the Luncheon.

5-31-01
Dated


Brenda M. Bergeron
Commission Attorney



STATE OF CONNECTICUT

STATE ETHICS COMMISSION

DOCKET NUMBER 2001-06) STATE ETHICS COMMISSION
IN THE MATTER OF A) 20 TRINITY STREET
COMPLAINT AGAINST) HARTFORD, CT 06106
UDV NORTH AMERICA, INC.) JUNE 1, 2001

STIPULATION AND ORDER

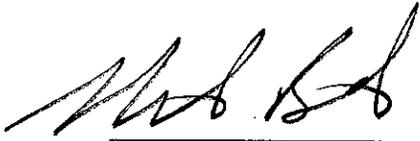
1. The Commission finds that the Respondent UDV North America, Inc. ("UDV") violated the Code of Ethics for Lobbyists, Conn. Gen. Stat. §1-91 et seq., as alleged in the attached Complaint, dated May 31, 2001.

2. UDV states that any violations were the inadvertent result of imperfect record-keeping, in that it obtained a written estimate of the number of persons who attended the Luncheon from the organizer of the event, and relied on that estimate of 300 persons to calculate a per person cost of the Luncheon that was below the legal limit. UDV, however, was subsequently unable to substantiate the number of attendees to the satisfaction of the Commission.

3. UDV waives any rights it may have under Conn. Gen. Stat. §§1-93, 1-93a, 1-98 and 1-80, including the right to a hearing or appeal in this case, and agrees with the Commission to an informal disposition of this matter as authorized by Conn. Gen. Stat. §4-177(c).

NOW THEREFORE, pursuant to Conn. Gen. Stat. §4-177(c), the State Ethics Commission and the Respondent agree to settle this matter in the manner described below:

1. The Ethics Commission orders, and UDV agrees to pay to the Commission, a civil penalty of \$3000 within thirty days, and henceforth to commit no further violations of the Code of Ethics for Lobbyists.
2. The Ethics Commission orders and the Respondent agrees to submit to the Commission within thirty days, an accurate amended financial report for the 3-4th Quarter of 2000.



Respondent UDV North America, Inc.

By: *Mike Bertan*

6/25/01
Date

Rosemary Giuliano, Chairperson
State Ethics Commission

Date