



# STATE OF CONNECTICUT

## STATE ETHICS COMMISSION

September 14, 2001

### PRESS RELEASE

On September 14, 2001, Ethics Commission Principal Attorney Brenda M. Bergeron filed a Complaint against the Mashantucket Pequot Tribal Nation/Foxwoods Resort Casino ("MPTN"), alleging a number of violations of the Code of Ethics for Lobbyists, Conn. Gen. Stat. §1-91 et seq., in connection with two events hosted by MPTN. One event was a dinner held in Philadelphia on August 3, 2001 at which fifteen Connecticut public officials, members of their staff or immediate families and/or state employees were in attendance. The second event was a reception held in Los Angeles on August 16, 2000, at which nine Connecticut public officials, members of their staff or immediate families and/or state employees were in attendance.

The Complaint alleges violations of the gift ban by exceeding the \$50 annual limit, failing to report the per person cost of the events accurately, and failing to report the aggregate cost of the event accurately. MPTN did report the events, but used a per person cost that was based on an original estimated attendance and budget. MPTN was unable to substantiate that the per person cost of the events was less than \$50.

The Ethics Commission and MPTN have settled this matter by entering into a Stipulation and Order that requires MPTN to pay a civil penalty of \$40,000.

Copies of the Complaint and Stipulation and Order are attached.

### FOR MORE INFORMATION CALL:

Alan S. Plofsky  
Executive Director and General Counsel

OR

Brenda M. Bergeron  
Principal Attorney

566-4472



# STATE OF CONNECTICUT

## STATE ETHICS COMMISSION

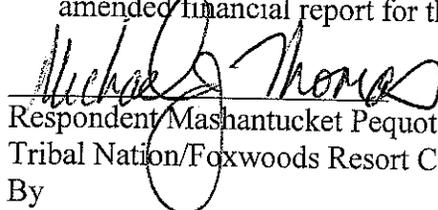
DOCKET NUMBER 2001-13 ) STATE ETHICS COMMISSION  
IN THE MATTER OF A ) 20 TRINITY STREET  
COMPLAINT AGAINST ) HARTFORD, CT 06106  
MASHANTUCKET PEQUOT  
TRIBAL NATION/FOXWOODS  
RESORT CASINO  
SEPTEMBER 14, 2001

### STIPULATION AND ORDER

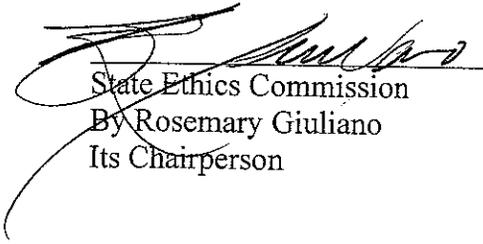
1. The Commission finds that the Respondent Mashantucket Pequot Tribal Nation/Foxwoods Resort Casino ("Respondent") violated the Code of Ethics for Lobbyists, Conn. Gen. Stat. §1-91 et seq., as alleged in the attached Complaint, dated September 14, 2001.
2. The Respondent acknowledges that it violated the Code as alleged, but states that the violation was not intentional. The Respondent also wishes to emphasize that the events at issue were widely-attended events which primarily focused on the federal level.
3. The Respondent waives any rights it may have under Conn. Gen. Stat. §§1-93, 1-93a, 1-98 and 1-80, including any 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 the Respondent agrees to pay to the Commission, a civil penalty of \$40,000 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 with the signing of this Stipulation and Order, an accurate amended financial report for the 3-4<sup>th</sup> quarter of 2000.

  
Respondent Mashantucket Pequot  
Tribal Nation/Foxwoods Resort Casino  
By

9/14/2001  
Date

  
State Ethics Commission  
By Rosemary Giuliano  
Its Chairperson

14 SEPT 01  
Date



# STATE OF CONNECTICUT

## STATE ETHICS COMMISSION

### CONFIDENTIAL

DOCKET NUMBER 2001-13  
IN THE MATTER OF A  
COMPLAINT AGAINST  
MASHANTUCKET PEQUOT  
TRIBAL NATION/ FOXWOODS  
RESORT CASINO

STATE ETHICS COMMISSION  
20 TRINITY STREET  
HARTFORD, CT 06106  
SEPTEMBER 14, 2001

### COMPLAINT

### COUNT ONE

1. At all times relevant to this Complaint, Respondent Mashantucket Pequot Tribal Nation/Foxwoods Resort Casino ("Respondent") was a client lobbyist registrant as those terms are defined in Conn. Gen. Stat. §§1-91(q) and (u).
2. Under Conn. Gen. Stat. §1-97(a), the Respondent cannot give to any state employee, public official, or member of his or her staff or immediate family food and drink worth fifty dollars or more in the aggregate in any calendar year.
3. On August 3, 2000, during the National Convention in Philadelphia, the Respondent hosted a dinner for Republican officials, honoring certain Connecticut public officials, at the Park Hyatt Hotel (the "Philadelphia Dinner"). The Respondent reported that fifteen state employees, public officials and/or members of a public official's staff or immediate family attended the event.
4. The Respondent was unable to substantiate that the per person cost of the Philadelphia Dinner was less than the fifty dollar limit allowed by law. Based solely on the records of the event kept by the Park Hyatt Hotel, the per person cost of the dinner was \$116.16.
5. On August 16, 2000, during the National Convention in Los Angeles, the Respondent hosted an event honoring the Connecticut Delegation at the Santa Monica Beach Hotel (the "Los Angeles Dinner"). The Respondent reported that nine state employees, public officials and/or members of a public official's staff or immediate family attended the event.

6. The Respondent was unable to substantiate that the per person cost of the Los Angeles Dinner was less than the fifty dollar limit allowed by law. Based solely on the records of the event kept by the Santa Monica Beach Hotel, the per person cost of the event was \$111.72.

7. The Respondent's provision of food and drink in excess of the fifty dollar limit violated Conn. Gen. Stat. §1-97(a).

COUNT TWO

1. Paragraphs One, Three and Five of Count One are hereby incorporated as Paragraphs One, Two and Three of Count Two.

4. Under Conn. Gen. Stat. §§1-96(a) and (e), a client registrant is required to report all expenditures made for lobbying and in furtherance of lobbying during the time period covered by the report, including, pursuant to Regulations of Connecticut State Agencies §1-92-49(a)(4), an aggregate statement of all expenditures made for entertainment (e.g., food and drink) whenever the aggregate exceeds fifty dollars in a calendar year. In addition, each 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.

5. Although the Respondent did provide an itemization of \$48 per person for each of the two events on its lobbyist financial report for the 3-4<sup>th</sup> quarters of 2000, that number was based on an original estimated attendance and budget for the events. Therefore, since the Respondent relied on an unsubstantiated number of attendees to calculate the per person cost, the Respondent cannot establish that the amount reported per person, \$48.00, was accurate.

6. Although the Respondent provided a limited aggregate number of the cost of the events on its lobbyist financial report for the 3-4<sup>th</sup> quarters of 2000, that number did not reflect the actual cost of the events.

7. The Respondent's failure to file a report which accurately reflected these expenditures violated Conn. Gen. Stat. §1-96.

9-14-01  
Dated

Brenda M. Bergeron  
Brenda M. Bergeron  
Commission Attorney