



**OFFICE OF STATE ETHICS**

**DOCKET NUMBER 2015-1** :  
: **18-20 TRINITY STREET**  
**IN THE MATTER OF A** :  
: **HARTFORD, CT 06106**  
**COMPLAINT AGAINST** :  
: **AUGUST 24, 2015**  
**JEFFREY GOTTLIEB** :

**STIPULATION AND CONSENT ORDER**

Pursuant to the Code of Ethics, General Statutes §§ 1-79, *et seq.*, Thomas Jones, Ethics Enforcement Officer, filed a Complaint against Jeffrey Gottlieb (“Dr. Gottlieb” or “Respondent”), alleging violations of the Code of Ethics for Public Officials. Based on the investigation by the Enforcement Division of the Office of State Ethics (“OSE”), the OSE finds that there is probable cause to believe that Dr. Gottlieb violated the Code of Ethics as further set forth herein.

The Parties have entered into this Consent Order following the issuance of the Complaint, but without any adjudication of any issue of fact or law herein.

**I. STIPULATION**

The Ethics Enforcement Officer and the Respondent stipulate to the following facts:

1. From on or about April 2012 through on or about September 2014, the Respondent

was employed as a Principal Psychiatrist at the Connecticut Valley Hospital in Middletown, a state facility operated by the Department of Mental Health and Addiction Services (“DMHAS”).

2. At all times relevant hereto, the Respondent was a “State Employee” as that term is defined in General Statutes § 1-79 (13).

3. At all times relevant hereto, the Respondent worked for a private company (“Private Company”) that provides psychiatric services to long term care facilities, and was compensated for this work.

4. The work that the Respondent performed for the Private Company was not related to the Respondent’s state job duties.

5. At all times relevant hereto, the Respondent used state resources, including an assigned DMHAS computer and the state email system, to process administrative paperwork for the Private Company on state time, and was compensated by the state for such time.

6. General Statutes § 1-84 (c) states in pertinent part:

No public official or state employee...shall use his public office or position or any confidential information received through his holding such public office or position to obtain financial gain for himself . . .

7. The Respondent, by using the resources provided by virtue of his state position for outside work for which he was compensated financially, used his state position to obtain financial gain for himself, in violation of General Statutes § 1-84 (c).

8. Each time the Respondent used the resources provided by virtue of his state position for outside work purposes constitutes a separate and distinct violation of General Statutes §1-84 (c).

## II. JURISDICTION

1. The Ethics Enforcement Officer is authorized to investigate the Respondent's acts as set forth herein, and to enter into this Stipulation and Consent Order.
2. The provisions of this Stipulation and Consent Order apply to and are binding upon the Respondent.
3. The Respondent hereby waives all objections and defenses to the jurisdiction of the Ethics Enforcement Officer over matters addressed in this Stipulation and Consent Order.
4. The Respondent waives any rights he may have under General Statutes §§ 1-80, 1-82, 1-82a, 1-87 and 1-88, including the right to a hearing or appeal in this case, and agrees with the Ethics Enforcement Officer to an informal disposition of this matter as authorized by General Statutes § 4-177 (c).
5. The Respondent consents to jurisdiction and venue in the Connecticut Superior Court, Judicial District of Hartford, in the event that the State of Connecticut seeks to enforce this Stipulation and Consent Order. The Respondent recognizes that the Connecticut Superior Court has the authority to specifically enforce the provisions of this Stipulation and Consent Order, including the authority to award equitable relief.
6. The terms set forth herein are in addition to, and not in lieu of, any other existing or future statutory, regulatory, or other legal obligation that may be applicable to the Respondent.
7. The Respondent understands that he has a right to counsel and has been represented by counsel during the OSE's investigation and in connection with this Stipulation and Consent Order.

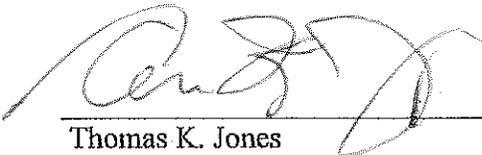
**III. ORDER**

NOW THEREFORE, pursuant to General Statutes § 4-177 (c), the Office of State Ethics hereby ORDERS, and Dr. Gottlieb agrees, that:

1. Pursuant to General Statutes § 1-88 (a) (1), Dr. Gottlieb will cease and desist from any future violation of § 1-84 (c).
2. Pursuant to General Statutes § 1-88 (a) (3), Dr. Gottlieb will pay civil penalties to the State in the amount of one thousand five hundred dollars (\$1,500.00) for his violation of General Statutes § 1-84 (c) as set forth in the Complaint and herein.

WHEREFORE, the Ethics Enforcement Officer and Dr. Gottlieb hereby execute this Stipulation and Consent Order dated August 24, 2015.

Dated: 8/31/15   
Dr. Jeffrey Gottlieb

Dated: 9/12/15   
Thomas K. Jones  
Ethics Enforcement Officer  
Connecticut Office of State Ethics  
18-20 Trinity Street  
Hartford, CT 06106  
(860) 263-2390