

Communicator Lobbyist Guide to the Code of Ethics

Contact Us



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Visitors must enter the building through the door next to the Bushnell Memorial Theater.

Specific E-mail Contacts: For the timeliest responses, please be sure to direct your questions to the appropriate e-mail address; for example, with lobbyist filing concerns such as, "my password doesn't work," please be sure to send your query to lobbyist.ose@ct.gov

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

[Staff Phone Number Listing](#)

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OFFICE OF STATE ETHICS

Introduction

The Connecticut Office of State Ethics was created on July 1, 2005, pursuant to Public Act [05-183](#), and is an independent regulatory division of the Office of Governmental Accountability, charged with administering and enforcing the Connecticut Codes of Ethics, located in Chapter 10 of the Connecticut General Statutes.

The Connecticut Office of State Ethics educates all those covered by the Codes of Ethics; provides information to the public; interprets and applies the Codes of Ethics; and investigates violations of, and otherwise enforces, the Codes of Ethics.

The Office of State Ethics consists of:

- Citizen’s Ethics Advisory Board
- Executive Director
- Legal Division
- Enforcement Division

The Office of State Ethics has the following jurisdiction:

- Part I** The Code of Ethics for Public Officials
General Statutes [§§ 1-79](#) to [1-90a](#);
- Part II** The Code of Ethics for Lobbyists (Part II)
General Statutes [§§ 1-91](#) to [1-101a](#); and
- Part IV** Ethical Considerations Concerning Bidding and State
Contracts General Statutes [§§ 1-101nn](#) to [1-101rr](#).

Citizen’s Ethics Advisory Board

The governing body of the OSE is the Citizen’s Ethics Advisory Board (CEAB), comprised of nine members appointed by the Governor and legislative leadership.

Members:

- | | |
|---|---|
| <i>Charles F. Chiusano, Chairperson</i> | <i>Herbert A. Grant, Vice Chairperson</i> |
| Mary Bigelow | Susan Gruen |
| Roger L. Kemp | Dennis Riley |
| Daniel M. Young | (1) Vacancy |

The CEAB holds monthly meetings that are open to the public. A schedule of CEAB meeting dates, times and locations is available at www.ct.gov/ethics.

ARE YOU A LOBBYIST?

Definitions.

Lobbyist is any person who either expends or agrees to expend, or receives or agrees to receive, \$2,000 or more in a calendar year to communicate directly or to solicit others to communicate with any public official or their staff in the legislative or executive branch, or in a quasi-public agency, in an effort to influence legislative or administrative action. General Statutes [§§ 1-91 \(k\) and \(l\)](#).

Lobbyists are covered by Part II of the Code of Ethics. (Part I of the Code of Ethics covers public officials and state employees.) Each state agency also has its own ethics policy, which may be more restrictive than what follows, particularly in connection with which benefits a lobbyist may provide to public officials and state employees. Be sure to obtain a copy of the state agency's policy before you engage in any lobbying with any agency official or employee. View: [Agency Ethics Policies](#).

What type of lobbyist are you?

Client Lobbyist is the individual entity *paying* for lobbying services on its behalf. In other words, the client lobbyist is expending or agreeing to expend the threshold amount of \$2,000 or more in a calendar year. A Client Lobbyist may utilize in-house communicator lobbyists as well as outside communicator lobbyists to conduct its lobbying activities. General Statutes [§ 1-91 \(u\)](#).

Communicator Lobbyist is the person who *receives payment* and does the actual lobbying (communicating or soliciting others to communicate.) A communicator lobbyist receives or agrees to receive \$2,000 or more for lobbying activities in a calendar year. General Statutes [§ 1-91 \(v\)](#).

A communicator lobbyist can be:

1. An individual;
2. A member of a Business Organization (i.e., a firm or association that is owned by or employs a number of lobbyists), General Statutes [§ 1-91 \(t\)](#); or
3. An in-house communicator (a lobbyist who is a paid employee of a client lobbyist).

Note: This guide speaks specifically to statutes and regulations regarding communicator lobbyists. There is a separate guide written specifically for client lobbyists which is available on our website. [Client Lobbyist Guide to the Code of Ethics](#)

DO YOU NEED TO REGISTER AS A LOBBYIST?

You are required by law to register as a lobbyist with the Office of State Ethics if you:

- Expend or agree to expend \$2,000 or more in a calendar year for lobbying and activities in furtherance of lobbying; *OR*
- Receive or agree to receive \$2,000 or more in a calendar year for lobbying and activities in furtherance of lobbying (including any reimbursements).

The \$2,000 registration threshold applies to any combination of the following activities:

Legislative Lobbying is any lobbying to affect legislation, including any matter within the cognizance of the legislature, even if you contact an executive branch official as part of your efforts.

Administrative Lobbying is any lobbying to affect the rules or regulations of an executive agency or any other matter within the official cognizance of that agency, also including lobbying to affect the actions of an executive or quasi-public agency regarding a contract, grant, award, purchasing agreement, etc.

Activities in Furtherance of Lobbying are expenditures for research, reports, polls, media buys, activities fostering good will, office expenses, secretarial or paralegal salaries, etc.; essentially the activities that support the actual lobbying efforts.

Once you meet the definition of communicator lobbyist, and you meet the above monetary threshold, you must register with the OSE on or before January 15 or prior to the commencement of lobbying. During an odd-numbered year, the registration fee is \$250 and the registration is valid for the biennium (i.e., until the end of the next even-numbered year). Registration in an even-numbered year is valid until the end of that even-numbered year and costs \$125.

General Statutes [§ 1-95](#).

See also the exceptions to the requirement to register as an administrative lobbyist, Regulations of Connecticut State Agencies [§ 1-92-42a](#).

Note:

Lobbying does not include communications by a party, its representative or an intervenor in a contested case before an executive agency or quasi-public agency; communications by a representative of a vendor acting as a salesperson and not otherwise engaging in administrative lobbying; and communications by attorneys made while engaging in the practice of law and not concerning legislative actions or changes to rules or regulations. General Statutes [§ 1-91 \(k\)](#).

ONLINE LOBBYIST FILING SYSTEM

General Statutes [§ 1-96b](#) requires online filing. In order to file electronically, you must become a registered user by requesting a username and password for the lobbyist filing system.

Note: If you already have a username and password (Hint: Your e-mail address is your username) you do not need to create a new username and account; you may proceed to Registration, or click “Forgot Password?” A temporary password will be sent to your e-mail.

New Users - Create a Username and Password

STEP 1

Visit our website at www.ct.gov/ethics. Select “Lobbyist Filing & Information” from the left hand navigation panel, and then select “Registration” located to the right of “New Users.”

LOBBYIST FILING SYSTEM – [New Users - Registration](#)

Select “Create User Account” for Select “You are an outside communicator lobbyist (business organization.)”

Office of State Ethics Lobbyist Registration Portal

Guide FAQ's OSE Home

I would like to become a Registered User

You are required by law to register as a lobbyist with the Office of State Ethics (OSE) if you expend or agree to expend \$2,000 or more in a calendar year on lobbying (i.e. client lobbyist), or receive or agree to receive compensation or reimbursement for actual expenses, or both, in a combined amount of \$2,000 or more in a calendar year for lobbying (i.e., communicator lobbyist).

You must complete a request for User ID/Password to register and file reports electronically by submitting either an ETH-4B (for use by Client Lobbyist/In-House Communicator) or ETH-4A (for use by Outside Communicators Lobbyists- Business Organization).

WHO ARE YOU?

You are a client lobbyist if: <ul style="list-style-type: none">You are a party or organization on behalf of whom lobbying takes place.You make expenditures or agree to make expenditures for \$2,000 or more in a calendar year for lobbying and in furtherance of lobbying.You employ in-house communicator(s). Create User Account	You are an outside communicator lobbyist (business organization) if: <ul style="list-style-type: none">You are a party or organization who lobbies on behalf of a client.You receive or agree to receive compensation or reimbursement for actual expenses, or both, in a combined amount of \$2,000 Or more in a calendar year for lobbying.You are not a client lobbyist Create User Account
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[Back](#)

IF YOU ARE UNSURE OF WHO YOU ARE, PLEASE CONTACT THE OFFICE OF STATE ETHICS AT (860) 261-0000

STEP 2

Verify that you are not creating a duplicate user account and assign or enter an Authorized Agent.

When creating a new user account, the registration system requires you to search to ensure that you are not already in the system as a Communicator Lobbyist. It also requires you to search for an authorized agent, who is either the registrant or another individual who is authorized to make changes to the account and to submit required financial statements. If the registrant is not an individual, an authorized officer or agent of the registrant shall sign the form. General Statutes [§ 1-95\(a\)](#)

Office of State Ethics
Lobbyist Registration Portal
Guide | FAQ's | OSE Home

Business Organization / Communicator Lobbyists - ETH 4A

Search for Business Organization / Communicator Lobbyists:

(If the name of the Business Organization/Communicator Lobbyist is not found, enter new Business Organization/Communicator Lobbyist name below.)

Enter New Business Organization / Communicator Lobbyists: *

Search for Authorized Agent by Last Name:

New Authorized Agent:

Last Name: *

First Name: *

Phone Number: * () - ext:

Email Address: *

Confirm Email Address: *

A39PU
Enter the security code shown:

Regenerate Image

By submitting this authorization form/application for username and password, you agree that you will not use the Office of State Ethics Lobbyist Electronic Filing System for information and services related thereto for any unlawful purpose. Unauthorized use or attempts to upload or change information stored in this system may result in civil penalties or criminal prosecution or both.

Home | CT.gov Home | Send Feedback

Internet

After creating a User Account, you will receive an e-mail containing a username and temporary password, which will allow you to log in to the lobbyist filing system to continue to the registration process.

Note: Creating a username and account is **not** a registration.

Communicator Lobbyist Guide to the Code of Ethics

STEP 3

Retrieve your temporary password from email notification and log in to the Lobbyist Filing System. After you log in, using the temporary password, you will be asked to create a new password.

E-Mail Notification with Temporary Password

Dear Communicator Lobbyist,

The Office of State Ethics has received a request from *Business Organization / Communicator Lobbyist* to become a named user for the lobbying filing system.

Your username is: (Your E-Mail Address)

Your temporary password is: IK5hJl5C

By logging in, you agree not to use this system for unlawful purposes. Unauthorized use or attempts to upload or change information stored in this system may result in civil penalties or criminal prosecution or both.

To login click the following link:

<https://www.oseapps.ct.gov/NewLobbyist/security/loginhome.aspx>

Sincerely,
Office of State Ethics

(This message was sent to you by an automated e-mail system. Please don't reply to it).

STEP 4

Enter Information for your personal profile.



The screenshot displays the 'Office of State Ethics' Lobbyist Registration Portal. The page title is 'Office of State Ethics' and the page number is '11'. The user is logged in as 'Communicator Lobbyist'. The main section is titled 'PERSONAL PROFILE' and contains a form to 'Update Your Profile'. The form fields are as follows:

Last Name *	<input type="text" value="Lobbyist"/>
First Name *	<input type="text" value="Communicator"/>
Street Address 1 *	<input type="text"/>
Street Address 2	<input type="text"/>
City *	<input type="text"/>
State *	<input type="text" value="CONNECTICUT"/>
Zip *	<input type="text"/>
Phone Number *	<input type="text" value="860"/> - <input type="text" value="563"/> - <input type="text" value="2397"/> - <input type="text"/>
Facsimile Number	<input type="text"/> - <input type="text"/> - <input type="text"/>

At the bottom of the form is a blue button labeled 'Update Profile'.

Communicator Lobbyist Guide to the Code of Ethics

STEP 5

Enter Information for your business profile.

The screenshot shows the 'Office of State Ethics' Lobbyist Registration Portal. The page title is 'Office of State Ethics' and the user is logged in as 'Communicator Lobbyist - (Communicator Lobbyists)'. The navigation menu includes 'Dashboard', 'Guide', 'FAQ's', 'OSE Home', and 'Logout'. The left sidebar contains a navigation menu with categories: 'REGISTRATION' (ETH-1A, ETH-1B, ETH-2A, ETH-2B, ETH-2C, ETH-2D), 'ACTIVITY', 'AWAITING CERTIFICATION', 'ADMINISTRATION' (Authorized Agent), 'PERSONALIZATION' (Set Default View, Personal Profile, Business Profile), 'REPORTS' (Comailed Reports), and 'Cmailed Reports'. The main content area is titled 'BUSINESS PROFILE' and contains a form for 'My Business Profile'. The form includes a search dropdown, text input fields for 'Business Organization / Communicator Lobbyist Name', 'Business Address 1', 'Business Address 2', 'City', 'State' (set to CONNECTICUT), and 'Zip'. Below the form are 'Add Business Organization' and 'Clear' buttons. A table below the form shows the following data:

Select	Business Organization Name	Business Address	Status	Actions
<input type="radio"/>	Communicator Lobbyists	20 Trinity Street, Hartford, CT, 06106	Created	

Below the table is a 'Terminate' button.

Congratulations! You have successfully created an account and are ready to proceed to registration. Remember creating an account is not a registration.

REGISTRATION

Which form should you use to register?

One or more individuals collectively engaged in the business of lobbying on behalf of others must register by completing the **ETH-1A**. Each individual member must certify the registration submitted by the business organization and the registration fee must be paid for each lobbyist. These forms are located and can be accessed by logging in to the [Lobbyist Filing System](#).

Client lobbyists and in-house communicator lobbyists register by completing the **ETH-1B**.

Note: Governmental Entity and Quasi Public Lobbyist Registration

A communicator lobbyist registered for a governmental entity must register by completing the **ETH-1A** but must file monthly and quarterly **ETH-2C** financial reports in accordance with the *client lobbyist's* filing schedule.

Any changes in the terms of compensation must be filed as an amendment to the registration.

On-Line Registration

STEP 1 – Log in

Visit our website at www.ct.gov/ethics. Select “Lobbyist Filing & Information” from the left hand navigation panel then select “[Log-In to Filing System](#).” Log in by entering your Username and Password in the log in box on the right hand side of the screen.

The screenshot shows the 'Office of State Ethics' website. At the top, there is a navigation bar with 'Guide', 'FAQ's', and 'OSE Home'. Below this, there is a 'Lobbyist Registration Portal' section with a login form. The form includes fields for 'Username:' and 'Password:', a 'Login' button, and a 'Clear' button. An orange arrow points to the 'Login' button. Below the login form, there are links for 'New User?' and 'Forgot Password?'. On the left side of the page, there is a 'Registration Statistics: 2011 - 2012' table and a 'Compiled Reports' section with various report options. The 'Compiled Reports' section includes a dropdown menu for 'Registration Period' set to '2011 - 2012' and several checkboxes for different report types.

Registration Statistics: 2011 - 2012	
Client Lobbyists	00
In-House Communicators	02
Business Organizations	01
Communicator Lobbyists	03

Compiled Reports | Lobbyist Filings | Support

- Registration Period: 2011 - 2012
- Additional Reports
- Combined Communicator Lobbyist List
- Combined Lobbyist List By Registrant with Type of Lobbying and Issues
- In-House Communicator Lobbyist List
- Business Organization/Outside Communicators Lobbyist List
- Registrations by Client, Communicator, Bus Org and Registration Dates
- Registrations by Business Organization/Communicators by Communicator Client and Registration Dates

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STEP 2 – Create a Registration (ETH-1A)

From the main Dashboard screen, select ETH-1A from the left hand navigation panel. The screen below will appear. Click on the orange button on the right that says “Create New ETH-1A.”

The screenshot shows the 'Office of State Ethics' Lobbyist Registration Portal. On the left is a navigation menu with 'REGISTRATION' selected, containing sub-items 'ETH-1A', 'ETH-1B', 'DISCLOSURE', 'ETH-2A', 'ETH-2B', 'ETH-2C', 'ETH-2D', and 'ACTIVITY'. The main content area is titled 'ETH-1A' and includes tabs for 'Default View', 'Draft', and 'Certification'. Below these is a search bar with 'Search by Client Name:' and a 'Registration Period' dropdown set to '2011 - 2012'. A 'Search' button and a 'View All' button are present. On the right side, there is a 'Welcome! Communicator Lobbyist - (Communicator Lobbyists)' message and a prominent orange button labeled 'Create New ETH-1A' which is highlighted by an orange arrow.

STEP 3 – Part I – Business Organization/Communicator Tab

Enter your business organization/communicator information and select the registration period for which you are registering, and then click “Continue.” Red asterisks * indicate a required entry. You may return to an earlier screen by clicking on the tabs at the top or by clicking the “back” button on the bottom of the screen. If you are unable to complete your report, click on “save draft,” and you will be able to return later to complete the report.

The screenshot shows the 'Business Organization Information' form. At the top, there are navigation tabs: 'Business Org', 'Member', 'Client', 'Compensation Terms', 'Subcontractor', 'Lobbying Targets', 'Issues', 'Review', 'Payment', and 'Certification'. The form includes a 'Select Registration Period' dropdown menu set to '2012', which is highlighted by an orange arrow. Other fields include 'Business Organization' (Communicator Lobbyists), 'Business Address 1' (20 Trinity Street, Hartford, CT, 06106), and 'Business Address 2'. A question 'Are you providing services to a Business Organization as a subcontractor?' has radio buttons for 'Yes' and 'No', with 'No' selected. At the bottom are buttons for 'Continue', 'Save Draft', 'Clear', and 'Cancel'.

STEP 3 – Part II – Subcontractor

If you are providing services to a Business Organization as a subcontractor, click “yes,” you will then be required to search and enter the Business Organization name and the Client.

The screenshot shows the 'Business Organization Information' form with the 'Subcontractor' tab selected. The 'Are you providing services to a Business Organization as a subcontractor?' question now has the 'Yes' radio button selected, highlighted by an orange arrow. Below this are search fields: 'Search by Business Organization Name:', 'New Business Organization Name: *', 'Search by Client Lobbyist for Business Organization:', and 'New Client Lobbyist for that Business Organization: *'. The 'Continue' button is also highlighted by an orange arrow.

Communicator Lobbyist Guide to the Code of Ethics

STEP 4 –Member Tab

List the business organization members lobbying on behalf of the client. Search by last name, select member and click on “Add Members” once a selection is complete. When complete, click “Continue.”

The screenshot shows the 'Office of State Ethics' Lobbyist Registration Portal. The user is on the 'Member' tab of the 'ETH-1A Communicator Lobbyists 2012' form. The 'Business Organization Members' section is highlighted. It includes a search form with fields for 'Last Name', 'First Name', and 'Email Address'. A blue 'Add Members' button is located at the bottom right of this section, with an orange arrow pointing to it. Other buttons like 'Continue', 'Save Draft', 'Back', 'Clear', and 'Cancel' are also visible.

STEP 5 – Client Tab

Provide client lobbyist information.

Note:

You will need to create and enter a separate ETH-1A and ETH-2A for each client.

Search by client name, select client, and the fields will auto populate data from the client registration. Search for the name of the person for the client with whom the communicator has contact.

The screenshot shows the 'Office of State Ethics' Lobbyist Registration Portal. The user is on the 'Client' tab of the 'ETH-1A Communicator Lobbyists 2012' form. The 'Client Lobbyist Information' section is highlighted. It includes a search form for 'Client Name' and a form for 'Name of person at client with whom such communicator lobbyist has contact'. Orange arrows point to the search fields and the 'Continue' button. The form includes fields for 'Client Name', 'Street Address 1', 'City', 'State', 'Zip', 'Last Name', 'First Name', 'Business Address 1', 'Business Address 2', 'City', 'State', 'Zip', 'Phone Number', 'Facsimile Number', and 'Email Address'.

STEP 6 – Compensation Terms Tab

Enter the terms of compensation for the registration period. Click on “Add Term.” Remember, if registering in an odd-numbered year, you should enter the contract amount for two years, unless you only intend to represent the client for a single year.

The screenshot shows the 'Office of State Ethics' Lobbyist Registration Portal. The user is logged in as 'Communicator Lobbyist'. The navigation menu includes 'Business Org', 'Member', 'Client', 'Compensation Terms', 'Subcontractor', 'Lobbying Targets', 'Issues', 'Review', 'Payment', and 'Certification'. The 'Compensation Terms' tab is active. The form is titled 'Business Organization Terms of Compensation'. It includes fields for 'Please check (if applicable):' with checkboxes for 'Sales Tax' and 'Expense Reimbursement'. The 'Amount' field is a text input with a dollar sign and a dropdown for frequency: 'Annual' (selected), 'Monthly', 'Hourly', 'Retainer', and 'Other'. The 'Time Period' field has 'From' and 'To' date pickers. The 'Total Anticipated' field is a text input with a dollar sign. The 'Categories of Work (other than lobbying)' section has checkboxes for 'Expert witness or consultant', 'Grass-roots (i.e., direct mail or phone solicitation)', 'Media (print or electronic advertising)', and 'Polling', plus an 'Other' text input. An 'Add Term' button is on the right, and a red arrow points to it. At the bottom are 'Continue', 'Save Draft', 'Back', 'Clear', and 'Cancel' buttons.

STEP 7 – Subcontractor Tab

This applies if a communicator lobbyist subcontracts with or through another individual or business organization (i.e., a subcontractor) to lobby on the clients behalf. Enter any subcontractor(s) who will provide lobbying for the client. Enter the terms of compensation for the subcontractor(s) for the registration period. Click on “Add Term,” and then click “Continue.”

The screenshot shows the 'Office of State Ethics' Lobbyist Registration Portal. The user is logged in as 'Communicator Lobbyist'. The navigation menu is the same as in Step 6. The 'Subcontractor' tab is active. The form is titled 'Subcontractor (if applicable)'. It starts with the question 'Are you paying another Business to lobby on behalf of the client?' with 'Yes' (selected) and 'No' radio buttons. Below is the 'Subcontractor Type' section with 'Business Organization' (selected) and 'Individual' radio buttons. The 'Search by Name' field is a dropdown menu. The 'Business Name' field is a text input. The 'Business Address 1' field is a text input. The 'Business Address 2' field is a text input. The 'City' field is a text input. The 'State' field is a dropdown menu with 'CONNECTICUT' selected. The 'Zip' field is a text input. The 'Email Address' field is a text input. Below this is the 'Terms of Compensation' section, which is identical to the one in Step 6. An 'Add Term' button is on the right, and a red arrow points to it. At the bottom are 'Add Next Subcontractor', 'Continue', 'Save Draft', 'Back', 'Clear', and 'Cancel' buttons.

STEP 8 – Lobbying Targets Tab

Enter the type of lobbying you are registering for: “Administrative, Legislative or Both.” Identify the agencies that you plan to lobby and indicate if you are soliciting state contracts or procurement awards with any agency. Click on “Add Agency,” and on “Add Contract/Award,” and then click “Continue.”

Office of State Ethics Lobbyist Registration Portal

Dashboard Guide FAQ's OSE Home Logout

ETH-1A Communicator Lobbyists 2012

Welcome! Communicator Lobbyist - (Communicator Lobbyists)

Business Org Member Client Compensation Terms Subcontractor **Lobbying Targets** Issues Review Payment Certification

Activities Registering for: Administrative Legislative Both

Executive and Quasi - Public Agency being lobbied

Indicate the Executive and Quasi-Public Agencies you intend to lobby.

Search by Executive and Quasi-Public Agencies: *

Soliciting State Contracts or Procurement Awards

If you are soliciting state contracts or procurement awards, please identify each agency you intend to solicit and each contract or procurement award you intend to solicit.

Search by Agencies: *

Contract or Procurement Award Soliciting:

STEP 9 – Issues Tab

Check all issues on which you expect to lobby for the client. Click “Continue.”

Office of State Ethics Lobbyist Registration Portal

Dashboard Guide FAQ's OSE Home Logout

ETH-1A Communicator Lobbyists 2012

Welcome! Communicator Lobbyist - (Communicator Lobbyists)

Business Org Member Client Compensation Terms Subcontractor Lobbying Targets **Issues** Review Payment Certification

Issues in which you expect to Lobby

Find:

<input type="checkbox"/> Aging	<input type="checkbox"/> Environment - recycling, packaging, pollution, waste	<input type="checkbox"/> Labor and Public employees - salaries and wages, collective bargaining, unions
<input type="checkbox"/> Agriculture, horticulture, farming, livestock	<input type="checkbox"/> Equal rights, civil rights, minority affairs	<input type="checkbox"/> Legal organizations and services
<input type="checkbox"/> Alcohol	<input type="checkbox"/> Food and beverage - industry and services	<input type="checkbox"/> Licenses, permits
<input type="checkbox"/> Athletics and sports	<input type="checkbox"/> Gaming - casinos, gambling, amusements, games	<input type="checkbox"/> Manufacturing - distribution and services
<input type="checkbox"/> Automotive	<input type="checkbox"/> Government - agencies, associations, organizations	<input type="checkbox"/> Marine and fisheries
<input type="checkbox"/> Banking, finance, lending, investment	<input type="checkbox"/> Government - financing, taxation, revenue, budget, appropriations, bids, fees, funds, contracts	<input type="checkbox"/> Pharmaceuticals, Pharmacy
<input type="checkbox"/> Biotechnology	<input type="checkbox"/> Government, municipal and special districts	<input type="checkbox"/> Public lands, parks, recreation
<input type="checkbox"/> Business	<input type="checkbox"/> Health and hospitals, health care systems, medical organizations	<input type="checkbox"/> Public safety - police, fire, law enforcement, other
<input type="checkbox"/> Chemical	<input type="checkbox"/> Higher education and employment advancement	<input type="checkbox"/> Real Estate - development, property
<input type="checkbox"/> Conservation, zoning, land and water use	<input type="checkbox"/> Housing and construction codes	<input type="checkbox"/> Technology
<input type="checkbox"/> Consumer affairs	<input type="checkbox"/> Human Services - adult, families, and children	<input type="checkbox"/> Tobacco
<input type="checkbox"/> Economic and community development	<input type="checkbox"/> Insurance - auto, home, life, other	<input type="checkbox"/> Transportation - air, sea, land, rail
<input type="checkbox"/> Education - institutions, services, programs	<input type="checkbox"/> Insurance - medical, dental, mental health	<input type="checkbox"/> Travel, tourism, culture
<input type="checkbox"/> Elections, campaigns, voting, political parties, ethics	<input type="checkbox"/> Insurance - unemployment insurance, public assistance, worker's compensation	<input type="checkbox"/> Utilities/telecommunications - gas, electricity, cable, telephone, television, radio, newspaper
<input type="checkbox"/> Energy	<input type="checkbox"/> Judiciary - courts, judges, crimes, prisons	<input type="checkbox"/> Veterans affairs

Communicator Lobbyist Guide to the Code of Ethics

STEP 10 – Review Tab

When reviewing your registration, click the blue “back” button on the bottom of the screen to update/change any information you entered. You may also click on the arrows across the top of the screen to return to a particular section.

Office of State Ethics Lobbyist Registration Portal

ETH-1A Communicator Lobbyists 2012

Business Org Member Client Compensation Terms Subcontractor Lobbying Targets Issues **Review** Payment Certification

Business Organization Information		Registration Number: 4749	
Business Organization:	Communicator Lobbyists	Registration Period:	2012
Terminated Date:	Pending		
Business Address 1:	20 Trinity Street	Business Address 2:	
City:	Hartford	State:	CT
		Zip:	06106

Are you providing services to a Business Organization as a subcontractor? Yes

Business Organization:	Communicator Lobbyists
Client:	Lobbyist Client

Business Organization Members		
Full Name	Email Address	Status

Continue Save Draft **Back** Cancel

STEP 11 – Payment Tab

Select your Payment Method: Check or Credit Card.

Registration occurs biennially (every two years). During an odd-numbered year, the registration fee is \$250 and the registration is valid for the biennium (i.e., until the end of the next even-numbered year). Registration in an even-numbered year is valid until the end of that even-numbered year and costs \$125.

Note: A registration is not final and submitted until payment is received by the Office of State Ethics.

Office of State Ethics Lobbyist Registration Portal

ETH-1A Communicator Lobbyists 2012

Business Org Member Client Compensation Terms Subcontractor Lobbying Targets Issues Review **Payment** Certification

PAYMENT METHOD

Business Organization:	Communicator Lobbyists
Client:	Lobbyist Client
Registration Number:	4749
Name of Authorized Communicator/ Member of Business Organization:	1 Communicator Lobbyist
Fee required:	\$ 125.00
Date:	09/14/2012
Payment Method:	Credit Card

Credit Card Details:

The State of Connecticut only accepts the following Credit Cards: Visa or Master Card

Card Number: *	
Expiration Date: *	09 2012
CVV Code(Card Verification Value): *	
Name as on Credit Card: *	
Payment Amount:	\$ 125.00

Continue Back Clear Cancel

STEP 12 – Certification Tab

You must certify the registration under penalty of false statement, before filing to the state. Check the box next to “I have read and agree to all above certifications” and click the “File to State” box. Payment, certification and filing registration to the state must occur before you can lobby.

Note: You are obliged by law to amend your ethics filings to ensure that they are current and accurate. Lobbying by member(s) who have not certified this registration may result in penalties of up to \$10,000.

The screenshot shows the 'Office of State Ethics' Lobbyist Registration Portal. The user is logged in as 'Communicator Lobbyist' and is on the 'Certification' tab. The page displays a 'CERTIFICATION' section with a warning: 'I do hereby swear or affirm, under penalty of false statement that:'. Below this are four bullet points regarding the accuracy and completeness of the registration information. A text input field for 'Name' contains 'Communicator Lobbyist'. A checkbox labeled 'I have read and agree to all above certifications.' is currently unchecked. Below the checkbox is a warning: 'YOU ARE OBLIGED BY LAW TO AMEND YOUR ETHIC FILING TO ENSURE THEY ARE CURRENT AND ACCURATE. LOBBYING UNDERTAKEN BY MEMBER(S) WHO HAS(HAVE) NOT CERTIFIED THIS REGISTRATION MAY RESULT IN PENALTIES OF UP TO \$10,000.' At the bottom, there are three buttons: 'File to State', 'Back', and 'Cancel'. Two orange arrows point to the checkbox and the 'File to State' button.

Congratulations! You have completed your registration as a communicator lobbyist.

Badges

Each individual who is a lobbyist shall, while engaged in lobbying, wear a distinguishing badge which shall identify him as a lobbyist. The size, color, material and other requirements of such badge shall be prescribed by regulation of the Citizen's Ethics Advisory Board. General Statutes [§ 1-101](#).

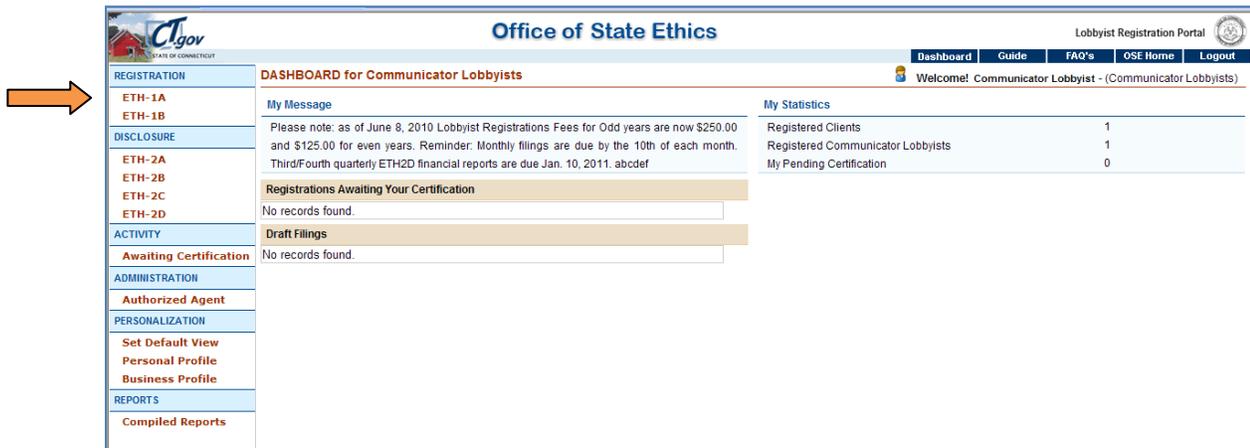
Replacement Badges

Replacement badges may be purchased for \$1.00 *cash only*. The fee is collected when you pick up your badge at the Office of State Ethics. Regulations of Connecticut State Agencies [§ 1-92-52](#). [Request a Replacement Badge](#).

REGISTRATION AMENDMENTS / TERMINATIONS

Step 1

To amend or terminate a registration, log in to the [lobbyist filing system](#), and from the DASHBOARD select the ETH-1A.



Step 2

Select radio button for the client and click on “amend” to amend the registration. Click on “Terminate” to terminate a communicator lobbyist for that client or to terminate the entire registration.



Amendments must be filed if there is a change in your lobbying activities, such as: (a) changes to fundamental contract terms or agreements to subcontract lobbying work; and (b) additions or deletions of communicator lobbyists. After your amendment has been filed to the State, the online system will show the date and time of the amendment, as well as the person who made the amendment.

You must file a notice of termination within 30 days after you cease the activity that first triggered registration. In doing so, you must certify that you do not intend to resume such lobbying activity for the remainder of the 2-year registration period. General Statutes [§ 1-95 \(c\)](#).

Communicator Lobbyist Guide to the Code of Ethics

Step 3

Select the communicator lobbyist that you want to terminate for the client you selected in the previous screen. Click the blue “Terminate Users” box.

The screenshot shows the 'Office of State Ethics' web portal. The user is logged in as a 'Communicator Lobbyist'. The page title is 'Lobbyist Registration Portal'. The navigation menu includes 'Dashboard', 'Guide', 'FAQ's', 'OSE Home', and 'Logout'. The main content area is titled 'Lobbyist Client - Termination'. It features a table with columns for 'Registered Users', 'Address', and 'User Roles'. The table contains one entry: 'Communicator Lobbyist' with the address '20 Trinity Street Hartford' and the role 'Communicator Lobbyist'. Below the table are three buttons: 'Terminate Users', 'Terminate Registration', and 'Back'. An orange arrow points to the 'Terminate Users' button.

Confirm that the termination is for the correct communicator lobbyist. Provide a reason for termination, read and check the certification box. Click on “Terminate.”

The screenshot shows the 'Office of State Ethics' web portal. The user is logged in as a 'Communicator Lobbyist'. The page title is 'Lobbyist Registration Portal'. The navigation menu includes 'Dashboard', 'Guide', 'FAQ's', 'OSE Home', and 'Logout'. The main content area is titled 'Lobbyist Client - Termination'. It features a form with a dropdown menu for 'Please provide reason for termination:' and a text area for 'NOTICE OF TERMINATION'. The notice text reads: 'Termination is being submitted for communicator lobbyist Communicator Lobbyist, member of Business Organization Communicator Lobbyists, for Client Lobbyist Lobbyist Client for the 2012 registration period. I, the undersigned, do hereby swear under penalty of false statement that: 1. I am authorized to file this Notice of Termination with the Office of State Ethics on behalf of Communicator Lobbyist, member of the Business Organization Communicator Lobbyists, for Client Lobbyist Lobbyist Client for the 2012 registration period. 2. I understand by terminating there are no intentions to resume such lobbying activity for the remainder of the 2-year registration period. 3. I understand that termination does not relieve Communicator Lobbyist of the reporting requirements for the period preceding the date that the notice of termination is received by the Office of State Ethics or for the period commencing on such date and ending on December thirty-first of the year in which termination occurs. 4. I understand that there are post-termination filing requirements that will apply to Communicator Lobbyist.' Below the notice is a checkbox labeled 'I have read and certify the above information.' and a 'Terminate' button. An orange arrow points to the checkbox, and another orange arrow points to the 'Terminate' button.

Termination Filing Requirements

It is important to remember that a post-termination report is due between January 1 and January 10 of the year following your termination, whether or not you engage in lobbying activities or make expenditures during that period. This report covers the period from the termination date through December 31 of the year in which termination took place. General Statutes [§ 1-96 \(d\)](#). For example, even if you terminate your registration on June 1, 2013, you still must file a post-termination report between January 1 and January 10 of 2014.

Note: If you have terminated and, subsequent to your termination, expend monies incident to prior lobbying or expend \$10 or more for the benefit of a public official, their staff or family member(s) within six months of terminating, you must file an ETH-2B with the OSE within 30 days. General Statutes [§ 1-96 \(g\)](#).

In [Advisory Opinion No. 2008-7](#), the Citizen's Ethics Advisory Board concluded that a communicator lobbyist who terminates his or her registration during a calendar year is no longer a registrant, but remains a communicator lobbyist for the remainder of that year for the purposes of the elections statutes.

Reporting

Once registered, you have filing responsibilities (see page 23.) You must file all reports, amendments and terminations online.

Electronic Signatures

An electronic signature satisfies the signature requirement of the Code of Ethics. Registrants who file online reports and who submit electronic signatures are considered to have duly "signed" the report. (Pursuant to [§§ 1-272 \(d\)](#), [1-274 \(a\)](#) and [1-276](#) of the Connecticut Uniform Electronic Transactions Act.)

Public Information

All disclosed information is available to the public in a variety of formats. Access to this information is available from our website in the lobbyist registration portal. Commonly requested reports include the lobbyist list, terms of compensation, concern/interest grouping, expenditures for the benefit of a public official, client financials, and client demographics.

COMMUNICATOR LOBBYIST FINANCIAL REPORTING

What financial reports do you need to file and when?

In addition to the registration form(s), registered lobbyists need to file periodic financial reports.

Communicator Lobbyists file the **ETH-2A** and **ETH-2B** forms. If you are the authorized agent for a client and have agreed to complete their financial reports you will also need to file **ETH-2D** forms. Instructions for this disclosure are contained in our [Client Lobbyist Guide to the Code of Ethics](#).

The **ETH-2A** records compensation, reimbursements from the client lobbyist and sales tax. The filing deadline for the **ETH-2A** for *each* client is due on or before **January 10** of each year.

The **ETH-2B** records unreimbursed expenditures of \$10 or more for a public official, their staff or immediate family. This form also records payments of necessary expenses of \$10 or more. Filing an **ETH-2B** must be made according to the paying *client lobbyist's* filing calendar (either monthly or quarterly.)

The **ETH-2C** is filed by the communicator lobbyist and records compensation, reimbursement and sales tax made by the governmental entity or quasi-public agency to communicator lobbyists registered for the governmental entity. It also gathers information such as money expended in connection with lobbying, expenditures benefitting a public official, staff or immediate family. Filing an **ETH-2C** must be made according to the *client lobbyist's* filing calendar below.

Client Lobbyist Filing Calendar	
2013 Client Lobbyist Quarterly Reporting Schedule	Due Dates
January 1 – March 31 (First Quarter Report)	April 10, 2013
April 1 – June 30 (Second Quarter Report)	July 10, 2013
July 1 – December 31 (Third and Fourth Quarters Combined)	January 10, 2014
2013 Client Lobbyist Monthly Reporting Schedule	Due Dates
January 1 – January 31	February 10, 2013
February 1 – February 28	March 10, 2013
March 1 – March 31 1st Quarter Report	April 10, 2013
April 1 – April 30	May 10, 2013
May 1 – May 31	June 10, 2013
June 1 – June 30 2nd Quarter Report	July 10, 2013

Communicator Lobbyist Guide to the Code of Ethics

How to File Your Financial Report – ETH 2A

STEP 1 – Log in

Visit our website at www.ct.gov/ethics. Select “Lobbyist Filing & Information” from the left hand navigation panel.

Office of State Ethics
Lobbyist Registration Portal

Registration Statistics: 2011 - 2012

Client Lobbyists	952
In-House Communicators	615
Business Organizations	100
Communicator Lobbyists	205

Welcome to State of Connecticut, Office of State Ethics Lobbyist Registration Portal.

If your browser is IE9 or you are using Windows7, please hit the compatibility view icon (broken paper) by the URL bar.

Lobbyist Registration login:

Username:

Password:

New User? | [Forgot Password?](#)

Log in by entering your Username and Password in the log in box on the right hand side of the screen.

Your e-mail address is your username.

Click: “Forgot Password?” To have a temporary password sent to your e-mail.

STEP 2 – Create a New ETH-2A

You must create an ETH-2A for each client. The filing deadline for the ETH-2A for each client is due on or before **January 10** of each year.

From the main Dashboard screen, select “ETH-2A” from the left hand navigation panel. The screen below will appear; click on the orange button on the right that says “Create New ETH-2A.”

Office of State Ethics
Lobbyist Registration Portal

Dashboard | Guide | FAQ's | OSE Home | Logout

Welcome! Communicator Lobbyist - (Communicator Lobbyists)

REGISTRATION

ETH-1A

ETH-1B

DISCLOSURE

ETH-2A

ETH-2B

ETH-2C

ETH-2D

ACTIVITY

Awaiting Certification

ADMINISTRATION

Authorized Agent

PERSONALIZATION

Set Default View

Personal Profile

Business Profile

REPORTS

Compiled Reports

ETH-2A

Default View | Draft

Communicator Lobbyists

Search by Client Name: Filing Year:

No disclosures found.

Communicator Lobbyist Guide to the Code of Ethics

STEP 3 – Communicator Tab

Search by Client Name. Select Client and Filing Year, then click “Continue.”

The screenshot shows the 'Office of State Ethics' website with the 'Communicator' tab selected. The page title is 'ETH-2A Communicator Lobbyist Report of Annual Compensation, Sales Tax and Reimbursement'. There are navigation tabs for 'Communicator', 'Compensation', 'Subcontractor', 'Review', and 'Certification'. Below the navigation, there is a search area with the following fields:

- Search by Client Name: [Dropdown menu]
- Select Filing Year: [-Select-] (with a sub-menu showing '2012')
- Client Name: Lobbyist Client
- Business Organization: Communicator Lobbyists

At the bottom of the search area, there are buttons for 'Continue', 'Save Draft', 'Clear', and 'Cancel'. An orange arrow points to the 'Search by Client Name' dropdown menu.

STEP 4 – Compensation Tab

Select month and report compensation, sales tax and reimbursement received for either **administrative and/or legislative lobbying** or work in furtherance of lobbying, click on “Add Month” for each entry.

Outside Communicator Lobbyist filing as an individual communicator:

Report compensation, sales tax collected and any expense reimbursements.

Outside Communicator Lobbyist filing as a Business Organization

Report the total compensation, sales tax and any expense reimbursements your organization received from the client. There is no requirement to apportion this amount among members of the business organization.

In-House Communicator for Client

Report compensation as the dollar value of the time you actually spent lobbying and / or in furtherance of lobbying. **Example:** Your annual salary is \$30,000 and you spend 50% of your time on lobbying related activities, report \$15,000. Use the expense reimbursement column to report amounts reimbursed for lobbying related expenditures.

The screenshot shows the 'Office of State Ethics' website with the 'Compensation' tab selected. The page title is 'ETH-2A Communicator Lobbyist Report of Annual Compensation, Sales Tax and Reimbursement'. There are navigation tabs for 'Communicator', 'Compensation', 'Subcontractor', 'Review', and 'Certification'. Below the navigation, there is a table for reporting compensation by month:

Month	Category	Compensation Amount	Sales Tax	Expense Reimbursement	Total	Actions
January	Legislative:	\$ []	\$ []	\$ []	\$ []	[Add Month] [Clear]
February	Administrative:	\$ []	\$ []	\$ []	\$ []	
March						
April						
May						
June						
July						
August						
September						
Total Legislative		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total Administrative		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total		\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

At the bottom of the table, there are buttons for 'Continue', 'Save Draft', 'Back', and 'Cancel'. An orange arrow points to the 'Add Month' button in the 'Actions' column.

STEP 5 – Subcontractor Tab

Screen I

Are you paying another business to lobby on behalf of a client? Select “Yes” and then select a subcontractor from the drop down or click on “Add Subcontractor” to add a subcontractor that does not appear on the drop down menu. Note: Adding a subcontractor will automatically amend your ETH-1A to include the subcontractor for the client. If you do not employ subcontractors for the client click “Continue.”

Screen II - Add Subcontractor

If applicable, enter the business organization or individual lobbyist that has a subcontract to lobby on behalf of the client. Enter the terms of compensation and click on “Add Term” for each subcontractor and on “Add Next Subcontractor” for additional subcontractors.

Communicator Lobbyist Guide to the Code of Ethics

Subcontractor Tab (Continued)

Screen III - Certify

Each subcontractor entry must be certified by the communicator lobbyist. Click “I have read and agree to all above certifications.” Click “Continue.”

Name of Subcontractor(s): 1 - Communicator Lobbyists

I do hereby certify under penalty of false statement that I make this report in accordance with the requirements of chapter 10, part II, General Statutes, and that this is a complete itemized statement which contains all the information required by said part for the period shown.

Name: Lobbyist Communicator

I have read and agree to all above certifications.

Continue Back Cancel

E-mail Notification

When adding a subcontractor for a client; the subcontractor will receive the following e-mail:

The Office of State Ethics has received an ETH-1A Communicator Lobbyist Registration on behalf of the Client Lobbyist for calendar year 2012, on which you are identified as a subcontractor.

If you receive or agree to receive \$2000 or more in a calendar year to lobby on behalf of this client lobbyist, you must register with the Office of State Ethics by filing an ETH-1A Registration.

Please visit our website to become a registered user and file your registration.

If you need further assistance, please refer to our Client and Communicator Lobbyist Guide, or e-mail us at lobbyist.ose@ct.gov.

Sincerely,
Office of State Ethics

Screen IV - Report Compensation, Reimbursement & Sales Tax

Select the subcontractor from the drop down list, select month and report compensation, sales tax and reimbursement paid for either **administrative and/or legislative lobbying**, click on “Add Month” for each entry. When complete click “Continue.”

Office of State Ethics

Lobbyist Registration Portal

ETH-2A Communicator Lobbyist Report of Annual Compensation, Sales Tax and Reimbursement

Communicator Compensation Subcontractor Review Certification

Do you use Subcontractors? Yes No Of the money reported on the previous page, enter on this page how much was paid to the subcontractors.

Select a Subcontractor: -Select- Add Subcontractor

Month	Category	Compensation Amount	Sales Tax	Expense Reimbursement	Total	Actions
	Legislative:	\$	\$	\$	\$ 0.00	Add Month Clear
	Administrative:	\$	\$	\$	\$ 0.00	

Subcontractor Name	Category	Compensation Amount	Sales Tax	Expense Reimbursement	Total
	Total Legislative		\$0.00	\$0.00	\$0.00 \$0.00
	Total Administrative		\$0.00	\$0.00	\$0.00 \$0.00
	Total		\$0.00	\$0.00	\$0.00 \$0.00

Continue Save Draft Back Cancel

Communicator Lobbyist Guide to the Code of Ethics

STEP 6 – Review Tab

When you are reviewing the ETH-2A form, click the blue “back” button on the bottom of the screen to update/change information you entered. You may also click on the arrows across the top of the screen to return to a particular section.

The screenshot shows the 'Office of State Ethics' website with the 'Lobbyist Registration Portal' header. The page title is 'ETH-2A Communicator Lobbyist Report of Annual Compensation, Sales Tax and Reimbursement'. The navigation bar includes 'Communicator', 'Compensation', 'Subcontractor', 'Review', and 'Certification'. The 'Review' tab is active. The form contains the following sections:

- Business Organization / Communicator Lobbyist Information:** Filing No. [blank], Filing Year: [blank]. Business Organization: Communicator Lobbyists. Client Name: Lobbyist Client.
- Business Organization Members:** A table with columns: Communicator, Email, Termination Date. Row: Lobbyist Communicator, u10falcongiris@gmail.com, [blank].
- Compensation, Sales Tax and Reimbursement:** A table with columns: Month, Category, Compensation Amount, Sales Tax, Expense Reimbursement, Total.
- Summary of Compensation, Sales Tax and Reimbursement:** A table with columns: Category, Compensation Amount, Sales Tax, Expense Reimbursement, Total. Rows: Total Administrative (\$0.00, \$0.00, \$0.00, \$0.00), Total Legislative (\$0.00, \$0.00, \$0.00, \$0.00).

At the bottom, there are buttons: Continue, Save Draft, Back, and Cancel. An orange arrow points to the 'Back' button.

STEP 7 – Certification Tab

Under penalty of false statement, certify your ETH-2A report. Click the box next to “I have read and agree to all above certifications” and then click “File to State.”

The screenshot shows the 'Office of State Ethics' website with the 'Lobbyist Registration Portal' header. The page title is 'ETH-2A Communicator Lobbyist Report of Annual Compensation, Sales Tax and Reimbursement'. The navigation bar includes 'Communicator', 'Compensation', 'Subcontractor', 'Review', and 'Certification'. The 'Certification' tab is active. The form contains the following sections:

- Name of Communicator Lobbyist(s):** 1. Lobbyist Communicator
- Statement:** I do hereby certify under penalty of false statement that I make this report in accordance with the requirements of Chapter 10, Part II, General Statutes, and that this is a complete itemized statement which contains all the information required by said Part for the period shown.
- Name:** Communicator Lobbyist
- Checkboxes:** I have read and agree to all above certifications.

At the bottom, there are buttons: File To State, Back, and Cancel. An orange arrow points to the 'File To State' button.

Congratulations! Your form ETH-2A has been successfully filed.

Financial Report Amendments

To amend your ETH-2A financial report, log in to your [lobbyist filing system](#) account and pick the appropriate client report form from your dashboard. Select “Amend.” You may also select “View Summary” or “View History” from this screen.



The screenshot displays the 'Office of State Ethics' Lobbyist Registration Portal. The interface includes a navigation menu on the left with categories like REGISTRATION, DISCLOSURE, ACTIVITY, ADMINISTRATION, PERSONALIZATION, and REPORTS. The main content area is titled 'ETH-2A' and shows a search filter for 'Communicator Lobbyists' with a 'Filing Year' dropdown set to 2012. A table lists one record for 'Lobbyist Client' filed on 10/15/2012. Below the table, three buttons are visible: 'View Summary', 'Amend', and 'View History'. An orange arrow points to the 'Amend' button.

Select	Client Name	Filing Year	Date Filed	Status
<input type="radio"/>	Lobbyist Client	2012	10/15/2012	Original

COMMON TRANSACTIONS

General Itemization

Each expenditure of \$10 or more for the benefit of a public official (except for legislative receptions, and charitable/civic events) must be itemized on your financial reports. Specifically, the report requires the following information:

- The nature of the benefit (e.g., a meal) and its date;
- Circumstances (attending lobbyists' names);
- Exact dollar amount expended; and
- Name, title and agency of individual receiving the benefit.

Expenses under \$10 that are related to lobbying are included in the aggregate amount. (See Step 6.) (General Statutes [§ 1-96 \(e\)](#).)

Valuation of Expenditures

In general, the value of an expenditure equals its cost to the lobbyist.

Expenditure = Actual Cost; or

When the cost of an expenditure is artificially low (e.g., a registered lobbyist receives a free ticket to an event, which is then given to a public official), the value of the expenditure is equal to the fair market value of the benefit (e.g., the cost to the public).

Artificially Low Expenditure = Fair Market Value

The value of food and beverage provided to a public official (or members of their staff or immediate family), is calculated by dividing the total expenditure by the number of individuals attending the meal or event.

Food and Beverage Value = Total Cost ÷ Number of Individuals Present

EXCEPT:

- When the actual amount expended was based on an anticipated number of attendees, one or more of whom did not attend, you may divide the total expenditure by the number of individuals originally expected; or
- In a restaurant setting, with stated menu prices and individual orders, you may determine the actual benefit received by each individual.

Regulations of Connecticut State Agencies [§ 1-92-48 \(c\)](#).

Splitting Costs

Two or more lobbyists may split the cost of a meal worth **up to \$49.99** for a public official or state employee. Similarly, lobbyists may split the cost of a gift worth **up to \$10**.

It is not permissible to circumvent the food and beverage or other gift exception limitations by splitting the cost of more expensive meals or items.

Notification Requirements

In addition to the notification requirements for legislative receptions and necessary expenses, if you give a reportable person (public official, state employee, candidate for public office or a candidate's staff or immediate family member) anything of value that is subject to itemization (i.e., \$10 or more), you must, within 10 days, provide a written report to the recipient, stating your name, a description of the item, the value of the item, and the cumulative value of all items provided to the same recipient in that calendar year. This provides a valuable check or reminder for both parties of the Code's aggregate limits. General Statutes [§ 1-97 \(d\)](#).

Reimbursement

An expenditure does not have to be reported if the recipient reimburses you within 30 days or prior to the due date of your next report, whichever is earlier. Reimbursements should be made by check to ensure verification upon audit. Regulations of Connecticut State Agencies [§ 1-92-54 \(c\)](#).

NECESSARY EXPENSES

Providing Necessary Expenses

You may provide necessary expenses to a public official or state employee **only** if the official or employee, in his or her official capacity, is actively participating in an event by giving a speech or presentation, running a workshop, or having some other active involvement. General Statutes [§ 1-84 \(k\)](#).

Necessary expenses can include:

- Travel (not first class);
- Lodging (standard cost of room for the nights before, of, and immediately following the event);
- Meals; and
- Related conference expenses.

Entertainment costs (tickets to sporting events, golf outings, night clubs, etc.) are **not** necessary expenses. Necessary expense payments also **do not** include payment of expenses for family members or other guests.

Within 30 days of providing necessary expenses, a communicator lobbyist must file an ETH-2B form with the OSE. General Statutes [§ 1-96e](#).

When a public official or state employee attends an in-state event in his or her official capacity as a principal speaker and receives admission, food or beverage from the event sponsor, the associated costs are not considered a gift and no necessary expense report is required. General Statutes [§ 1-84 \(k\)](#).

Fees and/or Honoraria

Public officials and state employees may **not** accept fees and/or honoraria for an article, appearance, speech or participation at an event in their official capacity.

Fees or honoraria for such activities, if offered based solely on expertise and without any regard to official position, may be acceptable. Contact the OSE before making any such payment.

LEGISLATIVE RECEPTIONS

What are Legislative Receptions?

Registered lobbyists may hold one legislative reception per year for General Assembly members, in accordance with the gift exceptions discussed below. General Statutes [§ 1-91 \(g\)](#) (10) and (11).

There are two types of legislative receptions. Lobbyists may choose to hold **one or the other** per calendar year – not both.

- The first type is a publicly-noticed legislative reception to which all members of the General Assembly are invited and the cost for food and beverage may not exceed \$49.99 per person.
- The second type is a regional reception to which all General Assembly members from a particular region in the state are invited and the cost for food and beverage may not exceed \$49.99 per person.

Related Itemization on Financial Reports

Legislative receptions must be itemized and list all attendees on lobbyist financial reports when the cost per person is \$30 or more and does not exceed \$49.99. This holds true for both types of receptions described above. General Statutes [§ 1-96 \(e\)](#).

Associated Notification Requirements

If you know that a legislative reception will result in an itemization that totals \$30 or more per person, you must include on the invitation or published notice that the event is expected to be reportable as such.

General Statutes [§ 1-96d](#).

Note: The requirement that legislative receptions be “publicly noticed” is satisfied by publishing the event in the Connecticut General Assembly Bulletin or in the Interim Bulletin. When those options are not available, notice should be published in a newspaper, circulating either statewide or regionally, depending on the nature of the event. See [Advisory Opinion No. 2007-3](#).

Note: A **charitable or civic event** at which a state servant participates in his or her official capacity carries identical itemization and notification requirements. General Statutes [§ 1-96 \(e\)](#).

GIFTS

Giving Gifts to State Personnel

As a registered lobbyist, you are considered to be a **restricted donor**. In general, public officials or state employees may not accept gifts from restricted donors.

A **gift** is defined as anything of value that is directly and personally received by a public official or state employee (and sometimes family members of those two categories) *unless* consideration of equal or greater value is provided. General Statutes [§ 1-91 \(g\)](#).

Gift Exceptions

There are, however, certain exceptions to this definition of “gift.” Not all exceptions are covered below; see General Statutes [§§ 1-91 \(g\) \(1\) – \(17\)](#) for the complete list.

Token Items – Restricted donors such as client lobbyists may provide any item of value that is not more than \$10 (such as a pen, mug, or inexpensive baseball cap) to a public official or state employee, provided that the annual aggregate of such items to a single beneficiary is \$50 or less. General Statutes [§ 1-91 \(g\) \(16\)](#).

Food and Beverage – Restricted donors may also provide less than \$50 worth of food and beverage in a calendar year to a public official or state employee, provided that the restricted donor or its representative is in attendance when the food and/or beverage is being consumed. General Statutes [§ 1-91 \(g\) \(9\)](#).

Major Life Events – Registered lobbyists are the only restricted donors who may make use of this exception. There is a \$1,000 limit on a gift a registered lobbyist gives to a public official, state employee or a member of that official’s or employee’s family for the following major life events: wedding, funeral, birth or adoption of a child, ceremony commemorating induction into religious adulthood, or retirement from state service. Regulations of Connecticut State Agencies [§ 1-92-53](#).

Gifts to the State – Restricted donors may provide what are typically referred to as “gifts to the state.” These gifts are goods and services provided to a state agency or quasi-public agency for use on state or quasi-public agency property or that support an event, and which facilitate state or quasi-public agency action or functions. General Statutes [§ 1-91 \(g\) \(5\)](#).

Other Exceptions – There are a total of 17 separate gift exceptions in the Code. Also exempt from the definition of gift are items such as informational materials germane to state action; ceremonial plaques or awards costing less than \$100; or promotional items, rebates or discounts that are available to the general public.

Legislative receptions, discussed in detail above, are exceptions to the definition of gift, as are gifts given by restricted donors to members of their immediate family.

POLITICAL CONTRIBUTIONS

Permissible Contributions

There are certain exceptions to the definition of gift. Items noted in these exceptions are permissible and may be accepted from restricted as well as non-restricted sources. Among these exceptions are two that pertain to political contributions:

- A political contribution otherwise reported as required by law or a donation or payment as described in General Statutes [§ 9-601a](#) (b) (9) or (10); and
- Volunteer services to aid or promote the success or defeat of any political party, any candidate(s) for public office or the position of convention delegate, town committee member or any referendum question.

Prohibitions and Considerations

- It is not permissible to offer or give a public official, state employee or candidate for public office (or such candidate's family member or associated business) anything of value, including a political contribution, with the understanding that a vote, official action or judgment of the recipient would be (or had been) influenced by the contribution.
- It is not permissible for a public official, state employee or candidate for public office to solicit or accept anything of value, including a political contribution, with the understanding that a vote, official action or judgment of the recipient would be (or had been) influenced by the contribution.
- The State Treasurer may neither pay nor enter into a contract with an investment services firm if a political committee established by the firm or a principal of the firm has made a contribution to (or solicited a contribution for) an exploratory or candidate committee established by the State Treasurer as a candidate for nomination or election to the Office of State Treasurer.

Sessional Ban on Lobbyist Contributions

Registered lobbyists and their affiliated political action committees (PACs) are banned from soliciting or donating to political campaigns while the General Assembly is in session. (General Statutes [§ 9-610 \(e\)](#), which falls within the jurisdiction of the State Elections Enforcement Commission.)

POLITICAL CONVENTIONS

Benefits Received at Conventions

Generally, the Ethics Code's gift and reporting provisions apply with equal effect to political and nonpolitical events and to in-state and out-of-state events. [Advisory Opinion No. 2004-12](#) addresses a number of hypothetical questions regarding the acceptance of meals or other benefits provided to public officials (e.g., legislators) at *national* legislative organizations or *national* political conventions. Specifically, benefits may be offered by the following sources, with the accompanying outcomes:

- Restricted donor (i.e., registered lobbyist; entity regulated by, doing business with or seeking to do business with official's agency; etc.)
 - Any benefit received must fall within one of the gift exceptions in General Statutes [§ 1-79 \(e\)](#) (1) – (18); for example, the \$50 annual limit on food and beverage.
- Non-restricted donor (e.g. out-of-state lobbyist whose employer does not have a Connecticut lobbyist):
 - If a benefit is offered by virtue of one's public position, benefit must be limited to less than \$100.
 - If the benefit is strictly personal, e.g., an out-of-state lobbyist and legislator are longtime friends, no limit exists.

<p>Note: If the recipient is at the conference because of his or her public office, the presumption is that any benefit provided is offered by virtue of his or her position.</p>
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- Restricted donor listed as a sponsor of the event:
 - If the convention is *generally* sponsored or underwritten by a corporation, and its funds are not earmarked for an event with Connecticut attendees, there is a \$100 limit to the benefits a legislator or public official may receive.
 - If a corporation provides funds with the explicit understanding that the monies will be used to underwrite an event at which Connecticut officials will be in attendance, the Code's gift restrictions apply.
- National legislative organization providing travel scholarships (funded by corporate contributions) for legislators:
 - Whether or not a scholarship account is funded by lobbyist contributions, a legislator or public official may accept travel expenses and accommodations (and other "necessary expenses") for an article, appearance or speech, or for participation at an event in one's official capacity.
 - Within 30 days of receiving reimbursement of necessary expenses for lodging or out-of-state travel, a public official/state employee must file an [ETH-NE](#) form with the Office of State Ethics.

Charitable Events at Conventions

[Advisory Opinion No. 2004-10](#) contemplates whether public officials and state employees may accept free tickets to a charitable event held in conjunction with a convention under the charitable event gift exception. In general, for this exception to apply (i.e., for the free ticket to be permissible):

- The official or employee must be invited to participate in his or her official capacity;
- Admission must be provided by the primary sponsoring entity (e.g., the charity, as [Advisory Opinion No. 2004-10](#) concluded); and
- Benefits may only include event admission and food and beverage (no travel or other tangible gifts over \$10).

<p>Note: There is nothing that would prohibit the official or employee from paying to attend the event in question.</p>
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Restrictions and Reporting for Lobbyists

As addressed in [Advisory Opinion No. 2000-19](#), the Lobbyist Code's gift restrictions and reporting requirements apply to expenditures for food and drink or entertainment made at the two major party political conventions.

- These restrictions and reporting requirements apply whether expenditures are made in or outside of CT and whether the purpose of the event is in furtherance of or unrelated to lobbying.
- Likewise, the provisions apply whether expenditures are made directly by the CT lobbyist or indirectly by a national association or business entity "on behalf of" the CT lobbyist.
- Further, the same requirements apply to convention events underwritten by a lobbyist, if its donations to the political convention committees were made with the explicit understanding that the monies would be used to pay for an event at which CT officials would be in attendance.

OTHER CONSIDERATIONS AND CODE REQUIREMENTS

Prohibited Activities General Statutes [§ 1-97](#).

Contingency Fees – No person may be employed as a lobbyist for compensation that is contingent upon the outcome of any administrative or legislative action.

Public Official’s Personal Obligation – No lobbyist may do anything with the purpose of placing any public official under personal obligation.

Lobbyist Employment – No lobbyist may attempt to influence any legislative or administrative action for the purpose of thereafter being employed to secure its defeat.

Communication/Information – No lobbyist may cause any communication to be sent to a public official in the name of any other individual except with the consent of such individual. Further, no person shall take or threaten to take official action against an individual for disclosing information to the Office of State Ethics.

Document Preservation

Keep all of your accounts, bills, receipts and any and all other documents necessary to substantiate your reports for a period of **three years** from the date the report is filed with the Office of State Ethics. It is also a good idea to keep a copy of the report itself. General Statutes [§ 1-96a](#). [2012 Lobbyist Record Keeping Manual](#).

<p>Note: The statute of limitations is five years; therefore you may wish to retain documents for an additional two years.</p>

Audits

Pursuant to General Statutes [§ 1-96a\(b\)](#) and Regulations of Connecticut State Agencies [§ 1-92-56\(a\)](#), the Chair of the Citizen’s Ethics Advisory Board shall periodically and randomly select client registrants to be audited by the Office of State Ethics. Selection ceremonies are open and publicly noticed.

Penalties (General Statutes [§ 1-99](#).)

Individuals may be subject to a penalty of \$10,000 for each violation of the Code of Ethics. Failure to file required reports can result in a fine of up to \$10,000, accrued at a rate of up to \$10 per day for each delinquent report.

Intentional violation of the Code of Ethics can result in a prohibition from engaging in the profession of lobbying for a period of two years. The Citizen’s Ethics Advisory Board may also report its findings to the Chief State’s Attorney for any additional actions deemed necessary. General Statutes [§ 1-99\(c\)](#).

