

OSE NEWS MARCH - APRIL 2015

OSE Notifications – Statements of Financial Interest May 1st Filing Deadline

The Office of State Ethics sent a two-week notice on April 14th 2015 and will be sending a **one-week notice on April 24, 2015** to all State Employees and Public Officials who were identified by their agency as being required to file an annual Statement of Financial Interests (SFI) with the Office of State Ethics (OSE) by May 1, 2015.

Ethics Liaison - SFI Tracking Report

If you are an Ethics Liaison with SFI designees in your agency, please take a moment to check in on your filers and remind your agency filers of their requirement to file. To date, there are over 1,200 filers that have yet to file. **Remember:** Failure to file a report, statement, or other information required by the Code, may result in the Board imposing a civil penalty of up to **\$10 per day**, for which the aggregate penalty for any one violation may not exceed \$10,000.

Log-in to the Statement of Financial Interest System select "Liaison" as role. This will bring you to the Dashboard screen. From the Dashboard screen, click on the Total Required Filers number in **red**. See screen example below. Clicking on the number will generate an Excel report that lists your required filers and who has filed electronically (E), or via Paper (P). Filers who have not yet filed will be blank.

The screenshot shows the 'Office of State Ethics' dashboard. At the top, there are navigation tabs: 'Dashboard', 'Maintain Filers', 'Notify Filers', and 'Personal Profile'. The user is logged in as 'Nancy S Nicolescu'. A 'My Message' section contains a notice about the 2012 SFI filing deadline. Below this is a '2012 Filing Statistics' table:

Agency	Total Required Filers	Filed Filers	Not Filed Filers
Office of Governmental Accountability	45	25	20
Total	45	25	20

A red arrow points to the 'Total Required Filers' value of 45 in the 'Total' row. To the right of the table is a 'Liaison Overview' diagram with a central 'Liaison' icon and four arrows pointing to 'Change Filer Agency', 'Dashboard', 'Maintain Filers', and 'Notify Filers'.

For assistance on how to maintain filers, please contact me at 860-263-2397 or refer to the [Guide to the Statements of Financial Interests Filing System for Agency Ethics Liaisons](#)

Recent Advisory Opinions

On March 19, 2015 the **Citizen's Ethics Advisory Board** met and decided on the opinion summarized below. Click on the AO number to read the full text of the opinion.

[Advisory Opinion No. 2015-2](#) **Application of the Code of Ethics to Post State Employment**

The Citizen's Ethics Advisory Board concluded that a former employee of the Connecticut Green Bank may engage in post-state employment as the head of a private business which will provide funding to projects that have been approved by the Green Bank so long as she abides by the restrictions explained in the opinion.

You may search Advisory Opinions by using the search engine located at the top right side of our website: www.ct.gov/ethics.

Recent Enforcement Matters

[Docket No. 2014-06](#): In the Matter of Craig J. Lubitski Consulting LLC (CJLC). On April 10, 2015, the Office of State Ethics and CJLC entered into a Consent Order settling allegations of violations of the Code of Ethics. As a contractor, CJLC provided analyses that were used by DSS to establish rates of reimbursement to nursing homes and residential care facilities. When the contract ended, CJLC began representing entities for which it had provided analyses by filing appeals with DSS challenging rates of reimbursement that it had helped establish while employed as a contractor. General Statutes § 1-86e (b) prohibits a state contractor from using confidential information gained in the performance of the contract for its own financial gain. The Citizen's Ethics Advisory Board imposed a penalty of \$10,000

[Docket No. 2013-53](#): In the Matter of Mary Keating. On March 5, 2015, the Office of State Ethics and Ms. Keating entered into a Consent Order settling allegations of violations of the Code of Ethics. While employed by DPH, Ms. Keating served as the Hospital Preparedness Coordinator in DPH's Public Health Preparedness Response Unit. She accepted a *per diem* nursing position in the emergency department of a hospital at a time when she was partially responsible for oversight of the hospital. General Statutes § 1-84 (b) of the Code prohibits a public official or state employee from accepting other employment that impairs their independence of judgment as to their state duties.

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