

**CONNECTICUT OFFICE OF STATE ETHICS**

**REPORT TO THE  
GOVERNOR**



**February 14, 2008**

I. Introduction.

The Connecticut Office of State Ethics (OSE) submits this report in accordance with Connecticut General Statutes Section 1-92(f). This report covers the period January 1, 2007 to December 31, 2007.

II. Statutory Reference

The OSE was officially created on July 1, 2005, by Public Act 05-183 as a successor agency to the State Ethics Commission. The agency has jurisdiction over Connecticut General Statutes Chapter 10, Part I, the Code of Ethics for Public Officials, and Part II, the Code of Ethics for Lobbyists, as well as limited jurisdiction over Part IV, Ethical Considerations Concerning Bidding and State Contracts.

III. Program Overview

The OSE administers and enforces the Codes of Ethics that help ensure government decisions are made in the public interest, untainted by consideration of private gain or the influence of special interests. The provisions of the Codes address issues such as gifts, outside employment, post-state employment, conflicts of interest, lobbyist registration and reporting, and financial disclosure. The OSE has four main functions: education, interpretation, enforcement and records retention. Simply put, the OSE educates all those covered by the law (the “regulated community,” consisting of state employees, public officials, lobbyists and, in certain circumstances, state contractors and candidates for public office); provides information to the public; interprets and applies the Codes of Ethics; and investigates and prosecutes potential violations of the codes.

The OSE is made up of the following components:

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

A. Citizen's Ethics Advisory Board

The governing body of the OSE is the Citizen's Ethics Advisory Board (CEAB or Board), which consists of nine members appointed by the Governor and legislative leadership. The CEAB is responsible for hearing issues regarding the Codes of Ethics as well as issuing advisory opinions and interpretations of the Codes as they apply to specific situations. The Board meets once each month at minimum, and holds special meetings as deemed necessary. The CEAB meetings are open to the public and are often covered by CT-N. A schedule of CEAB meeting dates, times, and locations is available on the OSE's Web site, [www.ct.gov/ethics](http://www.ct.gov/ethics).

As of December 31, 2007, the Board members were:

- Robert Worgaftik, Chairperson, Avon
- Enid Johns Oresman, Vice-Chairperson, Darien
- Jaclyn Bernstein, Farmington
- Michael Rion, West Hartford
- Rebecca Doty, Rockfall
- Dennis Riley, Norwich
- Sr. Sally J. Tolles, Windham
- Vacancy<sup>1</sup>

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<sup>1</sup>This position was filled in January 2008 with the appointment of Westport resident G. Kenneth Bernard.

- Vacancy

Other board members who served during 2007 were:

- Patricia T. Hendel, former Chairperson, New London
- Scott A. Storms, Windsor Locks

B. Executive Director

The executive director is the chief executive officer of the OSE and has the overall responsibility for the welfare and effectiveness of the agency including the agency's budget, day-to-day operations, staffing needs, personnel policies, hiring and firing of all OSE personnel, equipment, record and database maintenance and storage, both in electronic and hard-copy format. The executive director, who is accountable to the CEAB, is also responsible for the agency's external relations with the public and other state agencies on matters regarding the policies, priorities and mission of the OSE and serves as the principal legislative liaison responsible for coordinating the agency's legislative strategy and priorities.

Benjamin Bycel served as Executive Director until his resignation in September 2007. Beverly Hodgson served as Interim Executive Director during October and November 2007. Carol Carson was appointed Executive Director by the CEAB in December 2007.

C. Enforcement Division

During 2007, the Enforcement Division consisted of the ethics enforcement officer, two assistant ethics enforcement officers, a paralegal specialist and an associate accounts examiner. The ethics enforcement officer, Thomas Jones, directs and supervises the enforcement division of the OSE, which is responsible for the enforcement of the

Codes of Ethics. The division's duties include the investigation of potential violations of the Ethics Codes, receipt and issuance of complaints, and submittal of any alleged violation before a judge trial referee for a determination of probable cause. The enforcement division is also responsible for analyzing and auditing lobbyist registration and financial forms as well as statements of financial interests filed by legislators, public officials and public employees.

During 2007, the division received nineteen complaints from members of the public, and initiated eleven actions through the filing of its own complaints. In addition, the division initiated forty-eight evaluations (the initial investigation of an ethics matter) based on information received through public sources or its own analysis. By statute, all matters being investigated or prosecuted by the division are confidential until probable cause is found, or until the respondent elects to have the matter made public. The division resolved three complaints, resulting in penalties of \$20,250 being paid to the State:

**In the Matter of A Complaint Against Adrienne Nails** (2006-65). On March 9, 2007 the OSE and the Respondent settled this matter by entering into a Stipulation and Consent Order. Under this settlement, the Respondent agreed to pay a \$250 civil penalty. The complaint alleged that Ms. Nails, then an employee of the Department of Veterans Affairs (DVA), entered into a contract with DVA without an open and public process as required by law.

**In the Matter of A Complaint Against Theodore Anson** (2004-01). On November 2, 2007, the OSE and the Respondent settled this matter by entering into a Consent Order. Under the settlement, the Respondent, the former Commissioner of Public Works (DPW), paid \$30,000, half of which was attributed to the Office of State Ethics (the other half was attributed to the Attorney General as a result of a separate lawsuit filed by the AG). The complaint alleged that the Respondent had improperly received a gift from a person who had contracted with DPW and had failed to report the gift on his 2000 statement of financial interests.

**In the Matter of A Complaint Against Robyn Danahy** (2007-22). On November 26, 2007, the OSE and the Respondent settled this matter by entering into a Consent Order. Under the Consent Order, the Respondent paid a \$5,000 civil penalty. The complaint alleged that Ms. Danahy, a former employee of the UConn Athletics Department, had approached Scoutware, a contractor of the university, concerning employment and did not disclose this fact when she participated on the selection committee that was considering renewing Scoutware's contract. The complaint alleged that in such a position, Ms. Danahy had a conflict of interest that she was required to disclose, but failed to do so.

**Enforcement Actions Against Delinquent Lobbyists Filers** (2007-1UL to 2007-13UL). Multiple enforcement actions, including four contested hearings conducted under the Uniform Administrative Procedures Act, from August to October of 2007 resulted in the imposition and collection of \$7,320 in fines for lobbyists who did not meet statutory deadlines for filing financial reports with the OSE. Included in the contested hearings are:

**In the Matter of AFT Connecticut and Susan Heller Williams** (2007-1UL). The Office found that the second quarter ETH-2D lobbyist financial report was filed late. After a contested hearing, the hearing officer recommended and the CEAB imposed a fine of \$100.

**In the Matter of Conn PIRG and Christopher Phelps** (2007-2UL). The OSE found that the second quarter ETH-2D lobbyist financial report was filed late. After a contested hearing, the hearing officer recommended and the CEAB imposed a fine of \$640.

**In the Matter of CT Propane Coalition and T. Michael Morrissey** (2007-3UL). The OSE found that the second quarter ETH-2D lobbyist financial report was filed late. After a contested hearing, the hearing officer recommended and the CEAB imposed a fine of \$610.

**In the Matter of CT Library Association and Barry Williams** (2007-4UL). The OSE found that the second quarter ETH-2D lobbyist financial report was filed late. After a contested hearing, the hearing officer recommended and the CEAB imposed a fine of \$100.

Finally, the division conducted thirty four audits of lobbyists during 2007. Twenty of these audits related to registered client lobbyists, and fourteen of the audits involved the registered communicator lobbyists who lobbied on the clients' behalf. Of these, the division placed a total of four lobbyists under corrective action programs to

cure accounting or filing problems that were encountered during the course of the audits.

Other findings of the audit included:

- Nine instances of lobbyists exceeding gift limitations for public officials, their immediate families, or their staffs
- Twenty six instances of lobbyists not reporting or incorrectly reporting benefits for public officials, their immediate families, or their staffs
- Eleven instances of lobbyists delinquent filing financial reports
- Six instances of lobbyist failing to maintain substantiating documents required by law
- Ninety nine instances of lobbyist failing to provide a notice letter within ten days to certain public officials, their immediate families, or their staffs receiving benefits
- One instance of a failure to correctly report payments from a client lobbyist to a communicator lobbyist

D. Legal Division

During 2007, the legal division was made up of the general counsel, three assistant general counsels and a paralegal specialist. Under the direction of the general counsel, Barbara Housen, the legal division is responsible for the interpretation of statutes, case law, regulations, and prior advisory and staff opinions and provides written information and written and verbal opinions to persons subject to the code and to the general public. The general counsel's responsibilities also include providing the CEAB with legal advice on matters before it, and representing the Board in all matters in which it is a party. In addition, the general counsel is responsible for the oversight of the OSE's educational efforts, including the training of all state personnel in the Codes of Ethics and public education regarding ethics.

In 2007, the OSE issued 16 board opinions and 765 staff opinions. The total number of staff and CEAB advisory opinions for 2007 showed an 81% increase over those handled in 2006. In addition, over 5,000 telephone inquiries were handled by the Legal Division during 2007.

#### IV. Education and Public Information

The OSE recognizes that a strong education effort is of utmost importance in achieving compliance. The OSE engaged in strong education efforts in 2007, including speaking engagements, written materials (plain-language guides and handouts on more complex topics), electronic and other media, and print media/press.

In 2007, the OSE conducted 24 in-person trainings for state agencies and other interested groups, reaching nearly 1,200 individuals. Of particular note were the trainings conducted for the new members of the legislature, the staffs of the offices of the Governor and Lieutenant Governor, and state-wide agency commissioners. The OSE also offers training via Web-streaming video and training via DVD, distributing 19 copies during 2007 for use by state agencies to train employees.

An online training module that was completed in April 2007 provides comprehensive, online training and allows any state employee to interactively learn the main points of Part I of the Code of Ethics at his or her convenience. The online training includes a tracking mechanism (a printable certificate) by which agency ethics liaisons or compliance officers can verify who in their agencies has completed the training

The OSE communicates to each agency's ethics liaison or compliance officer (as well as key legislative personnel and other interested parties) monthly via an electronic newsletter. This vehicle serves to encourage ongoing dialogue and communication between the OSE and state agencies, and includes advisory opinion summaries as well as answers to frequently asked questions.

During 2007, in concert with the Office of the Governor, the OSE rolled out its first "Are You Lobbying?" campaign. The campaign consists of colorful, informative

posters and desk cards that convey the definition of a lobbyist and note that those who meet that definition must register with the OSE. These desk cards and posters were sent with a cover letter from the Governor to all agency commissioners.

V. Advisory Opinions.

Any person subject to the Code of Ethics for Public Officials or the Code of Ethics for Lobbyists has the right to request an advisory opinion. Until amended or revoked, these opinions are binding and, if relied upon in good faith, constitute an absolute defense to a criminal allegation of a Code violation. The CEAB approved 16 advisory opinions in 2007. These opinions are summarized as follows:

**ADVISORY OPINION NO. 2007-1, Reconsideration of Advisory Opinion 1997-20, Regarding § 1-84 (o)** - The CEAB concluded that: (a) the reporting requirement in § 1-84 (o) applies to any person regulated by, doing business with, or seeking to do business with a department or agency and not only to registered client lobbyists; and (b) that § 1-97 (d) applies to both registered client and communicator lobbyists. The Board also concluded that, for the purposes of § 1-84 (o), the determination of who is an executive head of an agency varies. Those agencies with questions as to their agency head should contact the Office of State Ethics. This opinion supersedes 1997-20.

**ADVISORY OPINION NO. 2007-2, Application of Section 1-84 (m) to the Judicial Branch** - It is the opinion of the CEAB that, for purposes of § 1-84 (m), attorneys admitted to practice law in the state of Connecticut are “directly regulated” by the Superior Court. Additionally, the Judicial Department and its components constitute a single state department or agency. Thus, employees of the Judicial Department are prohibited from accepting any “gift,” as defined in § 1-79 (e), from attorneys admitted to practice law in Connecticut.

**ADVISORY OPINION NO. 2007-3, Public Notice for Legislative Receptions** - Registered lobbyists and business organizations are permitted to host one legislative reception per year, either a state-wide or regional event. It is the opinion of the CEAB that the requirement that such legislative receptions be “publicly noticed” is satisfied by publishing the event in the Connecticut General Assembly’s Bulletin. When the General Assembly is not in session, the notice requirement is satisfied by publication in the interim Bulletin if the event is taking place at the state capitol or in the Legislative Office Building. Should these options not be available, notice should be published in a newspaper, circulating either statewide or regionally, depending on the nature of the event.

**ADVISORY OPINION NO. 2007-4, Outside Employment Scenarios of DOT Employees** - It is permissible for certain DOT employees to engage in certain specific outside employment activities, as described in detail in the opinion, if the prescribed restrictions are followed. Essentially, the focus in outside employment cases is whether a state employee is in a position to influence his private employer's business relationship with the employee's agency, and/or whether the agency employee has had any input in the contract development, contract award or contract administration process involving the private employer. The opinion also notes that individual state agencies are permitted to be more restrictive in implementing their internal ethics policies, including outside employment provisions, (as was the case with the DOT), so long as no other laws are violated.

**ADVISORY OPINION NO. 2007-5, Further Interpretation of § 1-84 (p)** - In Advisory Opinion 2006-6, the CEAB interpreted § 1-84 (p) to mean that subordinates and supervisors up and down the chain of command have a \$99.99 per gift limit when giving items to each other. (These individuals may also make use of the major-life-event exception, when applicable.) In this opinion, the Board concluded that supervisors and/or subordinates may not pool their money to give a collective or group gift valued in excess of the \$99.99 limit. Thus, except in the case of a major life event, it would be a violation for Supervisor A to accept a gift valued at \$150 from Subordinates X and Y (and for them to give such a gift), even though the individual contributions of X and Y are less than the \$99.99 limit established in 1-84 (p).

**ADVISORY OPINION NO. 2007-6, Revolving Door Application to Former State Employees Serving in More than One Agency** - Section 1-84b (b) of the Code of Ethics establishes a one-year "cooling-off" period for former state employees. In essence, the revolving door provision states that former employees cannot, for one year after leaving state service, represent anyone other than the state for compensation before their former agency concerning a matter in which the state has a substantial interest. The Board concluded that, for the purposes of this provision, an individual may have more than one department or agency if, within his/her last year of service, he/she served at more than one department or agency. This holds true even if the employee did not serve at more than one agency simultaneously. For example, an employee works at Agency A, then leaves that agency and works for Agency B, then leaves state service entirely, all in the same year. In this case, both agencies A and B would be considered to be "former agencies" for the purposes of 1-84b (b).

**ADVISORY OPINION NO. 2007-7, Potential Conflicts of Interest for State Agency Board Members** - The Code of Ethics does not prohibit a Council on Developmental Disabilities member from participating in government-funded programs or obtaining services from federal or state agencies. This holds true even if such services are administered by non-government agencies with business interests before the Council, as they are government-funded and available to any

member of the public with a disability (therefore, not considered a “gift” under the Code). It is, however, impermissible for a government program to be enhanced by the providing organization and given to a Council member (e.g., a lobster dinner instead of state-funded meatloaf). This would be considered a gift under the Code, subject to applicable restrictions.

**ADVISORY OPINION NO. 2007-8, Outside Employment of the Speaker of the House** -While the Code of Ethics does not prohibit the Speaker of the House (Speaker) from engaging in outside employment, the Code requires that there can be no use of his office or position to obtain financial gain. Under the unique facts of the Speaker’s situation, the Board concluded that it would be an inappropriate use of his office and position for him to solicit funds from lobbyists in connection with his outside employment.

**ADVISORY OPINION NO. 2007-9, Confidentiality Provisions** - The Board concluded that, following the filing of a formal complaint with the OSE, the complainant (the individual who filed the complaint) is prohibited from disclosing: (1) the existence of a formally-filed complaint; (2) any information acquired through interacting with the OSE; and (3) the fact that specific information was conveyed to the OSE. A complainant is *not* prohibited from disclosing the facts that formed the basis of the complaint. For example, a complainant may state to a third party, “Public official X used his office for personal financial gain.” The complainant may not state, “I informed the OSE that public official X used his office for personal financial gain.”

**ADVISORY OPINION 2007-10, CT Innovations Ex-Officio Board Members in Revolving-Door Scenarios** - Long-standing designees of ex-officio members of the Connecticut Innovations (CI) Board are considered to have “served” in the quasi-public agency for purposes of applying the one-year ban under the revolving door provisions in the Code. Such a long-standing designee who has left his or her employing state agency may not, within one year, appear before the CI Board for the purpose of being employed. Similarly, such a designee who remains at his or her employing state agency may not seek employment as CI’s Executive Director for one year from the date he or she ceases to be a designee of the Board.

**ADVISORY OPINION 2007-11, Discounts on Dues and Seminar Fees Made Available to All Government Employees by Non-Restricted Donors** - The Board concluded that: (1) three professional organizations whose memberships include a small percentage (less than 17 percent) of restricted donors are not themselves considered restricted donors for purposes of the gift provisions of the Code of Ethics for Public Officials, and (2) the Insurance Department may accept discounts on dues and seminar fees made available by those professional organizations/non-restricted donors.

**ADVISORY OPINION 2007-12, Effect of Public Act 07-1 on "Gifts to the State" from Restricted Donors** - Addressing four hypothetical scenarios, the CEAB concluded that: (1) a state technical high school may not accept a “gift to the state” from a restricted donor in the form of weeklong math or science workshops for its teachers; (2) a state agency may accept volunteer services from restricted donors in order to complete a statutorily required legislative report; (3) a state agency may not accept a contractor’s payment or reimbursement of travel expenses in order for agency employees to attend a meeting in New York City to discuss the implementation of a state contract and tour the contractor’s facilities; and (4) a state agency may accept a non-earmarked cash contribution from a restricted donor that would be deposited into an agency account and used for, among other things, paying for its employees to travel to and attend meetings and conferences.

**ADVISORY OPINION 2007-13, Government Discounts** - The CEAB concluded that the Code of Ethics does not prohibit public officials and state employees from receiving a government employee discount from a non-restricted donor valued at more than \$100 while on personal time, even if such discount is not offered to the general public or other large group on an equal basis. The discount in question, the Board stated, must be equally available and advertised to all government employees, regardless of rank, agency, or position with the state. If the discount meets the above requirements, public officials and state employees may accept it.

**ADVISORY OPINION 2007-14, Application of General Statutes §1-84 (m) to the Office of the Secretary of the State** - The CEAB concluded that a business entity is not, by the mere fact of registering with the Commercial Recording Division of the Office of the Secretary of the State, a restricted donor for purposes of General Statutes §1-84 (m), a gift provision in the Code of Ethics for Public Officials.

**ADVISORY OPINION 2007-15, Application of the Code of Ethics for Lobbyists to Registration and Reporting Requirements of Non-Profit Organizations** - The CEAB concluded as follows:

1. To qualify as “bona fide members” for purposes of General Statutes § 1-91 (f), individuals on a mailing list or an e-mail list must affirmatively accept the membership organization’s invitation to become a member and satisfy one of three other requirements.
2. For purposes of § 1-91 (f), only expenses incurred for communications made to members by way of “published” materials are exempt from reporting. In addition, the staff person of a client lobbyist who communicates with members in ways other than by “published” materials must count compensation received for the time spent communicating towards the \$2,000 lobbyist registration threshold.

3. Where the staff person of a non-profit who primarily conducts grassroots activities (e.g., soliciting others to contact their legislators) goes to the capitol to testify about a particular issue, the client must report compensation paid for the individual's time spent testifying and the time spent in preparation, and the individual must register as a lobbyist if he/she reaches the \$2,000 threshold.

4. The time spent participating on a legislative task force up until the release of the task force report is not considered reportable lobbying activity and does not count towards the \$2,000 lobbying threshold. Nonetheless, any subsequent activity to encourage or discourage legislative action on the task force recommendation is considered lobbying. Any compensation paid/received for the time spent engaging in such activity must be reported by lobbyists and counts towards the registration threshold for anyone not currently registered as a lobbyist.

**ADVISORY OPINION 2007-16, Definition of "Department Heads" for Purposes of General Statutes §1-83(a)(1)** - The CEAB concluded that, for purposes of General Statutes § 1-83 (a)(1)—which requires “department heads” (and others) to file annual Statements of Financial Interests—the term “department heads” means those individuals listed in General Statutes § 4-5.

## VI. Legislation

**Public Act 07-01** This clarified legislation passed in 2005, which was enacted to restore public confidence in the integrity of the state government and to ensure that elected officials are free of influence from companies doing business with the state (i.e., regulated donors or prohibited sources).

Certain aspects of the 2005 legislation were fine-tuned to more accurately reflect the legislative intent which was to eliminate the appearance or existence of undue influence that occurs when a regulated donor (i.e., a prohibited source) is able to give gifts to a public official or state employee.

The 2005 legislation restricted a regulated donor (i.e., a prohibited source) from making gifts to public officials or state employees, for their direct and personal benefit under, for example, the guise of a conference or an informational trip.

The 2007 legislation clarified that at no time did the legislature intend to prohibit gifts to state agencies or quasi-public agencies such as donations of scholarships from companies to a public university, for students in need, or donations of state-of-the-art equipment from a pharmaceutical company leaving the state.

**Public Act 07-201**. This law makes clear for the first time that those individuals required to file a SFI must disclose, “all sources of income, including the name of each employer, with a description of each source, in excess of one thousand dollars.” This law required that persons mandated to file a Statement of Financial

Interests (SFI) on or before May 1, 2007, also had to file a Supplemental SFI no later than August 1, 2007, stating the name of each employer of such person.

Public Act 07-201 also requires the establishment of a Task Force to study certain recommendations of the OSE with a view to determining what role, if any, the OSE should play in administering and enforcing ethics at the municipal level.

**Public Act 07-166.** This law removed all faculty members at public institutions of higher learning from the reach of § 1-84 (b) and (c) of the Code of Ethics for Public Officials (the outside employment provisions) provided they received prior approval from the state constituent unit which employs them. Only those faculty members who engage in outside employment without prior approval will remain subject to § 1-84 (b) and (c).

The law also modifies § 1-84 (i) of the Code by exempting “a contract with a public institution of higher education to support a collaboration with such institution to develop and commercialize any invention or discovery” from an open and public bidding process.

#### VII. Regulations

In December, 2007, comprehensive regulations received final approval from the Regulations Review Committee of the General Assembly. These regulations significantly updated the previous regulations to address the overhaul of the statutes that occurred in 2005. Among other changes, the regulations establish a procedural system for conducting enforcement proceedings under the new hearing structure that involves a judge trial referee.

#### VIII. Online Systems.

During 2007, the OSE continued to repair and update the on-line filing systems for lobbyists and public officials. In May, OSE was able to provide public officials with the ability to file forms electronically into an online system, which was utilized by over one quarter of the required filers. The on-line lobbyist filing system was upgraded to better track the lobbying activity in the state. During 2007, one hundred percent of mandatory lobbyist filings were made on-line and OSE published all such filings via the

Internet. These disclosures contributed to Connecticut being ranked first among the 50 states in the Good Jobs First annual survey of government openness.

IX. Challenges

A. Staffing

The OSE experienced significant staff changes in 2007. It began the year with a staff of 17 employees under the leadership of Executive Director Benjamin Bycel. On December 31, 2007, the staff consisted of 12 employees, including newly appointed Executive Director Carol Carson, whose first challenge in 2008 is to bring the OSE to its full staffing level of 20 employees.<sup>2</sup>

B. Online Filing Systems

A large amount of state resources have been devoted to fixing the online systems of the OSE, which consist of the lobbyist reporting system and the statements of financial interests system. In particular, the lobbyist disclosure system was brought from a state of total failure to a workable system that continues to improve. However, problems remain. The systems were created years ago under the previous Commission and had not been updated in many years prior to 2007. As such, the systems do not adequately incorporate many significant changes in web-based coding and content. The problems of the system are exposed and are most acute during the four mandatory filing periods each year (January 1-10; April 1-10; May 1, and July 1-10). During these periods many filers have complained about the inability of the system to timely process accurate data, and that the archaic system lacks user-friendliness. Because the OSE did not have any technical staff during 2007, the agency was forced to outsource most of the necessary revisions, leading

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<sup>2</sup> As of February 1, 2008, the staff numbers 16. Two other positions are in the process of being filled; two other positions will be filled before the end of the fiscal year.

to inefficiencies and an inability to begin major revisions until the second half of 2007. In 2008, the office has placed technological initiatives as one of the top priorities.

X. Conclusion

The OSE is one of the principal “watch dog” agencies established to build and maintain the confidence of Connecticut citizens in the integrity of their state government. Its mission is threefold: to provide education, guidance and advice to state employees, public officials, lobbyists and legislators to help them to comply with the Codes of Ethics; to ensure timely and accurate filings of lobbyist reports and financial disclosures; and, for those few individuals who do not comply with the codes, to vigorously and fairly prosecute violations of the codes.

The end of 2007 represented the end of the building stage for the OSE and the CEAB. The OSE is now embarking on its core mission to provide the citizens of Connecticut with the ethical oversight the state deserves.

Respectfully submitted,

A handwritten signature in cursive script that reads "Carol Carson".

Carol Carson, Executive Director

Dated February 14, 2008