STATE OF CONNECTICUT
STATE ETHICS COMMISSION

CONFIDENTIAL

DOCKET NUMBER 2001- 06
STATE ETHICS COMMISSION
IN THE MATTER OF A
20 TRINITY STREET
COMPLAINT AGAINST
HARTFORD, CT 06106
UDV NORTH AMERICA, INC.
MAY 31, 2001

COMPLAINT

COUNT ONE

1. At all times relevant to this Complaint, Respondent UDV North America, Inc. ("UDV") was a client lobbyist registrant as those terms are defined in Conn. Gen. Stat. §§1-91(q) and (u).

2. Under Conn. Gen. Stat. §1-97(a), UDV cannot give to any state employee, public official, or member of his or her staff or immediate family food and drink worth fifty dollars or more in the aggregate in any calendar year.

3. On August 14, 2000, during the National Convention in Los Angeles, the Respondent UDV, along with Northeast Utilities and United Technologies Corporation, paid for a luncheon honoring the Connecticut Delegation at a restaurant in Santa Monica, California (the “Luncheon”). UDV determined that twelve state employees, public officials and/or members of a public official’s staff or immediate family attended the Luncheon. Of these twelve reported persons, two reimbursed UDV for their share of the cost of the Luncheon.

4. UDV was unable to substantiate that the per person cost of the Luncheon was less than the fifty dollar limit allowed by law. Based on the number of people who had responded to the Luncheon invitation, the per person cost was $54.59.

5. UDV’s provision of food and drink in excess of the fifty dollar limit violated Conn. Gen. Stat. §1-97(a).
COUNT TWO

1. Paragraph One of Count One is hereby incorporated as Paragraph One of Count Two.

2. Under Conn. Gen. Stat. §1-96(e), a client registrant is required to file an accurate itemized statement of each expenditure of ten dollars or more per person per occasion made by the reporting registrant for the benefit of a public official, a member of his or her staff and/or a member of his or her immediate family.

3. Although UDV did provide an itemization of the Luncheon, it relied on an unsubstantiated number of attendees to calculate the per person cost. Therefore, UDV cannot establish that the amount reported per person, $41.39, is accurate.


COUNT THREE

1. Paragraph One of Count One is hereby incorporated as Paragraph One of Count Three.

2. Under Conn. Gen. Stat. §1-96a(a), a registrant is required to obtain all documents necessary to substantiate the financial reports required by Conn. Gen. Stat. §1-96 for a period of three years from the date of the filing of such reports.

3. UDV violated Conn. Gen. Stat. §1-96a(a) by failing to maintain records to substantiate the financial reporting made in connection with the Luncheon.

Dated 5-31-01

Brenda M. Bergeron
Commission Attorney
STIPULATION AND ORDER


2. UDV states that any violations were the inadvertent result of imperfect record-keeping, in that it obtained a written estimate of the number of persons who attended the Luncheon from the organizer of the event, and relied on that estimate of 300 persons to calculate a per person cost of the Luncheon that was below the legal limit. UDV, however, was subsequently unable to substantiate the number of attendees to the satisfaction of the Commission.

3. UDV waives any rights it may have under Conn. Gen. Stat. §§1-93, 1-93a, 1-98 and 1-80, including the right to a hearing or appeal in this case, and agrees with the Commission to an informal disposition of this matter as authorized by Conn. Gen. Stat. §4-177(c).

NOW THEREFORE, pursuant to Conn. Gen. Stat. §4-177(c), the State Ethics Commission and the Respondent agree to settle this matter in the manner described below:

1. The Ethics Commission orders, and UDV agrees to pay to the Commission, a civil penalty of $3000 within thirty days, and henceforth to commit no further violations of the Code of Ethics for Lobbyists.

2. The Ethics Commission orders and the Respondent agrees to submit to the Commission within thirty days, an accurate amended financial report for the 3-4th Quarter of 2000.
Respondent UDV North America, Inc.
By: Mike Bednar

Rosemary Giuliano, Chairperson
State Ethics Commission

6/25/01
Date