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**OFFICE OF STATE ETHICS' STATEMENT IN SUPPORT OF  
RAISED BILL No. 6298  
AN ACT CONCERNING CERTAIN REVISIONS TO THE STATE CODES OF ETHICS**

The primary purpose of this bill is to provide various substantive amendments to the Code of Ethics for Public Officials and the Code of Ethics for Lobbyists with the purpose of providing greater clarity, consistency and transparency. The Office of State Ethics ("OSE") supports passage of Raised Bill No. 6298, and respectfully requests that the following comments be considered.

The OSE supports section 1 of Raised Bill No. 6298, which limits gift giving between supervisors and subordinates to \$100 per calendar year. Currently, under subsection (p) of section 1-84 of the general statutes, supervisors and subordinates and members of their immediate families are restricted from accepting and/or receiving gifts costing more than \$100. The provision, however does not limit such gift-giving to any time-period. Arguably, subordinates and supervisors could exchange large number of gifts so long as these did not exceed the \$100 threshold per gift. Such amendment would place the subordinate-supervisor gift-giving in line with the limits set for the regulated donors and provide greater clarity as to the applicable time period. Since 2007, the issue of subordinate-supervisor gift-giving under § 1-84 (p) of the general statutes has been the subject of two formal advisory opinions, twenty-two written and fifteen verbal staff opinions.

The OSE also supports section 2 of Raised Bill No. 6298, which adds state employees to lobbyists' reporting of gifts. Due to the large scope of administrative lobbying, lobbyists should also have to disclose benefits provided to any state employee.

The OSE supports section 3 of Raised Bill No. 6298, which changes necessary expenses for lodging from "night before, of and after" to "day before, of and after." Currently, a public official who, in his or her official capacity, actively participates in an event, for example by giving a speech or presentation, or running a workshop, may be provided with expenses for the night of the event and the nights before and after. Thus, for example, a public official who receives expenses to travel out of state to speak on a Tuesday evening can arrive on Monday and stay until Thursday. The intent of the law was to provide a travel day on either end of the event; however the current language allows the inclusion of an additional day.

The OSE is also supportive of section 4 of Raised Bill No. 6298, which amends § 1-84(q) of the general statutes by adding the word "knowingly" to the prohibition wherein "no public official or state employee shall counsel, authorize or otherwise sanction action" that violates the codes. As currently in effect, the prohibition is overly broad and could result in a violation by an agency counsel's good faith interpretation of the Code of Ethics.

Sections 5, 6 and 7 of Raised Bill No. 6298 are also supported by the OSE as they increase the threshold for lobbyist registrations from \$2,000 to \$3,000. The threshold has been adjusted over the years from \$300 in 1978 to \$500 in 1981, \$1,000 in 1991, and \$2,000 in 1997. \$2,000 in 1997 dollars is worth nearly \$2,700 now. In 2008, such a change would affect 45 registrants who spent more than \$2,000 but less than \$3,000.

Finally, the OSE supports sections 8 and 9 of Raised Bill No. 6298, which make enforceable under the Code of Ethics revolving door restrictions of former Gaming Policy Board members and Department of Public Utility Control Commissioners. The existing revolving door restriction provided in § 12-557d (c) specifically prevents Gaming Policy Board members from accepting any form of employment by a business organization regulated by the Gaming Policy Board for two years following the board member's termination as a board member. Similarly, the existing revolving door restriction under § 16-2 (k) prevents former Department of Public Utility Control commissioners from accepting employment from certain public service companies for a period of one year following the expiration of their DPUC service. The section also prevents former commissioners who are also lawyers from appearing or participating in a matter for a period of one year following expiration of DPUC service. However, both statutes are currently unenforceable under the Code of Ethics for Public Officials. This proposed amendment would make these specific restrictions enforceable under the code.

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