STATE OF CONNECTICUT
OFFICE OF STATE ETHICS

May 31, 2012

Pamela B. Booth, Committee Administrator
Legislative Regulation Review Committee
State Capitol, Room 011
210 Capitol Avenue
Hartford, Connecticut 06106

Re: Amendments to Regulations of the Office of State Ethics

Dear Ms. Booth:

Pursuant to General Statutes §§ 4-168 and 4-170, enclosed please find the proposed amendment to the Regulations for Connecticut State Agencies, sections 1-92-40, 1-92-40a, 1-92-31, and 1-92-47.

The purpose of the proposed amendments is to revise and update the Office of State Ethics' agency regulations contained at Sections 1-92-40, 1-92-40a, 1-92-31, and 1-92-47 of the Regulations of Connecticut State Agencies (1) to reflect the recent reorganization of certain executive branch agencies, (2) to clarify that a board hearing concludes prior to deliberations by the Board, and (3) to allow the Office of State Ethics to adjust the lobbyist registration fee as changes in staffing levels affect the costs of administering its lobbyist registration system.

A single hard copy is hereby being submitted. As required, electronic copies of the documents will be submitted to the Legislative Regulation Review Committee, the Office of Fiscal Analysis, and the Government Administration and Elections Committee.

Thank you for your consideration of the proposed regulations. The contact person for purposes of regulations is Attorney Cynthia Isales. Please do not hesitate to contact her if you have any questions or concerns regarding the above.

Sincerely,

Carol Carson

Carol Carson
Executive Director

Enclosures

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I, Carol Carson, Executive Director of the Office of State Ethics, an Agency of the State of Connecticut, hereby certify that:

(1) On November 17, 2011, the proposed amendments to agency regulations were presented to the Citizen's Ethics Advisory Board ("Board") for approval. The Board members voted to adopt the proposed amendment to agency regulations.

(2) Pursuant to Connecticut General Statutes § 4-168, on December 20, 2011, the Office of State Ethics published in the Connecticut Law Journal a notice of intent to adopt the proposed amendments to the Regulations of Connecticut State Agencies, governing the Office of State Ethics. The purpose of the proposed amendments is to conform to existing statutory language, and to create greater transparency. A true copy of the notice of intent is attached hereto.

(3) Pursuant to Connecticut General Statutes § 4-168 (a) (2), the Office of State Ethics gave notice by mail to each joint standing committee of the General Assembly having cognizance of the subject matter of the proposed amendments to agency regulations.

(4) Pursuant to Connecticut General Statutes § 4-168, the Office of State Ethics gave notice to those persons who requested advance notice of the regulation-making proceedings and provided a copy of the proposed amendments to agency regulations to those persons who requested them. A copy of the proposed amendments to agency regulations was made available for public inspection on the agency website.

(5) Pursuant to Connecticut General Statutes § 4-168, the Office of State Ethics prepared a fiscal note, including an estimate of the cost or of the revenue impact on the state or any municipality of the state. A true copy of the fiscal note is attached hereto.

(6) Pursuant to Connecticut General Statutes § 4-168a, the Office of State Ethics conducted a regulatory flexibility analysis and provided notice to the Department of Economic and Community Development and the Commerce Committee of the General Assembly of its intent to adopt the proposed amendments.

(7) All interested persons were given reasonable opportunities beyond January 19, 2012 (the end date of the notice and comment period) to submit data, views or arguments concerning the proposed amendments to agency regulations and to inspect and copy the fiscal note referred to in paragraph (5) above.

(8) No person, group, governmental subdivision, agency or association requested an opportunity to present oral argument within the statutory fourteen day period following

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publication of the notice in the Connecticut Law Journal referred to in paragraph (2) above.

(9) On January 20, 2012 (the day after the end date of the notice and comment period), the Office of State Ethics received a letter from the Association of Connecticut Lobbyists with respect to the proposed regulations. Said letter (objecting solely to proposal #4) asked that the OSE consider maintaining the existing protocol for adjusting lobbyist registration fees.

(10) On February 7, 2012, staff of the Office of State Ethics met with representatives of the Association of Connecticut Lobbyists to discuss their concerns.

(11) As an added mechanism to provide lobbyists an opportunity to comment prior to the adoption of a change in the registration fee amount, the following language was inserted to proposal #4: "If the registration fee is expected to increase by 10% or more, the Citizen's Ethics Advisory Board shall either hold a public hearing or provide another opportunity for the presentation of views. The Office of State Ethics shall give all interested persons notice of the time, date, and place of any public hearing." On March 22, 2012, the Citizen's Ethics Advisory Board voted to approve the inclusion of that language.

(12) Pursuant to General Statutes § 4-169, the Office of State Ethics submitted the proposed amendments to agency regulations to the Attorney General for approval as to their legal sufficiency.

(13) On May 8, 2012, the Attorney General approved the Office of State Ethics' proposed amendments to agency regulations.

Carol Carson

Carol Carson
Executive Director

May 31, 2012