

Ethics Compliance: An Argument for Professional Services
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The general public thinks about lobbyists and the companies they represent with images of back rooms at the capitol and lunches at expensive restaurants. We've seen the movies and the portrayals in the press and we all picture dark suits and voices talking in hushed tones. What the public doesn't realize is that these images are outdated. Today's lobbyist ranges from the multi-national corporation with thousands of employees to the small not-for-profit seeking to protect the environment. All of these organizations are held to the same standard by Connecticut's regulatory agency, the Office of State Ethics, and all must live by the same rules of transparency.

Many organizations aren't aware that they are lobbying unless they hire a professional contract lobbyist to help them at the capitol (called an outside communicator lobbyist). Some companies don't know they've violated any rules until they are reported via anonymous tip to the agency. And some companies interact with state agencies and simply don't know that their activities constitute lobbying. If you don't see yourself as fitting into that stereotype of the lobbyist, you don't think you are lobbying, right?

It's important to understand that the rules are set up to level the playing field and you can be sure that your competitors are watching. The Office of State Ethics wants you to be in compliance but your competition wants to know if you aren't. Making sure that you understand the parameters of the registration and reporting requirements, and abiding by them, ensures that your organization can go about its business without fear of reprisal.

If you've followed the Office of State Ethics, you know that it has gone through some administrative changes in the past few years. Today, it has beefed up its Enforcement Division and redesigned its online filing system. More importantly, the agency is making a concerted effort to increase its review of the regulated community through reviews of potential violations and the audit system. As you can see from this chart, the agency is aggressively pursuing those who fail to register or report and is increasing the number of random audits it conducts. Remember that any action taken by the agency becomes part of the public record. Any corrective action, hearing, or penalty is published on their website and can be viewed by the press or competitors.

Total number of reviews of potential violations of the Codes of Ethics conducted by Enforcement Division in 2008	222
Of the 222, number of matters resolved	54
Of the 54 resolved, dollar amount collected in penalties	over \$121,000
Number of cases where penalties included monies paid by lobbyists who failed to register or where delinquent in filing financial reports	46
Number of tips received by Enforcement Division re: alleged violations of code	80
Number of completed and approved audits of registered client and communicator lobbyists in 2008	41
Of those audits, number that contained findings	29
* Source: Connecticut Office of State Ethics, ANNUAL REPORT TO THE GOVERNOR CALENDAR YEAR 2008 http://www.ct.gov/ethics/lib/ethics/publications/annual_reportfeb09.pdf	

The lesson to be taken from this is to arm yourself with trained experts in the ethics field, who understand not only the rules but have a firm grasp on the procedure and over 15 years of experience with the agency. Ethics reform remains a central theme in Connecticut politics where the environment is hyper-vigilant after the scandals of the Rowland and Ganim administrations. We see it in the news every day. Don't let your organization become the next headline.