OFFICE OF STATE ETHICS

DOCKET NUMBER 2013-24	:	OFFICE OF STATE ETHICS
IN THE MATTER OF A	:	18-20 TRINITY STREET
COMPLAINT AGAINST	:	HARTFORD, CT 06106
PFIZER, INC.	:	JUNE 4, 2014

STIPULATION AND CONSENT ORDER

Pursuant to the Code of Ethics, General Statutes § 1-79, et seq., Thomas K. Jones, Ethics Enforcement Officer for the Office of State Ethics ("OSE"), issued a Complaint against the Respondent, Pfizer, Inc. ("Pfizer" or "Respondent") for violations of the Code of Ethics for Lobbyists, General Statutes §§ 1-96 (a) and (e). Based on the investigation by the Enforcement Division of the OSE, the Ethics Enforcement Officer finds there is probable cause to believe that the Respondent, who was a client lobbyist registrant, violated the Code of Ethics as set forth in the Complaint.

The Parties have entered into this Stipulation and Consent Order following the issuance of the Complaint, but without any adjudication of any issue of fact or law herein.

I. STIPULATION

The Office of State Ethics and the Respondent stipulate to the following facts:

1. During 2012, Respondent Pfizer, was a client lobbyist registrant as defined in General Statutes § 1-91 (q) and (u).

2. Pursuant to General Statutes § 1-96, a client lobbyist registrant is required to file periodic financial reports, signed under penalty of false statement.

3. Under General Statutes § 1-96 (a), the periodic financial reports shall cover the client lobbyist registrants lobbying activities during the period covered. More specifically, the April and July reports shall cover its lobbying activities during the previous calendar quarter and the January report shall cover its lobbying activities during the previous two calendar quarters.

4. Furthermore, under General Statutes § 1-96 (c), the financial reports must include an itemized statement of each expenditure of ten dollars or more per person for each occasion made by the reporting registrant or a group of registrants which includes the reporting registrant for the benefit of a public official in the legislative or executive branch, a member of his staff or immediate family, itemized by date, beneficiary, amount and circumstances of the transaction.

5. Pursuant to General Statutes § 1-96 (c) and Regulations of Connecticut State Agencies § 1-92-48 (b), the financial reports of all client registrants..."shall include a detailed statement of each expenditure, valued at ten dollars or more per person per occasion or transaction, made for the benefit of a public official or a member of a public official's staff or immediate family, whether the expenditures are in furtherance of lobbying or unrelated to lobbying."

6. On September 3, 2012, during the Democratic National Convention, the Respondent hosted a reception at a vineyard near Charlotte, North Carolina. Nine state employees, public officials and/or members of a public official's staff or immediate family attended the reception.

7. Although the cost per person for the reception exceeded ten dollars, the Respondent failed to itemize any of the expenditures on its third and fourth quarter financial report of 2012 (ETH-2D).

8. By failing to file a ETH-2D for the third and fourth quarter financial report of 2012 that accurately reflected these expenditures, Respondent violated General Statutes § 1-96 (a).

9. By failing to itemize any of these expenditures on its third and fourth quarter financial report of 2012 (ETH-2D), Respondent violated General Statutes § 1-96 (e).

10. Respondent admits to the foregoing facts and admits that such facts constitute violations of the Code of Ethics, General Statutes §§ 1-96 (a) and 1-96 (e).

II. RESPOPNDENT'S POSITION

1. Respondent states that the reporting oversight was inadvertent and corrected immediately upon discovery.

2. Respondent states that they timely provided 10-day notification letters to reportable individuals in attendance at the event.

3. Respondent states that they do not have a prior enforcement history with the Office of State Ethics.

III. JURISDICTION

1. The Ethics Enforcement Officer is authorized to investigate the Respondent's acts as set forth herein and to issue a Complaint against the Respondent.

2. The provisions of this Stipulation and Consent Order apply to and are binding upon the Respondent.

3. The Respondent hereby waives all objections and defenses to the jurisdiction of the Office of State Ethics over matters addressed in this Stipulation and Consent Order.

4. The Respondent waives any rights it may have under General Statutes §§ 1-91, 1-93, 1-93a, 1-87 and 1-88, including the right to a hearing or appeal in this case, and agrees with the Office of State Ethics to an informal disposition of this matter as authorized by General Statutes § 4-177 (c).

5. The Respondent consents to jurisdiction and venue in the Connecticut Superior Court, Judicial District of Hartford, in the event that the State of Connecticut seeks to enforce this Stipulation and Consent Order. The Respondent recognizes that the Connecticut Superior Court has the authority to specifically enforce the provisions of this Stipulation and Consent Order, including the authority to award equitable relief.

6. The terms set forth herein are in addition to, and not in lieu of, any other existing or future statutory, regulatory, or other legal obligation that may be applicable to the Respondent.

7. The Respondent understands that it has the right to counsel and has been represented by counsel throughout the investigation and the negotiation of this Consent Order.

IV. ORDER

NOW THEREFORE, pursuant to General Statutes § 4-177 (c), the Office of State Ethics hereby **ORDERS**, and the Respondent agrees, that:

1. Pursuant to General Statutes § 1-88 (a) (1), the Respondent will heretofore cease and desist from any future violation of General Statutes § 1-96 (a).

2. Pursuant to General Statutes § 1-88 (a) (1), the Respondent will heretofore cease and desist from any future violation of General Statutes § 1-96 (c).

3. Pursuant to General Statutes § 1-88 (a) (3), the Respondent will pay a civil penalty to the State in the amount of five thousand dollars ($5,000) for its alleged violation of General Statutes §§ 1-96 (a) and 1-96 (e) as set forth in the Complaint.

WHEREFORE, the Office of State Ethics and the Respondent hereby execute this Stipulation and Consent Order dated June 4, 2014.

Dated: 6.6.2014

Pfizer, Inc.
2350 Kerner Blvd
Suite 250
San Rafael, CA 94901

Dated: June 19, 2014

Charles F. Chiusano, Chairman
Citizen's Ethics Advisory Board of the Office of State Ethics
18-20 Trinity Street, 2nd Floor
Hartford, CT 06106