



OFFICE OF STATE ETHICS

DOCKET NUMBER 2017-28	:	OFFICE OF STATE ETHICS
	:	
IN THE MATTER OF A	:	18-20 TRINITY STREET
	:	
COMPLAINT AGAINST	:	HARTFORD, CT 06106
	:	
RAFFAELLA COLER	:	AUGUST 6, 2018

STIPULATION AND CONSENT ORDER

Pursuant to the Code of Ethics, General Statutes §§ 1-79, *et seq.*, Thomas Jones, Ethics Enforcement Officer, filed a Complaint against Raffaella Coler (“Ms. Coler” or “Respondent”), alleging violations of the Code of Ethics for Public Officials. Based on the investigation by the Enforcement Division of the Office of State Ethics (“OSE”), the OSE finds that there is probable cause to believe that Ms. Coler violated the Code of Ethics as further set forth herein.

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

I. STIPULATION

The Ethics Enforcement Officer and the Respondent stipulate to the following facts:

1. At all times relevant hereto, the Respondent was employed as the Director of the Office of Emergency Medical Services (hereinafter "OEMS"), a state office established within the Connecticut Department of Public Health.

2. At all times relevant hereto, the Respondent was a "State Employee" as that term is defined in General Statutes § 1-79 (13).

3. At all times relevant hereto, the OEMS was responsible for, among other things, oversight of the state's regional emergency medical services councils (hereinafter "Regional Councils"), pursuant to General Statutes § 19a-178.

4. On or about 2017, a company based in Fairfield, Connecticut (hereinafter "Fairfield Company") organized an EMS-related conference ("EMS Conference") that was held from on or about May 31 through on or about June 3, 2017 at a venue in Uncasville, Connecticut.

5. At all times relevant hereto, representatives and officers of the Fairfield Company included individuals who concurrently held positions on Regional Councils, and/or who held positions in companies and other entities regulated by the OEMS and the Department of Public Health.

6. As a part of her state job duties, the Respondent had cause to communicate, and did communicate with said representatives and officers of the Fairfield Company concerning the EMS Conference.

7. As a part of her state job duties, the Respondent planned to attend the EMS Conference, and ultimately did attend the EMS Conference.

8. On or about April 26, 2017, the Respondent made a request to representatives of the Fairfield Company that the Fairfield Company pay for her to stay for two nights at a hotel located near the EMS Conference venue during the EMS Conference.

9. As a result of the Respondent's request, the Fairfield Company paid for the Respondent to stay for two nights at a hotel during the EMS Conference, with costs totaling on or around \$430.00.

10. The free hotel rooms requested and received by the Respondent were unnecessary to her state duties.

11. General Statutes § 1-84 (c) states in pertinent part:

No public official or state employee...shall use his public office or position or any confidential information received through his holding such public office or position to obtain financial gain for himself . . .

12. The Respondent, by seeking and obtaining two nights free at a hotel by virtue of her state position, used her state position to obtain financial gain for herself, in violation of General Statutes § 1-84 (c).

II. RESPONDENT'S POSITION

1. The Respondent states that her violation of the Code was neither knowing nor willful.

2. The Respondent states that in accepting the free hotel stay, she believed that she was following past practice and that she had permission.

III. JURISDICTION

1. The Ethics Enforcement Officer is authorized to investigate the Respondent's acts as set forth herein, and to enter into this Stipulation and Consent Order.

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 Ethics Enforcement Officer over matters addressed in this Stipulation and Consent Order.

4. The Respondent waives any rights she may have under General Statutes §§ 1-80, 1-82, 1-82a, 1-87 and 1-88, including the right to a hearing or appeal in this case, and agrees with the Ethics Enforcement Officer 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 she has a right to counsel and has elected to proceed without counsel.

IV. ORDER

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

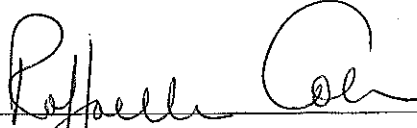
1. Pursuant to General Statutes § 1-88 (a) (1), Ms. Coler will cease and desist from any future violations of § 1-84 (c).

2. Pursuant to General Statutes § 1-88 (a) (3), Ms. Coler will pay civil penalties to the State in the amount of two hundred fifty dollars (\$250.00) for her violation of General Statutes §


1-84 (c) as set forth in the Complaint and herein.

WHEREFORE, the Ethics Enforcement Officer and Ms. Coler hereby execute this Stipulation and Consent Order dated August 6, 2018.

Dated: 8/7/18


Raffaella Coler

Dated: 8/13/18


Thomas K. Jones
Ethics Enforcement Officer
Connecticut Office of State Ethics
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Hartford, CT 06106
(860) 263-2390