**OFFICE OF STATE ETHICS**

| | | |
|---|---|---|
| DOCKET NUMBER 2018-02 | : | OFFICE OF STATE ETHICS |
| IN THE MATTER OF A | : | 18-20 TRINITY STREET |
| COMPLAINT AGAINST | : | HARTFORD, CT 06106 |
| RYAN O'HARA | : | JUNE 11, 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 the Respondent Ryan O'Hara ("O'Hara" or "Respondent"), alleging violations of the Code of Ethics, Connecticut General Statutes § 1-84b (b). Based on the investigation by the Enforcement Division of the OSE, the Office of State Ethics finds there is probable cause to believe that the Respondent violated the Code of Ethics as further set forth in herein.

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

1. Until on or about August 2017, Ryan O'Hara (hereinafter "O'Hara" or "Respondent") was a Transportation Engineer at the Department of Transportation ("DOT").

2. Until on or about August 2017, Respondent was a "State Employee" as that term is defined in General Statutes § 1-79 (m).

3. On or about August 2017, Respondent departed from state service and was thereafter a "former state employee."

4. Within one year of August 2017, Respondent accepted employment with an engineering company with business offices in Cheshire, Connecticut (the "Cheshire business").

5. Within one year of August 2017, and within one year of his leaving state service, Respondent had contact with employees at the DOT regarding a Major Traffic Generator ("MTG") related to a planned development in Newington, Connecticut in which the Cheshire business was involved.

6. Respondent was compensated by the Cheshire business for his contacts with the DOT.

7. The state has a substantial interest in the regulation of MTGs in Connecticut.

8. General Statutes § 1-84b (b) states in pertinent part:

> No former . . . state employee shall, for one year after leaving state service, represent anyone, other than the state, for compensation before the department, agency, board, commission, council or office in which he served at the time of his termination of service, concerning any matter in which the state has a substantial interest.

9. The Respondent, by engaging in the acts set forth above, represented someone other than the state for compensation before the DOT within one year of his departure from state

service, in a matter in which the state had a substantial interest, in violation of General Statutes § 1-84b (b).

10. Respondent admits to the foregoing facts, and admits that these facts constitute a violation of the Code of Ethics, General Statutes §1-84b (b).

## II. 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 he 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 he has a right to counsel and has expressly and knowingly waived such right during the OSE's investigation and in connection with this Stipulation and Consent Order.

## III. ORDER

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

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

2. Pursuant to General Statutes § 1-88 (a) (3), Respondent will pay a civil penalty to the State in the amount of Three Thousand Dollars ($3,000.00) for his violation of General Statutes § 1-84b (b) as set forth in the Complaint and herein.

**WHEREFORE,** the Ethics Enforcement Officer and the Respondent hereby execute this Stipulation and Consent Order dated June 11, 2018.

Dated: June 6, 2018

Ryan O'Hara

**Ryan O'Hara**

Dated: June 7, 2018

**Thomas K. Jones**
Ethics Enforcement Officer
Connecticut Office of State Ethics
18-20 Trinity Street
Hartford, CT 06106
(860) 263-2390