



STATE OF CONNECTICUT
STATE ETHICS COMMISSION

CONFIDENTIAL

DOCKET NUMBER 2003-7) STATE ETHICS COMMISSION
IN THE MATTER OF A) 20 TRINITY STREET
COMPLAINT AGAINST) HARTFORD, CT 06106
LAWRENCE E. ALIBOZEK) MAY 12, 2003

COMPLAINT

COUNT ONE

1. At all pertinent times relevant hereto, Lawrence E. Alibozek ("the Respondent") was a state employee as that term is defined in Conn. Gen. Stat. § 1-79(m).
2. At all pertinent times relevant hereto, the Respondent was the Deputy Chief of Staff at the Governor's Office.
3. Pursuant to Conn. Gen. Stat. § 1-84(c), no state employee shall use his position to obtain financial gain for himself.
4. The Respondent took checks, gold bullion coins, cash, and other things of value in return for steering large state contracts to certain individuals and/or their companies.
5. The Respondent took kickbacks through a corporation called TREA, LLC for directing state contracts to certain individuals and/or companies.
6. By virtue of the above, the Respondent violated § 1-84(c).
7. In part, subsection (d) of § 1-88 provides that any person who knowingly acts in his financial interest in violation of § 1-84 or any person who knowingly receives a financial advantage resulting from a violation of said section "shall be liable for damages in the amount of such advantage."
8. The Respondent knowingly acted in his financial interest in violation of § 1-84(c), or knowingly received a financial advantage resulting from a violation of § 1-84(c).

9. As set forth in Count 3 of this Complaint, the Respondent fraudulently concealed his violations of § 1-84(c).

COUNT TWO

1. Paragraphs 1 and 2 of the First Count are incorporated herein as paragraphs 1 and 2 of this, the Second Count, as if fully set forth herein.

3. Pursuant to Conn. Gen. Stat. § 1-84(g), no state employee shall solicit or accept anything of value, including but not limited to a gift or reward, based on any understanding that official action or judgment of the state employee would be or had been influenced thereby.

4. The Respondent took checks, gold bullion coins, cash, and other things of value in return for steering large state contracts to certain individuals and/or their companies.

5. The Respondent took kickbacks through a limited liability corporation called TREA, LLC for directing state contracts to certain individuals and/or companies.

6. On March 10, 2003, the Respondent pled guilty in Federal District Court to conspiracy to accept corrupt payments.

7. In so pleading, the Respondent admitted that he knowingly, willfully and corruptly conspired to accept things of value intending to be influenced and rewarded in connection with the business of the State of Connecticut, and that he did take gold, cash and things of value with the intent to be influenced and rewarded by taking favorable action in connection with state business.

8. By virtue of the above, the Respondent violated § 1-84(g).

9. In part, subsection (d) of § 1-88 provides that any person who knowingly acts in his financial interest in violation of § 1-84 or any person who knowingly receives a financial advantage resulting from a violation of said section "shall be liable for damages in the amount of such advantage."

10. The Respondent knowingly acted in his financial interest in violation of § 1-84(g), or knowingly received a financial advantage resulting from a violation of § 1-84(g).

11. As set forth in Count 3 of this Complaint, the Respondent fraudulently concealed his violations of § 1-84(g).

COUNT THREE

1. Paragraphs 1 and 2 of the First Count are incorporated herein as paragraphs 1 and 2 of this, the Third Count, as if fully set forth herein.

3. As the Deputy Chief of Staff, the Respondent was in a fiduciary relation to the citizens of the State of Connecticut in that in carrying out his job, he had a duty to act for their benefit.
4. On March 10, 2003, the Respondent pled guilty in Federal District Court to conspiracy to accept corrupt payments and to impair and impede the functions of the Internal Revenue Service (IRS).
5. In so pleading, the Respondent admitted that he knowingly, willfully and corruptly conspired to accept things of value intending to be influenced and rewarded in connection with the business of the State of Connecticut, and that he did take gold, cash and things of value with the intent to be influenced and rewarded by taking favorable action in connection with state business.
6. In pleading guilty, the Respondent admitted that he took steps to conceal the cash, gold bullion coins, checks, and other things of value that he took in exchange for steering large state contracts.
7. Pursuant to Conn. Gen. Stat. § 1-83, the Respondent had a duty to annually file with the Connecticut State Ethics Commission a Statement of Financial Interests.
8. The Respondent did not disclose as sources of income on his 1999 Statement of Financial Interests the cash, gold bullion coins, checks, and other reportable things of value that he took in violation of Conn. Gen. Stat. §§ 1-84(c) and (g), as set forth in Counts One and Two of this Complaint, and therefore concealed said violations from the Commission and the public which has the right to see all Statements of Financial Interests.
9. Pursuant to the Connecticut Income Tax laws, the Respondent had the duty to disclose all sources of income.
10. On information and belief, the Respondent did not disclose on his 1999 Connecticut Income Tax Return the cash, gold bullion coins, checks, and other reportable things of value that he took in violation of Conn. Gen. Stat. §§ 1-84(c) and (g), as set forth in Counts One and Two of this Complaint, and therefore concealed said violations from the State.
11. Because of the Respondent's fraudulent concealment of his illegal acts, the statute of limitations set forth in Conn. Gen. Stat. § 1-82(d) has been tolled by virtue of Conn. Gen. Stat. § 52-595.

May 13, 2003
Date


Denise Rodosevich
Commission Attorney