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Commissioner

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December 14, 2011

Thomas H. Dooley, Chairman
Citizen's Ethics Advisory Board
18-20 Trinity Street
Hartford, CT 06106-1660

RE: Draft Advisory Opinion 2011-6

Dear Mr. Dooley:

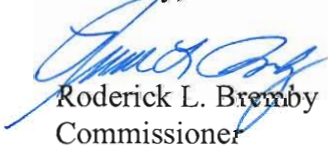
I am writing to request that you do not take up your review of the above-captioned draft advisory opinion at your meeting tomorrow, December 15, 2011, but instead postpone review of this draft opinion until your meeting scheduled to take place on January 26, 2012.

The question presented by the Department of Labor mirrors a question informally posed by the Department of Social Services (DSS) in the wake of a recent wave of retirements in this agency's Information Technology Division. The answer we received is not consistent with the conclusion proposed in this draft opinion. Based on that answer, we currently have three DSS retirees working for a vendor of the Department of Information Technology (DOIT) on DSS IT needs. There will be crippling consequences for this agency if the Board adopts this draft opinion. We are struggling here with vastly outdated technology with which new recruits have no experience. We are relying on our retirees, retained through DOIT's vendor, with the knowledge and informal approval of the Office of State Ethics, to see us through the transition to a new eligibility management system.

We were not made aware of the draft opinion until Monday December 12, 2011. I am requesting a postponement of your review of this question to allow us time to marshal our legal arguments and explore our alternatives for continuing the employment of these key individuals. We have conferred with our colleagues in the Department of Labor and they are in agreement with this request.

Thank you for your consideration. Please contact Brenda Parrella, Agency Legal Director and Ethics Liaison, if you have any questions or concerns about this matter.

Sincerely,



Roderick L. Bremby
Commissioner

cc: Brenda Parrella
Jennifer Devine, DOL

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