



STATE OF CONNECTICUT  
STATE ETHICS COMMISSION

ADVISORY OPINION NO. 91-25

Application of the Code of Ethics For Public Officials  
To Uncompensated Work

John A. Brunjes, an attorney in the State's Department of Banking, has asked the Ethics Commission to issue an advisory opinion answering the following question: is it permissible, under the provisions of the Code of Ethics for Public Officials, Connecticut General Statutes, Chapter 10, Part I, for Attorney Brunjes, working without compensation, to represent his cousin in a matter under the jurisdiction of the Banking Commissioner?

The substantive provisions of the Code of Ethics for Public Officials are, in the main, intended to prevent a state servant from using public position or authority for the private financial benefit of himself or herself, his or her immediate family or an associated business. See, Conn. Gen. Stat. §§1-83 through 1-86. No applicable provision of the Code, however, extends to the relationship of cousin. Consequently, since Attorney Brunjes will be working without compensation and since any resultant financial benefit to his cousin is beyond the scope of the Code, he may, consistent with the requirements of the Code of Ethics, undertake the representation in question.

This Opinion, of course, is in no way intended to address any possible application of the Attorneys' Rules of Professional Conduct to the question presented; nor is it intended to circumscribe any legal authority the Banking Commissioner may have to regulate such activities by employees of his Department.

By order of the Commission,

Astrid T. Hanzalek

Astrid T. Hanzalek  
Chairperson

Dated 12-9-91