

OFFICE OF STATE ETHICS

DOCKET NUMBER 2011-69 :
IN THE MATTER OF A : 18-20 TRINITY STREET
COMPLAINT AGAINST : HARTFORD, CT 06106
JOHN TRICARICO : FEBRUARY 23, 2012

COMPLAINT

COUNT ONE:

1. From on or about 2009 to the date of this Complaint, the Central Connecticut Regional Planning Agency (“CCRPA”) was a state contractor, hired by the Department of Transportation to provide and operate transportation services for disabled people (“paratransit services”) in the state of Connecticut.
2. On or about 2009, CCRPA subcontracted the operational component of its state paratransit services contract to DATTCO (“the paratransit subcontract”), and DATTCO became a state subcontractor under the direction of CCRPA.
3. From on or about May 2008 to on or about July 2010, John Tricarico (“Tricarico” or “Respondent”) was a Transportation Assistant at CCRPA. Among his duties from 2009 to July 2010 was assisting in the oversight of the paratransit subcontract.
4. From on or about July 2010 until on or about October 2011, Tricarico was a Transit Program Manager at CCRPA. Among his duties during this time was the oversight of the paratransit subcontract.
5. Tricarico’s authority over CCRPA’s paratransit subcontract with DATTCO derived exclusively from CCRPA’s paratransit services contract with the state of Connecticut.
6. Beginning no later than July 2009 and continuing until on or about October 2011, Tricarico solicited free or discounted gifts, services and other items of value from DATTCO, including but not limited to:
 - a. Lunches and dinners
 - b. Tickets to Boston Red Sox and New York Yankees baseball games
 - c. Tickets to New England Patriots football games
 - d. Tickets to rock concerts at Mohegan Sun
 - e. Use of DATTCO vehicles to assist in moving personal items
 - f. Use of DATTCO vehicles and drivers for personal trips to New Jersey, and the Connecticut casinos
 - g. Rides to and from work and to personal appointments

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- h. Job interviews at DATTCO for Tricarico's relatives
7. During the period between July 2009 and October 2011, Tricarico also solicited employment for himself at DATTCO.
 8. During the period between July 2009 and October 2011, Tricarico also issued himself authorization to ride on DATTCO's paratransit vehicles for his own personal use.
 9. Pursuant to General Statutes § 1-86e, no person hired by the state as a consultant or independent contractor shall "use the authority provided to the person under the contract . . . to obtain financial gain for the person, an employee of the person or a member of the immediate family of such person or employee."
 10. By using his authority over DATTCO to solicit free or discounted gifts, services, and other items of value from DATTCO, Tricarico used his authority under a state contract to obtain financial gain for himself and/or a member of his immediate family.
 11. Each solicitation set forth herein represents a separate and distinct violation of § 1-86e.

PRAYER FOR RELIEF

WHEREFORE, the Office of State Ethics prays for the following relief:

1. Pursuant to General Statutes section 1-88(a)(1), an Order mandating that the Respondent, John Tricarico, cease and desist from any future violation of General Statutes § 1-86e.
2. Pursuant to General Statutes section 1-88(a)(3), an Order mandating that the Respondent, John Tricarico, pay civil penalties to the State, not to exceed \$10,000, for each violation of General Statutes § 1-86e.

Dated at Hartford, Connecticut this 23rd day of February, 2012.

THE OFFICE OF STATE ETHICS,

BY: 

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