
IN THE MATTER OF BOLTON ST. JOHNS INC.

NOTICE OF REASONABLE CAUSE

Pursuant to Executive Law §94(12)(a), the Commission on Public Integrity ("Commission") finds that there is reasonable cause to believe that Bolton St. Johns, Inc. knowingly and willfully violated Legislative Law §§1-e(a)(4) and 1-h(b)(5), by failing to timely file a 2007-2008 Statement of Registration and accurately report the compensation received from your client, Medtronic Sofamor Danek, USA, Inc. On or about September 6, 2007 Bolton St. Johns, Inc filed with the Commission a contract with Medtronic Sofamor Danek, USA with a beginning date of August 15, 2007. Bolton St. Johns indicated to the Commission that this was not a late filing because no lobbying occurred prior to September 6, 2007 despite the earlier contract start date. Subsequently, a random audit conducted by the Commission on September 18, 2008, uncovered documents that indicate Bolton St. Johns billed the client and was paid for lobbying services in August 2007, prior to the date of registration.

As required by law, a copy of this notice is retained by the Commission for public inspection. Please be advised, that pursuant to Legislative Law §1-o(b) a lobbyist, public corporation, or client who knowingly and willfully fails to file a statement or report within the time required for the filing of such report, shall be subject to a civil penalty for each violation in the amount of twenty-five thousand dollars. In addition, pursuant to Legislative Law §1-o(c), a lobbyist, public corporation, or client who knowingly and willfully files a false statement or report shall be subject to a civil penalty in an amount not to exceed the fifty thousand dollars, to be accessed by the Commission.

Dated: 8-6-09

By: 
Barry Ginsberg
Acting Executive Director
Commission on Public Integrity