



# ETHICALLY SPEAKING

VOLUME 7, ISSUE 4

AUGUST 2022

## A Message from the Director

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The importance of an ethics and compliance program goes far beyond helping to prevent and detect misconduct, which is very important to the District government. It encompasses much more than that by helping us to recognize and avoid unwanted risks to the government and its reputation, and promoting collaboration which fosters ethical agency cultures.

The ethics program is responsible for increasing awareness of the ethics rules, advising employees who have questions, investigating and responding to suspected misconduct, and contributing to an agency's culture. It must also drive accountability and

ownership at every level in an agency and the government. Since 2012, BEGA has taken great pride in serving as the District's ethics and compli-



**Ashley D. Cooks**  
Director of Government Ethics

ance program and as a model for individual agency programs. We are in the process of implementing new ideas and approaches that will assist employees on their ethical

journeys. One such approach is our [online learning management system](#), which offers on-demand ethics trainings.

We will only succeed as a government when our values and commitment to ethics help us determine and shape our strategies and guide the way we go about achieving our goals.

## Upcoming Events

### General Ethics Training

September 14, 2022 - 1 pm

October 12, 2022 - 1 pm

Register for [Ethics Training](#)

### Hatch Act Training

September 6, 2022 - 1 pm

Date - time

Register for [Hatch Act Training](#)

### Ethics Counselor

#### Brown Bag

August 29, 2022 - 1 pm  
Comprehensive Code of Conduct

September 26, 2022 - 1 pm  
DC One Fund

## New and Notable



- ◆ BEGA's annual **Ethics Week** will be held in October. We will have several days of programming on the theme of "Ethics in Practice." BEGA's Office of Government Ethics and Office of Open Government will be on hand to present along with several guest speakers. We are planning some fun sessions, including some optional in-person activities. Look for an invitation and detailed itinerary coming soon. We hope to see you there.
- ◆ BEGA is in the process of reviewing the District's Code of Conduct and plans to propose a **Comprehensive Code of Conduct** that consolidates the District's ethics laws and standardizes the rules between the legislative and executive branches. Join the Office of Government Ethics for our next Ethics Counselor Brown Bag on August 29th to learn more about BEGA's proposals for changes to the District's ethics rules.
- ◆ Welcome London Green! London Greene joined BEGA in July as a Human Resources Specialist. Ms. Green has 11 years of human resources and office support experience. She obtained her master's degree in Human Resources Management in May 2019. A native Washingtonian, Ms. Greene enjoys spending time with family and friends and shopping.

## Enforcement Updates

### 22-0040P In re Y. Owens

The Director of Government Ethics issued a \$1,500 ministerial fine for violations of DPM § 1808.1, which provides that a District employee has a duty to protect and conserve government property and shall not use that property, or allow its use, for other than authorized purposes. The matter involved allegations that the Respondent used a District-issued purchase card to purchase personal gifts for an employee. The fine was issued after an informal hearing before the Director of Government Ethics. You can read the Ministerial Fine Order [here](#).

### 19-0011F In re J. Sumner

The Board approved a negotiated disposition in this matter stemming from Respondent's failure to submit a full and complete financial disclosure statement in violation of D.C. Official Code § 1-1162.24(a) (1). Respondent failed to disclose outside business interests and income on his 2017 Public Financial Disclosure Report. Respondent agreed to a \$750 fine and to amend his 2017 Public Financial Disclosure Statement. You can read the approved negotiated disposition [here](#).

### Complaint Summary

On August 8, 2022, BEGA published the Quarterly Complaint Summary Report for the Third Quarter of FY2022, ending June 30, 2022. The Complaint Summary provides details on the status of complaints of violations of the District's Code of Conduct. You can read the complaint summary [here](#).

# Ethics in the News



The U.S. Office of Special Counsel (OSC) recently announced settlement agreements with four federal employees who violated the Hatch Act. The Hatch Act prohibits certain political activity by federal em-

ployees, including engaging in political activity while on duty or while wearing a uniform or official insignia.

A Defense Intelligence Employee agreed to a three-day unpaid suspension for posting 12 partisan political Facebook messages while at work.

A Department of Veterans Affairs employee won election in 2021 as a township commissioner in Pennsylvania, a partisan political office. Although the employee did not actively campaign for election, her candidacy violated the Hatch Act

and she received a formal letter of reprimand.

Two Postal Service employees also reached agreements with the OSC. One letter carrier in Alaska agreed to a 21-day unpaid suspension for wearing a campaign hat while delivering mail in May 2019. Another letter carrier in California resigned and agreed to a one-year debarment from federal employment for intentionally removing and discarding 66 pieces of partisan political mail.

Read more about the OSC settlements [here](#) and [here](#).

## State and Local Ethics

Individuals who violate the City of Chicago’s ethics ordinance may see higher fines if they are subject to an enforcement action. The Chicago City Council unanimously approved a package of ethics reforms on July 20, 2022 that would raise the maximum fine for violating the city’s ethics ordinance from \$5,000 to \$20,000 per violation, with the option for the Board of Ethics to

impose a fine equal to the financial benefit that the city official or employee realized from the violation, if higher.

In addition to the increased fines, the measure expands the definition of companies who do business with the city to add companies that contract with the Chicago Transit Authority, Chicago Public Schools, and Chicago Housing Authority. It also

expands the rules against nepotism to cover domestic partners or relatives and prohibit hiring of relatives of city officials.

The ethics reforms are intended to address longstanding public corruption issues in Chicago that have resulted in the conviction of 37 members of the Chicago City Council since 1969.

You can read more [here](#).

## Inside the Mirror

Not everything that exists is a natural object. Our knowledge of the world is not confined to things we can physically touch and feel. For example, the concept of good. While it may seem odd to suggest that good does not exist outside of our minds, all beings with this capability have a consensus, albeit a large spectrum, on what is good.

This experience is unique to beings that have the capability to have “feelings” or “emotions”. To date, it’s been found that humans have up to twenty-seven emotions such as happiness, sadness, and fear. Individually, the goal is to personally evaluate these and create a system in which we feel good and create good without harming others.

You, as a human being, have a unique capability and opportunity to create something that would not otherwise exist and that we will always remember.





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# Ask BEGA

## Is my Outside Employment/Activity Ethical?

The Code of Conduct permits District employees to engage in outside employment and activities as long as it does not create a financial conflict of interest and the outside employment/activity is compatible with government service. Section 1807.1 of the District Personnel Manual describes 9 different activities that are *not* compatible with government employment. They include prohibitions against: 1) outside activity that interferes with your District government job; 2) using government time or resources for outside activity; 3) ordering or asking subordinates to perform tasks unrelated to District government work; 4) maintaining a financial interest in or serving as an officer of an outside organization if you may have to take action regarding the outside entity; 5) outside activity that

capitalizes on official District title; 6) divulging unauthorized public government information; 7) activity that impairs your mental or physical capacity to do your District job; 8)



serving as a representative in a matter before the District; and, 9) engaging in outside activity that is illegal.

If your outside employment involves teaching, writing or speaking, avoid sharing any official, non-public information and make sure the subject matter upon which you are sharing is not substantially devoted to your official government duties, responsibilities or information obtained from your government employment.

Employees with their business may not represent their outside business before the District. This includes making applications, negotiating terms and signing contracts or other paperwork. In order to ethically obtain contracting and consulting opportunities with the District, employees must engage a third-party intermediary to represent the business.

Finally, DC Official Code § 1-1162.23 (a) prohibits employees from taking action at their jobs that will have a direct and predictable effect on their finances. Make sure that your official actions do not impact your personal finances, your business's finances or the finances of anyone closely affiliated to you.

Contact OGE at [bega@dc.gov](mailto:bega@dc.gov) for advice on your outside employment.