

**DISTRICT OF COLUMBIA  
BOARD OF ETHICS AND GOVERNMENT ACCOUNTABILITY**

**MEETING MINUTES – November 6, 2025**

The District of Columbia Board of Ethics and Government Accountability held a hybrid meeting at the Board of Ethics and Government Accountability, 1030 15<sup>th</sup> Street, NW, Suite 700 West, and virtually on November 6, 2025, at 10:00 a.m. Chairperson Norma Hutcheson and Board members Charles Nottingham, Darrin Sobin, and Melissa Tucker attended the meeting. Board member Felice Smith did not attend the meeting.

Members of the public were welcome to attend, and a recording of the meeting is available on open-dc.gov and [BEGA's YouTube channel](#).

**I. Call to Order**

The meeting was called to order at 10:00 a.m.

**II. Ascertainment of Quorum**

Four Board members, Chairperson Hutcheson and Board members Nottingham, Sobin, and Tucker were present at the start of the meeting.

**III. Adoption of the Agenda/Approval of Minutes**

The Board unanimously to adopt the agenda for the meeting. The Board lacked a quorum to approve the minutes for the October 2025 meeting since Board members Nottingham and Tucker did not attend the October meeting.

**IV. Report by the Director of Open Government**

Good morning, Chairperson Hutcheson, and Members of the Board. I am Niquelle Allen, Director of Open Government. I am pleased to present this report on the activities of the Office of Open Government (“OOG”). Our mission is to ensure that all persons receive full and complete information concerning the affairs of the District of Columbia government and the actions of its officials. Since the last Board meeting, OOG has continued its work to ensure that the District of Columbia government’s operations are transparent, open to the public, and promote civic engagement. To that end, OOG has enforced the Open Meetings Act, advised on the Freedom of Information Act’s requirements, and provided training on those transparency laws. OOG has proudly served as advocates for an open and transparent government.

**A. Open Meetings Act (“OMA”) and Freedom of Information Act (“FOIA”) Advice**

**1. Advisory Opinions**

a. OMA Advisory Opinion – Smothers Elementary School Local School Advisory Team, #OOG-2024-0012

On October 8, 2025, I issued an Advisory Opinion #OOG-2024-0012, in response to a complaint which alleged that Smothers Elementary School Local School Advisory Team (“Smothers LSAT”) nominated a chairperson to Smothers LSAT outside of a regular LSAT meeting and cancelled one of its publicly noticed meetings without notice to the public of the cancellation.

I found that the Smothers LSAT’s alleged nomination or selection of a chairperson on a disputed date does not violate the Open Meetings Act (“OMA”) because the alleged nomination or selection process does not raise facts or circumstances covered in the OMA. The Advisory Opinion explains that the unique situation of Smothers’ LSAT being reduced to one or two members is one that warrants further examination, but insufficient and conflicting information prevents such within the context of the OMA. I found that the meeting notice issue falls within the OMA, but the evidence was inconclusive on which to decide whether Smothers LSAT violated the OMA by not providing notice to the public of the cancellation of one of its meetings. Notwithstanding the LSAT reduced membership and the insufficiency of information, I advised that LSATs must provide notice of meetings in accordance with the OMA. The LSAT must create a record, as best as possible, of the selection of members, create a process in such a situation, and make it available to the public.

Based on the Office of Open Government’s own investigation, I found that Smothers Elementary School Local School Advisory Team has violated the Open Meetings Act, by not doing the following: publishing meeting minutes or (information on access to) record of meetings for the year 2024, as required by D.C. Official Code § 2–578(b); publishing a schedule of its meetings for school year 2024 to 2025; and providing meeting notices for school year 2024 to 2025, in accordance with D.C. Official Code § 2–576(1).

I have determined that based on Smothers Elementary School LSAT’s violation of the OMA Notice of meetings and Open meetings requirements, Smothers LSAT must take OMA training within sixty (60) days of receipt of the Advisory Opinion to avoid further corrective action. A copy of the Complaint and Advisory Opinion have been added to Dropbox.

b. Letter Regarding OMA Advisory Opinion – District of Columbia Zoning Commission, #OOG-2024-003

On May 8, 2025, I issued Advisory Opinion #OOG-2024-003 pursuant to 3 DCMR § 10400, *et seq.*, and concluded that the District of Columbia Zoning Commission’s (the “Commission”) practice of holding stand-alone closed sessions violated the OMA because its practice provided inadequate notice of the Commission’s closed meetings and was inconsistent with the protocol that public bodies must follow to lawfully enter closed/executive sessions as set forth in D.C. Official Code § 2-575(c).

On October 21, 2025, I provided the Complainant and Commission with a letter confirming that the Commission has collaborated with the Office of Open Government to rectify this inconsistency, and has, to my satisfaction, fully done so. OOG considers the matter resolved and closed. A copy of the letter has been added to Dropbox.

c. OMA Advisory Opinion – Board of Trustees for I Dream Public Charter School, #OOG-2025-0026

On October 29, 2025, I issued an Advisory Opinion #OOG-2025-0026, in response to a complaint which alleged that I Dream Public Charter School Board (“I Dream PCSB,” or the “Board”) has not provided meeting location or links to its meetings and the last meeting minutes was published in December 2024. The Board relinquished its Charter at the end of School Year 2024-2025 and is not in operation. I recognized that the allegation in the Complaint is moot but decided to address the matter and issue the Advisory Opinion for the benefit of the stakeholders of active Boards of Trustees for Public Charter Schools, and should I Dream PCSB resume operation under a new Charter Agreement.

I found that I Dream PCSB violated the OMA by not (1) providing location or login information and links to its meetings and (2) posting its January 8, 2025, meeting minutes within the statutorily required thirty (30) business days on I Dream PCS’ website and/or Central Meeting Calendar (“CMC”). The Advisory Opinion takes notice that prior to relinquishing its Charter, the Board corrected the issues in part, by posting its 2025 meetings minutes on the school’s website and the Chairperson, in response to the Complaint, stated her resolve to ensure that all links to the Board’s meetings will be published in a timely manner.

d. OMA Advisory Opinion – Dismissal of Complaint Regarding D.C. Fire and Emergency Medical Services (DC FEMS), # OOG-2025-0060

On November 4, 2025, I issued Advisory Opinion # OOG-2025-0060, in response to a complaint about the alleged misconduct of a DC FEMS employee. I dismissed the complaint because it concerned a personnel matter that did not raise issues within the Director of Open Government’s authority under the OMA. The complainant was referred to the Office of the Fire and Emergency Medical Services Chief and the DC FEMS Office of Accountability.

2. Informal Advice

Since the last Board meeting, OOG has responded informally, via e-mail, telephone, or teleconference to requests for assistance as follows:

9 requests for OMA advice;

7 requests for FOIA advice; and  
14 requests for technical assistance with open-dc.gov.

**B. Meeting Monitoring**

OOG's staff attends public bodies' meetings, in person and remotely, to ensure compliance with the OMA. They also inspect public bodies' websites and OOG's Central Meeting Calendar for public meeting notices and records. OOG's attorneys provide legal advice on OMA compliance and take corrective action, if necessary.

Since the last Board meeting, OOG's legal staff have attended eleven (11) public body meetings. As a result of the monitoring, two (2) corrective measures were communicated. The public bodies failed to publish a complete meeting notice which should have included the agenda and regulatory statement pursuant to the Open Meetings Act and its Regulations.

**C. Training/Outreach**

1. Ethics Week 2025 - Sessions Attended by OOG

a. Sessions Facilitated by the Office of Government Ethics (OGE)

From October 14 - 17, 2025, the Board of Ethics and Government Accountability (Office of Government Ethics and Office of Open Government) held its Annual Training Seminar, Ethics Week 2025, "Keeping Government Transparent and Ethical." OOG's staff and I attended the OGE facilitated seminars in person and virtually, which included a variety of ethics courses with a focus on outside employment, donations and gifts, and ethics for government attorneys, presented by OGE. The Office of Open Government's team attended all the training courses and a list of the courses, including details regarding which OOG members attended each of the sessions facilitated by OGE, is included in Dropbox for your information.

b. Introduction and Opening Remarks from Director

On October 16, 2025, I opened a full day of FOIA and OMA courses at Ethics Week 2025 and provided a brief overview of the Office of Open Government and the office's activities and accomplishments. OOG's staff attended the session in-person and virtually.

c. "The Responsible Use of AI Tools in Government" Training

On October 16, 2025, I also facilitated "The Responsible Use of AI Tools in Government" training session. The course covered the basic characteristics of artificial intelligence (AI) technologies, including generative AI and large language models (LLMs), and the impact of AI on government records, FOIA, and government services. The training session also provided useful tips for employees using the AI in performing their duties including their duty to preserve confidential and proprietary information when using AI tools. OOG's staff attended the training in-person and virtually.

d. “History of the OMA/Recent Changes to the OMA” Training

On October 16, 2025, Attorney Advisor Brandon Lewis presented “History of the OMA/Recent Changes to the OMA.” The course provided an overview of the history of the Open Meetings Act and discussed recent changes made to the Act by the D.C. Council. I, along with OOG’s staff, attended the session in-person and virtually.

e. “Overview of Recent FOIA and OMA Advisory Opinions and Advice” Webinar

On October 16, 2025, Chief Counsel Louis Neal facilitated “Overview of Recent FOIA and OMA Advisory Opinions and Advice” webinar. The course discussed recent FOIA and OMA advisory opinions and advice issued by the Office of Open Government. I, along with OOG’s staff, attended the training virtually.

f. “Introduction to D.C. Freedom of Information Act” Webinar

On October 16, 2025, Attorney Advisor Joan Lelma facilitated “Introduction to D.C. Freedom of Information Act” (D. C. FOIA) webinar. The training session provided a brief history of D.C. FOIA, an overview of the FOIA exemptions, and discussed practical topics for FOIA officers. There was a question-and-answer segment following specific topics discussed. I, along with OOG’s staff, attended the training virtually.

g. Parliamentary Procedure Webinar

On October 16, 2025, OOG hosted a Parliamentary Procedure webinar, facilitated by Susan Leahy, Founder of Robert’s Rules Made Simple. This course covered the basics of Robert’s Rules of Order and focused on the seven fundamental motions. The webinar instructed participants on how to make motions in accordance with Robert’s Rules including when it is appropriate to use motions in meetings. The webinar also covered Board dynamics and leadership. I, along with OOG’s staff, attended the training virtually.

2. Open Meetings Act Training for District of Columbia Public Schools Staff

On October 20, 2025, Attorney Lelma facilitated an Open Meetings Act training for staff members of District of Columbia Public Schools who work closely with the District’s Local School Advisory Teams. Detailed instructions for complying with the OMA and recent amendments by the Open Meetings Clarification Temporary Amendment Act of 2025 to the OMA were provided. Chief Counsel Neal attended the training virtually.

3. Open Meetings Act Webinar for Department of Energy and Environment

On October 21, 2025, Attorney Advisor Anthony J Scerbo facilitated an Open Meetings Act webinar for staff members of Department of Energy and Environment (“DOEE”). The session provided a description of OOG’s functions and an in-depth examination of the application of the OMA to public bodies.

4. Open Meetings Act Training for District of Columbia US Senator Ankit Jain

On October 22, 2025, Attorney Scerbo conducted OMA training for Senator Jain. The training discussed the application of the statute to public bodies, more so the New Columbia Statehood Commission.

5. Digital Government Institute (“DGI”) Annual “Public Sector Digitization Best Practices” Workshop

On October 23, 2025, Attorney Lelma attended Digital Government Institute (“DGI”) annual “Public Sector Digitization Best Practices” virtual workshop facilitated by Christine Miranda-Izguerra, Head of Digitization at University of Chicago Library and Michael Smoyer, President of DGI. The presentation focused on the essential aspects of managing electronic records in the digital age. Designed specifically for government professionals, the workshop provided an overview of the best practices for digitizing records with an emphasis on how to leverage UChicago Node, an integrated digital collections platform bringing together digital collections at the University of Chicago and enhancing digital research beyond the University. The federal aspect of the workshop that would have addressed digitization of records in accordance with the Code of Federal Regulations was absent due to the ongoing federal government shutdown.

6. Artificial Intelligence Listening Session – Advisory Group on AI Values Alignment (AIVA)

On November 3, 2025, I participated in the District’s AI Public Listening Session hosted by the Office of the Chief Technology Officer (OCTO) on behalf of the on behalf of the Advisory Group on AI Values Alignment (AIVA), of which I am a member. Nancy Hapeman, the Chief Procurement Officer provided a presentation regarding agency’s procurement of AI tools. AVIA also heard from D.C. residents and stakeholders in the community regarding the use and deployment of AI in DC Government and held a Question-and-Answer session.

**D. Litigation and Legislative Update**

1. Litigation

a. Chicago Justice Project v. District (Case No. 2022-CA-001175-B (D.C. Super. Ct.))

I previously reported on this case in which the Chicago Justice Project (“CJP”) filed suit to compel the Metropolitan Police Department (“MPD”) to

release certain records concerning the Gang Tracking and Analysis System, in a dispute regarding an advanced fee that MPD demanded for its FOIA review, and a similar amount that CJP demanded in attorney's fees.

An oral motions hearing was held on September 25, 2025. The Court heard the parties' arguments and has taken the Motion for *In Camera* Review under advisement. The Court set a remote status hearing for January 23, 2026, to allow the Court time to rule on the motion and for the parties to continue discussing a resolution in line with their settlement agreement. A copy of the scheduling order has been added to Dropbox. OOG's staff will continue to monitor this case.

b. D.C. Open Government Coalition v. District (Case No. 2023-CAB-007251 (D.C. Super. Ct.))

I have previously reported on this case which involves the D.C. Open Government Coalition's ("DCOGC") lawsuit against the District seeking an accounting of the backlog of public-records requests submitted through the FOIAXpress Public Access Link. Since the last Board meeting, the case has proceeded with the parties' filing motions.

As background, on September 12, 2025, the District filed an Opposition to Plaintiff's Motion for Summary Judgment and Reply in Support of the District's Motion for Summary Judgment. On September 26, 2025, DCOGC filed its Reply to the District's Opposition to Summary Judgment. Copies of the filings are in Dropbox. A Motion Hearing has been scheduled for December 2, 2025. OOG's staff will continue to monitor this case.

c. America First Legal Foundation v. Jamieson Greer (Case No. 24-5168 (U.S. App. D.C.))

This was a case before the U.S. Court of Appeals for D.C. in which the America First Legal Foundation ("AFL") sued to compel the Office of Special Counsel ("OSC") to investigate whether a federal agency arbitrarily denied AFL's Freedom of Information Act request. The District Court dismissed AFL's claims on the merits.

The Court of Appeals concluded that AFL lacks Article III standing to pursue the claims. The Court found that an organization lacks standing to sue the OSC to compel it to investigate the Department of Justice's FOIA policy, and that deprivation of a procedural right without some concrete interest that is affected by the deprivation is insufficient to confer Article III standing. The OSC's failure to investigate the DOJ for its failure to turn over requested documents is not a concrete injury since any causal connection between the failure to conduct the investigation and the failure to comply with the document request is speculative, and the Appellant has not shown how a favorable judgment would

lead to redress. The Court found that if 5 U.S.C. § 1216 requires OSC to investigate FOIA violations, it does not create any entitlement for the requesting parties to receive information. The case was vacated and remanded.

- d. Campaign for Accountability v. United States Department of Justice (Case No. 24-5163 (U.S. App. D.C.))

This is a case in which the U.S. Court of Appeals for D.C. found that the Freedom of Information Act does not require the government to disclose Department of Justice, Office of Legal Counsel's ("OLC") opinions that resolve interagency disputes, concern the adjudication or determination of private rights, or interpret non-discretionary legal duties. It is the Court's decision that informational injury is sufficient to establish standing for claims brought under the reading-room provision of FOIA. OLC legal opinions related to the adjudication of private rights, the interpretation of non-discretionary duties, or the resolution of interagency disputes are not "working law" subject to disclosure under FOIA's reading-room provision. The Court of Appeals affirmed the District Court's decision that CFA's requests for opinions concerning private rights and non-discretionary legal duties are not disclosable under FOIA and reversed the Court's decision that CFA was entitled to see opinions resolving interagency disputes.

2. Legislation

- a. Legislative Action regarding Climate Change: On October 21, 2025, B-26-0066, the "Youth Advisory Council on Climate Change and Environmental Conservation Establishment Act of 2025," passed the Council on final reading, and would create a new public body "to provide an organized youth perspective on various issues that impact climate change," subject to the Open Meetings Act and conducting its business according to Roberts Rules of Order. The bill also calls for the provision of "[i]nformational material provided by the Office of Open Government concerning the duties of Youth Climate Council members." The Bill passed unanimously on both readings and has been transmitted to the Mayor, with a response due by November 12, 2025. The Bill and Committee Report remain in Dropbox.
- b. Legislative Action regarding the Freedom of Information Act: On July 28, 2025, the Council passed the "Fiscal Year 2026 Budget Support Emergency Act of 2025," B26-0340, which included the "Freedom of Information Clarification Emergency Amendment Act of 2025." The Mayor signed the measure on September 3. It expires on December 2, 2025.

On May 27, 2025, Chairman Mendelson introduced B26-0265, the Fiscal Year 2026 Budget Support Act of 2025. The bill passed unanimously on first reading, and by a vote of 10-2 on final reading on July 28, 2025. It was signed by the Mayor on September 4, 2025, receiving Act Number A26-



0148, and was transmitted to Congress on September 10, 2025. The projected law date is December 17, 2025.

Both bills provide authority for implementing the District’s FY26 budget and include “Freedom of Information Clarification Emergency Amendment Act of 2025.” This emergency amendment of D.C. FOIA was introduced to clarify the scope of exemptions and created a new exemption for particular data or records that the Criminal Justice Coordinating Council (“CJCC”) and District of Columbia Sentencing Commission receive from a “court, federal agency, or federally established agency.” Copies of the bills remain in Dropbox.

**E. Administrative**

FY27 Budget Formulation Kickoff: On October 17, 2025, Director Allen, Director Cooks, Chief of Staff Mitchell, and Administrative Officer Titus attended the kickoff meeting for formulating the FY27 budget hosted by the Office of the City Administrator. The meeting included an update on budget forecasts, information that the hiring freeze and certain waiver requirements have been suspended, and that budget enhancement requests will not be received. BEGA will meet with the Office of the City Administrator before the end of the calendar year regarding the FY27 budget.

**This concludes the Office of Open Government’s November 6, 2025, report. I am happy to answer any questions the Board may have.**

Board member Sobin asked Director Allen about the nature of the misconduct at issue in the DC FEMS complaint that she dismissed. Director Allen stated that it was a personnel matter. Director Cooks, General Counsel Asia-Stewart Mitchell and Chief Counsel Louis Neal confirmed that both OOG and OGE reviewed the complaint and it did not raise issues within BEGA’s jurisdiction.

**V. Report by the Director of Government Ethics**

Good morning, Chairperson Hutcheson and Members of the Board. I am Ashley Cooks, the Director of Government Ethics. I am pleased to present this report on the activities of the Office of Government Ethics (“OGE”).

**A. Update on Status of OGE Investigations**

The information reported today regarding OGE’s cases will not reflect any status changes that may occur because of actions taken by the Board during today’s meeting.

OPEN INVESTIGATIONS BY STATUS	
Open	77
Open - Negotiations	0

Open - Show Cause Hearing	0
Grand Total	77

OPEN "UNDOCKETED MATTERS"	
Grand Total	5

PENDING/STAYED INVESTIGATIONS BY STATUS	
Closed - Pending Collection	32
Stayed - Pending DC Superior Court Case	3
Stayed - OAG False Claims Act Case	0
Stayed - OIG Investigation	3
Stayed - US District Court Case	2
Grand Total	40

REGULATORY MATTERS BY STATUS	
Closed - Pending Collection	46
Open	866
Grand Total	912

	Current	Last month	July
Investigations Open	77	67	44
Investigations Stayed	8	8	8

The number of open preliminary and formal investigations includes 19 new matters. The investigative team resolved 9 investigations since the Board last met. This total does not reflect the number of complaints that were dismissed for a lack of jurisdiction.

The Quarterly Complaint Report for Quarter 4 of Fiscal Year 2025, covering the period from July 1, 2025, through September 30, 2025, is expected to be published by mid-month to the BEGA website with a press release and heatmap. Copies will be placed in the DropBox for the next meeting.

## B. Training/Outreach

### 1. Professional Development Trainings Attended by Staff

Human Resources Specialist Megan Stoutamire took training on Developing and Entering Question Sets, and e-Recruitment with the Department of Human Resources.

### 2. Conducted by staff

Since the last Board meeting, OGE conducted 6 training sessions, excluding Ethics Week: the October Monthly Ethics Training, two New Employee Orientation

Ethics segments, the Quarterly Outside Employment training, and a Hatch Act training for the Office of the Attorney General and the Quarterly Boards and Commissions training.

In October, 134 users viewed the recently published Outside Employment Course on the LMS and 134 users viewed our full ethics training on the LMS. We also launched course CSR212 Lobbying District of Columbia Government.

Fifty-six District employees completed ethics training using Peoplesoft and 58 new employees attended New Employee Orientation and received information on the District's ethics rules in October.

### 3. Outreach

I am proud to say that the agency achieved another successful annual ethics symposium. Ethics Week took place on October 14-17, 2025, and included two in-person days, one hybrid day and one fully virtual day. This year's theme was "Keeping Government Transparent and Ethical" and included sessions designed to encourage employees to comply with the ethics, open meeting, and FOIA laws. New courses such as "The Responsible Use of AI Tools in Government", "Outside Employment Case-by-Case", "This or That: Is it Ethics or a Personnel Matter" and Ethics Week classics such as, "Legal Ethics for Government Attorneys" and "Ethics Gameshow" were highly attended. OGE also recognized District government Ethics Counselors who had a high rate of compliance in the 2025 Financial Disclosure program during my introductory session. Nearly 400 (373 exactly) District employees attended Ethics Week.

## C. Advisory Opinions/Advice

### 1. Informal Advice

OGE's legal staff provided advice for approximately 34 ethics inquiries, which is 11 more than the 23 reported at the October Board meeting. This number does not include responses we have provided to questions regarding the Lobbyist and FDS e-filing systems.

### 2. Formal Advisory Opinions

OGE has not issued any formal advisory opinions since the last Board meeting.

## D. Legislation and Rulemaking Updates

### 1. Lobbyist Registration and Reporting

OGE published a Notice of Proposed Rulemaking for the Lobbyist section of BEGA's regulations on September 26, 2025. The proposed amendment to Title 3 DCMR changes the date on which each Activity Report is due from the 10<sup>th</sup> to the

15<sup>th</sup> of January, April, July, and October (Section 5803.2). The 30-day comment period closed on October 26<sup>th</sup> and we did not receive any comments. The Final Notice of Proposed Rulemaking is ready for publication in the D.C. Register. A copy of the rulemaking was placed in the Dropbox for your review.

2. Financial Disclosure Amendment Rulemaking

On September 27, 2024, pursuant to D.C. Official Code § 1-1161.01(47)(I), the Board of Ethics and Government Accountability (“BEGA”) designated members of 47 boards and commissions as public financial disclosure statement filers. Shortly after the rulemaking was finalized, OGE became aware that many of the boards had been repealed or merged with other designated boards. As a result, OGE has drafted a Notice of Proposed Rulemaking, which will correct the list of designated boards and commissions in 3 DCMR § 5710. Upon approval by this Board, the Notice will be sent to the D.C. Register for a 30-day comment period. A copy of the Notice of Proposed Rulemaking was placed in the Dropbox for your review.

**E. OGE Administrative Matters**

1. OGE is in the process of filling its vacancies that have recently occurred or that were delayed because of the District government’s hiring freeze. First, Acting General Counsel Asia Stewart-Mitchell has been selected to serve as BEGA’s General Counsel. She has served the agency for the past nine years as an Attorney Advisor then as Supervisory Attorney Advisor. She has taken the lead and assisted with pivotal agency decisions such as FDS rulemakings and legislation, personnel decisions, advisory opinions, litigation, investigations, and most recently, a Freedom of Information Act appeal. She completed DCHR and George Washington University’s Certified Public Manager program in 2023. Please join me in congratulating Ms. Stewart-Mitchell.

Second, OGE welcomes Courtnae Brown as the office’s first legal assistant. Ms. Brown is a third-year law student at the University of the District of Columbia. She received her Bachelor of Science in Criminal Justice from the University of Alabama and a Master’s in Public Administration from Kennesaw State University. In addition to her legal course work, she participates in the Rising for Justice legal clinic. Welcome Courtnae.

Lastly, OGE is in the process of hiring for its Program Support Assistant and Investigator vacancies.

**F. Financial Disclosure Statement (FDS)**

Pursuant to D.C. Official Code §§ 1-1162.24 and 1-1162.25, public officials and certain government employees must file a financial disclosure statement as a means of transparency and to prevent engaging in conduct that violates the financial conflicts of interest statute. BEGA is responsible for ensuring that employees and public officials, who meet the statutory requirement, file their annual financial disclosure statement.

The 2025 Financial Disclosure season has closed, and the FDS filing deadline was May 15<sup>th</sup>. OGE opened the season with 10,147 names in the e-filing system. Enforcement measures are now underway, and Financial Disclosure Enforcement letters were sent to 698 designated filers who failed to file, and 50 late filers. Financial Disclosure fines were due by October 2nd per the fine letter. Those employees who did not voluntarily pay the fine were sent to the Office of Pay and Retirement Services for a wage garnishment. Finally, the D.C. Council's fall Financial Disclosure filings are due on November 15, 2025.

#### **G. Lobbying Registration and Reporting (LRR)**

Pursuant to D.C. Official Code § 1-1162.27(a), a person who receives compensation or expends funds in an amount of \$250 or more in any 3-consecutive-calendar-month period for lobbying shall register with the Director of Government Ethics and pay the required registration fee. According to D.C. Official Code § 1-1162.30, each registrant shall file a quarterly report concerning the registrant's lobbying activities during the previous quarter.

On September 19, Program Coordinator Stan Kosick opened the e-filing system for 2025 Quarter 3 Reporting. This Activity Report covered July 1 to September 30, and those Reports were due on October 15th. Four-Hundred Seventy-Three Activity Reports were filed. Enforcement for the first and second quarters is underway.

#### **H. Public Investigations**

**24-0016-F and 25-0002-F In re Trayon White** – These are formal investigations based on: (1) the criminal indictment of the Ward 8 Council member for, allegedly agreeing to receive and accepting bribes and (2) allegations that he violated the Code of Conduct by failing to file a full and complete public financial disclosure statements. The Board scheduled a hearing in 25-0002-F to take place on February 5, 2026.

**Thank you. This concludes the Office of Government Ethics' November 6, 2025, report.**

#### **VI. Public Comment**

There were no public comments.

#### **VII. Executive Session (nonpublic)**

The Board voted unanimously to enter into Executive Session to discuss ongoing, confidential investigations pursuant to D.C. Official Code § 2-575(b)(14), to consult with an attorney to obtain legal advice and to preserve the attorney-client privilege between an attorney and a public body pursuant to D.C. Official Code § 2-575(b)(4)(A), to discuss personnel matters including the appointment, employment, assignment, promotion, performance evaluation, compensation, discipline, demotion, removal, or resignation of government appointees, employees, or officials pursuant to D.C. Official Code § 2-575(b)(10), and to deliberate on a

decision in which the Ethics Board will exercise quasi-judicial functions pursuant to D.C. Official Code § 2-575(b)(13).

### **VIII. Resumption of Public Meeting**

The meeting resumed at 11:54 a.m.

The Board approved a negotiated disposition in **25-0029-P In re D. Jackson**

The Board will meet next on December 4, 2025 at 10:00 a.m.

The meeting adjourned at 11:55 a.m.