

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



Office of Government Ethics

In Re: R. Wilson  
Case No.: 1634-001

NEGOTIATED DISPOSITION

Pursuant to section 221(a)(4)(A)(v)<sup>1</sup> of the Board of Ethics and Government Accountability Establishment and Comprehensive Ethics Reform Amendment Act of 2011 ("Ethics Act"), effective April 27, 2012 (D.C. Law 19 -12 4, D.C. Official Code § 1 -116 1.01 *et seq.*), the Office of Government Ethics ("the Office") hereby enters into this Public Negotiated Disposition with the Respondent, R. Wilson. Respondent agrees that the resulting disposition is a settlement of the above-titled action, detailed as follows:

I. FINDINGS OF FACT

Respondent was an employee of the Office of the Superintendent of Schools ("OSSE") from September 7, 2014 until July 31, 2017. Respondent and her husband own, operate, have a fiduciary role in or have a financial interest in, at least six businesses, business ventures or job positions, all of which she failed to disclose on her Public Financial Disclosure Statements ("PFDS") for three consecutive years.

II. NATURE OF VIOLATIONS

Respondent's conduct is in violation of the District Code of Conduct, as set forth below:

- ❖ Count One: Failing to submit a full and complete financial disclosure statement in violation of D.C. Official Code § 1-1162.24(a)(1).
  - On May 31, 2015 Respondent submitted a 2014 Public Financial Disclosure Statement on which she failed to disclose her multiple outside businesses.
- ❖ Count Two: Failing to submit a full and complete financial disclosure statement in violation of D.C. Official Code § 1-1162.24(a)(1).
  - On May 24, 2016 Respondent submitted a 2015 Public Financial Disclosure Statement on which she failed to disclose her multiple outside businesses.
- ❖ Count Three: Failing to submit a full and complete financial disclosure statement in violation of D.C. Official Code § 1-1162.24(a)(1).
  - On May 13, 2017 Respondent submitted a 2016 Public Financial Disclosure Statement on which she failed to disclose her multiple outside businesses.

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<sup>1</sup> Section 221(a)(4)(A) of the Ethics Act provides, in pertinent part, that "[i]n addition to any civil penalty imposed under this title a violation of the Code of Conduct may result in the following:....Any negotiated disposition of a matter offered by the Director of Government Ethics, and accepted by the respondent, subject to approval by the Ethics Board."

**None of the above-referenced actions were authorized by the District of Columbia.**

Respondent accepted full responsibility for her actions when meeting with OGE employees to resolve this matter. Respondent identified the following factors as mitigating circumstances to be considered by OGE in deciding upon an appropriate remedy in this matter, which factors OGE took into consideration and gave such weight as OGE believed was warranted:

- Many of her outside business ventures and events served her local community

Moreover, by agreeing to settle this matter via a negotiated disposition, Respondent will allow OGE to avoid expending significant time and resources to litigate this matter through a contested hearing, and to focus its finite resources on other investigations.

### III. TERMS OF THE NEGOTIATED DISPOSITION

Respondent acknowledges that her conduct violated the District Code of Conduct. Respondent agrees to pay a total fine in the amount of **\$2,750.00**, to resolve these violations of the District Code of Conduct, in accordance with the following terms and conditions:

1. Respondent agrees to pay the **\$2,750.00** by submitting successive monthly payments of \$230.00 to OGE, beginning on January 20, 2019 and continuing until such time as the fine amount is fully satisfied.
2. Respondent agrees to amend her 2015, 2016 and 2017 Public Financial Disclosure Statements, on or before January 20, 2019, so that the documents are true, accurate, complete, and correctly reflect all of her outside business interests during her tenure as an OSSE employee.
3. Respondent agrees to respond truthfully and completely to each of the questions on all future Financial Disclosure Statements she may be required to submit in the District.

Respondent agrees to pay a fine in the amount of **\$2,750.00** and promises not to engage in such conduct in the future. In return for Respondent's acknowledgement and promise, the Office will not seek any further remedy or take any further action relating to the above misconduct.

Respondent shall submit successive monthly payments of \$230.00 by cashier's check made out to "DC Treasurer" and mailed or delivered to:

Board of Ethics and Government Accountability  
One Judiciary Square  
441 4<sup>th</sup> Street, NW  
Suite 830 South  
Washington, DC 20001

**Respondent acknowledges and understands that this Negotiated Disposition is only binding upon herself and OGE in resolution of her violations of the Code of Conduct that applies to District government employees and public officials. Respondent acknowledges and**

understands that OGE does not have the authority to bind any other District or federal government agency to this agreement, including but not limited to the Metropolitan Police Department, the District of Columbia Office of the Attorney General (“OAG”), the United States Attorney for the District of Columbia (“USAO”) or the United States Department of Justice (“DOJ”). Respondent further acknowledges and understands that notwithstanding the terms of this Negotiated Settlement, her conduct described hereinabove may also subject her to the imposition of civil and/or criminal penalties by other government agencies who are not bound by the terms of this agreement whatsoever.



R [Redacted] Wilson  
Respondent

12/17/18  
Date

Respondent agrees to pay the **\$2,750.00** by submitting successive monthly payments of \$230.00 to OGE beginning on January 20, 2019 and continuing until such time as the fine amount is fully satisfied. Respondent acknowledges that she is solely responsible for satisfying the fine amount.

Respondent understands that if she fails to pay the full \$2,750.00 fine in accordance with the terms set forth hereinabove, pursuant to section 221(a)(5)(A) of the Ethics Act (D.C. Official Code § 1-1162.21(a)(5)(A)), the Ethics Board may file a petition in the Superior Court of the District of Columbia for enforcement of this Negotiated Disposition and the accompanying Board Order assessing the fine. Respondent agrees that this Negotiated Disposition is not just an admission of wrongdoing, but constitutes various factual admissions by her that may be used in any subsequent enforcement or judicial proceeding that may result from her failure to comply with this agreement. Respondent also understands that, pursuant to section 217 of the Ethics Act (D.C. Official Code § 1-1162.17), she has the right to appeal any order or fine made by the Ethics Board. Nonetheless, Respondent knowingly and willingly waives her right to appeal the accompanying Board Order assessing the \$2,750.00 fine in this matter in exchange for the concessions made by this Office in this Negotiated Disposition.

Respondent further understands that if she fails to adhere to this agreement, OGE may instead, at its sole option, recommend that the Ethics Board nullify this settlement and hold an open and adversarial hearing on this matter, after which the Ethics Board may impose sanctions up to the full statutory amount (\$5,000.00 per violation) as provided in the Ethics Act for each violation.<sup>2</sup> Because the Office is, at this time, foregoing requesting that the Ethics Board hold an open and adversarial hearing on this matter, Respondent waives any statute of limitation defenses should the Ethics Board decide to proceed in that matter as a result of Respondent’s breach of this agreement.

The mutual promises outlined herein constitute the entire agreement in this case. Failure to adhere to any provision of this agreement is a breach rendering the entire agreement void. By our signatures, we agree to the terms outlined therein.

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<sup>2</sup> Section 221(a)(1) (D.C. Official Code § 1-1162.21(a)(1)).

  
R                      WILSON  
Respondent

12/17/18  
Date

Brent Wolfingbarger  
BRENT WOLFINGBARGER  
Director of Government Ethics

12-17-2018  
Date

This agreement shall not be deemed effective unless and until it is approved by the Board of Ethics and Government Accountability, as demonstrated by the signature of the Chairman below.

APPROVED:  
Tameka Collier  
TAMEKA COLLIER  
Chairperson, Board of Ethics and Government Accountability

19 Dec 18  
Date

#1634-001  
BW/ASM/IC

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



Office of Government Ethics

IN RE: R. Wilson

Respondent

CASE No.: 1634-001

**ORDER**

Based upon the mutual representations and promises contained in the Negotiated Disposition approved by the Board herein on December 19, 2018, and upon the entire record in this case; it is, therefore

ORDERED that Respondent pay a civil penalty in the amount of TWO THOUSAND SEVEN HUNDRED AND FIFTY DOLLARS (\$2,750.00).

This Order is effective upon approval by the Board of Ethics and Government Accountability, as demonstrated by the signature of the Chairperson below.

A handwritten signature in blue ink, appearing to read "Tameka Collier", is written over a horizontal line.

TAMEKA COLLIER  
Chair, Board of Ethics and Government Accountability

A handwritten date "19 Dec 18" in blue ink is written above a horizontal line.

Date