

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



Office of Government Ethics

In Re: N. Tourinho  
Case No. 24-0057-P

**NEGOTIATED DISPOSITION:**

Pursuant to section 221 (a)(4)(E)<sup>1</sup> of the Board of Ethics and Government Accountability Establishment and Comprehensive Ethics Reform Amendment Act of 2011, effective April 27, 2012, D.C. Law 19-124, D.C. Code § 1-1161.01 *et seq.*, (“Ethics Act”), the Office of Government Ethics (the “Office” or “OGE”) hereby enters into this public negotiated settlement agreement with the Respondent, N. Tourinho. Respondent agrees that the resulting disposition is a settlement of the above-titled action, detailed as follows:

**FINDINGS OF FACT:**

At all relevant times Respondent served as a District government employee with DC Department of Human Services (“DHS”) as a Supervisory Social Worker.

An OGE investigation revealed that Respondent organized and registered [REDACTED] (“The LLC”) as a limited liability company in 2020. Respondent reviewed an online posting for a grant opportunity regarding mental health professionals, which was administered by the DC Department of Behavioral Health (“DBH”). Respondent subsequently signed and submitted a grant application on behalf of the LLC. On August 9, 2023, Respondent signed two Notice of Grant Awards and a Modification Notice as the owner of the LLC agreeing to the awarded Comprehensive Expansion School-Based Behavioral Health Grant from DBH. The organization was initially awarded \$489,113.50 and the grant amount was modified to increase the amount by \$70,333.67 with a total award of \$559,447.17 for the 2023 fiscal year. On October 18, 2023, Respondent signed the Notice of Grant Award which continued the grant from October 2023 to September 2024 and modified the 2024 fiscal year amount to total \$1,213,061.98. The funding of this grant was used to hire and manage therapists and other health specialists who provide services to DC Public Schools (“DCPS”) students during school hours.

The OGE investigation also revealed that Respondent’s tour of duty is 8:30 AM to 5:00 PM in 2023, but 7:30 PM to 4:30 PM in 2024. In 2023, the evidence shows that Respondent sent 9 emails regarding the grant to DBH, using the LLC’s email that included Respondent’s name. Of the 9 emails, 7 were sent to DBH between Tuesday, October 3, 2023, and Friday, December 15, 2023,

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

during Respondent's tour of duty. Respondent also sent 12 emails between March 3, 2024, and May 6, 2024, of which 10 were sent during her tour of duty.

### NATURE OF MISCONDUCT

Respondent violated the following provision of the Ethics Act and District Personnel Manual ("DPM"):

- ❖ Count One: Serving in a representative capacity or as an agent or attorney for any outside entity involving any matter before the District of Columbia in violation of DPM § 1807.1(h):
  - Respondent signed and submitted the application for the grant from DBH, signed the Notice of Grant Award documents, and signed a modification to the grant. Respondent sent 21 emails in total on behalf of the LLC in communication with DBH regarding the grant or operations of the grant within the years 2023 and 2024.
- ❖ Count Two: Using government time or resources for other than official business, or government approved or sponsored activities, in violation of DPM § 1807.1(b):
  - Respondent sent 21 emails in total on behalf of the LLC in communication with DBH. Seventeen of those emails sent were during Respondent's official tour of duty within years 2023 and 2024.

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

Respondent accepted full responsibility for the conduct stated herein. Respondent acknowledges that the conduct violated the Code of Conduct. Respondent identified the following factors as mitigating circumstances to be considered by OGE in deciding upon an appropriate remedy in this matter. OGE considered said factors and gave such weight as OGE believed was warranted. Respondent attempted to acquire a personal understanding of whether the actions described herein were lawful but did not seek advice from OGE to confirm that understanding.

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.

### TERMS OF THE NEGOTIATED SETTLEMENT

Respondent agrees to a fine in the amount of **THREE THOUSAND DOLLARS (\$3,000.00)**. Additionally, Respondent promises not to engage in such conduct in the future and to attend full ethics training within three months. In consideration of Respondent's acknowledgement and agreement, OGE will seek no further remedy and will take no further action related to the above misconduct.

1. Respondent agrees to pay the \$3,000.00 fine no later than September 2, 2024. Payment will be accepted by certified check or money order, made out to the D.C. Treasurer, delivered to and received by OGE at 1030 15<sup>th</sup> Street NW, Suite 700 West, Washington, DC 20005 or by electronic payment at <https://dcwebforms.dc.gov/pay/bega1/> using transaction ID 24-0057P.







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IN RE: N. Tourinho  
Respondent

CASE No.: 24-0057-P

ORDER

Based upon the mutual representations and promises contained in the Negotiated Disposition approved by the Board herein on August 1, 2024, and upon the entire record in this case; it is, therefore

ORDERED that Respondent pay a civil penalty in the amount of **THREE THOUSAND DOLLARS (\$3,000.00)**.

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 black ink that reads "Norma B. Hutcheson".

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NORMA HUTCHESON  
Chairperson, Board of Ethics and Government Accountability

8/1/2024

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Date