



# ETHICALLY SPEAKING

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## A Message from the Director

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It's Financial Disclosure Statement Season! We are busy ensuring that this year's filing process runs smoothly. By this time, you should have received notice from your agency on whether you are a public or confidential filer.

Financial Disclosure — providing the financial interests of public officials and particular employees — is fundamental to furthering the District's integrity and ensuring transparency in our government. Believe it or not, financial disclosure is an integral part of every state government.

The purpose of financial disclosure is to prevent employees from engaging in conduct that violates the financial conflict of interest statute. In other words, to prevent personal



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

interests from affecting official action. In the coming weeks, you will be required to file a financial disclosure statement,

which discloses information regarding your outside employment, ongoing economic interests, securities, debts, real estate, licensures, and gifts, as well as the same for your spouse, domestic partner and/or dependent children. To fulfill the purpose of program, you must provide a complete and accurate financial statement.

**The deadline to file is May 15, 2024.** For more information regarding financial disclosure, visit us at [bega.dc.gov](http://bega.dc.gov). We are here to assist with any questions.

## Upcoming Events

### General Ethics Training

5/8/24 - 1:00 pm  
[Register here](#)

6/12/24 - 1:00 pm  
[Register here](#)

### Local Hatch Act Training

5/7/24 - 1:00 pm  
[Register here](#)

6/4/24 - 1:00 pm  
[Register here](#)

### Ethics Counselor Brown Bag

4/29/24 - 1:00 pm  
Financial Disclosure Updates

5/20/24 - 1:00 pm  
Best Practices Report

### Quarterly Boards & Commissions Training

4/24/24 - 11:00 am  
[Register here](#)

### Lobbyist Registration & Reporting Training

6/26/24 - 10:30 am  
[Register here](#)

# New and Notable

## Financial Disclosure Season in Progress

We are in the middle of the Financial Disclosure filing season and BEGA wants the 2023 season to be the best season yet! Here are some tools to help filers meet the **MAY 15th filing deadline**.

Need to take training? You can register for trainings on our website, through Peoplesoft, or using our on-demand Learning Management System (LMS).

Looking for FDS forms? BEGA's new online Financial Disclosure Request Quickbase lets you submit forms online.

### FDS FORMS

Check out the Ask BEGA section at the back of this newsletter for more quick facts about FDS.

REGISTER

PEOPLESOFT

LMS



# Enforcement Updates

## 23-0100-P In re L Graves

Respondent, then the Human Resources Director at the DC Public Library, agreed to pay a \$17,500 civil penalty for violations of the District's outside employment restrictions. Respondent worked two outside jobs, as a doula and as a human resources manager with a consulting company, which conflicted with her position at DCPL. Read the [agreement](#).

## 24-0009-F In re Aretha Chapman

The Board issued a Notice of Violation to Respondent, charging three violations of the code of conduct: (1) not working the full amount of time reported (DPM § 1807.1(b)); (2) obtaining records under false pretenses (§ 1808.1); and (3) using her official position to gain access to information (§ 1800.3(g)). Read the [NOV](#).

## 24-0045-P In re J Scott

Respondent agreed to pay a \$750 civil penalty for violation of DPM § 1808.1

for using his official email for personal business. Read the [agreement](#).

## 24-0019-P In re M Briggs

The Board approved a \$700 civil penalty for Respondent for violations of DPM §§ 1807.1(h) and 1808.1. Respondent acted as an agent for his nonprofit organization before the District and used his official email for communications. Read the [agreement](#) [here](#).

## 24-0019-P In re L Palmer 24-0039-P In re M Scott

These two matters involve violations of the nepotism prohibitions by current and former Office of the Chief Procurement Officer employees. Respondent Palmer violated DPM §§ 1806.3 and 1806.6 by advocating for her son to be hired by OCP and failing to file a written recusal. Palmer agreed to a \$1,500 civil penalty and restitution in the amount of \$63,415.56. Respondent Scott agreed to a \$1,000 civil penalty for violation of DPM § 1800.3(h) for failure

act impartially and not give preferential treatment. Read the [agreements](#) [here](#) and [here](#).

## 24-0003-F In re Anita Bonds

The Board dismissed the formal investigation into allegations that, during the 2018 election season, Councilmember Bonds coerced her staff to participate in her campaign while on District duty and in official space and coerced her senior staff to direct other staff to engage in campaign activity. Read the order [here](#).

## 24-0005-F In re Anthony Merritt

The Board dismissed the formal investigation against Respondent who was charged with participating in two separate conspiracies to accept bribes. Respondent was sentenced to 110 months in prison and order to pay restitution of \$736,536 and forfeit over \$581,000. Read more [here](#).

# Ethics in the News



The first of four criminal cases against former president Donald Trump is set to start in New York next week. This case stems from charges of payments of hush money in connection with the 2016 election. Multiple appeals are currently in process in connection with the case brought by the Manhattan District Attorney. Three other cases, one in Georgia and two federal matters, are also making their way to trial. Read about the status of the Trump cases [here](#).

New Jersey Senator Robert Menendez is currently set for trial

next month on federal bribery charges and charges that he acted as an agent of a foreign government. Last month, federal prosecutors filed a third superseding indictment charging the Senator and his wife with obstruction of justice and conspiracy to commit obstruction of justice. Read about the charges [here](#) and [here](#).

One of the New Jersey businessmen charged with Senator Menendez, Jose Uribe, pleaded guilty to conspiracy to commit bribery, conspiracy to commit honest services wire fraud and honest services wire fraud for providing a car to Senator Menendez's wife in exchange for the senator's agreement to attempt to influence state criminal prosecutions. Uribe also pleaded guilty to making false statement to federal prosecutors. Read

more about the Uribe plea agreement [here](#) and [here](#).

The U.S. Office of Special Counsel (OSC) suspended two federal employees for violations of the Hatch Act. OSC found that a Federal Deposit Insurance Corporation employee hosted a fundraising event for a candidate for partisan political office at his home, solicited contributions for another candidate, and while on duty, sent emails organizing a campaign event for a third candidate. OSC also found a civilian Coast Guard employee violated the Hatch Act by sharing posts on her personal Facebook account that supported or opposed candidates or political parties while on duty or in official space. The FDIC employee was suspended for 130 days without pay and the Coast Guard employee for 90 days without pay.

## State and Local Ethics

The Rhode Island Ethics Commission fined a state official \$5,000 for improperly accepting gifts from a state contractor in connection with a 2023 trip to Philadelphia. The Ethics Commission also found probable cause to believe that a second former state official violated the state's Ethics Code by accepting gifts on the same trip. The Ethics Commission will proceed to an adjudicative hearing after the probable cause finding. The agreement and order is available [here](#). Read more about the cases [here](#) and [here](#).

Voters in San Francisco overwhelmingly approved a series of changes to the city's ethics laws. The ballot measure

approved by 88% of the voters would expand the prohibitions under the city's gifts rule, extend an annual ethics training requirement to all employee's with decision-making authority, amend the definition of bribery, standardize rules on employee's outside activities, allow electronic filing of public disclosures, and allow for additional penalties for violations. Information about the ballot measure is available [here](#) and [here](#).

The Los Angeles City Ethics Commission fined a former city council employee \$3,750 for violation of the city's post-employment restrictions. Within a year of leaving his council position, the former

employee received compensation for attempting to influence city action. Read the agreement [here](#).

The Los Angeles City Ethics Commission also fined a lobbyist \$7,500 for failing to register as a lobbyist and failing to file required quarterly reports. The company that employed the lobbyist agreed to a \$5,000 fine. Read the agreements [here](#) and [here](#).



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For more information about BEGA, you can find us at:



To subscribe to this newsletter, email us at [bega@dc.gov](mailto:bega@dc.gov).

## Ask BEGA

2024 Financial Disclosure Season is upon us. Here are some quick facts about FDS.

### **What is financial disclosure?**

Financial disclosure is the primary method used to identify potential or actual conflicts of interest. Public officials, designated District employees, and Advisory Neighborhood Commission ("ANC") Commissioners, must report financial interest by filing financial disclosure forms by **May 15th** of each year. D.C. Official Code §§ 1-1162.24 and 1-1162.25.

### **Types of Filers**

There are two types of financial disclosure filers: public disclosure and confidential disclosure filers. The type of filer you are depends on the nature of your work and your salary. Your agency's Ethics Counselor is responsible for compiling a list of employees designated by the agency as

Public Financial Disclosure Statement ("PFDS") filers and a list of employees designated as Confidential Financial Disclosure



Statement ("CFDS") filers for the year and sending those lists to BEGA. An employee must have worked in their current position for at least thirty (30) days in the previous calendar year to be designated as a filer.

### **How to file**

Filers should utilize BEGA's e-filing system which is available via our [website](#) under Financial Disclosure > Financial Disclosure Filing System > File a Financial Disclosure Statement. If you have questions on how to access the

online filing system or issues with your submission, please submit a Support Ticket via our website.

### **Filing after separation from the District**

I worked at the District's Department of Public Works ("DPW") for four (4) months in 2023 but resigned to go work for a private entity. Am I still required to file?

Yes, employees that worked for at least thirty (30) days in calendar year 2023 should submit a financial disclosure statement within 90 days of separation. If you were not informed of this requirement prior to your separation and you recently received a notification to file, please submit your FDS using our e-filing system. Should you have any questions, please feel free to contact [bega-fds@dc.gov](mailto:bega-fds@dc.gov).