



# ETHICALLY SPEAKING

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## A Message from the Director

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THE HOLIDAY SEASON  
The holiday season -- a  
time for good cheer!  
For egg nog, for parties, for  
friends to be near.  
But I must be careful, lest I  
accept free a gift not  
permitted, no matter how  
wee.

Title 6B of the DCMR  
explains in detail the  
relevant bar.  
It defines the term gift  
to mean all things worth  
money. That's NBA tickets  
or jars full of honey.

Some gifts may be taken  
but some are verboten.  
The source is the key -- it's  
the rule that I'm quotin'.

The source seeks some act,  
I must find an exception or  
I could be sacked.

Even others who give can  
cause problems for me.  
If my job prompts the  
giving -- my position, you  
see.  
But lucky for me,  
some exceptions exist.



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

They're in DPM 1803.5 and  
they should not be missed.  
I can pay market value if  
the gift I do like,  
or I can at my option say  
"go take a hike."  
I can always say no,  
But I need not decline,

if worth tenor less then the  
gift can be mine.

For gifts that a friend or  
my sister might send,  
The rules recognize I don't  
want to offend.  
Regardless of value, it only  
must be that their motive  
to give wasn't business,  
but me.

So go forth with good  
cheer and know there's no  
reason. To think that the  
gifts rules will ruin your  
season!

Happy Holidays Everyone!

## Upcoming Events

### General Ethics Training

1/8/25 - 1:00 pm  
[Register here](#)

2/12/25 - 1:00 pm  
[Register here](#)

### Board and Commission Training

1/29/25 - 11:00 am  
[Register here](#)

### Outside Employment Training

1/7/25 - 1:00 pm  
[Register here](#)

### Lobbyist Registration & Reporting and E-Filing Training

1/8/25 - 10:30 am  
[Register here](#)

### Ethics Counselor Brown Bag

1/27/25 - 1:00 pm

# New and Notable

## New Outside Employment Training

Thinking about starting a new part-time job or business or taking on a new activity? Make sure that your outside activity or employment is permissible under the Code of Conduct. To address these questions and more, BEGA will be holding new quarterly training sessions on the rules that apply to outside employment. Sign up for sessions starting in January. Register [here](#).



## On Demand Training

Looking for more training opportunities? Have some time in your day for some ethics training? BEGA's Learning Management System allows you to access ethics training when and where you want. Sign up for the LMS or take trainings [here](#).

## BEGA is hiring!

Do you have a passion for ethics and open government or know someone who does? Come join us at BEGA. BEGA is currently hiring an Attorney Advisor for the Office of Government Ethics and a Human Resources Specialist for the agency. Read more about the positions on [careers.dc.gov](https://careers.dc.gov).

# Enforcement Updates

## 24-0073-P In re A. Barnes-Johnson

The Board approved a negotiated disposition with Respondent, an Independence and Learning Support Teacher at Anacostia High School. Respondent violated DPM § 1807.1(h) by signing and submitting invoices for requests for funding and/or reimbursement requests to DCPS for funds to be disbursed to her catering business on 8 occasions. The agreement included a \$350 civil penalty. Read the agreement [here](#).

## 24-0009-F In re Aretha Chapman

The Board approved a negotiated disposition with Respondent, a former Paralegal Specialist with DCPS. Respondent violated DPM § 1807.1(b) by falsifying her time sheet, reporting that she worked a full nine hour in office day between the period of November 1, 2022 and July 25, 2023 and violated DPM § 1808.1 when she obtained Datawatch scans for DCPS employees under false pretenses. The agreement included the payment of a \$4,000 civil penalty.

The adversarial hearing scheduled for December 14-15, 2024 was canceled after the Board approved the agreement. Read the agreement [here](#).

# Ethics in the News



The Senate voted to confirm David Huitema as the new Director of the U.S. Office of Government Ethics on November 14, 2024. He was sworn into the position on December 16, 2024. Director Huitema takes over the agency during the presidential transition period.

After a delay, President-elect Trump's transition team signed a memorandum of understanding with the Biden White House just before Thanksgiving. The MOU

will allow the Biden administration to coordinate with the incoming Trump administration. Ethics officials had expressed concern that the delay in reaching an agreement could lead to conflicts of interest and leave the new administration unprepared to govern. The Trump transition team did not sign an agreement with the General Services Administration that would have allowed them to receive federal funding, cybersecurity support, and government office space and, instead, will fund the transition through private fundraising. Read more about the presidential transition agreement [here](#).

In addition to working with the incoming administration on the transition process, U.S. OGE recently issued an advisory opinion on the application of the ethics rules to presidential inaugural events. The opinion discusses the gifts rules that apply to attendance at events, rules regarding use of position and resources related to events, as well as restrictions on fundraising that apply to inaugural events. Read the advisory opinion [here](#).

## State and Local Ethics

New York City's Campaign Finance Board has denied a request from Mayor Eric Adams for matching funds to fund his reelection campaign. Mayor Adams is currently under indictment for allegedly accepting conduit contributions and participating in a wide-ranging bribery scheme involving the Turkish government. The Campaign Finance Board denied the request for \$4.5 million in matching funds, noting the criminal indictment of Mayor Adams along with his campaign's failure to provide requested documents and information sought by the Board. Read more [here](#).

The Wisconsin Office of Lawyer Regulation filed a complaint against a former Wisconsin Supreme Court justice who was hired by Republican state legislators to review the conduct of the 2020 election in Wisconsin. The 10-count ethics complaint alleged that the former justice filed false information with a judge, repeatedly engaged in dishonest conduct, unfairly disparaged a judge and attorney, failed to perform competent legal work, did not follow the directions of his client, released confidential information, and lied to investigators. Read more [here](#).

New ethics rules in effect in San Francisco include changes to the city's rules regarding ethics, conflicts of interests, protections for whistleblowers, lobbying, and campaign finance. The new rules expand the city's rule on prohibited gifts to city officials from certain restricted sources, including removing exceptions and applying the gifts rule to additional sources. The new rules were adopted by the city's voters earlier in 2024 and were proposed by the Ethics Commission after numerous public corruption prosecutions of city officials and contractors. Read more about the changes [here](#).



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## Ask BEGA

**Maria, a senior analyst at a District agency, oversees a team of junior employees. While Maria loves her job, she is tired of the day-to-day routine and wants to bring some fun to the office! With the holiday season approaching, Maria's team decides to organize a small holiday lunch in the office to kick off what Maria hopes will be the start of more office fun days. This year the agency's budget is tight, again, so they plan to pool their funds to buy lunch and decorate the office. Because Maria keeps the party alive and has been great to work for, Maria's team members want to buy her a holiday gift. However, Jake, one of the employees on Maria's team, is uncertain about whether he can contribute, because Maria is his supervisor. Specifically, he's**

**worried that it might be seen as an inappropriate gift from a subordinate to a superior.**



**Can Jake contribute? Is he required to contribute to the party or the gift to Maria?**

Jake can contribute to the holiday lunch and give a gift to Maria, his supervisor, as long as it meets the ethical guidelines, and he wants to actually contribute. The gift must be modest—worth \$10 or less—and voluntary. Employees should not feel pressured to contribute. Maria and other

supervisors should not be involved in collecting funds for either the lunch or the gift since that could make employees feel they need to contribute even if they may not want to.

If Jake is unsure about whether the value of the gift or lunch is allowable under the rules, he should check with the agency's ethics counselor or contact BEGA to ensure compliance with the ethics rules.