



District of Columbia

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### BEGA's February 2025 Newsletter

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## A Message From the Director



In honor of Black history month, please join me in celebrating Black leaders who are trailblazers in the ethics community.

**Danielle Gardner Wright** serves as the Chief Integrity Officer for the City of Philadelphia. She is tasked with promoting honesty and integrity within the administrative and executive branches through guidance, education, and compliance.

**Christal Phillips** was appointed Executive Director of the City of Detroit Board of Ethics in 2022. She leads a team of three staff and seven volunteer Board members.

**Donald Sherman** serves as the Executive Director and Chief Counsel for Citizens for Responsible Ethics in Washington. He has served in various oversight, ethics, and policy roles in the White House and Congress.

**Delante Thomas** was appointed as the first-ever Chief Ethics Officer for the City of Cleveland. He is charged with providing advice, counsel, training, and enforcement of Ohio Ethics Laws for a workforce of 8,000 public employees.

**Candies Pruitt** has served as Staff Counsel for the Massachusetts State Ethics Commission, Enforcement Division since 2007.

**Cricket Snyder** serves as the Chief Compliance Officer for the Jefferson County Commission in Alabama.

### Upcoming Events

## New and Notable



### Financial Disclosure Season Starts Now

The 2025 financial disclosure season is here and OGE is available to assist ethics counselors as you compile your list of public and confidential filers prior to the March 3, 2025 deadline. We will hold our last Mandatory Ethics Counselor FDS Training on February 19 at 11:00 am. [Clicker here](#) to register to attend the training.

BEGA recently completed a rulemaking designating 46 new boards and commissions as containing members who must file a Public Financial Disclosure Statement ("PFDS"). The members of these boards and commissions must file a 2025 PFDS, reporting on their financial holdings and activities in 2024 no later than May 15, 2025. You can read 3 DCMR § 5710 [here](#).

### Lobbyist Advisory Opinion

OGE has issued a draft advisory opinion providing guidance to lobbyists and informing District government employees of their obligations regarding lobbying contacts. The comment period for this advisory opinion closes soon. To review the draft and provide comments see the [opinion here](#).

### New Financial Interests and Disclosure Course

OGE has launched a new FDS training course which allows users to receive customized financial disclosure information based on their status as a filer and/or Ethics Counselor. Check out course [BGA601-a92en](#) – Financial Interests and Disclosure on our [LMS](#).

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### General Ethics Training

3/12/25 - 1:00 pm  
4/9/25 - 1:00 pm

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### Board and Commission Training

4/30/25 - 11:00 am

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### Outside Employment Training

4/1/25 - 1:00 pm

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### Lobbyist Registration & Reporting Training

3/19/25 - 10:30 am

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### Ethics Counselor Brown Bag

New Peoplesoft Query  
2/24/25 - 1:00 pm

What successful ECs do to prepare for FDS season

3/31/25 - 1:00 pm

## Enforcement Updates

The Board will hold an adversarial hearing in **Case No. 24-0010-F In re Marcellus Willis** starting March 6, 2025 at 11:00 am.

The Office of Government Ethics has charged Respondent Willis with one

count of violating DPM § 1800.3(g) by using his official position to make unauthorized transactions totaling over \$38,000 for his personal benefit and 36 counts of using

government property for unauthorized purposes in violation of DPM § 1808.1.

[Read the Amended Notice of Violation.](#)

### Ethics in the News

Ethics pledges signed by incoming and prospective Trump



administration officials identify a large list of potential conflicts of interests that the new officials may face. The publicly released ethics pledges are agreements between the members of the new Trump administration and federal ethics officials identifying the potential conflicts of interest that may arise for the officials in connection with their duties in the new administration. For example, Attorney General Pam Bondi, a former lobbyist, agreed that she would not handle “any particular matter” involving her former lobbying firm, Ballard Partners, and she would not do business with any former clients she personally represented for a year. Howard Lutnick, the nominee to serve as Commerce Secretary and a former Wall Street financier, identified 106 different corporate entities that present a potential conflict of interest. [Read more](#)

### State and Local Ethics

The Department of Justice has ordered federal prosecutors in the Southern District of New York to drop criminal charges against New York City Mayor Eric Adams. Mayor Adams is charged with conspiracy, soliciting illegal foreign national campaign contributions, bribery, and wire fraud. The memorandum states that that the decision by DOJ was made without assessing the strength of the criminal case against Mayor Adams, instead stating that the indictment limited the Mayor’s ability to assist President Trump’s immigration policies. [Read more here.](#)

Federal prosecutors have also charged former Oakland Mayor Sheng Thao, her partner, and two individuals who own a company that contracts with the city in connection with an alleged pay-to-play scheme. The indictment alleges that Mayor Thao and her partner accepted bribes from the owners of California Waste Solutions, which holds a multi-million-dollar contract with Oakland, in exchange

about the ethics pledges and potential conflicts of interest identified by administration officials in their pledges and public financial disclosure reports [here](#).

President Trump has designated advisor Elon Musk as special government employee (SGE), a category of employees that are intended to provide limited services to the federal government that may not be available through an agency's regular employees. SGEs can work no more than 130 days in any 365 consecutive days, can be paid or unpaid, and are exempt from some disclosure laws required of full-time employees. Read more about the use of SGE's and the potential ethics issues that may arise [here](#).

In additional news on the federal ethics front, President Trump has fired two federal ethics officials – Special Counsel Hampton Dellinger, who lead the Office of Special Counsel (OSC) and David Huitema, Director of the Office of Government Ethics (USOGE). OSC enforces federal whistleblower laws and the federal Hatch Act which governs political activity by federal employees. USOGE oversees the executive branch ethics programs. Special Counsel Dellinger has already filed a suit challenging his dismissal. Read more about the litigation [here](#).

The Office of Special Counsel filed a Hatch Act complaint against a former Federal Emergency Management Agency employee who instructed subordinates to avoid visiting homes with Donald Trump signs in October 2024. Read the complaint filed with the Merit Systems Protection Board [here](#).

for promises to extend the city's recycling contract and purchase modular housing units from a company owned by the contractors. The contractors were also the subject of an investigation by Oakland's Public Ethics Commission in 2019, which investigated allegations that the family behind California Waste Solution used straw donors to illegally funnel campaign contributions to local and state elected officials, including former Mayor Thao. Read more about the pay-to-play charges [here](#) and about Oakland's Public Ethics Commission investigations [here](#).

North Dakota is considering legislation that would provide lawmakers who disclose potential conflicts of interest and follow legislative ethics rules with immunity from prosecution in connection with their votes. The director of the state's Ethics Commission opposes the legislation. The legislature is also considering legislation to address the Ethics Commission's enforcement process. Read more about the pending bills [here](#).

## Ask BEGA



**Question:** I am a teacher at a high school in the District and am interested in volunteering to help fundraise for WE CARE, a nonprofit located in Baltimore that helps group homes and shelters find funding. To my knowledge, WE CARE does not do business with my high school or with the District, but they may be interested in contracting with the District in the future. I've attended a BEGA training and understand that this cannot be done while at work, so I want to add that the volunteer work would be done outside of my regular work hours, and I would only offer to help with fundraising to private foundations or corporations. With this considered, is it okay to volunteer?

**Answer:** Volunteering at WE CARE may be permissible provided you comply with DPM § 1807 and other provisions of the Code of Conduct. That means that you would need to volunteer outside of your District tour of duty and you may not use any government resources in connection with your participation. You are also prohibited from disclosing or using non-public government information during your volunteer activity.

District employees and officials are also prohibited from serving in a representative capacity or as an agent or attorney for any outside entity involving any matter before the District of Columbia. This means that District government employees and officials are prohibited from appearing before the District on behalf of any third party (this applies regardless of whether you are paid by the outside organization). Things like meeting attendance and signing and submitting documents are tantamount to representation for purposes of this rule. In addition, if WE CARE does business with your school or with DCPS in the future you should notify your office and formally recuse yourself of any matters involving WE CARE.

Because a host of other ethics rules could apply to your outside activity, please reach out so we can review the specific rules that may apply to your work with WE CARE.



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