



# ETHICALLY SPEAKING

VOLUME 9, ISSUE 5

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## A Message from the Director

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Greetings Ethics Friends! On last week we hosted our annual Ethics Week conference. This year's theme was Empowered by Ethics. I'd like to thank everyone who attended and a huge THANKS to the Ethics Week committee.

To be empowered by ethics means that you are a steward of ethical conduct and that you make ethics a priority in all aspects of your life. It also means that you serve as an ethics advocate.

The three keys of empowerment are used to motivate employees towards achieving goals. I believe that these keys are essential to ethical empowerment.

The first key is communication and information sharing. One of the best ways to build a sense of trust and responsibility in people is by sharing information.



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

Training and advising employees on the ethics rules enables them to make ethical decisions. The second key is creating autonomy through boundaries.

Boundaries show people where they can be autonomous and responsible, rather than telling them what they can't do. The Code of Conduct is our ethical boundary, and we express it through training and enforcement.

The third key is to replace the hierarchy with self-directed individuals and teams, who learn to create autonomy by using newly shared information and boundaries. Those employees have a strong sense of self-management and are engrained with ethical awareness. Employees who are empowered by ethics set positive examples for others.

## Upcoming Events

### General Ethics Training

11/13/24 - 1:00 pm  
[Register here](#)

12/11/24 - 1:00 pm  
[Register here](#)

### Local Hatch Act Training

11/4/24- 1:00 pm  
[Register here](#)

### Board and Commission Training

10/30/24 - 11:00 am  
[Register here](#)

### Ethics Counselor Brown Bag

11/25/24 - 1:00 pm  
Gifts

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

12/18/24 - 10:30 am  
[Register here](#)

# New and Notable

## Ethics Week 2024 took place October 15-18

Presentations and recordings will be available on our website soon. [Ethics Week 2024.](#)



## Lobbyist Program Update

Starting October 1, 2024 the Lobbyist Registration Fee increased from \$250 to \$350 and from \$50 to \$100 for nonprofits. The penalty for late registration and reporting increased from \$10 per day for up to 30 days to \$100 per day for up to 60 days, for a maximum late fee of \$6,000 for each late registration or report.

## Welcome Brenda Keels!

We are excited to welcome Brenda Keels as an Attorney Advisor at OGE.

Brenda is a proud graduate of Bennett College in Greensboro, North Carolina, where she earned her undergraduate degree before continuing her studies in African Studies at the University of North Carolina at Greensboro, focusing on the African diaspora. She went on to earn her JD from Catholic University of America School of Law and her LL.M. from Georgetown University Law Center. Brenda joins BEGA from the Executive Office of the Mayor.

# Enforcement Updates

## Quarterly Complaint Summary

OGE issued a complaint summary and updated heat map for complaints closed in the third quarter of FY2024. The documents are available on the [updated Heat Map](#) page along with data from the prior quarters.

## 24-0086-P In re A Akeredolu-Ale

The Board approved a negotiated disposition with Respondent, a Program Manager at the Department of Disability Services for one count of violating DPM 1800.3(h) by failing to act impartially and giving preferential treatment to a private organization or individual. Respondent provided his sister and her employer with requested equipment despite not being assigned

to provide services to her employer and not having a full understanding of the requirements for her worksite. Respondent agreed to pay a \$1,000 civil penalty and attend ethics training. Read the negotiated disposition [here](#).

# Ethics in the News



The Department of the Interior's Office of Inspector General (DOI OIG) found that former Deputy Secretary Tommy Beaudreau violated ethics rules by failing to monitor his investments and recuse himself from matters affecting his financial interests.

An investment advisor for Beaudreau purchased stock in ExxonMobil and Chevron valued at under \$5,000 each at the time of purchase without Beaudreau's knowledge or authorization.

Both ExxonMobil and Chevron were on DOI's List of Prohibited Investments at the time of the purchase since the companies are regulated by the agency. Beaudreau learned about the holdings the same month he participated in a meeting about a DOI regulation that would rule imposed new safety requirements on operators of oil and gas wells in the Gulf of Mexico.

The DOI OIG found that Beaudreau violated 18 U.S.C. § 208 by participating in a meeting that would have a direct and predictable effect on ExxonMobil and Chevron at a time he knew that he owned stock in the companies. The report also found that Beaudreau violated his ethics agreement and his certification of ethics

compliance by failing to monitor his holdings. Beaudreau learned about the holdings upon reviewing his brokerage statements prior to filing his required annual public financial disclosure statement and did not regularly review his holdings to ensure compliance.

Read the report [here](#).

## State and Local Ethics

A former Los Angeles Department of Water and Power official has been accused of violating the city's gift rules in connection with attendance at a conference hosted by Accenture, a consulting firm with contracts with the department. In a California State Bar complaint by a DWP contractor and lawsuit by DWP employees alleging retaliation and harassment, the DWP official allegedly worked with Accenture to relabel invoices for the conference to allow DWP to pay for food and beverages at the conference. The complaints allege that the invoices initially reflected the costs of a \$980 food and beverage package that was later revised to a conference fee even though the conference was free to attend

and the food and beverage costs exceeded the \$60 permissible daily limit. Read more about the allegations [here](#).

Louisiana Governor Jeff Landry is expected to reach an agreement with the Louisiana Board of Ethics to settle charges that he failed to disclose flights he took to and from Hawaii on a political donor's private plane in 2021 when he was the state's Attorney General. The Board is expected to approve an agreement with Landry at its December monthly meeting. Beginning January 2025, the governor will be able to appoint new members to the Board, which will expand from 11 to 15 members. Read more [here](#).

Tennessee Governor Bill Lee is asking the Tennessee Ethics Commission to render advice on whether it was permissible for him to accept approximately \$1,900 in travel expenses to serve as the keynote speaker at a July conference in Florida sponsored by the Alliance Defending Freedom. State laws prohibit members of the executive branch from accepting gifts, including travel reimbursements, from lobbyists and entities that employ lobbyists. Lee is seeking to clarify whether the prohibition on "employer of a lobbyist" applies to a 501(c)(3) organization that employs an individual who is registered to lobby on behalf of the group's affiliated 501(c)(4) group. Read more [here](#).



## Board of Ethics and Government Accountability

Office of Government Ethics  
1030 15th Street, NW  
Suite 700 West  
Washington, DC 20005  
Phone: 202-481-3411  
Email: [bega@dc.gov](mailto:bega@dc.gov)  
Website: [bega.dc.gov](http://bega.dc.gov)

Ashley D. Cooks, Director of Government Ethics  
Rashee Raj, General Counsel  
Asia Stewart-Mitchell, Supervisory Attorney for Advice and Education  
Maurice Echols, Attorney Advisor  
Brenda Keel, Attorney Advisor  
Franshun Vann, Attorney Advisor  
Lynn Y. Tran, Senior Attorney Advisor to BEGA's Board

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

### What is the Local Hatch Act?

The Local Hatch Act generally prohibits District employees from engaging in political activity while on duty, including while teleworking. The purpose of the Local Hatch Act is to ensure that government programs are administered in a non-partisan manner.

How is political activity defined?

Political activity is defined as any activity directed toward the success or failure of a political party, candidate for partisan political office, or partisan political group.

### Does the Local Hatch Act limit my ability to contribute to the campaign of a partisan political candidate such as those in the current presidential race?



No, a District employee may contribute to the campaign of a partisan candidate, or to a political party or organization, provided that the employee does not do so while on duty.

### Does this mean that I can solicit others to give to a campaign in the current presidential election as well?

You may solicit others to donate to a particular presidential campaign ONLY when you are off duty from District work. You may not use District resources or facilities to do so. Of note, this permission does not apply to campaigns for District candidates.

### Best Practices

Violations of the Local Hatch Act carry serious penalties. Employees should consult with BEGA or their Ethics Counselor before engaging in any political activity.