



pennsylvania  
STATE ETHICS COMMISSION

# Annual Report



*The signing into law of Act 170 of 1978 by then  
Governor Milton Shapp surrounded  
by legislative leaders.*

**2018**

40th Anniversary cover photograph courtesy of the Pennsylvania State Archives



# Table of Contents

## **General**

Introduction . . . . .	3
Commissioners and Staff . . . . .	4
Contact Information . . . . .	7
Public Information . . . . .	7
Budget . . . . .	8

## **Ethics**

Powers and Duties . . . . .	9
Restricted Activities . . . . .	9
Financial Disclosure . . . . .	10
Civil Penalties . . . . .	10
Notice of Non-Compliance Flowchart . . . . .	11
Opinions and Advices . . . . .	12
Opinions and Advices Flowchart . . . . .	13
Complaints/Investigations . . . . .	14
Investigative Flowchart . . . . .	15

## **Pennsylvania Lobbying Disclosure Law . . . . .16**

## **Commission Ordered Penalties and Restitution . . . . .17**

## **Act 114 of 2016 . . . . .18**

## **Pennsylvania Race Horse Development and Gaming Act . . . . .18**

Gaming Act: Executive-Level Public Employee Flowchart . . . . .19

Gaming Act: Public Official Flowchart . . . . .20

## **Pennsylvania Medical Marijuana Act (MMA) . . . . .21**

MMA: Executive-Level Public Employee Flowchart . . . . .22

MMA: Public Official Flowchart . . . . .23

## **COGEL: Council on Governmental Ethics Laws . . . . .24**

## **Public Outreach and Training . . . . .24**





## Introduction

Calendar year 2018 marked the 40th anniversary of the passage of Act 170 of 1978, the enabling legislation creating the State Ethics Commission. By enacting the Ethics Act, the General Assembly officially declared that a public office is a public trust and any effort to realize personal financial gain through such office is a violation of that trust. As the Commission enters a new decade, we take a look back at legislation that has shaped the Commission.

There have been notable amendments to the Ethics Act over the past four decades, including Act 9 of 1989 and Act 93 of 1998. The passage of Act 9 of 1989 on June 26, 1989 was the culmination of a two-year sunset process which nearly resulted in the Commission's termination. With the passage of Act 9, the seven-member Commission was reconstituted with some significant changes including time limits on investigations. Act 93 of 1998 codified the Ethics Act and included a Lobbying Disclosure Law that required lobbyists and principals to register with the Ethics Commission and disclose expenditures relating to efforts to influence legislative action and administrative action in the Commonwealth. However, the constitutionality of Act 93 of 1998 was challenged, and in May 2000, the Commonwealth Court of Pennsylvania, by a 4-3 vote, ruled that the Lobbying Disclosure Law was an unconstitutional infringement upon the right of the Supreme Court of Pennsylvania to regulate attorneys in the practice of law. An appeal to the Pennsylvania Supreme Court resulted in a 3-3 vote, such that the Commonwealth Court ruling was upheld and the Lobbying Disclosure Law was invalidated.

The Commission's role in lobbying regulation resurfaced in 2006 with the passage of Act 134 of 2006, the Lobbying Disclosure Law, which vested with the Commission duties and responsibilities relating to the activities of lobbyists and principals which include issuing advisory opinions, as well as conducting investigations and enforcement in relation to violations of the Lobbying Disclosure Law.

The Lobbying Disclosure Law was most recently amended by Act 2 of 2018, which mandated electronic filing and provided for increased penalties.

Over the past ten years, the Commission has also been assigned responsibilities pursuant to the Pennsylvania Racehorse Development and Gaming Act, 4 Pa.C.S. § 1101, et seq, and Act 16 of 2016 known as the Medical Marijuana Act. Under both of these laws, the Commission is charged with generating a public listing of all

state, county, municipal, and other governmental positions meeting the relevant statutory definitions of the terms "public official" or "executive-level public employee," as well as issuing determinations specific to the Gaming Act and the Medical Marijuana Act. In addition, the Commission was also assigned responsibilities pursuant to Act 114 of 2016 to publish a list of all employment positions with the State Horse Racing Commission with duties that would subject those individuals to certain "revolving door/post termination" restrictions and to make determinations whether particular individuals would be subject to such restrictions.

Over the years, the Commission has taken advantage of advancements in technology to better serve those it regulates and the general public. Specifically, since 2014 public officials and public employees have had the option to file Statements of Financial Interests electronically with the Commission. This electronic filing system has proven to be a cost savings for the Commission and a convenience for filers. It has enabled the public to search the Commission's website to view Statement of Financial Interests filings contemporaneous with the filing of such forms. The number of filers using the electronic system is steadily increasing.

In addition to its three primary functions of administering and enforcing Statement of Financial Interests disclosure requirements, issuing advices and opinions, and conducting investigations, the Commission continues to place a substantial emphasis upon its educational role. The Commission consistently devotes substantial efforts to educate public officials, public employees, candidates, solicitors, and the public at large as to the provisions of the Ethics Act and the Commission's mandated duties. To that end, over the past year, Commission staff has appeared and participated in 38 seminars, workshops, panel discussions, and presentations to governmental bodies and associations. The Commission intends to maintain and, if possible, increase its education efforts.

Although there have been multiple changes to the Ethics Act and many additions to the duties and responsibilities of the Commission, the Commission's mission has remained constant: that is to strengthen the faith and confidence of the people of the Commonwealth of Pennsylvania in their government. This is done through a fair, impartial, and balanced application of the law.



## Commissioners and Staff

### COMMISSIONERS

The Ethics Act mandates that the Commission is to be comprised of seven Commissioners. The President Pro Tempore of the Senate, the Minority Leader of the Senate, the Speaker of the House and the Minority Leader of the House each appoint one Member. Three Members are appointed by the Governor, two of whom may be of the same political party. Commission Members are appointed without confirmation.

The Commission was comprised of seven Members during calendar year 2018. On January 26, 2018, Commissioner Shelley Y. Simms, Esquire, was appointed to the Commission by Governor Tom Wolf to replace Commissioner Maria Feeley, who served until January 25, 2018.

### CURRENT COMMISSIONERS

- Nicholas A. Colafella, Ph.D. (Chairman)
- Mark R. Corrigan, Esquire (Vice Chairman)
- Roger E. Nick
- Melanie F. DePalma
- Monique Myatt Galloway, Esquire
- Michael A. Schwartz, Esquire
- Shelley Y. Simms, Esquire

### COMMISSIONER BIOGRAPHIES



#### NICHOLAS A. COLAFELLA, CHAIRMAN

Nicholas A. Colafella, Ph.D., was appointed as a Member of the Commission on December 27, 2004. Dr. Colafella served as Vice Chairman of the Commission from January 28, 2013, until being elected Chairman of the Commission on January 16, 2015.

Dr. Colafella was a Member of the Pennsylvania House of Representatives from 1981 to 2002, serving the 15th Legislative District (Beaver County). As a Member of the House of Representatives, Dr. Colafella served as the Democratic Chairman of the House Insurance Committee (1992-1998), and the House Education Committee (1999).

During this time period, Dr. Colafella also served as a Member of the Board of Directors of the Pennsylvania Higher Education Assistance Agency, the Pennsylvania State Board of Education, the Council of Higher Education, and the State Board of Vocational Education. From 1969 until 1980, Dr. Colafella served as the Dean of Continuing Education and Community Service for the Community College of Beaver County as well as its Director of Evening Education. He also served as a business instructor at the same institution, and previously served as a high school business teacher at Center High School and Northwestern High School.

In 1992, Dr. Colafella was recognized as the Outstanding Legislator of the Year by the College and University Public Relations Association of Pennsylvania, and he was named Man of the Year in 1982 by the Upper Beaver Valley Jaycees.

Dr. Colafella has devoted substantial efforts toward community involvement, including his service as Chairman of the Beaver County

Drug and Alcohol Commission, the University of Pittsburgh Medical Center, Beaver Valley Hospital Advisory Committee, board member of the Pennsylvania State University Beaver Campus Advisory Committee, and the Beaver County Mental Health and Mental Retardation Agency.

From 1956 to 1958, Dr. Colafella served in the United States Navy. He received his Ph.D. from the University of Pittsburgh, where he published his dissertation entitled "A Study of Voluntary Support for Pennsylvania Community Colleges." He received his M.A. in Education from Duquesne University and his B.S. in Education from Youngstown State University.



#### MARK R. CORRIGAN, VICE CHAIRMAN

Mark R. Corrigan, Esquire, was appointed as a Member of the Commission on July 2, 2012, by Senator Joseph Scarnati, President Pro Tempore of the Senate. The Commission elected him Vice Chairman on March 6, 2015.

Mr. Corrigan graduated from the Université de Montpellier, France, 1972; Shippensburg State College, 1973; Pennsylvania State University, 1975; and Dickinson School of Law, 1979.

Mr. Corrigan is a member of the Bar of the Supreme Court of Pennsylvania. He taught in the Harrisburg School System from September 1973 to June 1976. Mr. Corrigan served as Law Clerk with the Pennsylvania Department of Education from June 1977 to October 1979. He was Legal Counsel to Senator J. Doyle Corman. Mr. Corrigan was the Executive Director of the Senate Local Government Committee from November 1, 1979, to June 30, 1981. He was elected Secretary of the Senate of Pennsylvania on June 30, 1981 and served in that position until retiring on December 31, 2011.



#### ROGER E. NICK, COMMISSIONER

Roger E. Nick was appointed as a Member of the Commission on January 2, 2013, by then Speaker of the House, Samuel H. Smith.

Mr. Nick is a native of Smethport, Pennsylvania, and a graduate of Edinboro State University, with a B.A. in Political Science. Mr. Nick was employed by the Pennsylvania General Assembly and the Pennsylvania Higher Education Assistance Agency from 1973 until his retirement in 2009. During his 36-year career with the Commonwealth, Mr. Nick held a number of positions with the Pennsylvania House of Representatives, including Executive Director of the House Transportation Committee (1973 – 1976), Legislative Liaison to the Pennsylvania Department of Transportation (1983-1985), and Chief of Staff to Speaker of the House Matthew J. Ryan (1985 to 2003). Mr. Nick served as an Executive Assistant to State Senator Robert J. Kusse from 1976 to 1983. Mr. Nick also served as the Vice President of the Legislative and Board of Affairs for the Pennsylvania Higher Education Assistance Agency from 2003 to 2005. Mr. Nick returned to the Pennsylvania House of Representatives in 2005, serving as the Chief Clerk from 2005 until his retirement in 2009.

Mr. Nick was active as a Member of the Legislative Audit Advisory Commission, a position he held from 2011 to 2013.



**MELANIE F. DEPALMA, COMMISSIONER**

Melanie F. DePalma was appointed as a Member of the Commission on January 14, 2015, by the Honorable Tom Corbett, then Governor of the Commonwealth of Pennsylvania. Ms. DePalma is a native of the Harrisburg area and a graduate of the Pennsylvania State

University, Capital College. She earned a B.S. degree, with distinction, in Public Policy.

Over the course of her career, Ms. DePalma held positions in both the private and public sectors before retiring from the Commonwealth of Pennsylvania in 2014. Most recently, Ms. DePalma served in the Pennsylvania Office of Administration as Director of the Bureau of State Employment from 2011 to 2014. Prior to this, Ms. DePalma was appointed by the Honorable Tom Corbett as Deputy Director in the Governor’s office of Public Liaison. Ms. DePalma was employed as a Legislative Liaison in the Pennsylvania Office of the Attorney General from 1997 to 2011 serving Attorneys General Fisher, Pappert and Corbett respectively. Ms. DePalma was employed by the Government Affairs Division of the Westinghouse Electric Corporation from 1986 to 1996, serving as a Legislative Analyst and registered lobbyist for the Corporation from 1992 to 1996. Prior to spending several years at home raising her children, Ms. DePalma was also employed by the Pennsylvania House of Representatives from 1974 to 1979.



**MONIQUE MYATT GALLOWAY, COMMISSIONER**

Monique Myatt Galloway, Esquire, was appointed as a Member of the Commission on September 27, 2017, by the Honorable Jay Costa, Minority Leader of the Pennsylvania Senate.

Ms. Galloway is Regional Counsel with the Federal Transit Administration (FTA) for Region III located in Philadelphia, Pennsylvania, where she is responsible for advising the Region’s leadership and staff on all legal matters impacting the region, including procurement, grants, environmental, labor, ethics and litigation.

Ms. Galloway is a former federal judicial law clerk to the Honorable Cynthia M. Rufe of the United States District Court for the Eastern District of Pennsylvania.

Ms. Galloway began her legal career as a trial attorney with the Department of the Navy, Office of General Counsel in Washington, D.C., and later an associate at a global defense law firm in Philadelphia, Pennsylvania. Prior to joining FTA, Ms. Galloway was an attorney at a national class action law firm in Radnor, Pennsylvania, where she handled complex consumer protection and wage and hour cases throughout the United States.

Throughout her career, Ms. Galloway has remained devoted to the Bar and the community. In 2014, Ms. Galloway served as President of the Barristers’ Association of Philadelphia, Inc., one of the largest affinity bar associations in Pennsylvania. Ms. Galloway is also a former Board Member of the Public Interest Law Center of Philadelphia.

Ms. Galloway has served on numerous committees, including the Philadelphia Bar Association’s Commission on Judicial Selection

and Retention and the Bylaws Committee as well as the Third Circuit Lawyers Advisory Committee. Currently, Ms. Galloway serves as an Advisory Board Member to the Public Interest Law Center of Philadelphia and the Barristers’ Association of Philadelphia, Inc.

Ms. Galloway has received numerous legal and professional awards. In 2014, The Legal Intelligencer selected Ms. Galloway as a “Lawyer on the Fast Track,” and The Philadelphia Tribune honored Ms. Galloway as one of Philadelphia’s Most Influential African Americans. Ms. Galloway was also included in the 2014 “Lawyers of Color Hot List” for the Eastern Region. In 2012, Ms. Galloway was awarded the President’s Award by the Barristers’ Association of Philadelphia, Inc. for exemplary service to the organization and the community. From 2013 through 2017 consecutively, Ms. Galloway was listed in the Pennsylvania edition of the Super Lawyers Magazine® as a Rising Star, an honor given to the top 2.5 percent of attorneys in the state who are 40-years old or younger.

Ms. Galloway received her J.D., cum laude, in 2003 from Thurgood Marshall School of Law, where she was Managing Editor of the Thurgood Marshall Law Review. In 2008, Ms. Galloway received her LL.M. in Trial Advocacy from Temple University and received her B.B.A. in Accounting in 2000 from Texas Southern University.



**MICHAEL A. SCHWARTZ, COMMISSIONER**

Michael A. Schwartz, Esquire, was appointed to serve as a Member of the Commission on October 12, 2017, by the Honorable Tom Wolf, Governor of the Commonwealth of Pennsylvania.

Mr. Schwartz is a partner and co-chair of the Litigation and Dispute Resolution Department of Pepper Hamilton, LLP, resident in the Philadelphia office. He also is the Chair of the firm’s White Collar Litigation and Investigations Practice Group and a member of the Media and Communications Practice Group. Mr. Schwartz focuses his practice in the areas of criminal defense and counseling, internal corporate investigations, corporate compliance programs, corporate monitorships and First Amendment matters. Mr. Schwartz serves on the firm’s Professional Responsibility Committee.

Before joining Pepper Hamilton, LLP in 2008, Mr. Schwartz headed the Corruption, Civil Rights, Labor and Tax Fraud unit of the U.S. Attorney’s Office for the Eastern District of Pennsylvania. As an Assistant U.S. Attorney for approximately 14 years, he successfully prosecuted some of the region’s highest-profile corruption cases, including the electronic surveillance investigation during former Philadelphia Mayor John F. Street’s administration and the corruption prosecutions of former City Treasurer Corey Kemp and former City Councilman Richard Mariano.

Mr. Schwartz is a 1990 graduate of Yale Law School and a 1987 graduate of the Pennsylvania State University, where he earned his B.A. in Economics. Mr. Schwartz served as a law clerk for the Honorable Edmund V. Ludwig, United States District Court for the Eastern District of Pennsylvania, taught trial advocacy and corruption law and policy at Temple Law School, and guest lectured at Temple Law School, University of Pennsylvania Law School, Rutgers School of Law, and Drexel School of Law.



### SHELLEY Y. SIMMS, COMMISSIONER

Shelley Y. Simms, Esquire, was appointed as a Member of the Commission on January 26, 2018, by the Honorable Tom Wolf, Governor of the Commonwealth of Pennsylvania.

Ms. Simms is General Counsel and Chief Compliance Officer of FIS Group, a registered investment advisor that provides customized manager of managers investment solutions for institutional investors. Ms. Simms has oversight responsibility for the legal and compliance matters at FIS Group and is a member of the firm's Enterprise Risk Management, Senior Management and Investment Committees.

Prior to joining FIS Group in 2004, Ms. Simms was independent counsel to ARAMARK Corporation, and she previously held legal positions at Comcast Corporation and Ballard Spahr LLP.

Additionally, she served as law clerk to the Honorable Theodore A. McKee, United States Court of Appeals for the Third Circuit.

Ms. Simms is a former Board Member of the Hospitals and Higher Education Facilities Authority of Philadelphia, the Russell Byers Charter School, and Operation Understanding.

Ms. Simms is a recipient of the Philadelphia Business Journal Corporate Counsel Award, the Urban League of Philadelphia Whitney M. Young Service Award and the City of Philadelphia Mayoral Liberty Bell Award.

Ms. Simms received her J.D. from Harvard Law School in 1993, where she was a Supervising Editor of the Harvard Law Review, and is a 1990 graduate of Brown University, where she earned her B.A., with departmental honors, in English/American Literature and Bio-Medical Ethics. Ms. Simms has bar admissions in Pennsylvania and New Jersey.

## STAFF

### EXECUTIVE DIVISION

- Robert P. Caruso, Executive Director
- Brian D. Jacisin, Deputy Executive Director/Director of Investigations

### OFFICE OF CHIEF COUNSEL

- Robin M. Hittie, Chief Counsel
- Martin W. Harter, Senior Assistant Counsel
- Esther Estelle, Legal Assistant

### ADMINISTRATIVE DIVISION

- Leticia Powell, Director for Administration
- Sean M. Firestine, Information Technology Manager
- Nicole Stockdale, Clerk Typist
- Stanley G. Weaver, Clerk Typist
- Jessica Wenger, Clerk Typist

### INVESTIGATIVE DIVISION (HEADQUARTERS)

- Jeffery S. Frankenburger, Assistant Counsel
- Daniel M. Bender, Senior Special Investigator
- Gregory Curran, Senior Special Investigator
- Jonathan Fry, Special Investigator
- Heather L. Mulhollan, Secretarial Support

### INVESTIGATIVE DIVISION (WESTERN REGIONAL OFFICE)

- Jason P. Bricker, Regional Supervising Investigator
- Daniel Cali, Special Investigator
- Joseph Grado, Special Investigator (resigned 4/27/2018)
- Grant Pampiks, Special Investigator (effective 6/11/2018)
- Cynthia L. Hershberger, Secretarial Support

## COMMISSION MEMBER AND EMPLOYEE RESTRICTIONS

The Ethics Act places certain obligations upon the Commission and its staff members. No individual, while a Member or employee of the Commission, shall:

1. Hold or campaign for any other public office;
2. Hold office in any political party or political committee;
3. Actively participate in or contribute to any political campaign;
4. Directly or indirectly attempt to influence any decision by a governmental body, other than a court of law or as a representative of the Commission on a matter within the jurisdiction of the Commission; or
5. Be employed by the Commonwealth or a political subdivision in any other capacity whether or not for compensation.

Additionally, no Member of the Commission shall have served as an officer in a political party for one year prior to appointment.

The Commission has also implemented an internal Code of Conduct to govern the Members of the Commission, which is set forth in the Commission's Regulations, at 51 Pa. Code § 11.1, et seq.



## Contact Information

### FOR THE PENNSYLVANIA STATE ETHICS COMMISSION:

#### ADDRESS/HOURS OF OPERATION:

Pennsylvania State Ethics Commission  
Finance Building  
613 North Street, Room 309  
Harrisburg, PA 17120-0400  
Office Hours: Monday – Friday, 8:00 a.m. – 5:00 p.m.  
Telephone: (717) 783-1610  
Fax: (717) 787-0806  
Toll free: (800) 932-0936  
Website: [www.ethics.pa.gov](http://www.ethics.pa.gov)  
E-mail address: [ethics@pa.gov](mailto:ethics@pa.gov)

**Note: As of December 1, 2017, the Commission no longer utilizes a Post Office Box. The new mailing address is that listed above.**

#### PITTSBURGH REGIONAL OFFICE:

Pennsylvania State Ethics Commission  
1 Forestwood Drive, Suite 102  
Pittsburgh, PA 15237  
Telephone: (412) 635-2816  
Fax: (412) 635-2818

### OPEN-RECORDS OFFICER:

Robert P. Caruso, Executive Director  
Pennsylvania State Ethics Commission  
Finance Building  
613 North Street, Room 309  
Harrisburg, PA 17120-0400  
Telephone: (717) 783-1610  
Toll free: (800) 932-0936  
Fax: (717) 787-0806  
E-mail: [RA-ethicsRTKL@pa.gov](mailto:RA-ethicsRTKL@pa.gov)

### COMMONWEALTH OF PENNSYLVANIA OFFICE OF OPEN RECORDS:

Commonwealth of Pennsylvania  
Office of Open Records  
333 Market Street, 16th Floor  
Harrisburg, PA 17101-2234  
Telephone: (717) 346-9903  
Fax: (717) 425-5343  
E-mail: [openrecords@pa.gov](mailto:openrecords@pa.gov)  
Web page: [www.openrecords.pa.gov](http://www.openrecords.pa.gov)  
Executive Director: Erik Arneson

## Public Information

### ETHICS COMMISSION WEBSITE

[www.ethics.pa.gov](http://www.ethics.pa.gov)

### ETHICS COMMISSION E-LIBRARY

[www.ethicsrulings.pa.gov](http://www.ethicsrulings.pa.gov)

### STATEMENTS OF FINANCIAL INTERESTS FILINGS:

All Statement of Financial Interests forms filed with the Commission are available for public inspection and copying. There is a charge of 25 cents per page for paper copies.

Statements of Financial Interests filed with the Commission are also available for public inspection via the Commission's website at [www.ethics.pa.gov](http://www.ethics.pa.gov).

For calendar year 2018, the Commission's online Statement of Financial Interests filing system continued to gain popularity with county and local public officials, candidates, former public officials and employees, and public employees not required to file with the Governor's Office of Administration.

### COMMISSION DECISIONS:

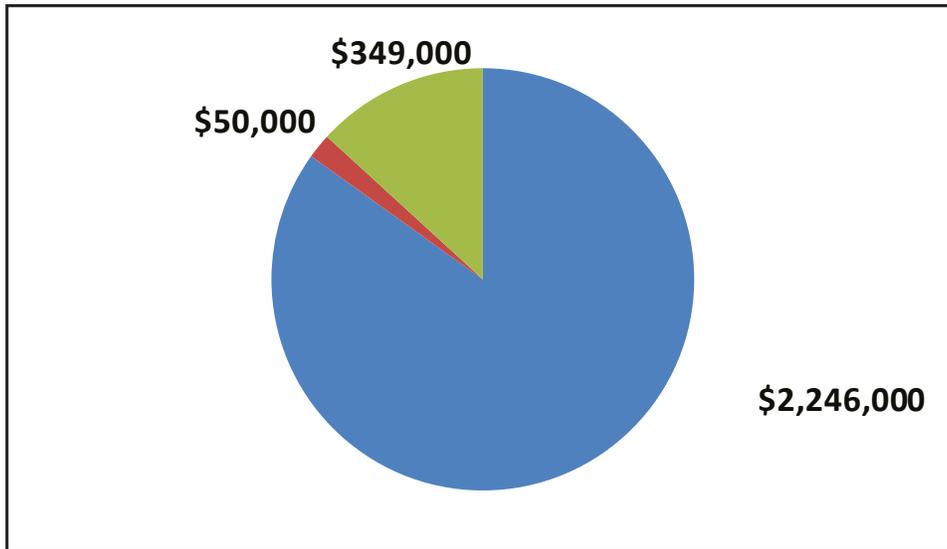
Commission decisions (Orders, Opinions, Advices of Counsel, and Determinations) are available at the offices of the Commission and at the Commission's e-Library, which may be accessed via the Commission's website at [www.ethics.pa.gov](http://www.ethics.pa.gov).



# Budget

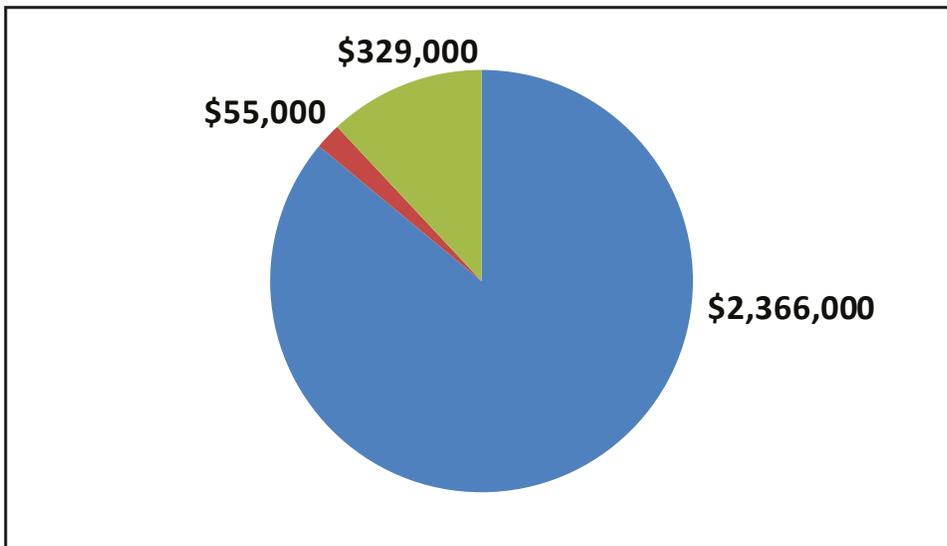
## TWO-YEAR BUDGET ANALYSIS APPROPRIATION 2017-2018

Employee salaries/benefits .....	\$2,246,000
Miscellaneous personnel services .....	\$50,000
Agency operations .....	\$349,000
Total .....	\$2,645,000



## APPROPRIATION 2018-2019

Employee salaries/benefits .....	\$2,366,000
Miscellaneous personnel services .....	\$55,000
Agency operations .....	\$329,000
Total .....	\$2,750,000





## Powers and Duties

The powers and duties of the Commission under the Ethics Act include:

- Issuing prospective advisory opinions regarding an individual's duties and responsibilities under the Ethics Act.
- Receiving and reviewing Statements of Financial Interests filed pursuant to the Ethics Act.
- Investigating alleged violations of the Ethics Act, holding hearings, and issuing decisions in relation to said investigations.
- Preparing and publishing an annual report, special reports, educational materials, and technical studies to further the purpose of the Ethics Act.
- Prescribing rules and regulations to implement the provisions of the Ethics Act (see, 51 Pa. Code § 11.1 et seq.).
- Holding at least two public hearings each year to seek input from persons and organizations which represent individuals subject to the Ethics Act.

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## Restricted Activities

The Ethics Act restricts certain activities as detailed in Section 1103 of the Ethics Act.

Section 1103(a) of the Ethics Act restricts public officials and public employees from using the authority of the public position, or confidential information received by being in such position, for a prohibited private pecuniary benefit. The Ethics Act provides certain exceptions to the prohibition.

Sections 1103(b) and 1103(c) of the Ethics Act prohibit improper influence involving offering/giving or soliciting/accepting something of monetary value based on the understanding that the vote, official action, or judgment of a public official, public employee, nominee, or candidate for public office would be influenced thereby.

Section 1103(d) of the Ethics Act prohibits public officials and public employees from accepting an honorarium.

Section 1103(e) of the Ethics Act prohibits the solicitation or acceptance of a severance payment or anything of monetary value contingent upon the assumption or acceptance of public office or employment. The Ethics Act provides certain exceptions to the prohibition.

Where a public official/public employee, his spouse or child, or a business with which he, his spouse or child is associated, is otherwise appropriately contracting with the public official's/public employee's governmental body, or subcontracting with any person who has been awarded a contract with the governmental body, in an amount of \$500.00 or more, Section 1103(f) of the

Ethics Act requires that an "open and public process" be observed as to the contract with the governmental body. Section 1103(f) of the Ethics Act also provides that the public official/public employee may not have any supervisory or overall responsibility as to the implementation or administration of the contract with the governmental body.

Section 1103(g) of the Ethics Act prohibits a former public official/public employee from representing a person, with promised or actual compensation, before the governmental body with which he has been associated for one year after he leaves that body.

Section 1103(h) of the Ethics Act prohibits the use of information from Statements of Financial Interests for a commercial purpose.

Section 1103(i) of the Ethics Act provides that for two years following termination of employment with the Commonwealth of Pennsylvania, a former executive-level State employee may not be employed by, receive compensation from, assist or act in a representative capacity for a business that he actively participated in recruiting to the Commonwealth or that he actively participated in inducing to open or expand a plant, facility or branch in the Commonwealth, through a grant or loan of money or a promise of a grant or loan of money from the Commonwealth to such business.

Section 1103(j) of the Ethics Act provides procedures to be used when voting conflicts occur.

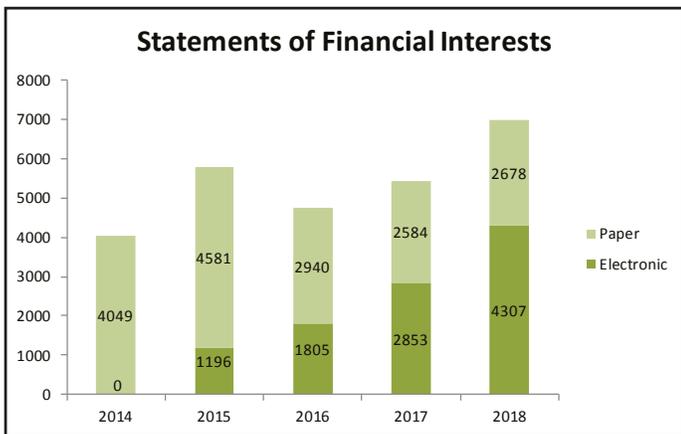


# Financial Disclosure

Section 1104 of the Ethics Act (65 Pa.C.S. § 1104) requires that public officials, public employees, solicitors, nominees, and candidates for public office file Statements of Financial Interests. Section 1105 of the Ethics Act (65 Pa.C.S. § 1105) describes the information to be reported.

In preparation for the May 1, 2019 filing deadline for calendar year 2018, a total of 201,035 Statement of Financial Interests forms were distributed between December 2018 and mid-January 2019 to 7,001 state, county, and local government entities for distribution to public officials, public employees, and candidates required to comply with the Ethics Act. All filers are given the option to electronically file at the Commission’s website in lieu of completing a paper form. However, a filer using the Commission’s online filing system must ensure that copy(ies) of the form are filed with all required filing location(s).

For calendar year 2017 (filing year 2018), there were 6,985 individuals who filed Statements of Financial Interests with the Commission. Of those who filed, 4,307 (62%) filed electronically through the Commission’s website, which is a 10% increase in electronic filings from the previous year. Direct filers with the Commission consisted of 316 candidates for public office; 1,356 constables and deputy constables; and 262 cabinet members and staff. An additional 3,528 direct filers included state officials, former state employees and members of state boards and commissions. Indirect filers totaled 1,523 and consisted of local government individuals who filed voluntarily with the Commission. Statements of Financial Interests filed with the Commission are public documents and are available online for public inspection in the e-library which may be accessed via the Commission’s website at [www.ethics.pa.gov](http://www.ethics.pa.gov).



## CIVIL PENALTIES

Those public officials/public employees, solicitors, nominees, and candidates for public office who are required to file Statements of Financial Interests pursuant to Section 1104 of the Ethics Act (65 Pa.C.S. § 1104), and have failed to do so or have filed deficient Statements of Financial Interests, may be subject to an assessment of a civil penalty as delineated in Section 1109(f) of the Ethics Act (65 Pa.C.S. § 1109(f)).

Pursuant to the Ethics Act (65 Pa.C.S. § 1101 et seq.), the Regulations of the Commission (51 Pa. Code § 11.1 et seq.), as well as the Policies and Procedures of the Commission, upon learning that an individual has either failed to file or has filed a deficient Statement of Financial Interests, the Commission must first notify the individual of such non-compliance. A Warning Notice Letter is sent to an individual who has either not filed or filed a deficient Statement of Financial Interests. Each Warning Notice Letter affords the individual 20 days to cure the deficiency and/or delinquency without penalty. If the individual fails to file within the cure period(s), the Commission may levy a civil penalty of not more than \$25.00 per day up to a maximum of \$250.00 against the individual and order the filing of the Statement of Financial Interests.

Should an individual fail to comply with an Order of the Commission to either remit the assessed civil penalty and/or to file a Statement of Financial Interests, the Commission is authorized to pursue the matter in the Commonwealth Court of Pennsylvania for the purposes of enforcement of the Commission’s Order.

For the calendar year 2017 filing, the Commission identified 342 current and/or former state-level public officials/public employees who failed to file Statements of Financial Interests by the May 1, 2018, deadline. Those 342 individuals received an initial or First Warning Notice Letter directing them to file the outstanding forms. Of those 342 individuals who were sent First Warning Notice Letters, 71 failed to cure their filings within the 20-day period, prompting the need for Second or Final Warning Notice Letters. As of calendar year-end 2018, 237 (69%) of the originally identified non-filing current or former state-level public officials/public employees had filed their Statements of Financial Interests.

The Commission identified 854 Board and Commission members who failed to file Statements of Financial Interests based on an audit conducted by the Administrative Division in June 2018 for calendar years 2013 - 2017. As of calendar year-end 2018, 480 (56%) of the originally identified non-filing Board and Commission members had filed their Statements of Financial Interests.

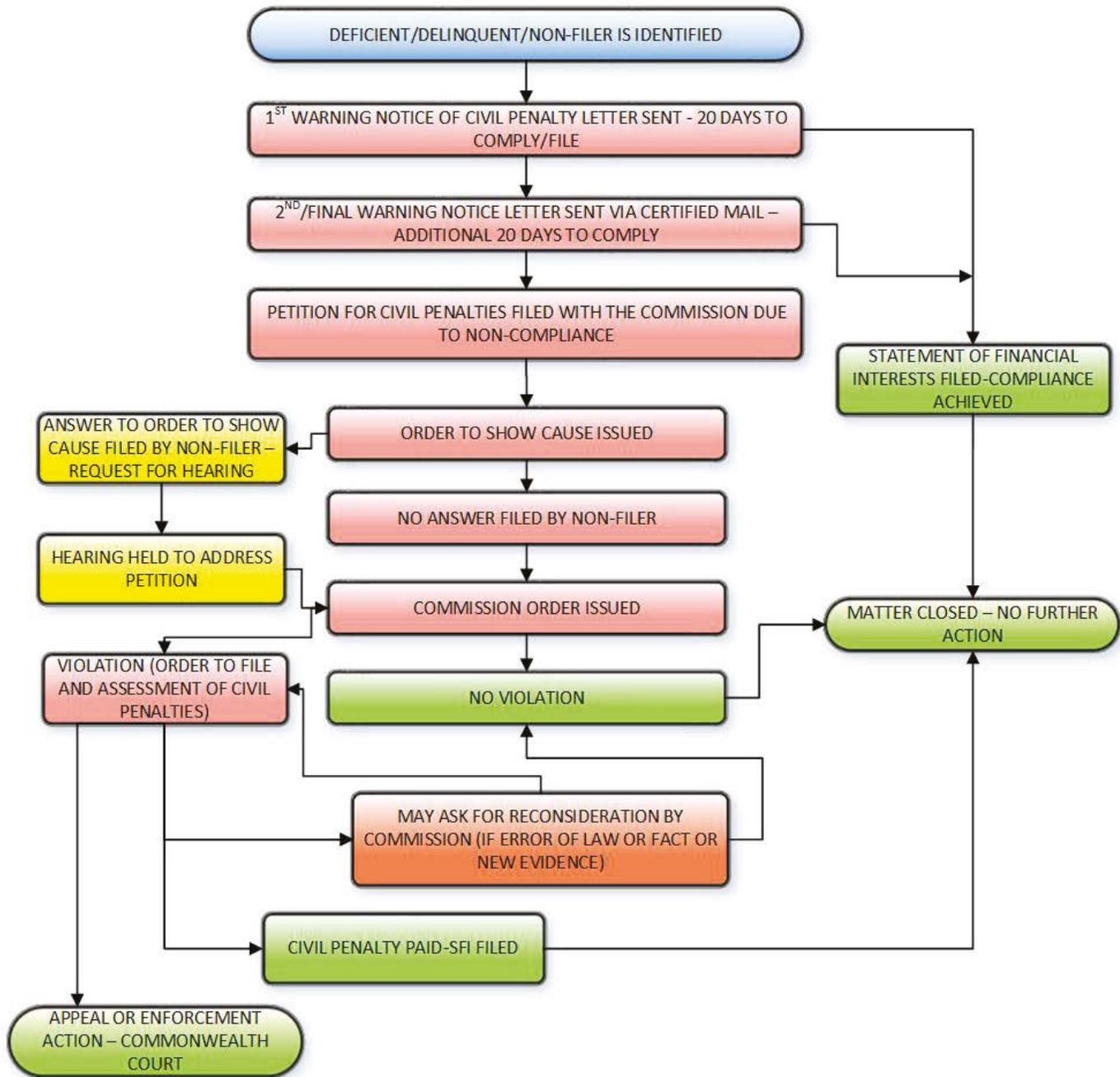
The Commission identified 224 constables/deputies who failed to file and/or filed deficient Statements of Financial Interests for calendar year 2017. Of the 224 constables/deputies who were sent First Warning Notice Letters, 98 failed to file/amend within the 20-day cure period, prompting the need for Second or Final Warning Notice Letters. As of calendar year-end 2018, 203 (91%) of the originally identified deficient/non-filing constables/deputies had filed their Statements of Financial Interests.

Compliance Reviews resulted in identification of 162 delinquent and/or deficient filers, all of whom were sent First Warning Notice Letters followed by 20 who were sent Second/Final Warning Notice Letters. As of year-end 2018, 152 (94%) of those identified individuals have filed corrected/amended Statements of Financial Interests.

During calendar year 2018, the Commission issued a total of forty-eight (48) Orders ruling on Petitions for Civil Penalties against public officials/public employees who failed to correct delinquent/deficient Statements of Financial Interests.



## NOTICE OF NON-COMPLIANCE FLOWCHART



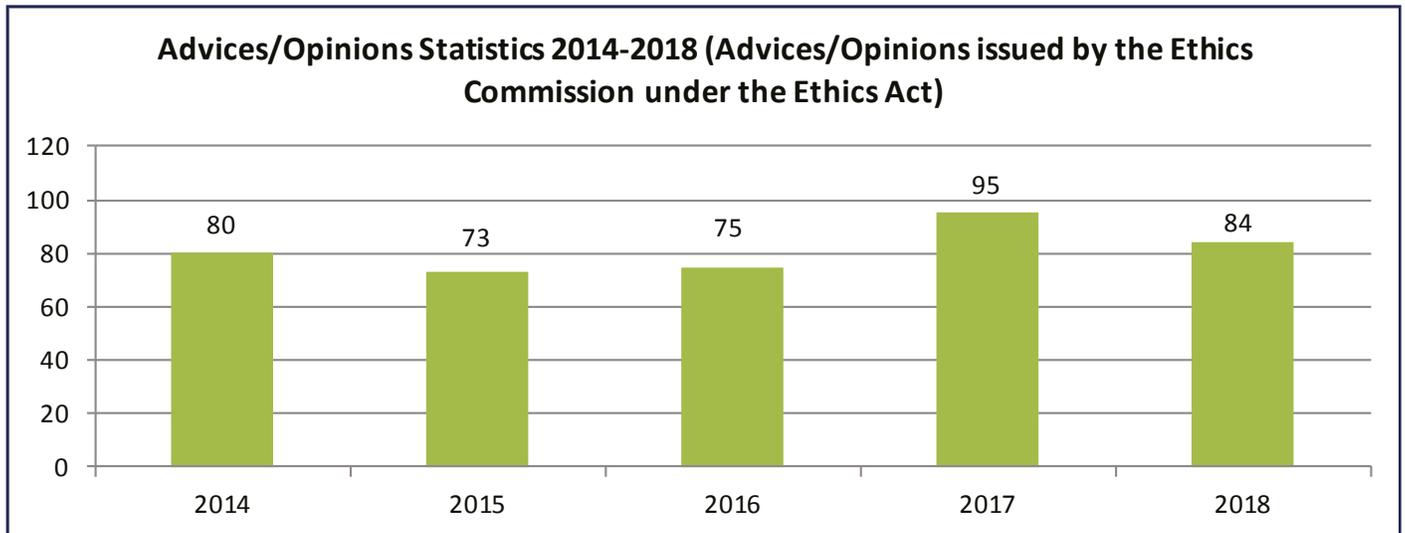


## Opinions and Advices

Section 1107(10)-(11) of the Ethics Act directs the Commission to provide an Opinion or Advice to any person about his or her duties under the Act. An Opinion or Advice may also be provided to the employer or appointing authority of such person. Opinions and Advices provide a complete defense against enforcement action initiated by the Commission. An Advice of Counsel is evidence of good faith conduct in any other civil or criminal proceeding if the requester truthfully disclosed all material facts and acted in reliance on the Advice. An Opinion is an absolute defense to any criminal or civil penalty provided all material facts are truthfully disclosed and the requester acts in good faith on the Opinion.

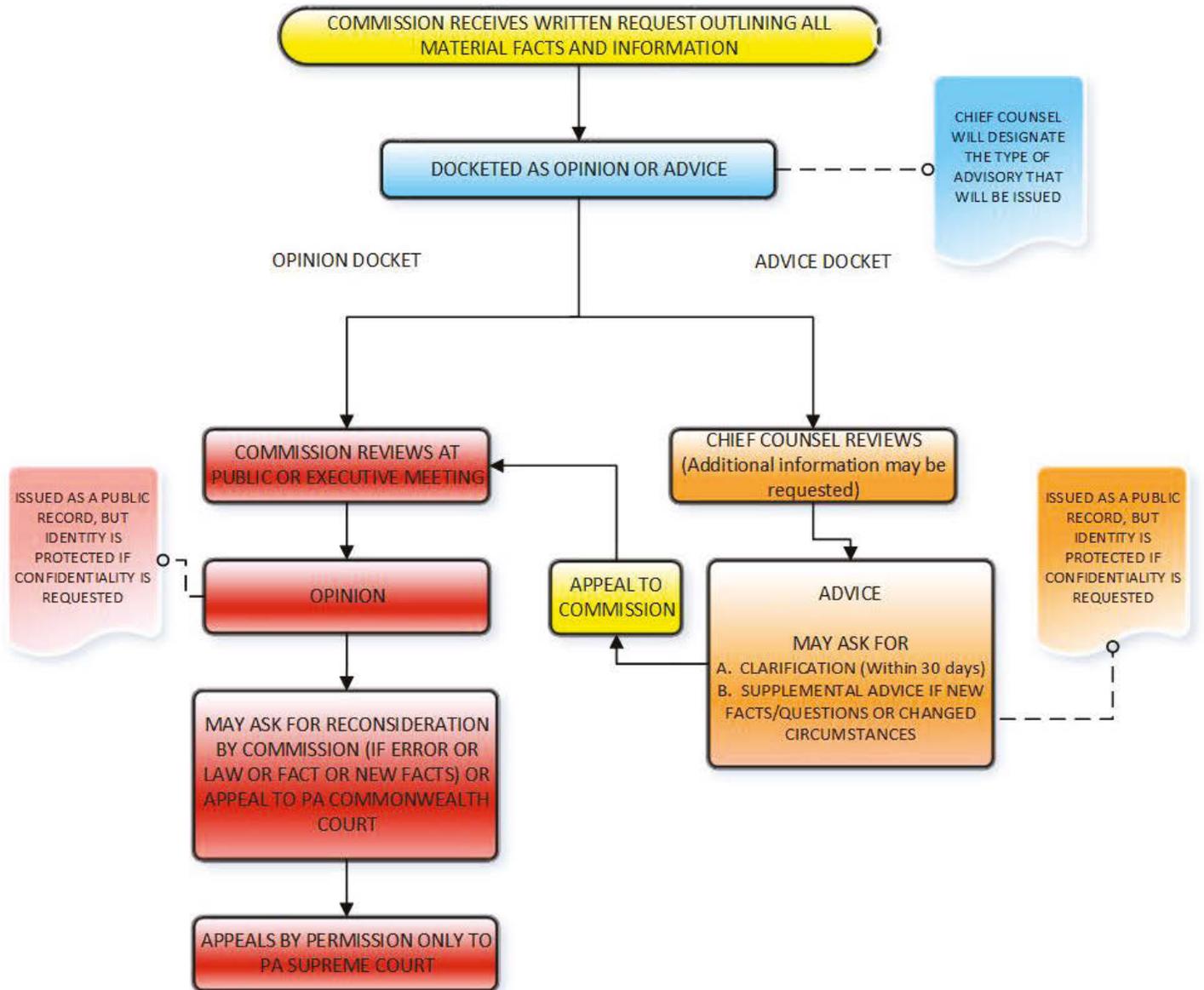
From January 1, 2018, through December 31, 2018, the Commission issued a total of 84 advisories under the Ethics Act, consisting of four Opinions and 80 Advices of Counsel.

Opinions and Advices are public records. However, a requester may require that the Opinion or Advice contain such deletions and changes as shall be necessary to protect the identity of the persons involved. Pursuant to the Ethics Act, the Commission is required to provide specified libraries throughout the Commonwealth with copies of Advices of Counsel, Opinions, and Orders that are a matter of public record. Copies of Opinions and Advices are available online in the Commission's e-Library at [www.ethics.pa.gov](http://www.ethics.pa.gov).





# OPINIONS AND ADVICES FLOWCHART





# Complaints/Investigations

The Commission is authorized to investigate matters upon receipt of a sworn complaint or it may initiate investigations upon its own motion. In order for a sworn complaint to be valid, it must include the full name(s) and address(es) of the complainant and respondent; contain allegations related to a specific individual(s); be signed by the complainant; and be properly notarized.

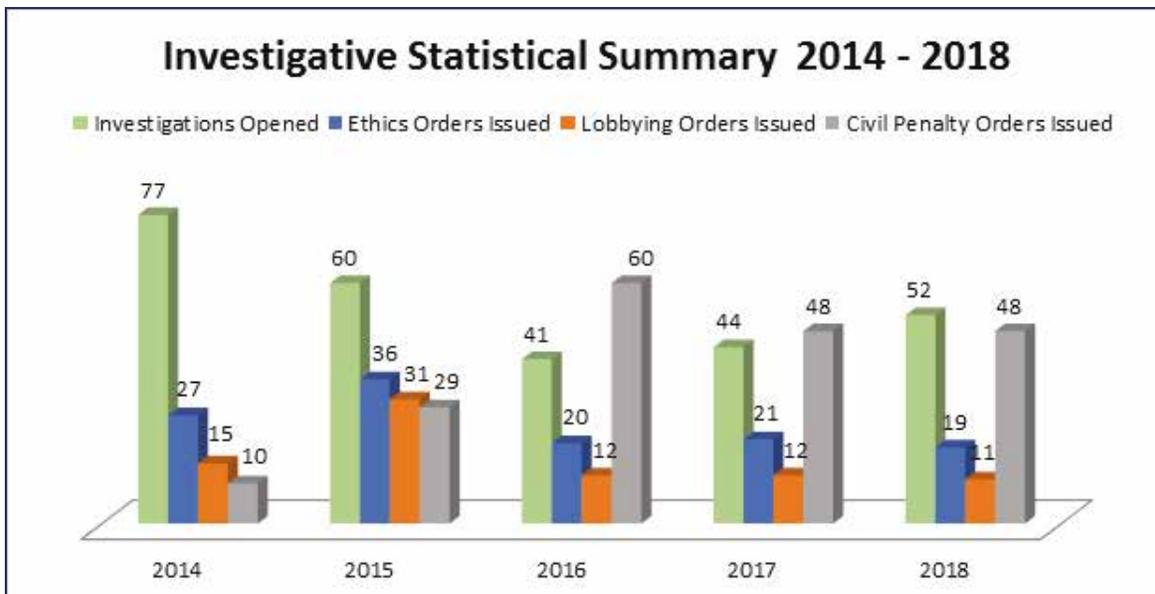
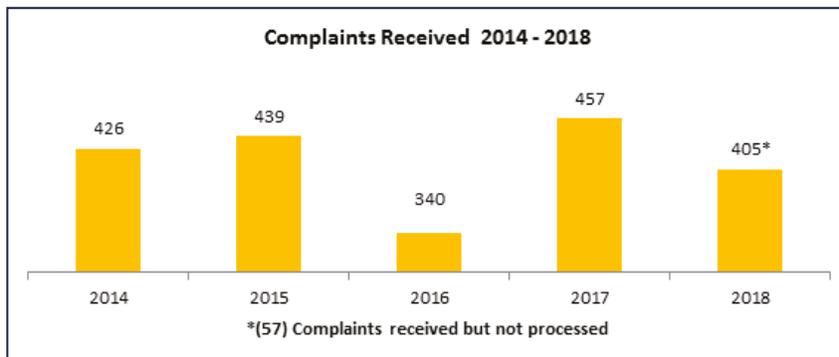
During 2018 the Investigative Division processed 405 complaints, however, due to the timing of the receipt of complaints and an existing backlog, an additional 57 complaints that were received in 2018, were not processed until 2019. Of those 405 complaints processed, 52 were opened as full investigations. The Commission additionally issued 19 public Orders finding violations of the Ethics Act by public officials/public employees.

Upon receipt of a complaint, the Commission’s Investigative Division will initially notify the complainant in writing to confirm the receipt of the complaint. In the event the complained of matter is not within the Commission’s jurisdiction or if the complaint lacks sufficient information, the complainant will be notified of the deficiencies at that time. If a matter is to be investigated, the Commission’s Investigative Division will initiate a preliminary inquiry which must be completed within 60 days. Upon conclusion of the preliminary inquiry, the matter will either be closed or the matter will be opened for a full investigation. If a matter is opened as a full

investigation, the complainant will be notified within 72 hours, and both the complainant and subject of the investigation (respondent) will be notified every 90 days thereafter of the general status of the matter. If after a preliminary investigation the matter is terminated, both the complainant and the respondent will be notified.

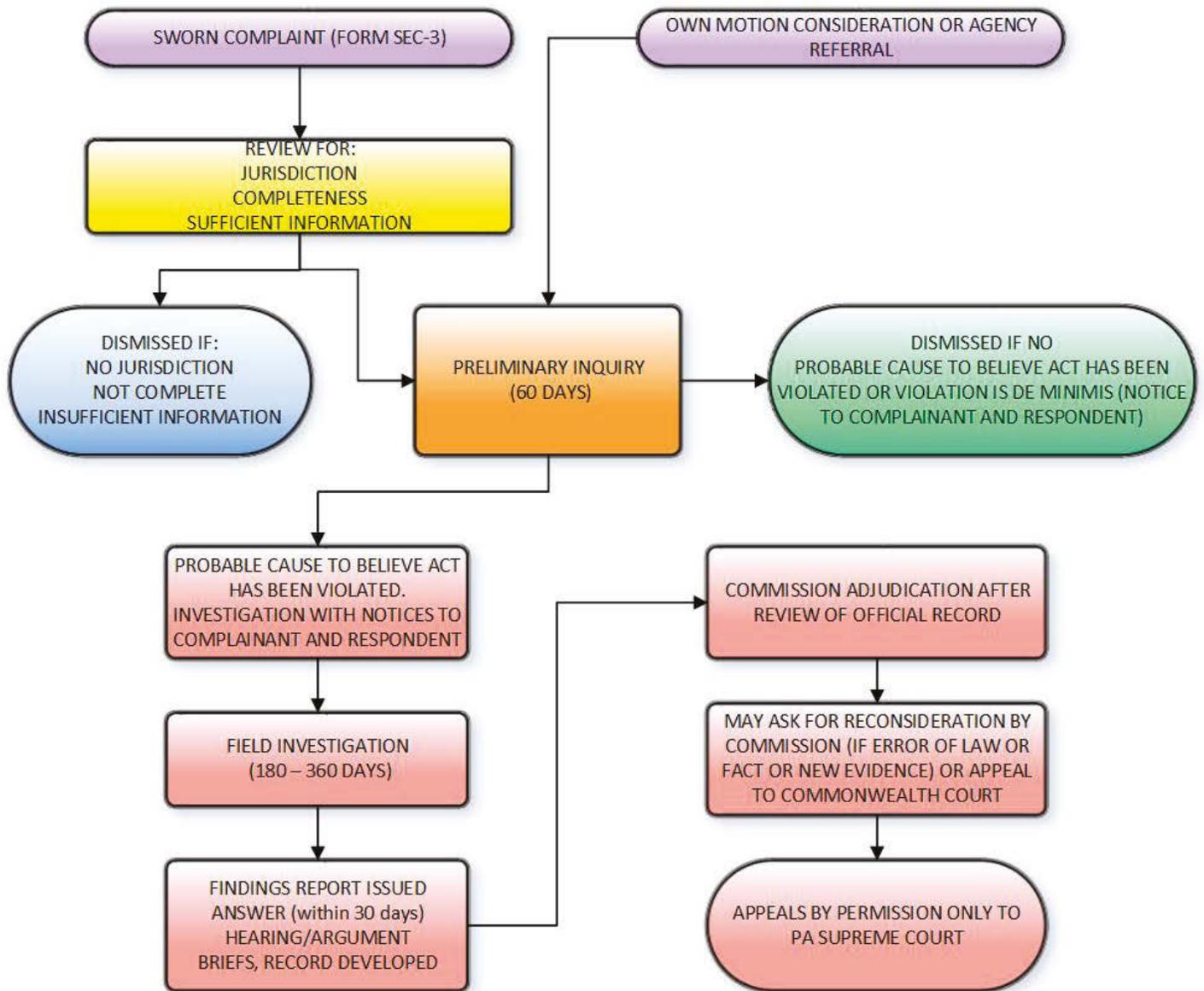
Once a full investigation has been initiated, and upon the conclusion of the field investigation, the respondent will be issued an Investigative Complaint/Findings Report containing the relevant findings of fact. The Investigative Complaint/Findings Report must be issued no later than within 360 days of the initiation of the full investigation. The respondent must file an Answer to said report within 30 days after its issuance. Following the issuance of the Investigative Complaint/Findings Report, a respondent may choose to negotiate a settlement of the matter. If a respondent chooses to challenge the allegations contained within the Investigative Complaint/Findings Report, the respondent will be afforded a full and fair opportunity to do so following the filing of an Answer.

Upon the conclusion of the investigation and all other proceedings, the Commission will issue a final Order containing findings of fact and conclusions of law. Final Orders issued by the Commission are public documents and will be released as such. They are also available online in the Commission’s e-Library at [www.ethics.pa.gov](http://www.ethics.pa.gov).





# INVESTIGATIVE FLOWCHART





# Pennsylvania Lobbying Disclosure Law

## OVERVIEW

Under the Lobbying Disclosure Law, 65 Pa.C.S. § 13A01, et seq., the Commission's responsibilities include enforcement and issuing advisories. Responsibility for the administration of the registration and reporting requirements is vested in the Pennsylvania Department of State.

## ADVISORIES

From January 1, 2018, through December 31, 2018, the Commission issued two advisories under the Lobbying Disclosure Law, consisting of one Opinion and one Advice of Counsel.

The Commission issues advisories under the Lobbying Disclosure Law to persons with standing (legal authority) to submit such requests. The process for issuing advisories under the Lobbying Disclosure Law is similar to the process under the Ethics Act. Advisories are issued as to prospective conduct only.

## ENFORCEMENT

The Commission has authority to enforce the registration and reporting requirements (Sections 13A04 and 13A05) and to some extent, the "prohibited activities" section (Section 13A07) of the Lobbying Disclosure Law.

With regard to enforcement of the registration and reporting requirements, the Lobbying Disclosure Law provides a process (see Section 13A09) whereby the Commission is to issue a "Notice of Alleged Noncompliance" to a person (hereinafter referred to as the "non-filer") who has failed to register or report as required. The non-filer is given an opportunity to appeal to the Commission and have a hearing. Intentional violations are referred to the Office of Attorney General and, in some instances, to the Disciplinary Board of the Supreme Court of Pennsylvania ("Disciplinary Board") as discussed below. For negligent violations, the Commission may impose an administrative penalty. The Commission may also prohibit a non-filer from lobbying for economic consideration for up to five years if the non-filer fails to comply after notice of non-compliance and a hearing, if requested.

With regard to enforcement of the "prohibited activities" section of the Lobbying Disclosure Law, Section 13A07, the Commission has authority to receive complaints, conduct investigations, hold hearings, and impose administrative penalties as to: (1) lobbying "conflicts of interest" as described in subsection (d); and (2) 10 categories of "unlawful acts" listed in subsection (f). For violations as to these particular types of "prohibited activities," the Commission has authority to impose financial penalties and to prohibit a lobbyist from lobbying for economic consideration for up to five years.

For all other prohibited activities detailed in Section 13A07 of the Lobbying Disclosure Law, the Commission may initiate investigations through the Executive Director and hold hearings pursuant to the Commission's general authority under Section 13A08(g). However, the only penalty the Commission may impose for these types of violations is prohibition against lobbying for economic consideration for up to five years in the event of an intentional violation. 65 Pa.C.S. § 13A09(e)(4).

For all of the above types of matters, if the Commission has reason to believe that an intentional violation of the Lobbying Disclosure Law has been committed, the Commission must refer all relevant information to the Office of Attorney General and, if the lobbyist or principal is an attorney, to the Disciplinary Board. 65 Pa.C.S. § 13A09(h). Referrals to the Attorney General and Disciplinary Board would generally not preclude the Commission from conducting its own proceedings. However, matters involving alleged conflicts of interest on the part of attorneys would be handled exclusively by the Disciplinary Board. 65 Pa.C.S. § 13A07(d)(8).

An alleged violation of the "unlawful acts" provision by an attorney would be referred to the Disciplinary Board. 65 Pa.C.S. § 13A07(f)(3)(ii). Matters involving an attorney's failure to register or report would be heard by the Commission with the Commission referring cases involving intentional conduct to the Disciplinary Board as well as the Attorney General. In the event of an attorney's negligent failure to register/report, the Commission could impose an administrative/civil penalty but would be required to inform the Disciplinary Board of such action. 65 Pa.C.S. § 13A09(b)(2)-(3), (c)(3).

## LOBBYING COMPLIANCE ACTIVITIES

The Commission continues to engage in compliance efforts regarding lobbying activities undertaken in calendar year 2018. The Commission, through the Investigative Division, monitors and enforces the Lobbying Disclosure Law (65 Pa.C.S. § 13A01, et seq.) through compliance reviews of Registration Statements, as well as Quarterly Expense Reports filed by principals, lobbyists and/or lobbying firms with the Pennsylvania Department of State.

During calendar year 2018, the Pennsylvania Department of State did not identify any lobbyists, principals, or lobbying firms, which had filed deficient Registration Statements and as such, the Commission did not pursue any penalties against same. The Commission received a complaint regarding two principals who failed to register with the Pennsylvania Department of State. The Commission issued an Order in each case, by Consent Agreement. The Commission found that the principals violated the Lobbying Disclosure Law when they engaged in lobbying activities in an effort to influence legislative action with the Commonwealth of Pennsylvania at a time when they failed to properly register with the Pennsylvania Department of State as a principal within ten days of acting in any capacity as a principal.

During the reporting period for calendar year 2018, the Commission issued a total of 105 Warning Notice Letters to principals regarding their failure to file Quarterly Expense Reports as required by the Lobbying Disclosure Law. Of those 105 Warning Notice Letters sent, nine principals did not file their quarterly expense reports and/or otherwise comply with the Warning Notices within the cure period. Those nine principals were the subject of Notices of Alleged Non-Compliance, an action undertaken by the Investigative Division of the Commission seeking the assessment of a monetary penalty against non-complying principals. Of the eleven Orders issued by the Commission, nine were negotiated agreements, one was issued after parties submitted position statements, and one was the result of a default judgment.



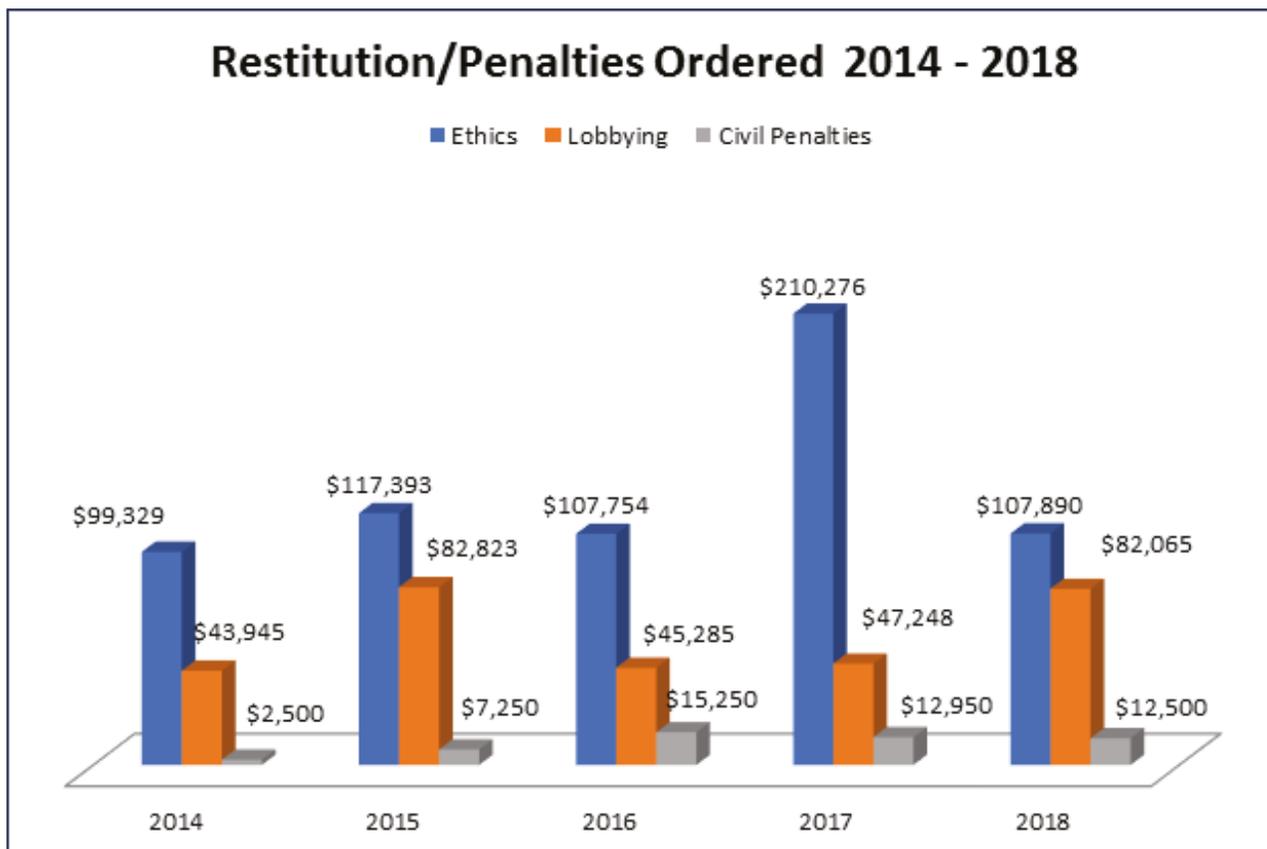
## Commission Ordered Penalties and Restitution

Pursuant to Section 1107(13) of the Ethics Act (65 Pa.C.S. § 1107 (13)), the Commission is empowered to issue findings, reports and orders relating to investigations initiated pursuant to Section 1108 (65 Pa.C.S. § 1108) of the Act. Any order issued by the Commission finding that a public official or public employee has obtained a financial gain in violation of the Pennsylvania Public Official and Employee Ethics Act may require the subject of the investigation to make payment of restitution to the appropriate governmental body. The ordering of restitution is in addition to any other penalties provided for in the Ethics Act, such as the Treble Penalty provision. Any person who obtains financial gain in violation of the Ethics Act could face the possibility of being ordered to pay a sum of money equal to three times the amount of the financial gain (65 Pa.C.S. 1109 (c)).

During calendar year 2018 the Commission ordered the payment of \$107,890.32 in restitution and/or treble penalty. This amount is attributable to orders issued from both negotiated settlements and contested matters following evidentiary hearings.

In addition to any other civil remedy or criminal penalty provided for in this chapter, the Commission may levy a civil penalty upon any person who fails to file a Statement of Financial Interests at a rate of not more than \$25.00 a day for a maximum penalty of \$250.00. The Commission issued \$12,500.00 in civil penalties during calendar year 2018, the majority of which were findings of deficient and/or non-filing for extended periods, such that the maximum possible penalty exceeded ten days, and was therefore capped at \$250.00.

Lastly, as set forth in the Pennsylvania Lobbying Disclosure Law, specifically 65 Pa.C.S. § 13A09(c), any principal, lobbyist and/or lobbying firm who has negligently failed to register or report as required is subject to assessment of an administrative penalty not to exceed \$50.00 a day. Effective April 16, 2018, the administrative penalty increased under Act of February 14, 2018, PL. 2, No. 2 (Act 2 of 2018) directing penalties of \$50.00 a day for the first 10 days late; \$100.00 a day between 10 and 20 days late; and \$200.00 a day after the first 20 days late. During calendar year 2018, the Commission issued penalties totaling \$82,065.00 concerning late/deficient Lobbying registrations and/or quarterly reports.





## Act 114 of 2016

Pursuant to Act 114 of 2016 pertaining to employees of the State Horse Racing Commission, the Commission has responsibilities for:

- (1) Biennially publishing a list of all employment positions within the State Horse Racing Commission with duties that would subject the individuals in those positions to the “revolving door/post-termination” restrictions at 3 Pa.C.S. § 9311(b)(6)(xiv); and

- (2) Making a determination, upon request, as to whether a particular individual/person would be subject to the “revolving door/post-termination” restrictions at 3 Pa.C.S. § 9311(b)(6)(xiv).

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## Pennsylvania Race Horse Development and Gaming Act

Pursuant to the Pennsylvania Race Horse Development and Gaming Act (“Gaming Act”), 4 Pa.C.S. § 1101, et seq., the Commission has responsibilities for:

- (1) Biennially publishing a list of all state, county, municipal, and other government positions meeting the definitions of the terms “public official” set forth in Section 1512(b) of the Gaming Act or “executive-level public employee” set forth in Section 1103 of the Gaming Act, for the purpose of enabling the identification of persons who would be subject to certain prohibitions of Section 1512 of the Gaming Act;
- (2) Biennially publishing a list of all positions of employment with the Gaming Control Board or with independent contractors to the Board that are subject to the “revolving door/post termination” restrictions of Sections 1201(h)(13) and (13.1) of the Gaming Act;
- (3) Biennially publishing a list of all positions within the Pennsylvania State Police, the Pennsylvania Office of Attorney General, and the Pennsylvania Department of Revenue that are subject to the “revolving door/post-termination” restrictions of Section 1512.1(a) of the Gaming Act;
- (4) Making a determination, upon request, as to whether a particular individual/person would be subject to various prohibitions or “revolving door/post-termination” restrictions within the Gaming Act (see, 4 Pa.C.S. §§ 1201(h)(14), 1512(a.5)(1), 1512.1(e)(1); and
- (5) Determining whether to extend deadlines by which executive-level public employees, public officials, party officers, or their immediate family members would be required to divest themselves of financial interests that they would be prohibited from holding under Section 1512 of the Gaming Act.

### GAMING ACT DETERMINATIONS

From January 1, 2018, through December 31, 2018, there was one Determination issued by the Commission under Section 1201(h)(14) of the Gaming Act, 4 Pa.C.S. § 1201(h)(14).

Paper copies of Commission Determinations are available at cost from the Commission or free of charge via the Commission’s e-Library, which may be accessed via the Commission’s website at [www.ethics.pa.gov](http://www.ethics.pa.gov).

### GAMING LISTS

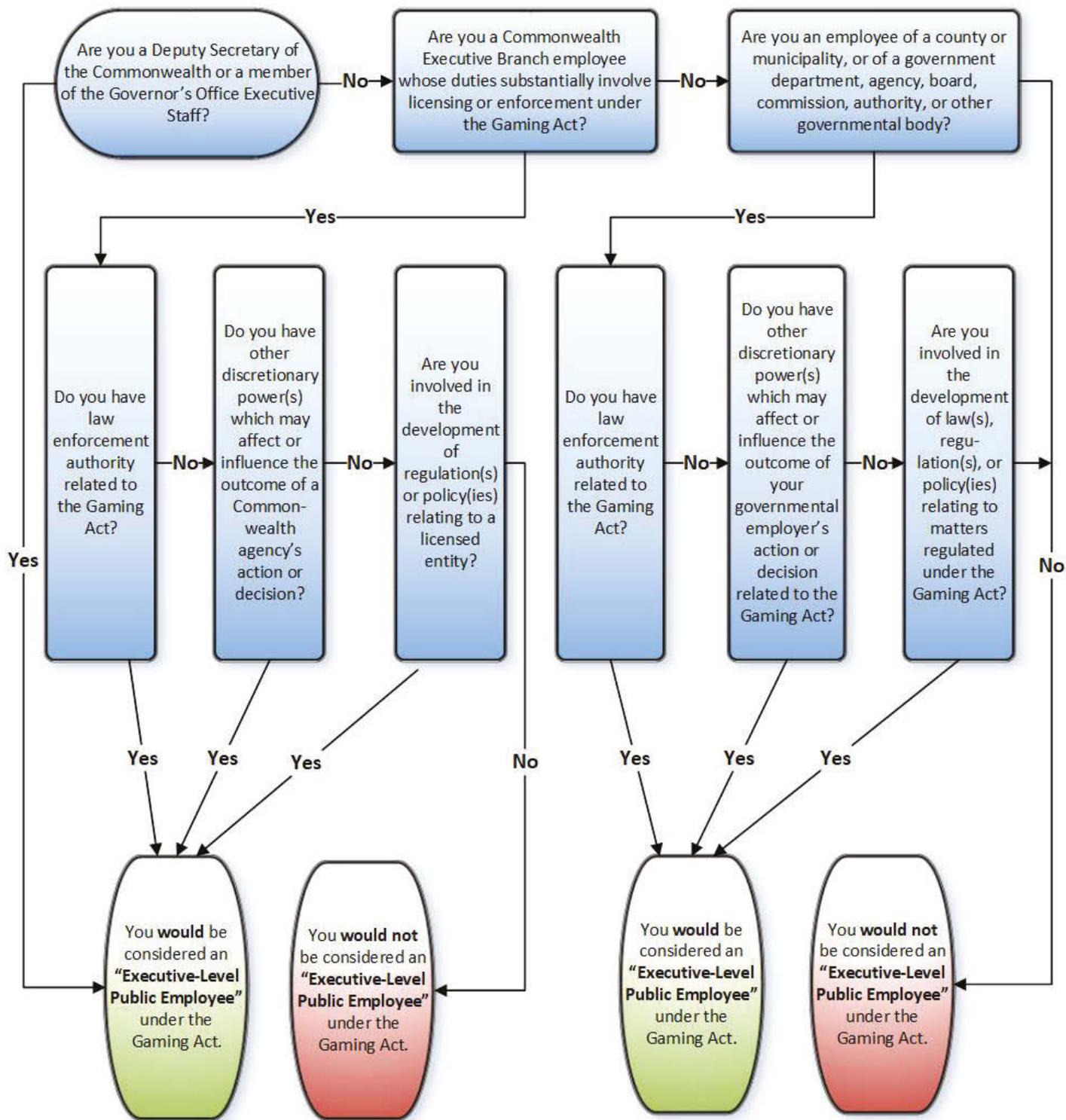
Lists developed by the Commission pursuant to the Gaming Act are published biennially in the Pennsylvania Bulletin, and they are also accessible via the Commission’s website within its e-Library at [www.ethics.pa.gov](http://www.ethics.pa.gov) and via the Pennsylvania Gaming Control Board’s website at [www.gamingcontrolboard.pa.gov](http://www.gamingcontrolboard.pa.gov), which features a link to the Commission’s e-Library.

### STATUS AS AN EXECUTIVE-LEVEL PUBLIC EMPLOYEE OR PUBLIC OFFICIAL

The term “executive-level public employee” is defined in Section 1103 of the Gaming Act. The term “public official” is defined in Section 1512(b) of the Gaming Act.

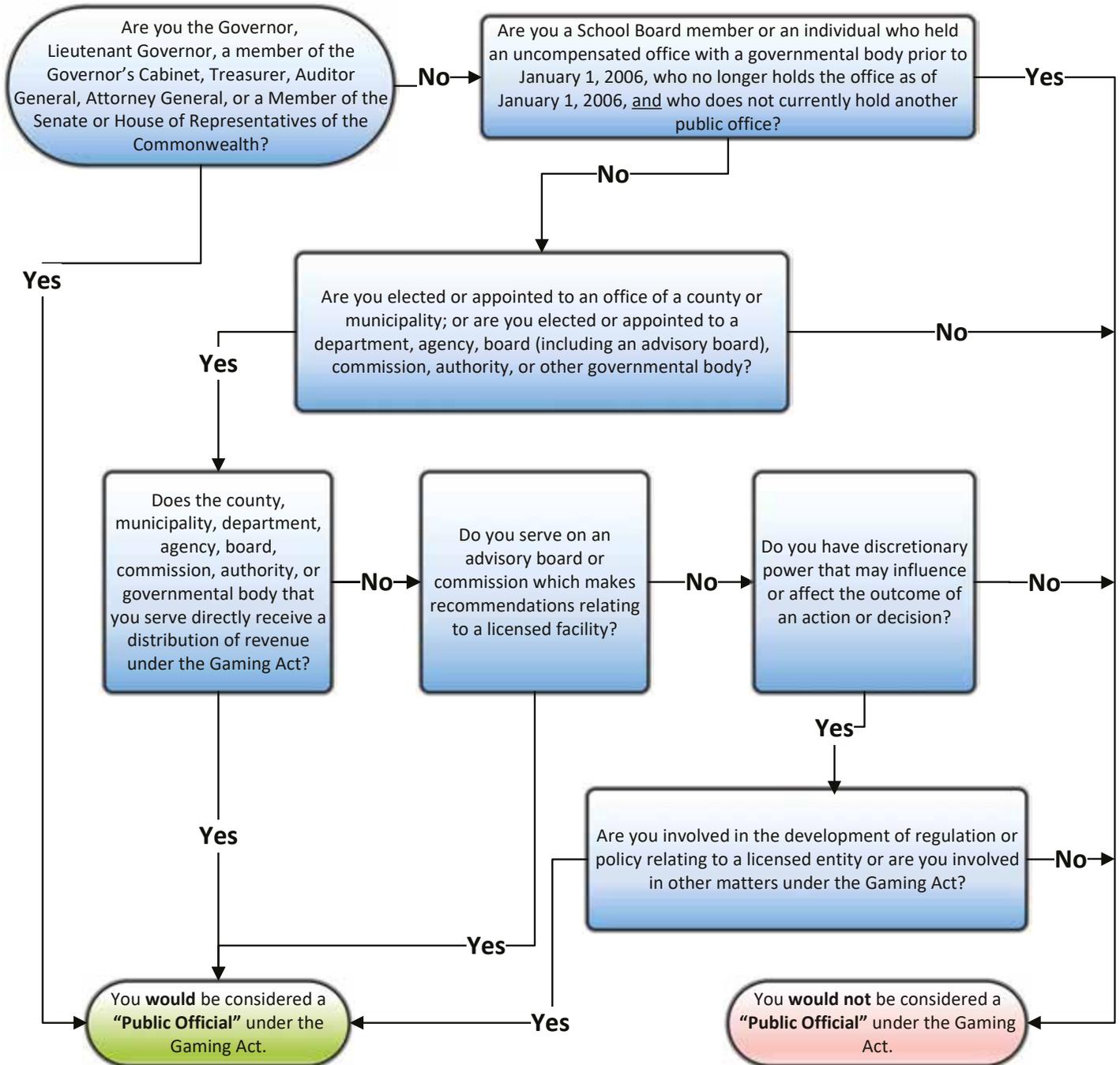


# GAMING ACT: EXECUTIVE-LEVEL PUBLIC EMPLOYEE FLOWCHART





# GAMING ACT: PUBLIC OFFICIAL FLOWCHART





# Pennsylvania Medical Marijuana Act

On April 17, 2016, the Governor of Pennsylvania signed into law Act 16 of 2016, the Medical Marijuana Act, which charged the Commission with new responsibilities.

Pursuant to Section 2101.1 of the Medical Marijuana Act, the Commission now has responsibilities for:

- (1) Issuing determinations, upon request, as to whether particular persons would be subject to restrictions regarding holding a financial interest in or being employed by a medical marijuana organization or a holding company, affiliate, intermediary or subsidiary thereof; and
- (2) Biennially publishing a list of all state, county, municipal and other government positions meeting the applicable definitions of the terms “public official” or “executive-level public employee,” which are two of the categories of persons subject to the aforesaid restrictions.

## MEDICAL MARIJUANA ACT DETERMINATIONS

From January 1, 2018, through December 31, 2018, there were no Determinations issued by the Commission under Section 2101.1(d)(1) of the Medical Marijuana Act, 35 PS. § 10231.2101.1(d)(1). Determinations under the Medical Marijuana Act are public records.

Paper copies of Commission Determinations are available at cost from the Commission. Determinations are also accessible within the Commission’s e-Library, which may be accessed via the Commission’s website at [www.ethics.pa.gov](http://www.ethics.pa.gov).

## MEDICAL MARIJUANA ACT LISTS

Lists developed by the Commission pursuant to the Medical Marijuana Act will be published biennially in the Pennsylvania Bulletin and will also be accessible within the Commission’s e-Library, which may be accessed via the Commission’s website at [www.ethics.pa.gov](http://www.ethics.pa.gov).

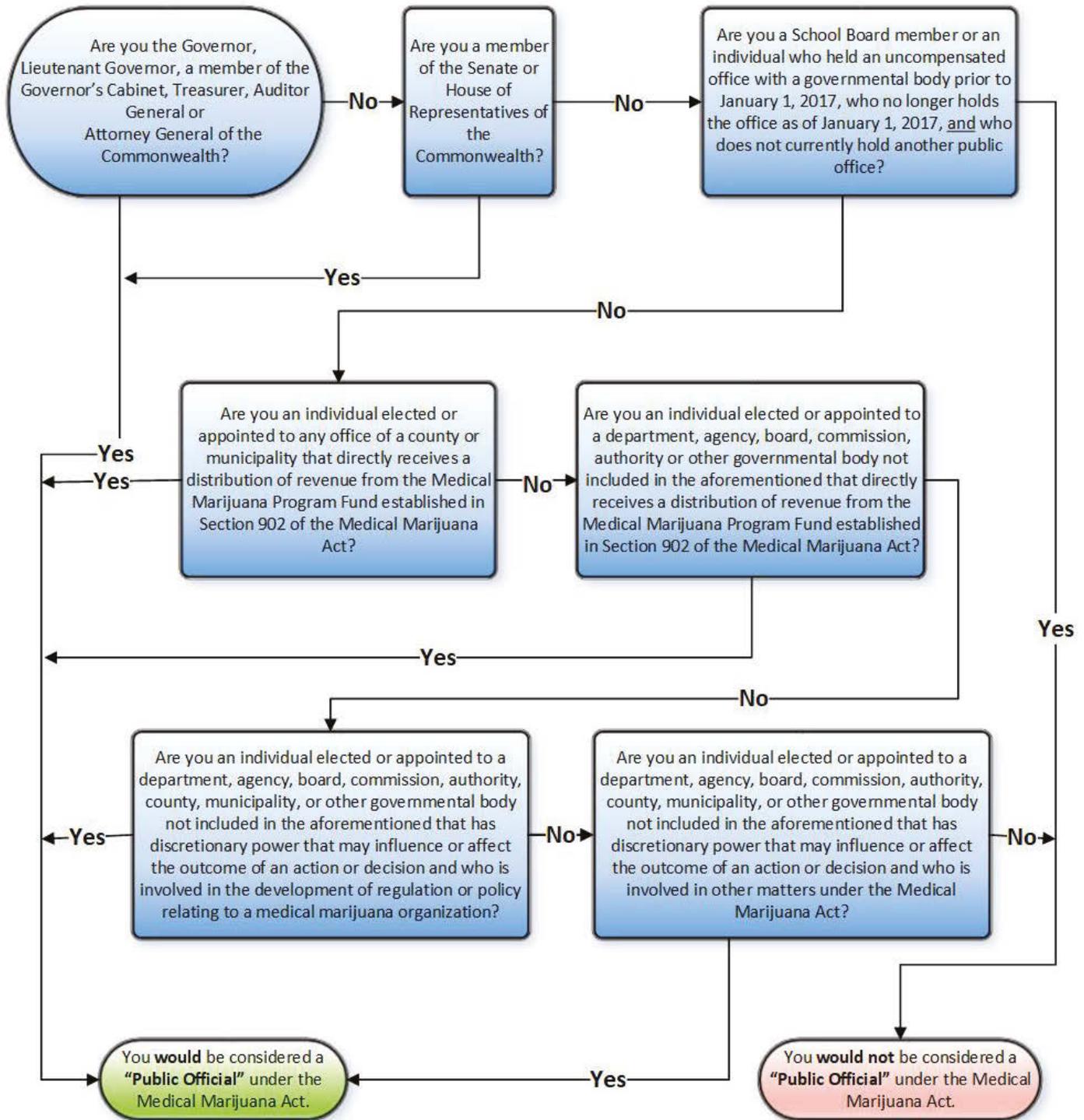
## STATUS AS AN EXECUTIVE-LEVEL PUBLIC EMPLOYEE OR PUBLIC OFFICIAL

The term “executive-level public employee” is defined as it is defined at Section 1103 of the Gaming Act, 4 Pa.C.S. § 1103, with any references to “this part” referring to the Medical Marijuana Act rather than the Gaming Act. See, Knox, Determination 17-3001. The term “public official” is defined in Section 2101.1(e) of the Medical Marijuana Act.





# MEDICAL MARIJUANA ACT: PUBLIC OFFICIAL FLOWCHART





## COGEL: Council on Governmental Ethics Laws

The Commission has continued to be involved in the activities of the Council on Governmental Ethics Laws (COGEL). COGEL is an international professional association of agencies, organizations, and individuals with duties and responsibilities relating to governmental ethics, lobbying registration and reporting, campaign finance reporting and administration, election, and freedom of information laws. More information on COGEL may be found at [www.COGEL.org](http://www.COGEL.org).

The 2018 Annual COGEL Conference was held from December 9-12, 2018, in Philadelphia, Pennsylvania, and several Commission staff members and Commissioners were in attendance.

The 2019 Annual COGEL Conference will be held from December 15-18, 2019, in Chicago, Illinois.

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## Public Outreach and Training

The Commission considers its duty to educate public officials/public employees, as well as members of the public in general, a key factor in fulfilling its responsibilities under the Ethics Act. Through the Commission's public outreach efforts, thousands of public officials/public employees, who might otherwise receive no education or training regarding the Ethics Act, have been provided guidance in a seminar/classroom-type setting designed to encourage discussion. In addition, Commission staff hosts an Ethics Exhibit at the Pennsylvania State Association of Township Supervisors (PSATS) annual convention, where attendees are afforded an opportunity to view the Commission's informational booth and engage in conversation with staff.

During calendar year 2018, Commission staff participated in 38 separate training and/or outreach events which were held at various locations throughout the Commonwealth of Pennsylvania. The in-state training and outreach programs consisted of various levels of presentations geared towards local, as well as state level, public officials and employees. Ethics training/presentations occurred at the Allegheny County and Western Pennsylvania Township Commissioner's Association Fall Conference, at locations in Cranberry Woods, Horsham, Wilkes-Barre, and Harrisburg in support of the Pennsylvania State Association of Boroughs (PSAB), at the Annual Fall Workshop of the Pennsylvania Association of Public Employee Retirement Systems, the State County Treasurer's Conference, and at three locations of the Pennsylvania Municipal Authorities Association (PMAA) in Breinigsville, Mars, and Camp Hill.

Presentations were also made to the following state agencies and city offices: City of Bethlehem, City of Johnstown Ethics Board, City of Philadelphia Law Office, Office of General Counsel Labor and Employment Practice Group, Pennsylvania Early Learning Council, Philadelphia Parking Authority, Public School Employees' Retirement System, and the State

Board to Assess Sexually Violent Predators. In addition, two presentations were completed for the Governor's office regarding Statements of Financial Interests training for Board Administrators.

Commission staff also participated in several Ethics panels: PMAA's Solicitor Panel, the Office of Administration's panel regarding Business Ethics, Pennsylvania Association of School Administrators regarding Characteristics and Challenges of Ethical Leadership, the annual COGEL conference in December regarding Emerging Trends in Investigations and Enforcements, and an Ethics Panel at Pennsylvania State University.

Local trainings occurred at Greater Johnstown School District, Lamar Township, the Local Government Academy, Luzerne County, the Moshannon Valley Council of Governments, the Pennsylvania Municipal League and Philadelphia School District. In addition, a webinar was presented to the Pennsylvania Association of School Administrators.

Commission staff also presented an Ethics training for the Philadelphia Bar Association, and two trainings for the Pennsylvania Bar Institute: one as a live stream webinar to approximately 250 attorneys and the other as a live broadcast event for the Land Use Institute.

These presentations were all well received and attended by hundreds of individuals in total. The Commission expects to continue its training efforts for calendar year 2019. It is estimated that between 1,000 and 5,000 individuals will have the opportunity to attend and participate in various educational/training programs as a result of the Commission's outreach efforts. Individuals seeking training by the Commission can do so by submitting a written request to the Commission, or by submitting the Training Request Form available on the Commission's website at [www.ethics.pa.gov](http://www.ethics.pa.gov).





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