



**pennsylvania**  
STATE ETHICS COMMISSION

**2023 ANNUAL REPORT**

Public Office is a Public Trust

TABLE OF CONTENTS



**Message from the Executive Director** . . . . . 1

**General**

    Introduction. . . . . 2

    Commissioners and Staff . . . . . 3-7

    Commission Member and Employee Restrictions . . . . . 7

    Contact Information . . . . . 8

    Public Information . . . . . 8

    Budget. . . . . 9

**Public Official and Employee Ethics Act**

    Powers and Duties of the Ethics Commission . . . . . 10

    Restricted Activities . . . . . 10

    Financial Disclosure Requirements . . . . . 11

        Civil Penalties . . . . . 12

        Civil Penalty Enforcement Flowchart. . . . . 13

    Opinions and Advices . . . . . 14

        Opinions and Advices Flowchart . . . . . 15

    Complaints/Investigations . . . . . 16

        Investigative Flowchart. . . . . 18

**Pennsylvania Lobbying Disclosure Law** . . . . . 19

**Commission-Ordered Penalties and Restitution** . . . . . 20

**Act 114 of 2016** . . . . . 21

**Pennsylvania Race Horse Development and Gaming Act.** . . . . 21

    Gaming Act: Executive-Level Public Employee Flowchart . . . . . 22

    Gaming Act: Public Official Flowchart . . . . . 23

**Act 42 of 2017 (Video Gaming Act)**. . . . . 24

    Video Gaming Act: Executive-Level Public Employee Flowchart . . . . . 25

    Video Gaming Act: Public Official Flowchart . . . . . 26

**Pennsylvania Medical Marijuana Act (MMA).** . . . . 27

    MMA: Executive-Level Public Employee Flowchart . . . . . 28

    MMA: Public Official Flowchart . . . . . 29

**COGEL: Council on Governmental Ethics Laws** . . . . . 30

**Public Outreach and Training** . . . . . 30





## MESSAGE FROM THE EXECUTIVE DIRECTOR



It is my pleasure to submit for your review the Pennsylvania State Ethics Commission’s Annual Report for calendar year 2023.

The Commission’s core mission and guiding principle is that public office is a public trust. In 2023, the Commission and its staff worked to ensure that our work aligns with our core mission and guiding principle, and we did that in three major ways.

First, we took steps to be **proactive**. We did this by teaching about the Ethics Act and Lobbying Disclosure Law. In 2023, we provided live instruction to approximately 1,300 public officials and public employees across Pennsylvania. We also created web-based and recorded trainings to reach an even wider audience, which were viewed approximately 2,400 times since being posted. We began affirmatively inviting governmental bodies to host in-person trainings, and we have increased those invitations in 2024. We purchased a learning management system and will soon roll out topic-specific on-demand trainings that explain concepts in a simple and easily understandable way which we will make available to everyone in 2024.

As we have done since the Commission was originally established, we continued to provide sound, useful, and prompt advice regarding obligations and restrictions of the Ethics Act, Lobbying Disclosure Law, and the other laws under which we are tasked with administering. In 2023, the Commission issued 70 Advisory Opinions, prospectively guiding public officials and public employees on their obligations and responsibilities so they can be confident they are not running afoul of these laws.

We also worked to ensure that guidance to individuals is clear and simple. In 2023, we began a technical update of our Commission’s regulations for statutory consistency, clarity, and modernization, and those updated regulations were fully promulgated in 2024. We also began a more substantive review of our regulations and will seek considerable public input into any proposed changes before beginning the regulatory promulgation process.

Second, we held people **accountable** by conducting the highest quality investigations into violations of the Ethics Act and Lobbying Disclosure Law. The meticulous work of our skilled investigators ensured our investigations were thorough, fair, and held those who have violated the law accountable in an appropriate manner. We referred complaints that appeared to be criminal rather than administrative in nature to appropriate law enforcement. We also pursued administrative penalties against those lobbyists, lobbying firms, and principals who failed to meet their filing requirements under the Lobbying Disclosure Law.

Third, we promoted government that is **transparent**. We did this by administering and enforcing the timely and complete filing of Statements of Financial Interests (SFIs) by all public officials and public employees in Pennsylvania. This important duty ensured that members of the public could identify conflicts between the public official’s or public employee’s personal interests and their public responsibilities. In 2023, we printed and mailed SFIs to approximately 6,500 governmental bodies in Pennsylvania for distribution to their public officials and public employees for completion. We also reviewed every SFI filed through our online filing system, conducted audits, and pursued civil penalties for deficient and delinquent filers. While we do not know the exact number of SFIs filed each year (since many file at the local government level), we believe approximately 160,000 public officials and public employees filed SFIs in 2023, representing a tremendous level of transparency by state and local public officials and public employees.

The State Ethics Commission has long played an important role in promoting faith in government. We look forward to continuing this critical work for the citizens of the Commonwealth of Pennsylvania in 2024 and beyond.

Sincerely,

Mary W. Fox, Executive Director



GENERAL

INTRODUCTION

In accordance with the provisions of the Public Official and Employee Ethics Act (“Ethics Act”), the Pennsylvania State Ethics Commission is issuing this annual report of Commission operations for calendar year 2023.

The Commission’s three main functions which seek to uphold the public trust are: (1) administration and enforcement of the financial disclosure requirements; (2) providing advice and guidance in the form of written advisories to public officials and employees (or their appointing authorities or employers) regarding their duties and responsibilities under the Ethics Act; and (3) conducting investigations, either through receipt of a sworn complaint or upon its own motion, of alleged violations of the Ethics Act.

In addition to its responsibilities under the Ethics Act, the Commission is vested with enforcement duties under Pennsylvania’s Lobbying Disclosure Law including conducting investigations in relation to alleged violations of the filing provisions of the Lobbying Disclosure Law. Commission staff has coordinated with the Pennsylvania Department of State to ensure timely filing of mandated reports. The Commission issued rulings with penalties in excess of \$65,000 for failure to comply with the reporting requirements of the law. The Commission is also empowered to issue advisory opinions under the Lobbying Disclosure Law.

The Commission has additional responsibilities under the Pennsylvania Racehorse Development and Gaming Act and Act

114 of 2016, the Video Gaming Act, and the Medical Marijuana Act. Each law charges the Commission 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 advice to certain individuals subject to financial interest and revolving door/post termination restrictions under those laws.

The Commission is constantly striving to strengthen the faith and confidence of the citizens of the Commonwealth in their government. The Commission looks forward to its continued service to both the public and those public officials and employees it regulates.



COMMISSIONERS & STAFF

COMMISSIONERS

The Commission is an independent agency of the commonwealth, comprised of seven Members who are primarily vested with the responsibility of administering and enforcing the provisions of the Ethics Act and Lobbying Disclosure Law, as well as providing guidance to those individuals who are subject to the provisions of those laws. 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, no more than two of whom may be of the same political party. Commission Members are appointed without Senate confirmation

The Commission was comprised of six Members for calendar year 2023.

**COMMISSIONERS**

Michael A. Schwartz, Esquire

Shelley Y. Simms, Esquire (*served from January 26, 2018 – November 1, 2023*)

Rhonda Hill Wilson, Esquire

Paul E. Parsells

David L. Reddecliff

Robert P. Caruso

Emilia McKee Vassallo, Esquire (*replaced Commissioner Simms on November 1, 2023*)

COMMISSIONER BIOGRAPHIES

MICHAEL A. SCHWARTZ, COMMISSIONER



Michael A. Schwartz, Esquire, was appointed as a Member of the Commission on October 12, 2017, by the Honorable Tom Wolf, Governor of the Commonwealth of Pennsylvania. The Commission elected him Vice Chair on January 24, 2023, and Chair on October 4, 2023.

Mr. Schwartz is a partner and chair of the White Collar Litigation and Investigations Practice Group of Troutman Pepper, resident in the Philadelphia office. Mr. Schwartz focuses his practice in the areas of criminal defense and counseling, defense of False Claims Act and Foreign Corrupt Practices Act matters, internal corporate investigations, corporate compliance programs, corporate monitorships, and First Amendment matters. Mr. Schwartz has significant experience in the pharmaceutical and medical device, health care, construction, and government contracting industries. Mr. Schwartz serves on the firm’s Policy Committee.

Before joining Pepper Hamilton 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. The Commission elected Ms. Simms Chair on January 24, 2023, and she served in that position until October 4, 2023.

Ms. Simms is General Counsel and Chief Compliance Officer of Xponance, Inc., a registered investment advisor that provides customized equities and fixed income portfolios for institutional investors. Ms. Simms has oversight responsibility for the legal and compliance matters at Xponance. She is a member of the firm’s Senior Management and Investment Governance Committees, and is the chairperson of the firm’s Compliance-Operations-Risk Committee.

Prior to joining Xponance 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 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.



**RHONDA HILL WILSON,  
COMMISSIONER**

Rhonda Hill Wilson, Esquire was appointed as a Member of the Commission on January 3, 2022, by the Honorable Jay Costa, Minority Leader of the Pennsylvania Senate. The Commission elected her Vice Chair on October 4, 2023.

Rhonda Hill Wilson, Esquire is an attorney with the Law Offices of Rhonda Hill Wilson, P.C. Ms. Hill Wilson represents individuals and families in automobile negligence, premises liability, nursing home and medical negligence, and wrongful death cases. Ms. Hill Wilson is past president of the National Bar Association’s Women’s Law Division-Philadelphia and a past member and past national officer of the American Association for Justice (formerly known as the Association of Trial Lawyers of America) and its National College of Advocacy Board of Trustees and its Executive Committee. She is a member of the Pennsylvania Association

for Justice, the Philadelphia Trial Lawyers Association and the Philadelphia Bar Association. She is a member of the Advisory Board of the Barrister’s Association of Philadelphia, Inc. and been awarded the Austin Norris Award for Community Service by the Barristers Association in 2013. In 2022, she was awarded the Barrister’s Association of Philadelphia’s Woman of Distinction. She is a Life Member of the National Bar Association and was awarded the President’s Award by the National Bar Association in 1994 and 2012.

Ms. Hill Wilson previously served as Co-Chair on the Pennsylvania Interbranch Commission for Gender, Racial and Ethnic Fairness. She was previously a radio host on WURD radio station in Philadelphia. She is committed to equal access to the courts and access to health care for all.



**PAUL E. PARSELLS,  
COMMISSIONER**

Paul E. Parsells was appointed as a Member of the Commission on June 7, 2022, by The Honorable Joanna McClinton, Minority Leader of the House of Representatives.

Mr. Parsells retired after 40 years of service to the Commonwealth in 2021. Upon accepting a position

with the Commonwealth, he served two years as a field auditor for the Auditor General, and then spent the next 38 years serving the House of Representatives.

From 1988 to 2006, Commissioner Parsells served as the Executive Director of the House Transportation Committee under six different Chairmen. In that position he also served as the voting designee for the Chairman on the State Transportation Commission, Rail Freight Advisory Committee, Aviation Advisory Committee, Motor Carrier Safety Advisory Committee and the Pedalcycle and Pedestrian Advisory Committee.

In 2006 he was asked to serve as Chief of Staff for the Majority Whip and later as Chief of Staff for Speaker Keith McCall. When the Speaker retired, Commissioner Parsells was named Transportation Policy Director for the Leader.

Mr. Parsells finished his career as Caucus Chief of Staff for Leaders Frank Dermody (2014-2020) and Joanna McClinton (2021).

Commissioner Parsells is a 1978 graduate of Mercer University with a B.A. in Business Administration, and still has a few remaining battle scars from his soccer career there.



**DAVID L. REDDECLIFF,  
COMMISSIONER**

David L. Reddecliff was appointed as a Member of the Commission on September 16, 2022, by the Honorable Bryan D. Cutler, Speaker of the Pennsylvania House of Representatives.

Dave grew up in Conemaugh Township, Somerset County and is

a graduate of Indiana University of Pennsylvania, with a B.A. in Political Science. He married Carole in 1986 and together raised three wonderful children; Andrew, Maggie and Hannah.

Dave retired on March 23, 2021 after more than 38 extraordinary years with the Pa House of Representatives. His career was varied, holding more than 12 different positions beginning in 1982. On December 9, 2015, the House unanimously elected him as the 106th Chief Clerk, one of the oldest positions in state government, dating to 1682.



**ROBERT P. CARUSO,  
COMMISSIONER**

Robert P. Caruso was appointed as a Member of the State Ethics Commission on January 10, 2023 by the Honorable Tom Wolf, Governor of the Commonwealth of Pennsylvania.

Mr. Caruso was employed by the State Ethics Commission from 1982

until retiring in April 2022. He was the longest tenured employee in Commission history. Mr. Caruso held a number of positions with the Commission’s Investigative Division including Special Investigator, Director of Investigations and Deputy Executive Director. He was named the Commission’s Executive Director in January 2013 and served in that capacity until his retirement.

During his lengthy career with the State Ethics Commission Mr. Caruso successfully investigated the Commission’s highest profile conflict of interest cases that resulted in criminal prosecutions and convictions of public officials and employees at both the state and local levels of government. Mr. Caruso’s achievements include the first convictions under the State Ethics Act of public officials selling votes in return for approval of a major mall project and multiple federal convictions as a result of a state official accepting bribes in return for the award of technology grants. As executive director, Mr. Caruso oversaw the implementation of the Commission’s electronic statements of financial interests filing system and the initiation of a case management tracking system.

Prior to joining the Commission Mr. Caruso was employed by Clearfield County in the Office of District Attorney and as a parole officer.

Mr. Caruso graduated from Pennsylvania State University with a Bachelor of Science in Law Enforcement and earned a Master of Arts in Criminal Justice from Indiana University of Pennsylvania.

In 2018 he received the Outstanding Alumni Award from Penn State’s Department of Criminology and Sociology. Mr. Caruso serves on the Board of Visitors for the Criminology and Sociology Department. Mr. Caruso also serves on the Board of Compliance for Vibra Healthcare.



**EMILIA MCKEE VASSALLO,  
COMMISSIONER**

Emilia McKee Vassallo was appointed as a Member of the Commission on November 1, 2023, by the Honorable Josh Shapiro, Governor of the Commonwealth of Pennsylvania.

Ms. McKee Vassallo is a White

Collar Defense/Internal Investigations Partner in the Philadelphia office of national law firm Ballard Spahr. She is an experienced litigator and legal counselor, she focuses on conducting internal investigations and representing businesses, organizations, and individuals in white collar defense and complex commercial litigation. Ms. McKee Vassallo has conducted internal investigations of high-profile, highly sensitive matters for major corporations, government agencies, and institutions, including investigations spurred by whistleblower complaints to federal and state agencies. She applies her investigative and analytical skills and experience in civil and criminal cases to litigate complex commercial disputes, with an emphasis on unfair competition cases. Ms. McKee Vassallo’s experience encompasses advising on antitrust and securities-related compliance, government investigations, and enforcement actions by the Securities and Exchange Commission and the Department of Justice, including counsel and training on the Foreign Corrupt Practices Act. She also has experience with private securities litigation, where she has successfully represented clients in contentious arbitration of high-stakes disputes. Ms. McKee Vassallo also maintains an active pro bono practice and is a volunteer on the Prisoner Civil Rights Panel in the U.S. District Court for the Eastern District of Pennsylvania.

Ms. McKee Vassallo served as clerk for the Honorable Ann Claire Williams, United States Court of Appeals for the Seventh Circuit, and the Honorable Lawrence F. Stengel, United States District Court for the Eastern District of Pennsylvania.

She is a Fellow for the Leadership Council on Legal Diversity, is a Member of the Executive Committee of the Temple Law Alumni Association, participates in the Corporate Counsel Women of Color Conference, is a Stakeholder of the Charting Your Own Course program, and serves on Ballard Spahr’s Hiring Committee and Diversity, Equity, and Inclusion Council.

She has been recognized as Philadelphia Business Journal’s “40 Under 40” List in 2023, named The Best Lawyers in America “Ones to Watch,” Criminal Defense: White-Collar, 2021-2024 (Philadelphia), and recognized as a 2022 “Lawyer on the Fast

(cont’d on page 6)



Track” by The Legal Intelligencer. She received the Philadelphia Business Journal’s Amber Racine Award in 2021 and was named to the “40 & Under List,” - Competition/Antitrust (Northeast) in 2023 by Benchmark Litigation.

Ms. McKee Vassallo is a magna cum laude graduate of the Temple University James E. Beasley School of Law where she received the Order of the Coif and served as a Note and Comment Editor for the Temple Law Review. She is also a cum laude graduate of the University of Pennsylvania where she was a Member of the Pi Gamma Mu Honor Society.

Ms. McKee Vassallo has been admitted to the bar in New Jersey, Pennsylvania, the U.S. District Court for the Eastern District of Pennsylvania, the U.S. Court of Appeals for the Third Circuit, the U.S. Court of Appeals for the Seventh Circuit, and the U.S. Supreme Court.



STAFF

Executive Division  
Mary W. Fox, Executive Director  
Jeffery Frankenburger, Deputy Executive Director  
Julie Gibson, Executive Secretary

Office Of Chief Counsel  
Bridget K. Guilfoyle, Chief Counsel  
Martin W. Harter, Deputy Chief Counsel  
Esther Estelle, Legal Assistant

ADMINISTRATIVE DIVISION  
Jessica Wenger, Director of Administration  
Stanley G. Weaver, Administrative Officer  
Brittany Beam, Clerk Typist 2/SFI Support  
Jonelle Whitney, Clerk Typist 1/SFI Support  
Sean M. Firestine, Information Technology Administrator and Forensic Specialist

INVESTIGATIVE DIVISION (EASTERN REGION)  
Jenifer Layman, Investigative Counsel  
Michael Garrett, Eastern Regional Director  
Daniel M. Bender, Senior Special Investigator and Training Officer  
Gregory Curran, Special Investigator  
Heather L. Mulhollan, Administrative Officer

INVESTIGATIVE DIVISION (WESTERN REGION)  
Jason P. Bricker, Western Regional Director  
Kathleen Haefner, Special Investigator (retired 5/23)  
Hannah Easley, Special Investigator  
Kylee D. Stevenson, Special Investigator  
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: [ra-ethicswebmaster@pa.gov](mailto:ra-ethicswebmaster@pa.gov)

Western 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:

Mary W. Fox, 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)



PUBLIC INFORMATION

Ethics Commission Website:

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

Ethics Commission E-Library:

<https://www.ethicsrulings.pa.gov>

Statements of Financial Interests Filings:

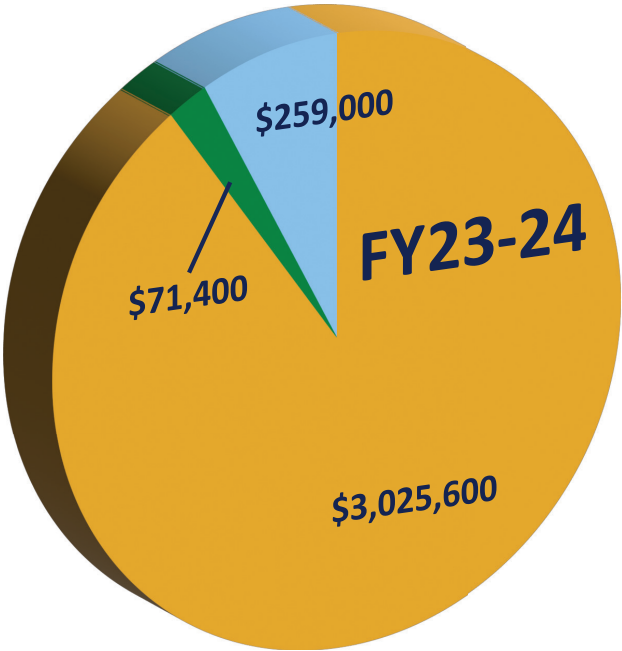
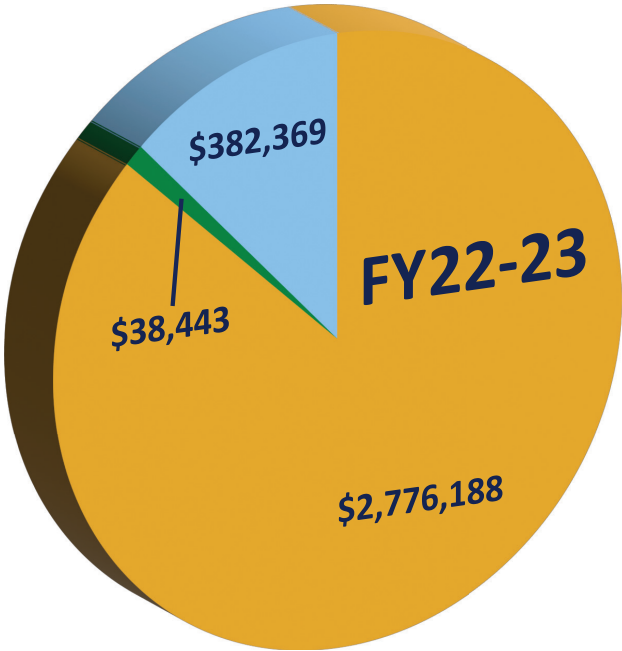
All Statement of Financial Interests forms filed with the Commission are available for public inspection via the Commission’s website at [www.ethics.pa.gov](http://www.ethics.pa.gov).

Commission Decisions:

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

TWO-YEAR BUDGET APPROPRIATION BREAKDOWN

2022-2023		2023-2024	
■ Employee salaries/benefits. ....	\$2,776,188	■ Employee salaries/benefits. ....	\$3,025,600
■ Miscellaneous personnel services .....	\$38,443	■ Miscellaneous personnel services .....	\$71,400
■ Agency Operations. ....	\$382,369	■ Agency Operations. ....	\$259,000
Total. ....	\$3,197,000	Total. ....	\$3,356,000





# PUBLIC OFFICIAL AND EMPLOYEE ETHICS ACT

## POWERS AND DUTIES

The powers and duties of the Commission under the Public Official and Employee Ethics Act (Ethics Act), 65 Pa.C.S. § 1101 et seq., 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 investigations.
- Preparing and publishing an annual report, special reports, educational materials, and technical studies to further the purposes of the Ethics Act.
- Prescribing rules and regulations to implement the provisions of the Ethics Act (see, 51 Pa. Code § 11.1 et seq.).

## RESTRICTED ACTIVITIES

The Ethics Act restricts the following activities:

Conflicts of Interest - Section 1103(a) of the Ethics Act restricts public officials and public employees from using the authority of their 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.

Seeking and Accepting Improper Influence - 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.

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

Contingent and Severance Payments - 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.

Contracts with a Governmental Body – Section 1103(f) of the Ethics Act provides that where a public official/public employee, their spouse or child, or a business with which they, their 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, that an “open and public process” must 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.

Former Public Official or Public Employee (One-year Revolving Door) - 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.

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

Former Executive-Level State Employee - 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 they actively participated in recruiting to the Commonwealth or that they 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.

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

## FINANCIAL DISCLOSURE REQUIREMENTS

Section 1104 of the Ethics Act requires that public officials, public employees, solicitors, nominees, and candidates for public office file Statements of Financial Interests. Section 1105 of the Ethics Act sets forth what information must be disclosed.

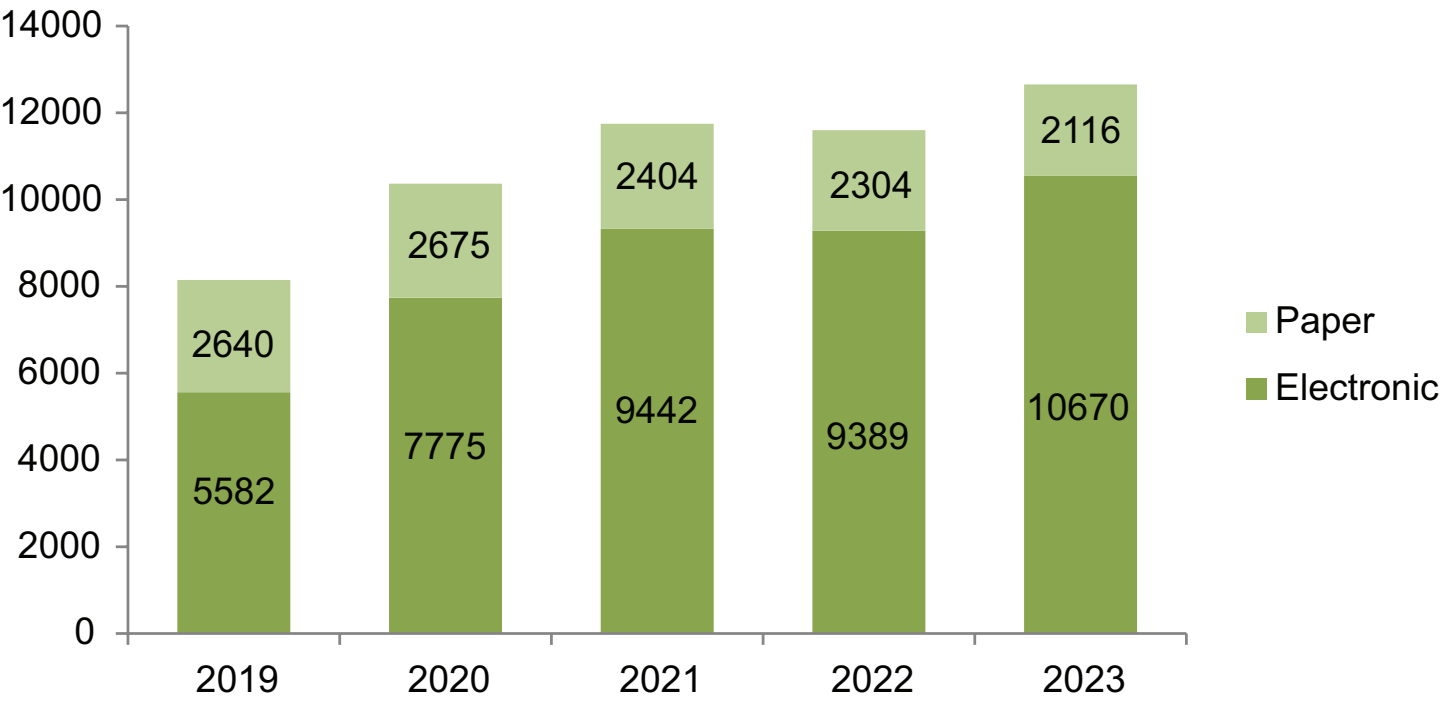
Between December 18 and December 22 of 2023, a total of 166,274 Statement of Financial Interests forms were distributed to 6,597 state, county, and local government entities for distribution to public officials, public employees, and candidates required to file Statements of Financial Interests for the 2023 calendar year pursuant to the Ethics Act.

All individuals filing Statements of Financial Interests have the option to file electronically through the Commission’s website. It is the responsibility of each filer to ensure that a copy of their form is filed with all required filing locations.

For calendar year 2022 (filing year 2023), 12,786 individuals filed Statements of Financial Interests with the Commission. 10,670 (83%) were filed electronically through the Commission’s website.

Those individuals who filed with the Commission included the Governor, Lieutenant Governor, judge candidates (171), as well as current and former: members of the General Assembly (346); members of state boards and commissions (1,854); constables and/or deputy constables (1,168); and state employees (2,857). There were 6,387 additional filers consisting of local government individuals who filed voluntarily with the Commission. The remainder of the filings were made with the governing authority of the political subdivision or other location as required by the Ethics Act.

Statements of Financial Interests Received by the Commission





CIVIL PENALTIES

Those public officials/public employees, solicitors, nominees, and candidates for public office who are required to file Statements of Financial Interests but have failed to do so or have filed a deficient form may be assessed a civil penalty per Section 1109(f) of the Ethics Act. The Civil Penalty process is set forth in the Ethics Act, the Regulations of the Commission (51 Pa. Code § 11.1 et seq.), and 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 sends a Warning Notice Letter to the individual, providing them 20 days to cure the deficiency and/or delinquency without penalty. If the individual fails to file within the cure period, a Final Warning Notice is sent via certified mail, giving the person an additional 20 days to cure the deficiency. If the individual fails to file within that cure period, the Commission may levy a civil penalty of not more than \$25.00 per day up to a maximum of \$250.00 and order the filing of the Statement of Financial Interests.

During the 2023 calendar year, the Commission identified 1,494 public officials/public employees who either filed a deficient Statement of Financial Interests or failed to file as required by the Ethics Act. This included 1,109 individuals who failed to file

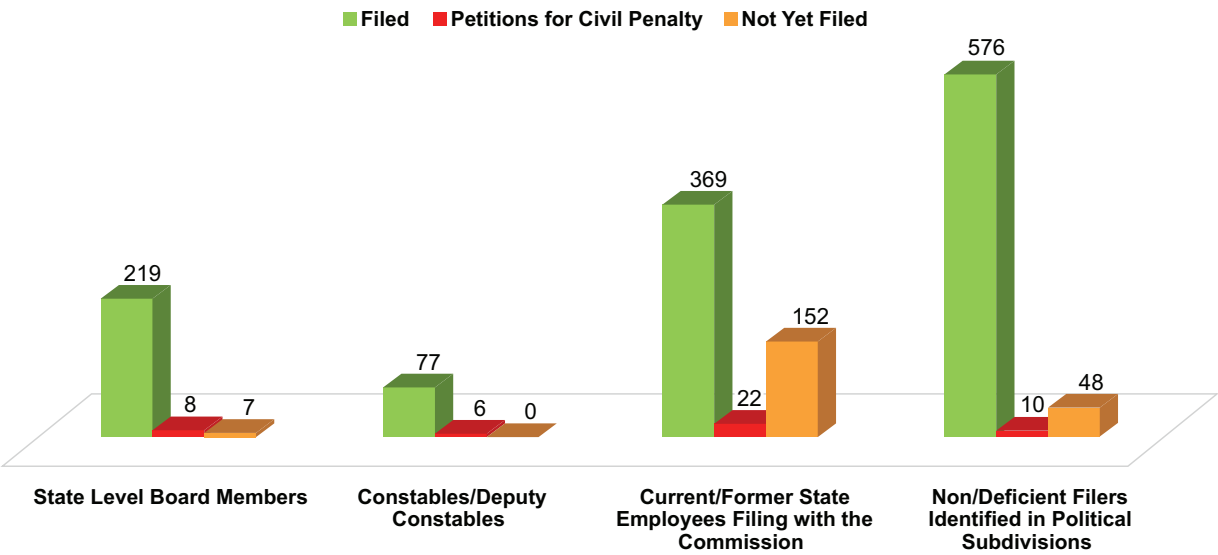
a Statement of Financial Interests and 385 individuals who filed a deficient Statement of Financial Interests. The Commission’s Administrative Division issued 1,494 Warning Notice Letters which resulted in 1,241 individuals filing or amending Statements of Financial Interests by the end of calendar year 2023.

The Commission’s Investigative Division also conducted 17 on-site Compliance Reviews resulting in the identification of 281 delinquent/deficient filers, issuing Warning Notice Letters to those individuals, and resulting in a 90% compliance rate.

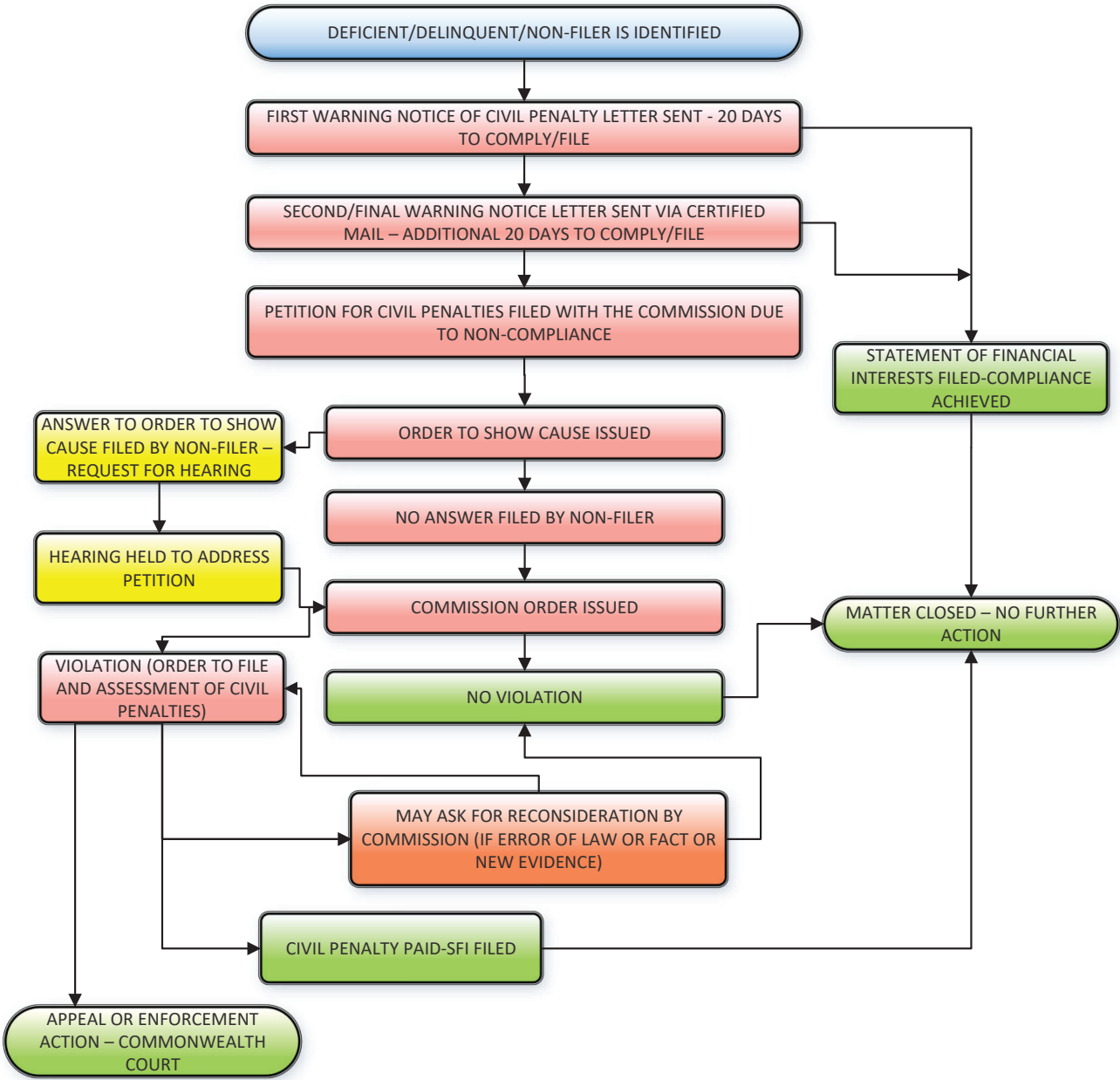
Of the total remaining 253 deficient or delinquent filers, the Commission filed Petitions for Civil Penalties against 46 individuals. The Commission plans to pursue civil penalty proceedings against the remaining deficient or delinquent filers in 2024.

In 2023, the Commission also issued 30 Orders that levied civil penalties against public officials/public employees who failed to correct delinquent/deficient Statements of Financial Interests.

Delinquent/Deficient Non-filers Identified in Calendar Year 2023 by Category



CIVIL PENALTY ENFORCEMENT FLOWCHART





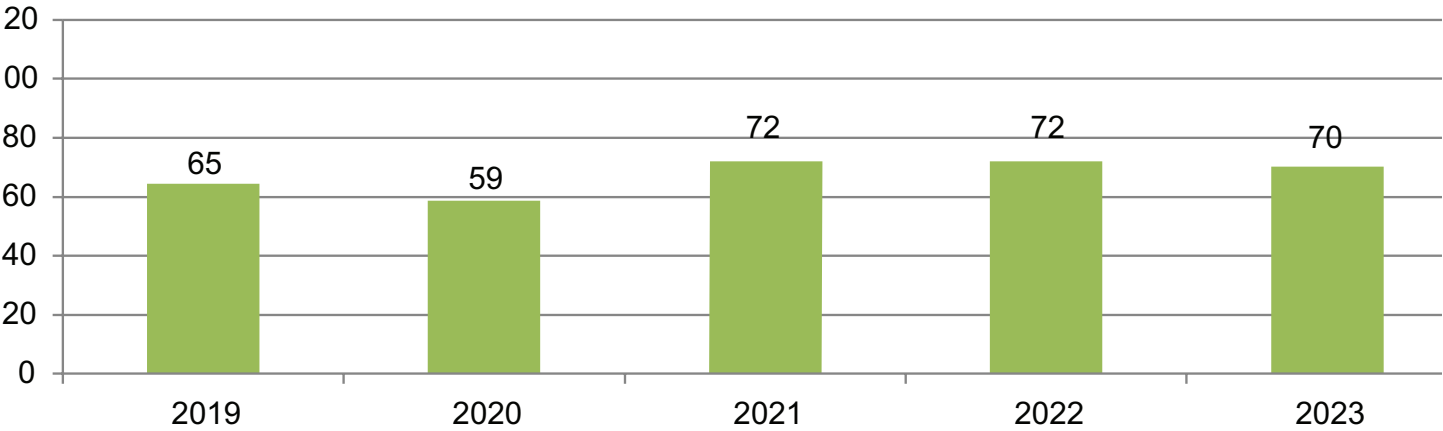
OPINIONS AND ADVICES

The Ethics Act provides public officials, public employees, or their employers or appointing authorities the opportunity to seek prospective Advisory Opinions with regard to their duties or obligations under the Ethics Act, as detailed in Sections 1107(10)-(11).

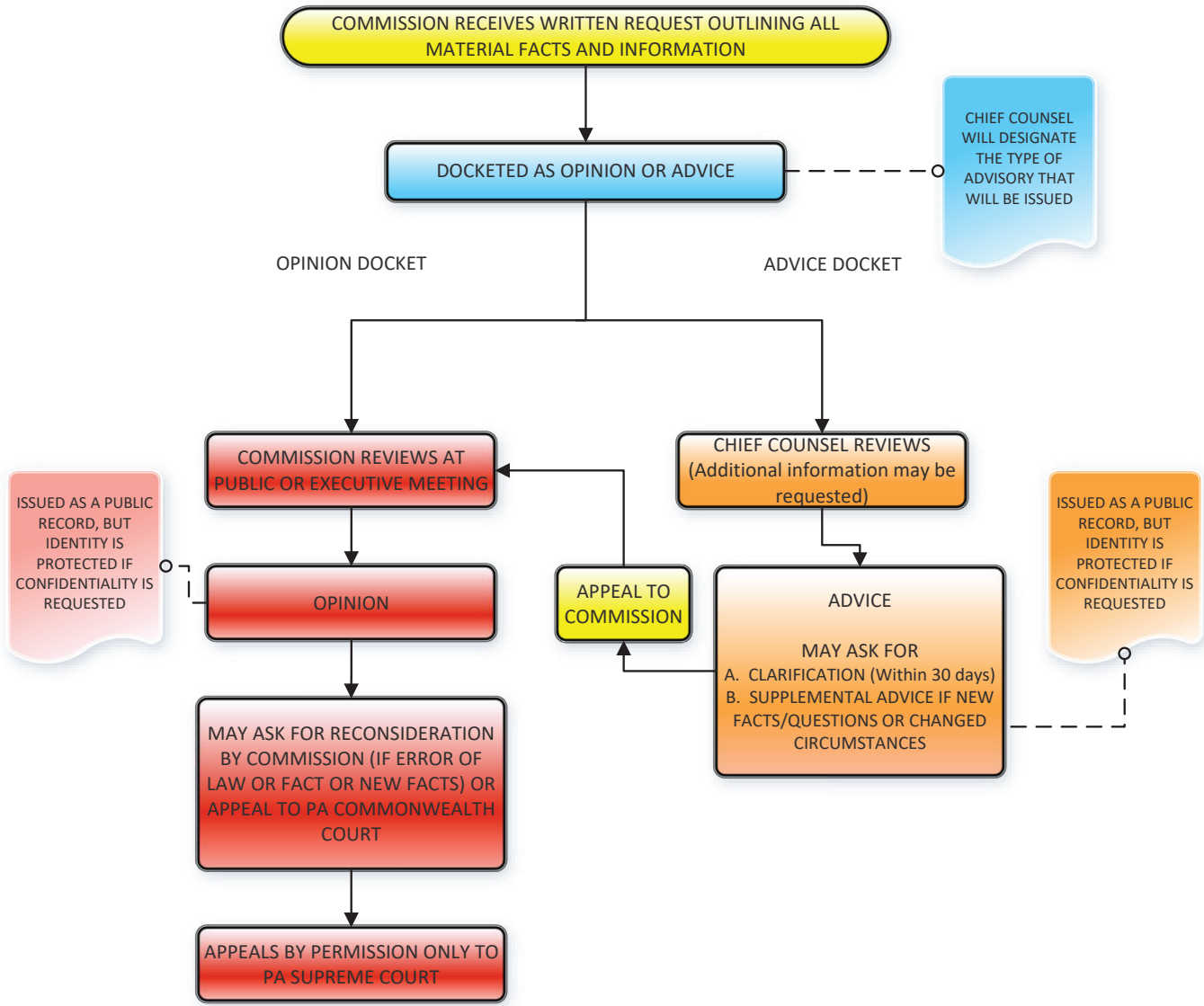
Opinions and Advices provide a complete defense against enforcement action initiated by the Commission. An Advice of Counsel is evidence of good faith conduct in any other civil or criminal proceeding if the requester truthfully disclosed all material facts and acted in reliance on the Advice. An Opinion is an absolute defense to any criminal or civil penalty provided that all material facts are truthfully disclosed and the requester

acts in good faith on the Opinion.  
  
Between January 1, 2023, and December 31, 2023, the Commission issued 70 Advisory Opinions under the Ethics Act, consisting of 1 Opinion and 69 Advices of Counsel.  
  
Opinions and Advices are publicly posted on the Commission’s e-Library at [www.ethics.pa.gov](http://www.ethics.pa.gov). 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.

Advices/Opinions Statistics 2019-2023 (Advices/Opinions issued by the Ethics Commission under the Ethics Act)



OPINIONS AND ADVICES FLOWCHART





COMPLAINTS / INVESTIGATIONS

The Commission’s Investigative Division investigates allegations of violations of the Ethics Act or Lobbying Disclosure Law.

Upon receipt of a complaint, if the matters complained of fall within the Commission’s jurisdiction, the Investigative Division will investigate the matter.

No later than 360 days after initiating a full investigation, the Investigative Division may issue an Investigative Complaint/ Findings Report. If the investigation finds no violation of the Ethics Act at any point in the investigative process, the investigation must be closed. Cases are resolved through settlement or after an administrative hearing before the Commission. Ultimately the Commission will issue a final Order which is a public document available on the Commission’s e-Library at [www.ethics.pa.gov](http://www.ethics.pa.gov).

The Investigative Division received 265 complaints in 2023. Of those 265 complaints, 35 were initiated as preliminary inquiries, 18 were opened as full investigations, and 37 were referred to the Administrative Division to be handled through the civil penalty process.

The Commission ultimately issued 14 public Orders in 2023. Those Orders included findings of violations of the Ethics Act and the imposition of financial penalties against a number of public officials/public employees including School District Superintendents and Board Members, Authority Board Members and Employees, a PennDOT Surveyor, Municipal Board Members, and other local public officials and public employees of boroughs and townships. The Orders reflected violations for conflicts of interest, including diverting public monies for personal gain, violations of the one-year revolving door prohibition, and violations for delinquent and deficient Statements of Financial Interests.

Orders of note issued by the Commission in 2023 included the following:

Orders No. 1816 and 1817: Postupac and Scappe, Issued April 14, 2023.

Robert Postupac, Superintendent of Blackhawk School District, and Mark Scappe, Member of the School Board of Moon Area School District, violated Sections 1103(a) (conflict of interest), 1103(b) (seeking improper influence), and 1103(c) (accepting improper influence) when they used their public offices to offer/give a position of employment to the others’ child at their respective School Districts. Additionally, they both had numerous deficient Statements of Financial Interests.

Based upon the Supreme Court’s decision in *Sivick v. State Ethics Commission*, 238 A.3d 1250 (Pa. 2020), the Commission did not order restitution against Postupac and Scappe as they themselves did not receive a financial gain. However, both Postupac and Scappe were required to make payment of \$750 to

the Commonwealth of Pennsylvania as a result of their Statement of Financial Interests deficiencies.

Orders No. 1815 and 1818: Tucker and Meyer, Issued January 25, 2023 and April 14, 2023 respectively.

John Tucker and Dieter Meyer, Members of the Board of the North and South Shenango Joint Municipal Authority, violated Sections 1103(a) when they used the authority of their positions to participate in Authority votes to approve guest attendance and expense payments; when they incurred and charged expenses of a personal nature to Authority credit cards and accounts when traveling on Authority business for conferences and/or conventions; and when he submitted for reimbursement expenses of a personal nature alleged to have been paid in cash or by personal credit card. Those personal expenses were in relation to Tucker and Meyer’s attendance (and the attendance of their personal guests) at Water Environment Federation (WEFTEC) conferences in New Orleans and Chicago, Pennsylvania Municipal Authorities Association (PMAA) Annual Conference and Trade Shows within Pennsylvania, and PMAA regional spring and fall dinner meetings. The personal expenses including items such as tours, hotel stays unnecessary to conference attendance, alcohol, and expenses related to their personal guests. In addition, the Commission found that Tucker and Meyer filed deficient and/or delinquent Statements of Financial Interests. The Commission Ordered Tucker to make payment of \$6,000, and Meyer, \$2,500 to the Authority. The Commission also Ordered Tucker and Meyer to file complete and accurate Statements of Financial Interests, and for Tucker to make payment of \$750 and Meyer \$1,000 to the Commonwealth reflective of their Statement of Financial Interests deficiencies and delinquencies.

Order No. 1820: Wanson, Issued April 14, 2023.

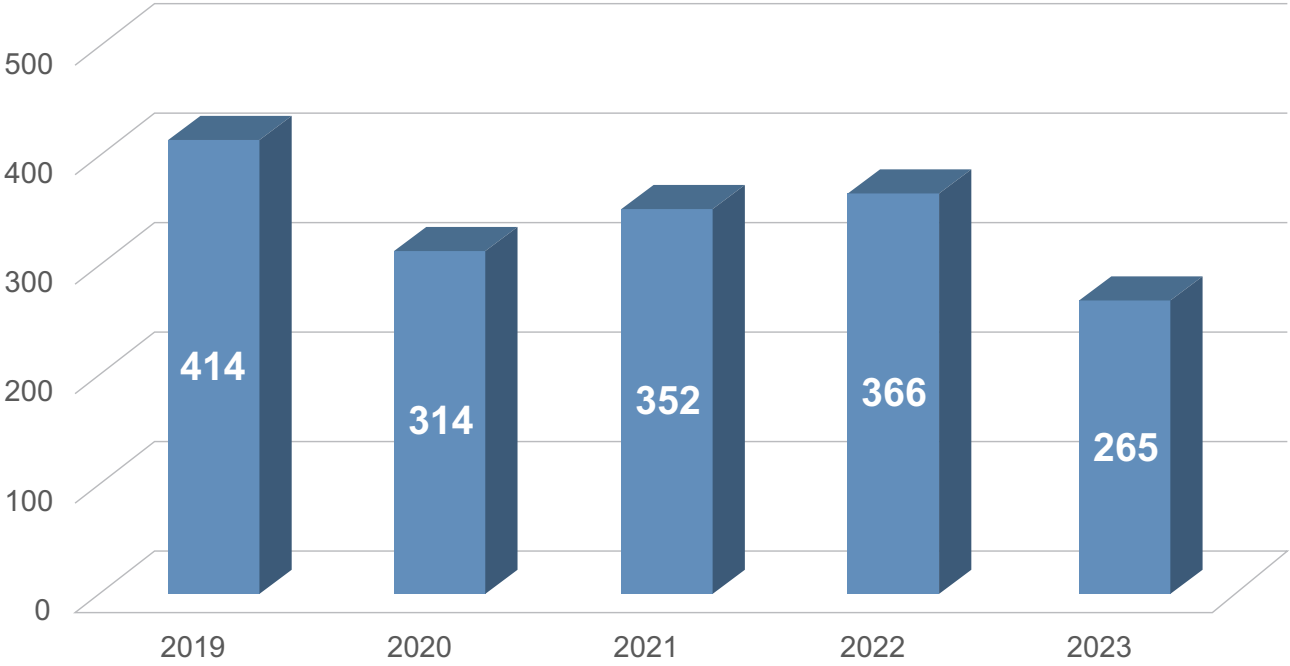
Eric Wanson, Engineering District 12-0 Chief of Surveys for the Pennsylvania Department of Transportation’s (PennDOT’s) Design Unit Survey Department, violated the conflict of interest provision of the Ethics Act, Section 1103(a), when he used PennDOT surveying equipment without authorization; and when he used confidential information obtained through his public employment when he used PennDOT’s subscription to the KeyNet GPS system all for the private pecuniary benefit of himself and/or Buck Ridge Surveying, Inc., a business with which he is associated. In addition, Wanson filed a deficient Statement of Financial Interests. The Commission directed Wanson to pay \$62,000 to the Commonwealth of Pennsylvania, and to file a complete and accurate Statement of Financial Interests.

Order No. 1819: Kasper, Issued April 14, 2023.

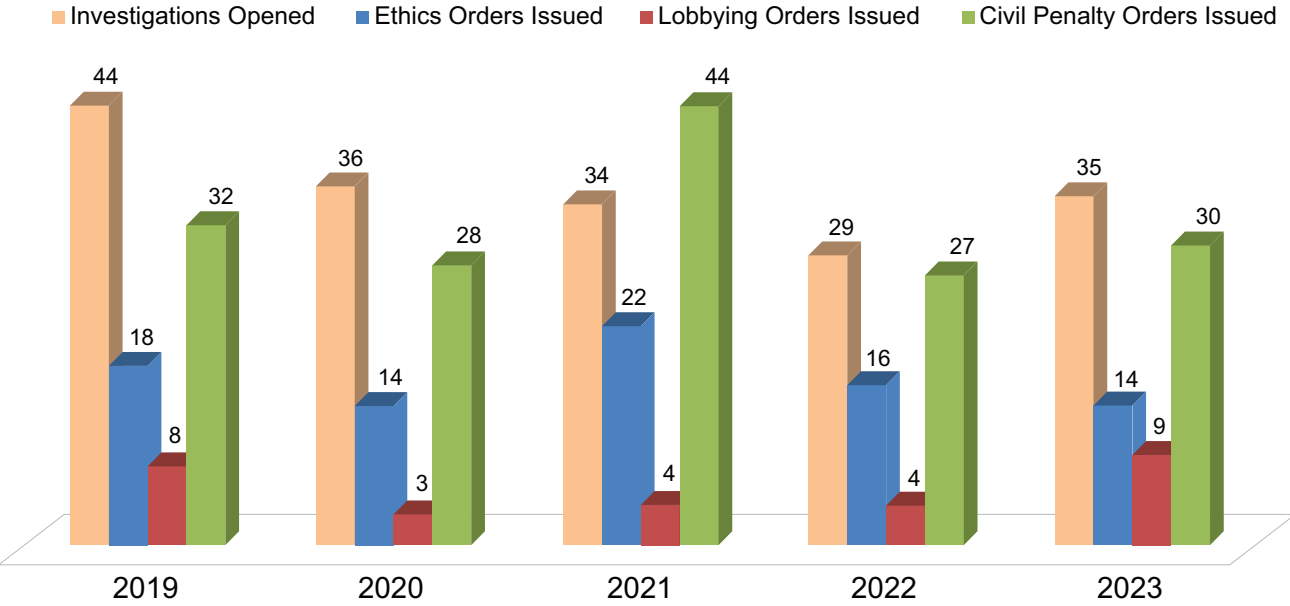
William Kasper, Customer Service Manager for North Penn Water Authority, Montgomery County, violated the conflict of interest provision of the Ethics Act, Section 1103(a), when he participated in the process for the Authority to enter into a contract with RIO Supply, Inc. at a time when he was negotiating future employment with RIO Supply, Inc., and accepting travel, lodging, and hospitality from RIO Supply, Inc. In addition,

Kasper violated the one-year revolving door provision of the Ethics Act, Section 1103(g), when he represented RIO Supply, Inc., in sales efforts with the Authority within one year of leaving employment with the Authority. The Commission directed Kasper to make payment in the amount of \$17,644.82 to the Commonwealth of Pennsylvania, and file complete and accurate Statements of Financial Interests.

Complaints received 2019-2023

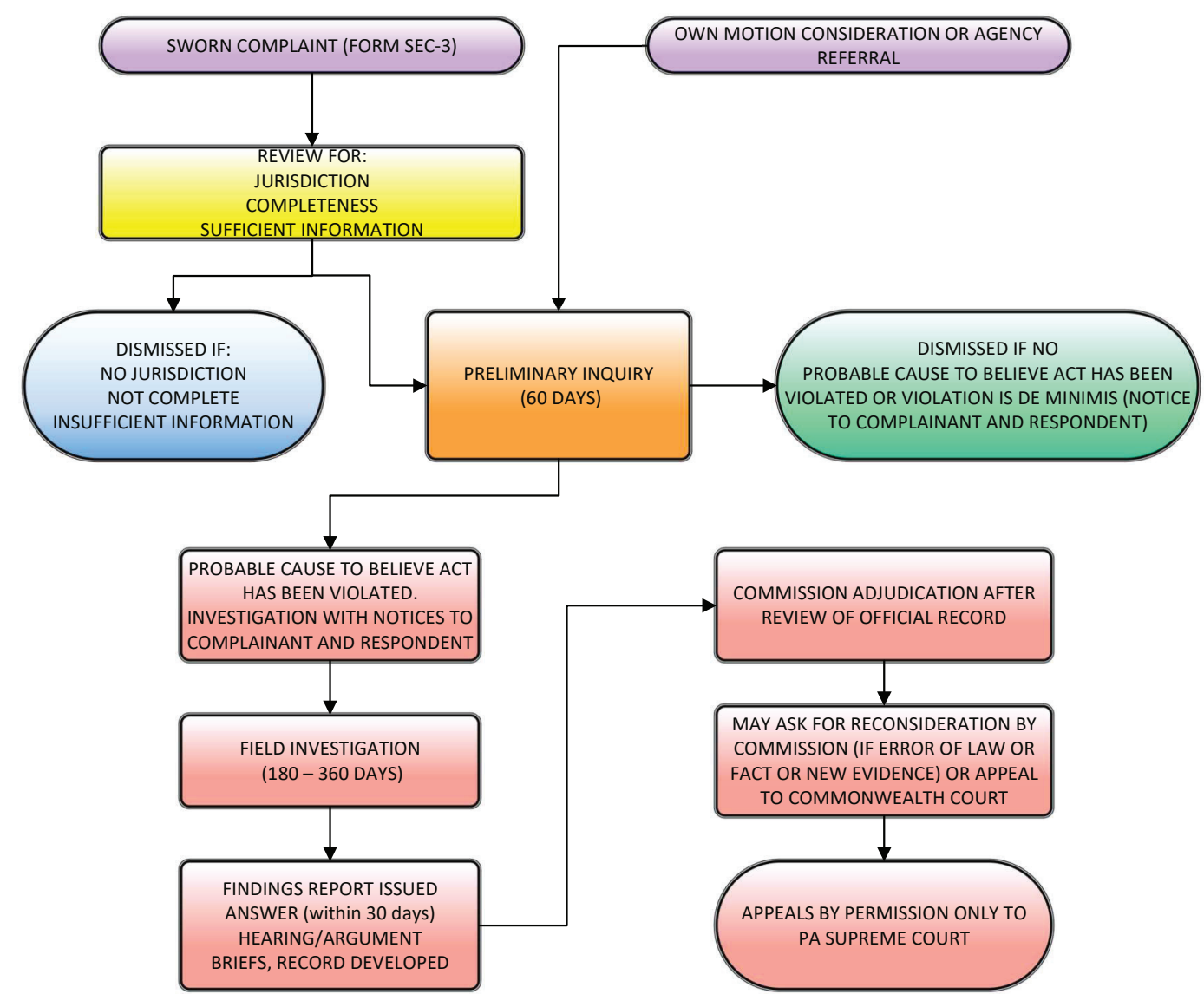


Investigative Statistical Summary 2019-2023





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

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.

The Commission did not receive any requests for advisories under the Lobbying Disclosure Law in 2023.

Enforcement

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. 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) ten 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).

Lobbying Compliance Activities

The Commission continues to engage in compliance efforts regarding lobbying activities undertaken in calendar year 2023. The Commission monitors and enforces the Lobbying Disclosure Law through compliance reviews of Registration Statements and Quarterly Expense Reports filed by principals, lobbyists and/or lobbying firms with the Pennsylvania Department of State.

During the reporting period for calendar year 2023, the Commission issued a total of 73 Warning Notice Letters to principals regarding their failure to file Quarterly Expense Reports as required by the Lobbying Disclosure Law. Nine of those principals did not file their Quarterly Expense Reports and/or otherwise comply with the Warning Notice Letters within the cure period. Those nine principals were the subject of Notices of Alleged Noncompliance, an action undertaken by the Investigative Division seeking the assessment of monetary penalties against non-complying principals.



COMMISSION-ORDERED PENALTIES AND RESTITUTION

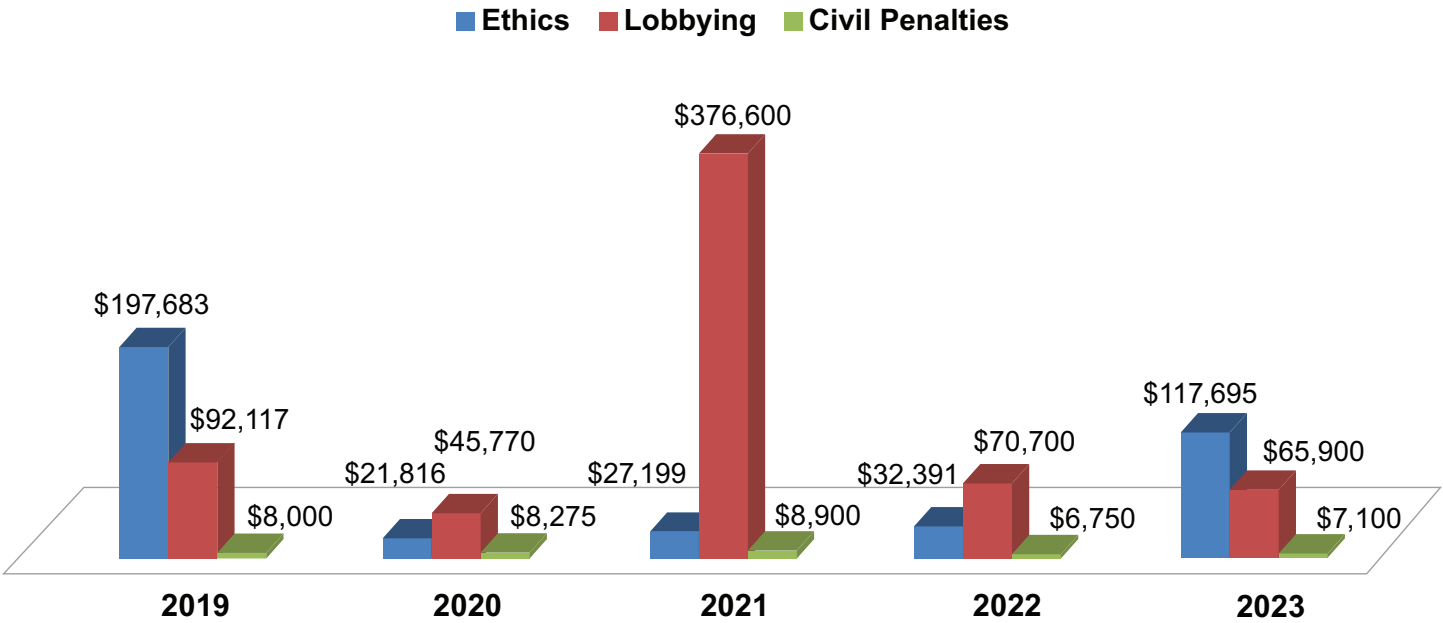
Pursuant to Section 1107(13) of the Ethics Act (65 Pa.C.S. § 1107 (13)), the Commission is empowered to issue findings, reports and orders relating to investigations initiated pursuant to Section 1108 of the Ethics Act (65 Pa.C.S. § 1108). Any order issued by the Commission finding that a public official or public employee has obtained a financial gain in violation of the 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 Damages provision. Pursuant to the Treble Damages provision, any person who obtains financial gain in violation of the Ethics Act may be 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 2023 the Commission ordered the payment of \$117,694.82 in restitution. This amount is attributable to Orders issued from both negotiated an mediated settlements and cases where the respondent failed to respond and the Commission

found them in default. In addition to any other civil remedy or criminal penalty provided for by the Ethics Act, 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 levied \$7,100.00 in civil penalties during calendar year 2023.

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. Effective April 16, 2018, the administrative penalty is \$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 2023, the Commission levied penalties totaling \$65,900.00 for late/deficient lobbying Registration Statements and/or Quarterly Expense Reports.

Restitution/Penalties Ordered 2019-2023



In 2021, the Commission Ordered an administrative penalty in the amount of \$117,800 on a case that was ultimately appealed and resolved through mediation. That amount is included in the 2021 Lobbying Penalty Amount. The settlement amount of \$8,000 is also included in the 2023 Lobbying Penalty Amount.

ACT 114 OF 2016

Pursuant to Act 114 of 2016, dealing with Race Horse Industry Reform, and 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).

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 Gaming Control 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

The Commission issued one Determination under the Gaming Act in calendar year 2023.

Gaming Lists

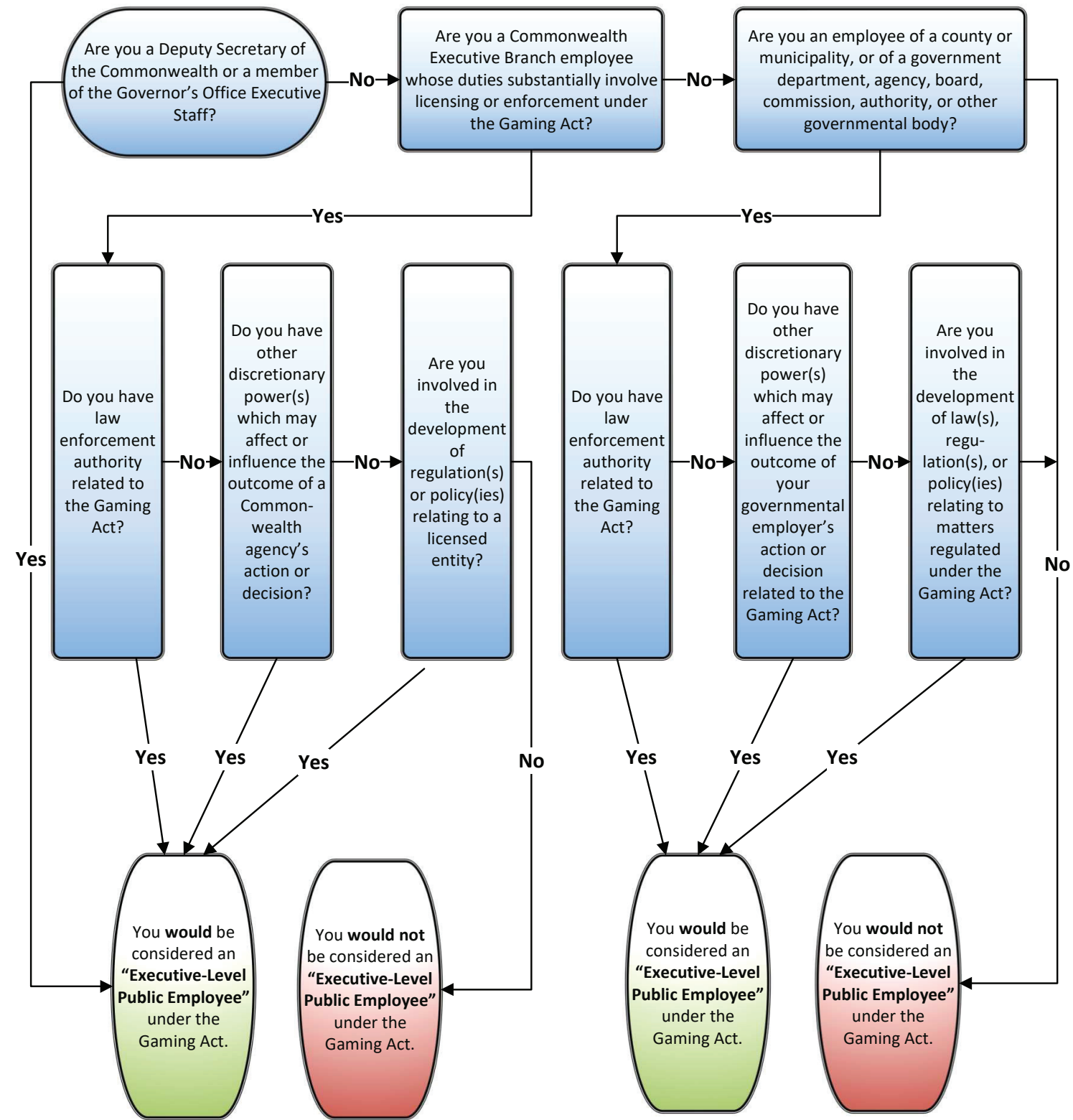
Lists developed by the Commission pursuant to the Gaming Act are published biennially in the Pennsylvania Bulletin, and they are also accessible via the Commission’s website within its e-Library at [www.ethics.pa.gov](http://www.ethics.pa.gov) and via the Pennsylvania Gaming Control Board’s website at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

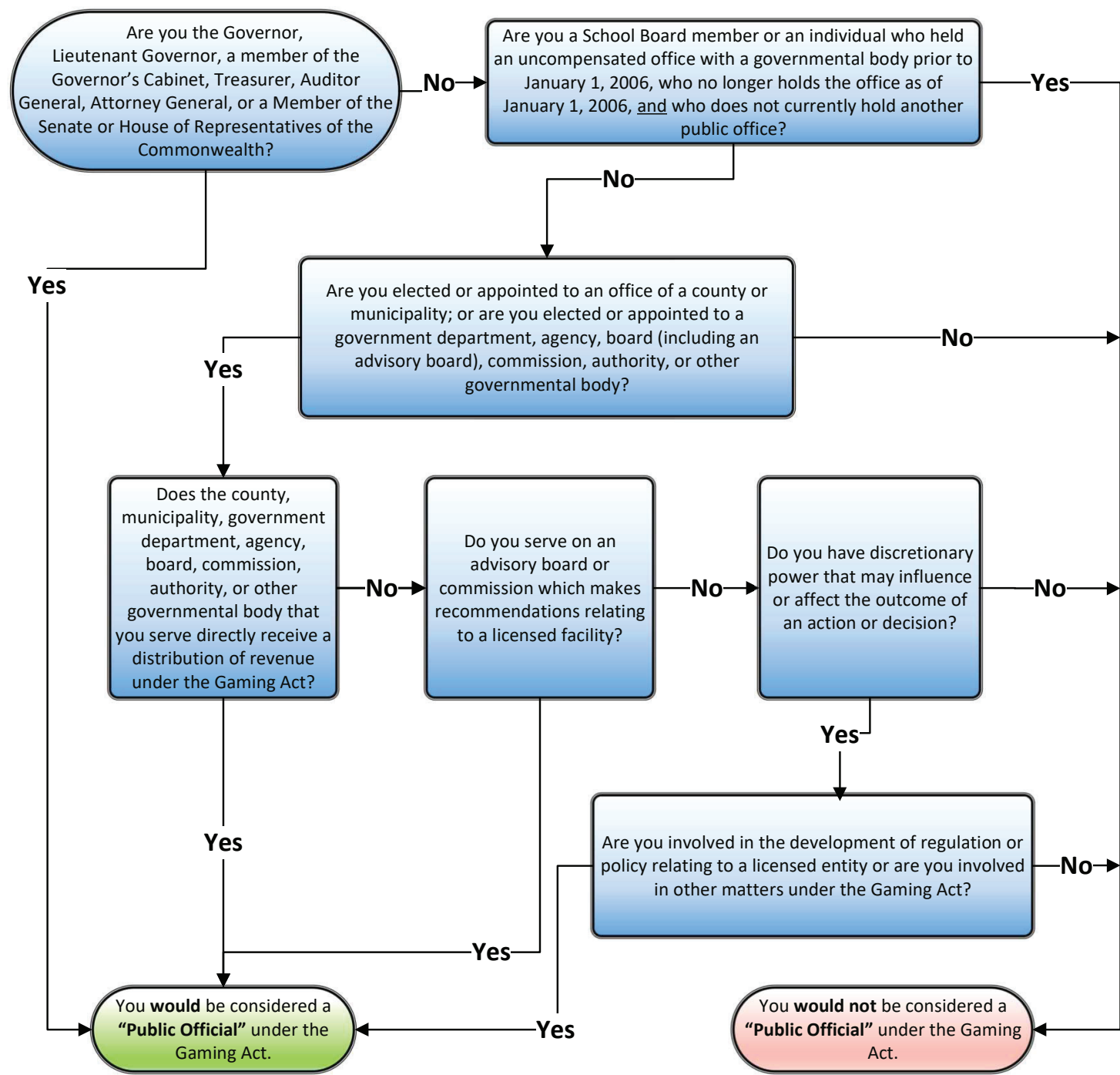
The term “executive-level public employee” is defined in Section 1103 of the Gaming Act. The term “public official” is defined in Section 1512(b) of the Gaming Act.



GAMING ACT: Executive-Level Public Employee Flowchart



GAMING ACT: Public Official Flowchart





ACT 42 OF 2017 (Video Gaming Act)

Pursuant to Act 42 of 2017 (referred to herein as the “Video Gaming Act”), 4 Pa.C.S. § 3101 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 4303(g) of the Video Gaming Act or “executive-level public employee” set forth in Section 3102 of the Video Gaming Act, for the purpose of enabling the identification of persons who would be subject to certain prohibitions of Section 4303 of the Video Gaming Act;
- 2. Biennially publishing a list of all positions of employment with the Gaming Control Board or with independent contractors to the Gaming Control Board that are subject to the “revolving door/post-termination” restrictions of Section 4302(a) or Section 4302(b) of the Video 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 4304(a) of the Video Gaming Act;

- 4. Making a determination, upon request, as to whether a particular individual/person would be subject to the various prohibitions or “revolving door/post-termination” restrictions within the Video Gaming Act (see, 4 Pa.C.S. §§ 4302(d)(1), 4303(f)(1), 4304(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 4303 of the Video Gaming Act.

Video Gaming Act Determinations

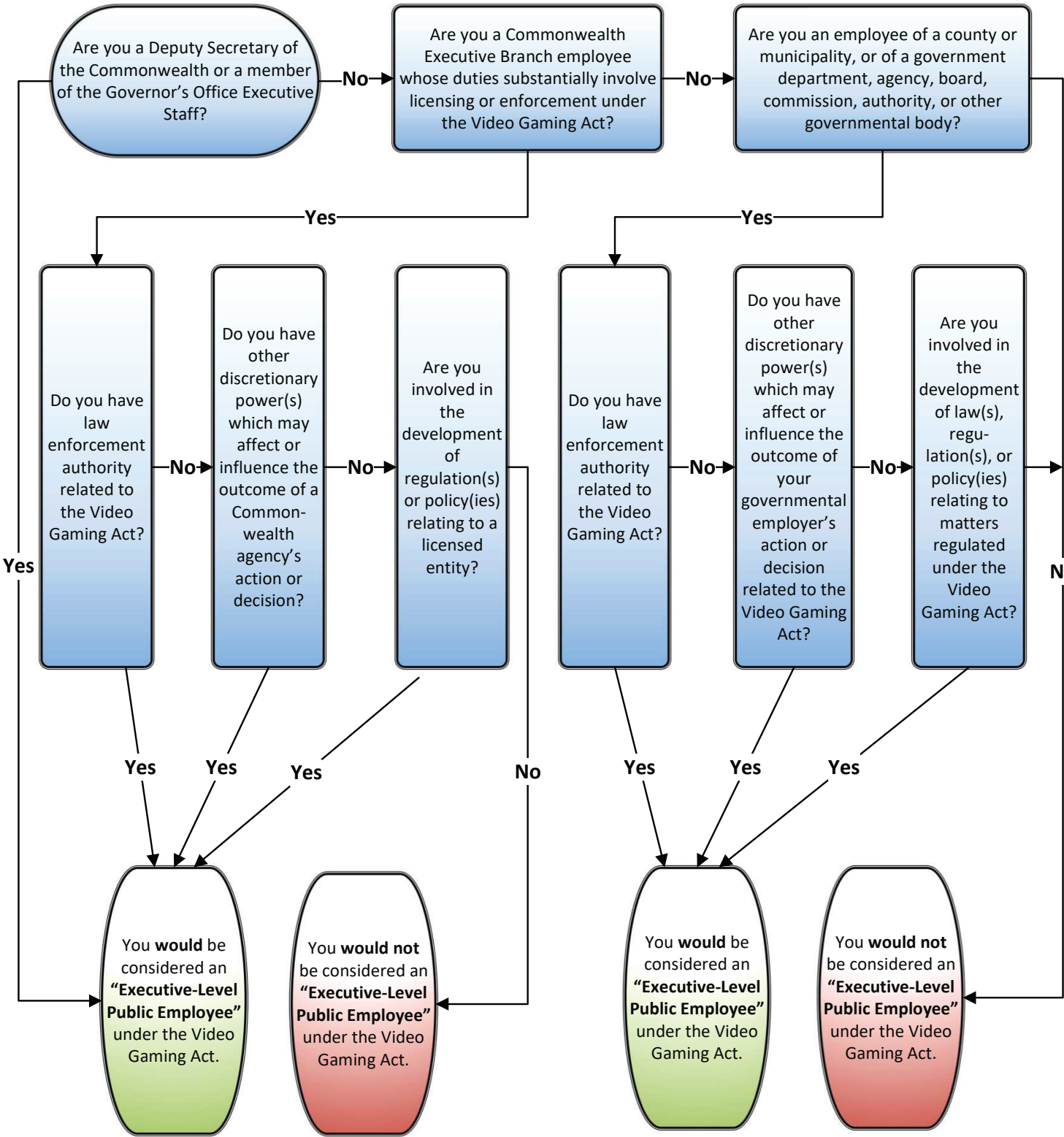
There were no requests submitted to the Commission for a Determination under the Video Gaming Act in calendar year 2023.

Status as an Executive-Level Public Employee or Public Official

The term “executive-level public employee” is defined in Section 3102 of the Video Gaming Act. The term “public official” is defined in Section 4303(g) of the Video Gaming Act.

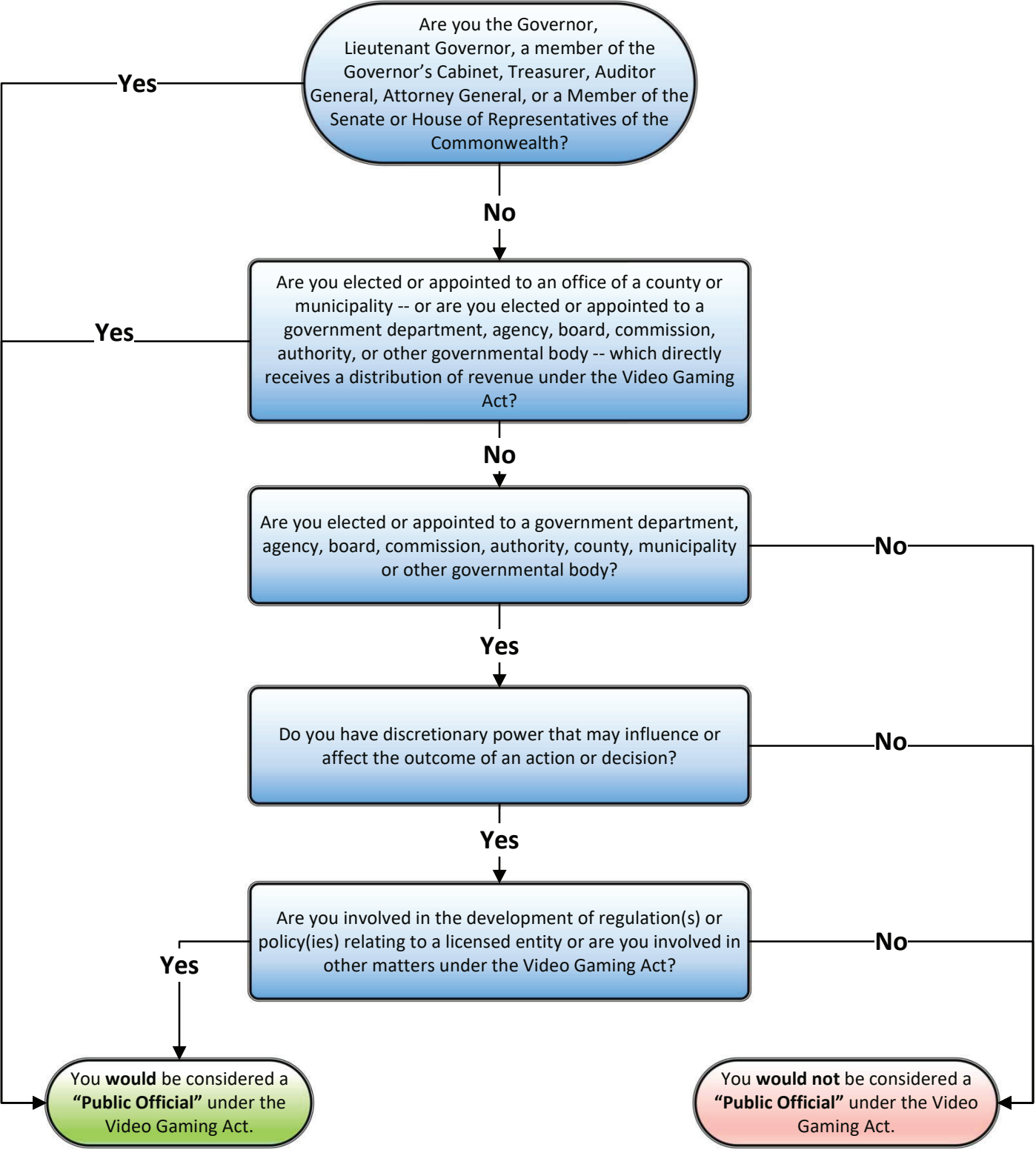


VIDEO GAMING ACT: Executive-Level Public Employee Flowchart





VIDEO GAMING ACT: Public Official Flowchart



PENNSYLVANIA MEDICAL MARIJUANA ACT (MMA)

Pursuant to Section 2101.1 of the Medical Marijuana Act, 35 P.S. § 10231.2101.1, the Commission 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.

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 Determinations

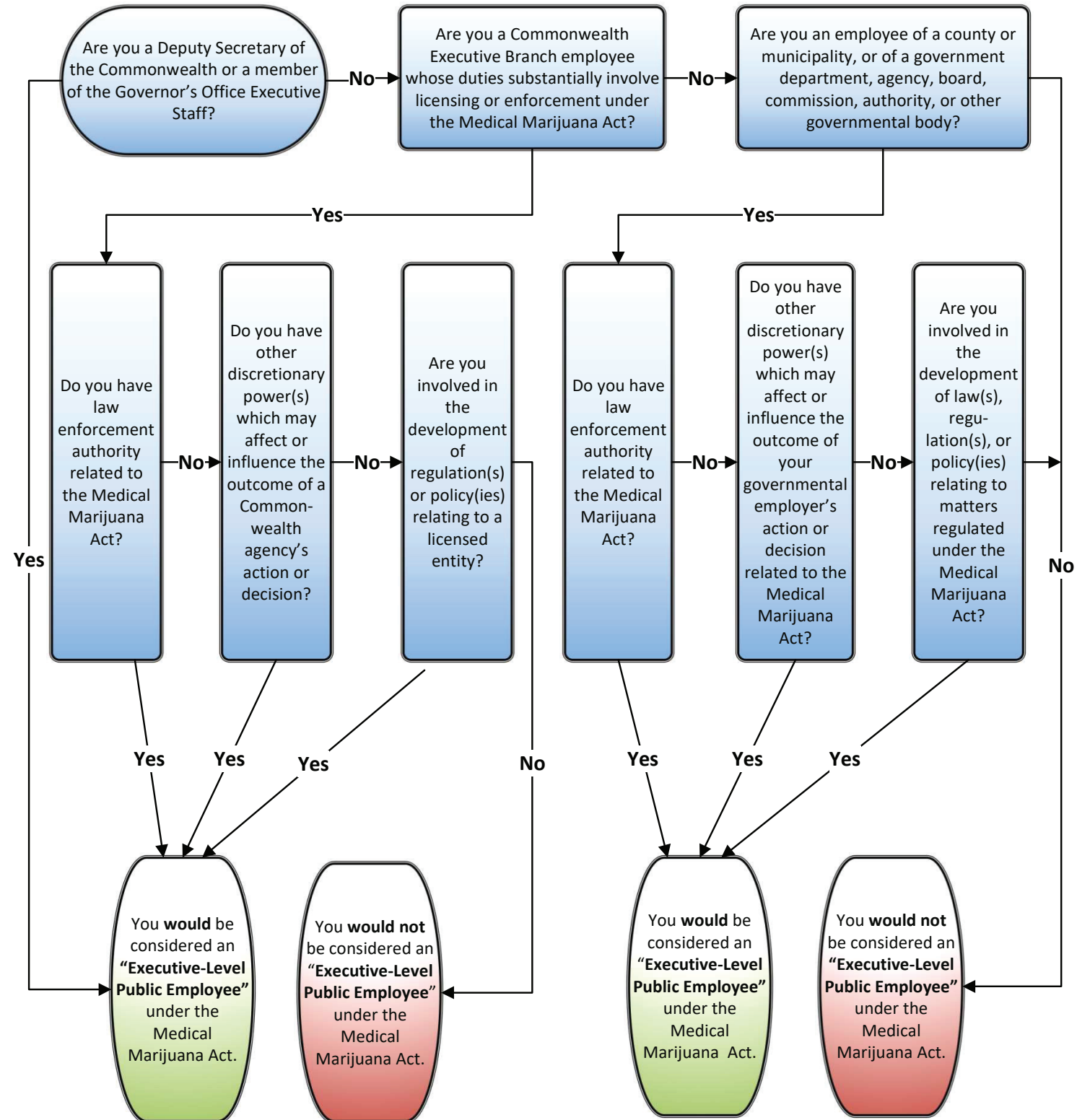
There were no requests submitted to the Commission for a Determination under the Medical Marijuana Act in calendar year 2023.

Medical Marijuana Act Lists

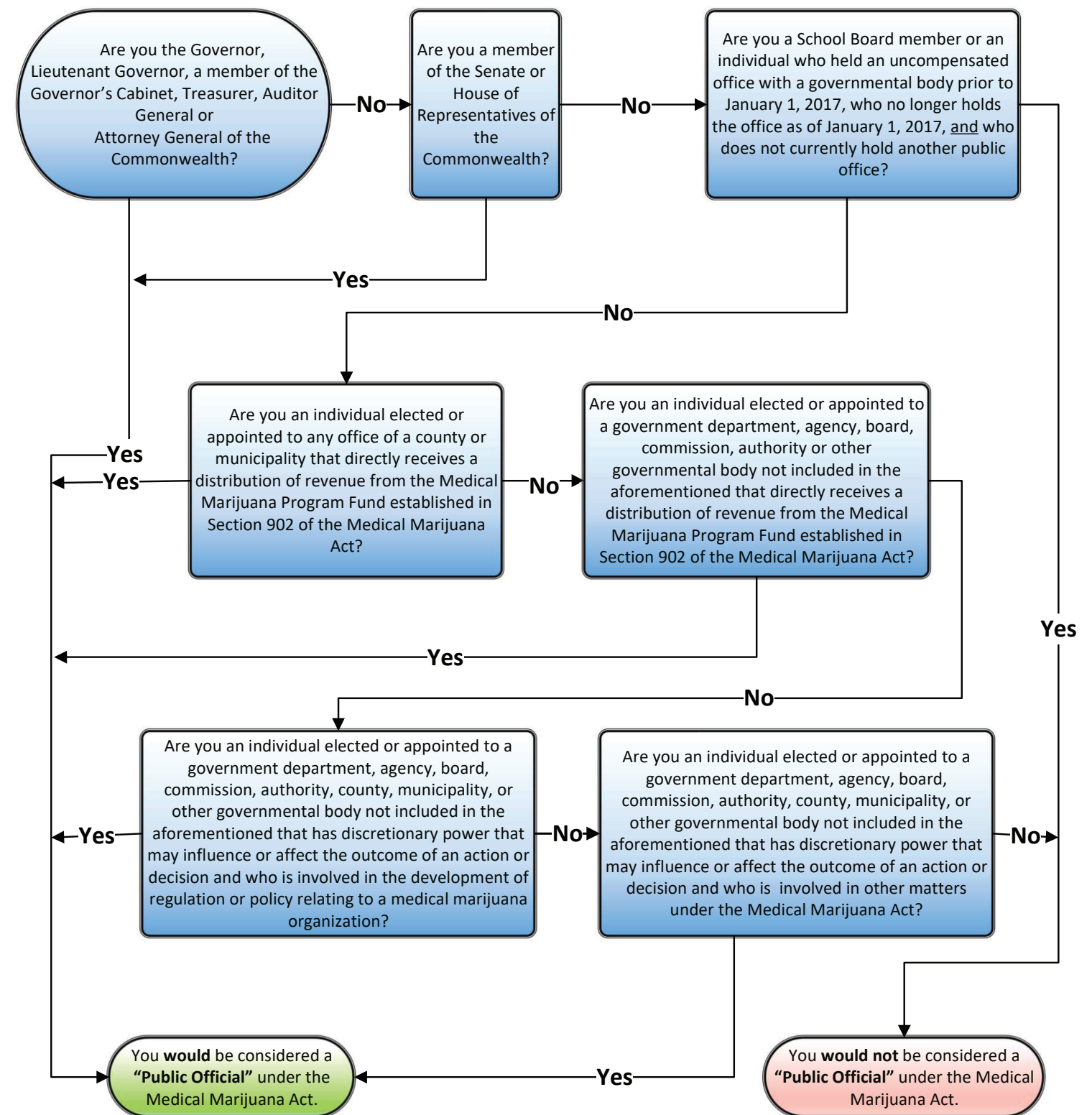
Lists developed by the Commission pursuant to the Medical Marijuana Act will be published biennially in the Pennsylvania Bulletin and can also be accessed via the Commission’s website at [www.ethics.pa.gov](http://www.ethics.pa.gov).



## MEDICAL MARIJUANA ACT: Executive-Level Public Employee Flowchart



## MEDICAL MARIJUANA ACT: Public Official Flowchart





# COGEL: COUNCIL ON GOVERNMENTAL ETHICS LAWS

The Commission has continued to be active in 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).

One Commissioner and three staff members attended the 2023 Annual COGEL Conference in Kansas City, Missouri.

## 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, 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 or virtual setting.

During calendar year 2023, the Commission staff completed twenty-six Ethics training events, educating over 1,300 public officials/public employees regarding the Ethics Act and their key responsibilities under the Act. Twenty-two of these trainings were presented in person, and the remaining four were virtual.

Some examples of the organizations that Commission staff provided trainings for in calendar year 2023, as well as in previous years, included the Pennsylvania Municipal Authorities

Association (PMAA), Pennsylvania State Association of Boroughs (PSAB), Pennsylvania State Association of Township Supervisors (PSATS) and the Pennsylvania Municipal League. During calendar year 2023, Commission staff also developed new relationships/provided trainings to the Montgomery Bar Association Real Estate Committee, PA Association of Sewage Enforcement Officers (PASEO), Domestic Relations Association of Pennsylvania (DRAP), State Conservation Commission, Lehigh County Controller’s Office, and the Pennsylvania Office of State Inspector General (OSIG).

Individuals seeking training by the Commission can submit a written request to the Commission, or use the Training Request Form available on the Commission’s website at [www.ethics.pa.gov](http://www.ethics.pa.gov).





# STATE ETHICS COMMISSION

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