



pennsylvania
STATE ETHICS COMMISSION

2021 ANNUAL REPORT

Public Office is a Public Trust



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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 2021.

The Commission’s primary mandate as provided for in Section 1101 of the Ethics Act is to strengthen the faith and confidence of the people of the Commonwealth in their government. The citizens have the right to be assured that the financial interests of public officials and employees do not conflict with their public duties. 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. The Commission’s jurisdiction in all three areas is uniform in its application to local, county, and state level public officials and public employees.

The Commission, an independent agency of the Commonwealth, is comprised of seven Members who are vested with the responsibility of administering and enforcing the provisions of the Ethics Act, as well as providing guidance to public officials and public employees as it relates to their conduct under the Ethics Act. The Commission has established policies and procedures for regulating and enforcing the restricted activities provisions of the Ethics Act, which are administered impartially by a staff of dedicated and experienced employees.

In addition to its responsibilities under the Ethics Act, the Commission is vested with enforcement duties under the Lobbying Disclosure Law (Act 134-2006) relating to the activities of lobbyists and principals who seek to influence state government. The Commission is empowered to conduct investigations in relation to alleged violations of the filing provisions of the Lobbying Disclosure Law. Commission staff has focused on achieving compliance with the Lobbying Disclosure Law’s registration and quarterly expense reporting requirements through coordination with the Pennsylvania Department of State to ensure filing of mandated reports. Staff diligence and collaboration with the Pennsylvania Department of State has resulted in a decrease in the number of enforcement actions initiated in 2021 as compared to previous years. Even with staff diligence, the Commission issued rulings with penalties in excess of \$375,000 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 (Act 42

of 2017), and the Medical Marijuana Act (Act 16 of 2016). 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 certain Determinations.

Lastly, the Pennsylvania Racehorse Development and Gaming Act requires the Commission to publish a list of all employment positions within 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. The Commission has fulfilled its responsibilities under all five laws without an increase in staff.

The Commission continues to see success with the use of its electronic filing system for Statements of Financial Interests. The electronic filing system, developed by Commission staff and implemented in 2014, has seen a steady increase in usage, by not only those who are required by law to file Statements of Financial Interests with the Commission, but also through voluntary filings made by local and state government officials. The electronic filing system is capable of accepting all filings, including local filings, if needed in the future. Filing electronically has proven to be convenient, efficient and a cost savings. The Commission is hoping to transition to all electronic filing in the future.

The Commission continues to place great importance on providing guidance to public officials and public employees on the message that “public office is a public trust” and that ethical conduct and integrity are essential principles for those serving in the public sector. Commission staff continues to provide numerous training/educational seminars to those in public service. Despite the limitations posed by COVID restrictions, in 2021 Commission staff participated in 21 seminars, workshops, panel discussions and presentations involving a wide range of governmental institutions and associations, primarily through virtual trainings and webinars. Staff has also developed trainings for the Governor’s Office of Administration and both Chambers of the General Assembly. The Commission, in conjunction with the Office of Attorney General, developed training videos and webinars to expand the message to over 2,700 governmental bodies across the Commonwealth.

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 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, no more than two of whom may be of the same political party. Commission Members are appointed without confirmation.

The Commission was comprised of six Members for calendar year 2021. On January 3, 2022, Rhonda Hill Wilson, Esquire, was appointed to the Commission by the Honorable Jay Costa, Minority Leader of the Pennsylvania Senate to replace Commissioner Everett A. Gillison, Esquire who served until May 13, 2020.

Current Commissioners as of January 3, 2022

Nicholas A. Colafella, Ph.D. (Chairman)
Mark R. Corrigan, Esquire (Vice Chairman)
Roger E. Nick
Melanie F. DePalma
Michael A. Schwartz, Esquire
Shelley Y. Simms, Esquire
Rhonda Hill Wilson, Esquire

Commissioner Biographies

Nicholas A. Colafella Chairman

Nick Colafella was appointed as a Member of the Commission on December 27, 2004. Mr. Colafella served as Vice Chairman of the Commission from January 28, 2013, until being elected Chairman of the Commission on January 16, 2015.



Mr. 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, Colafella served as the Democratic Chairman of the House Insurance Committee (1992-1998), and the House Education Committee (1999).

During this time period, Mr. 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, Mr. 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, Mr. 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.

Mr. Colafella has devoted substantial efforts toward community involvement, including his service as Chairman of the Beaver County Drug and Alcohol Commission, Heritage 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, Mr. 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 and Parliamentarian of the Senate of Pennsylvania on June 30, 1981 and continuously re-elected to serve 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 retired from full-time employment after 36 years with the Commonwealth in 2009. During his career he was employed by the Pennsylvania General Assembly, including Executive Director of the House Transportation Committee (1973 - 1976), Executive Assistant to State Senator Robert J. Kusse (1976 - 1983), and Chief of Staff to Speaker of the House Matthew J. Ryan (1985 - 2003). He also served as Legislative Liaison to the Pennsylvania Department of Transportation (1983 - 1985) and Vice President of Legislative and Board Affairs for the Pennsylvania Higher Education Assistance Agency (2003 - 2005). Mr. Nick returned to the Pennsylvania House of Representatives in 2005, serving as the Chief Clerk from 2005 until his retirement in 2009.

After retirement, he served as a Member of the Legislative Audit Advisory Commission from 2011 until his appointment to the Commission.

**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 Bachelor of Science 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.

**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.

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.



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.



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.

STAFF

Executive Division

Robert P. Caruso, Executive Director

Jeffery Frankenburger, Supervising Investigative Counsel

Julie Gibson, Executive Secretary

Office of Chief Counsel

Brian D. Jacisin, Chief Counsel

Martin W. Harter, Deputy Chief Counsel

Esther Estelle, Legal Assistant

Administrative Division

Leticia Powell, Director of Administration (retired 7/21)

Nicole Stockdale, Clerk Typist

Stanley G. Weaver, Administrative Specialist

Jessica Wenger, Administrative Officer

Brittany Myers, Clerk Typist 2/SFI Support

Jonelle Whitney, Receptionist/SFI Support

Sean M. Firestine, Information Technology Manager and Forensic Specialist

Investigative Division (Headquarters)

Jenifer Layman, Assistant Counsel

Jonathan Fry, Eastern Regional Director

Daniel M. Bender, Senior Special Investigator and Training Officer

Gregory Curran, Senior Special Investigator (retired 6/21)

Hayley Dull, Special Investigator

Heather L. Mulhollan, Administrative Assistant

Investigative Division (Western Regional Office)

Jason P. Bricker, Western Regional Director

William Foley, Special Investigator

Kathleen Haefner, 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

E-mail address: ra-ethicswebmaster@pa.gov

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

PUBLIC INFORMATION

Ethics Commission Website:

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 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.

For calendar year 2021, 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.

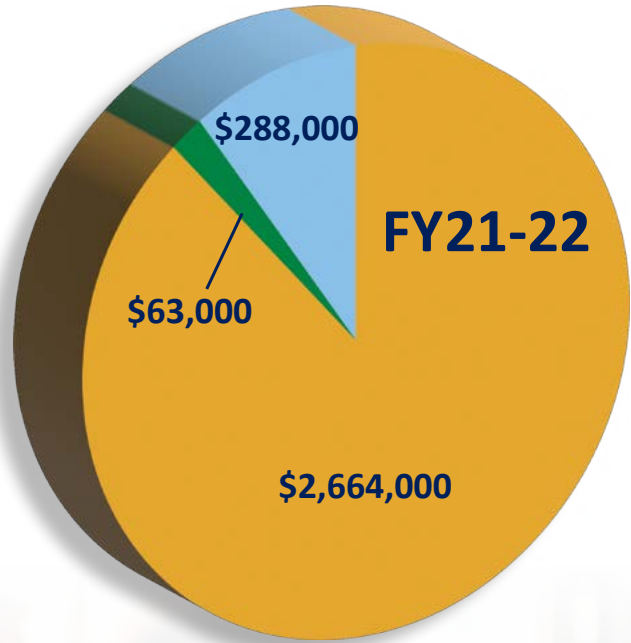
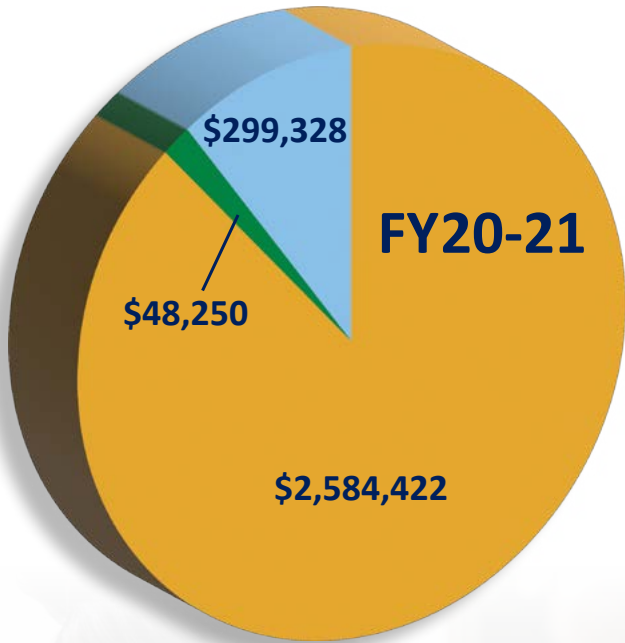
TWO-YEAR BUDGET ANALYSIS APPROPRIATION

2020-2021

■ Employee salaries/benefits	\$2,584,422
■ Miscellaneous personnel services	\$48,250
■ Agency Operations.	\$299,328
Total	\$2,932,000

2021-2022

■ Employee salaries/benefits	\$2,664,000
■ Miscellaneous personnel services	\$63,000
■ Agency Operations.	\$288,000
Total	\$3,015,000



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 said 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.).
- Holding at least two public hearings each year to seek input from persons and organizations which represent individuals subject to the Ethics Act.

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 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.

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.



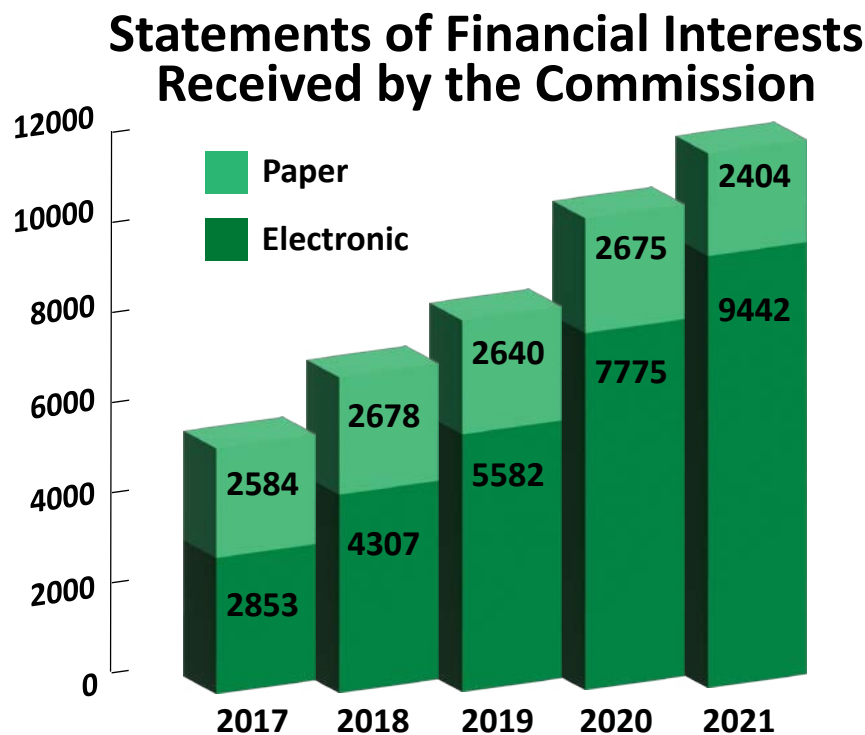
FINANCIAL DISCLOSURE REQUIREMENTS

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) delineates what financial information is to be disclosed.

Between December 18 and December 24 of 2021, a total of 176,275 Statement of Financial Interests forms were distributed to 6,329 state, county, and local government entities for distribution to public officials, public employees, and candidates required to file Statements of Financial Interests for the 2021 calendar year pursuant to the Ethics Act. The Administrative Division continued to update the distribution list to avoid duplicate, erroneous and/or obsolete mailings.

All individuals filing Statements of Financial Interests have the option to file electronically through the Commission's website in lieu of completing a paper form. However, a filer using the Commission's online filing system must ensure that a copy of the form is filed with all required filing locations.

For calendar year 2020 (filing year 2021), there were 11,846 individuals who filed Statements of Financial Interests with the Commission. Of those who filed, 9,442 (80%) filed electronically through the Commission's website, resulting in a 18% increase in electronic filings from the previous year. Those individuals who filed with the Commission included candidates for public office, which include judge candidates (3), as well as current and former: members of the General Assembly (316); members of state boards and commissions (1,702); constables and/or deputy constables (1,771); and state employees (1,980). There were 6,074 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 their political subdivision or other location as required by the Ethics Act. Statements of Financial Interests filed with the Commission are public documents and are available online for public inspection through the e-Library which may be accessed via the Commission's website at 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, 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 will notify the individual of such non-compliance. Warning Notice Letters are sent to individuals who have 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, 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.

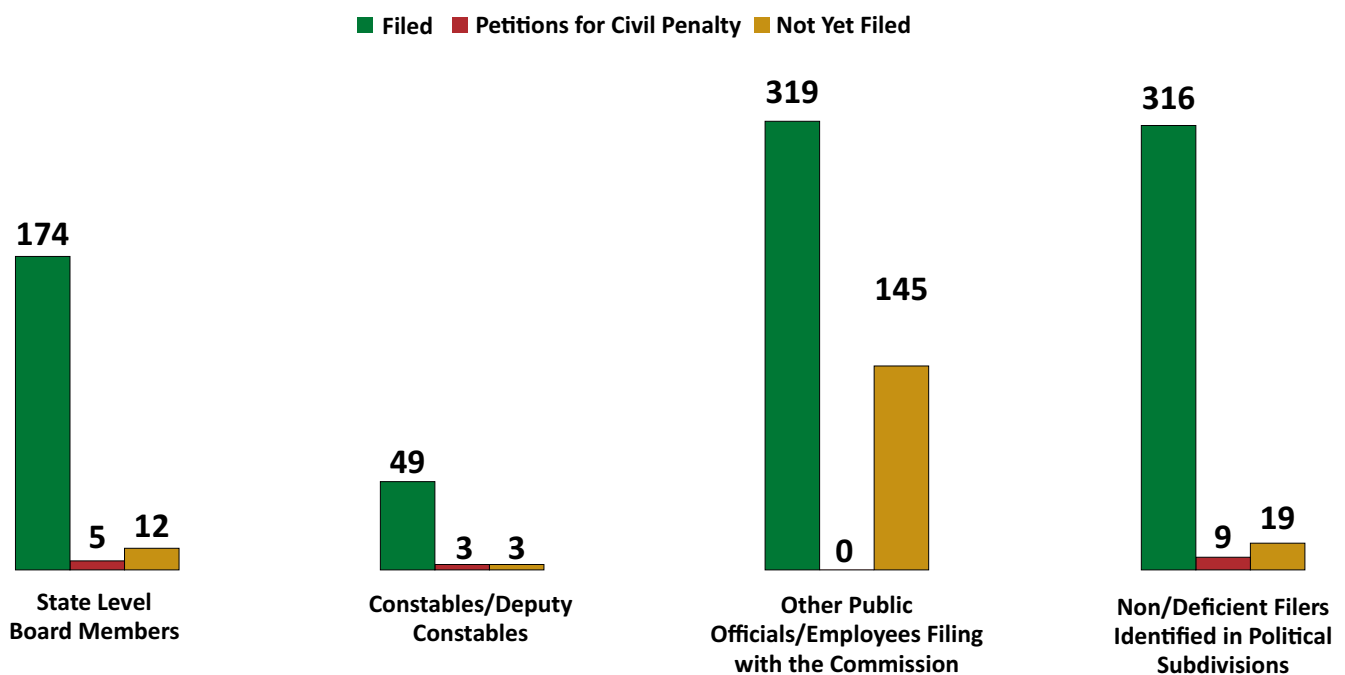
Should an individual fail to comply with an Order of the Commission to either remit the assessed civil penalty and/or to file a Statement of Financial Interests, the Commission may pursue the matter in the Commonwealth Court of Pennsylvania for the purpose of enforcement of the Commission's Order.

During the 2021 calendar year, the Commission identified 1,054 public officials/public employees who either filed a deficient Statement of Financial Interests or failed to file as

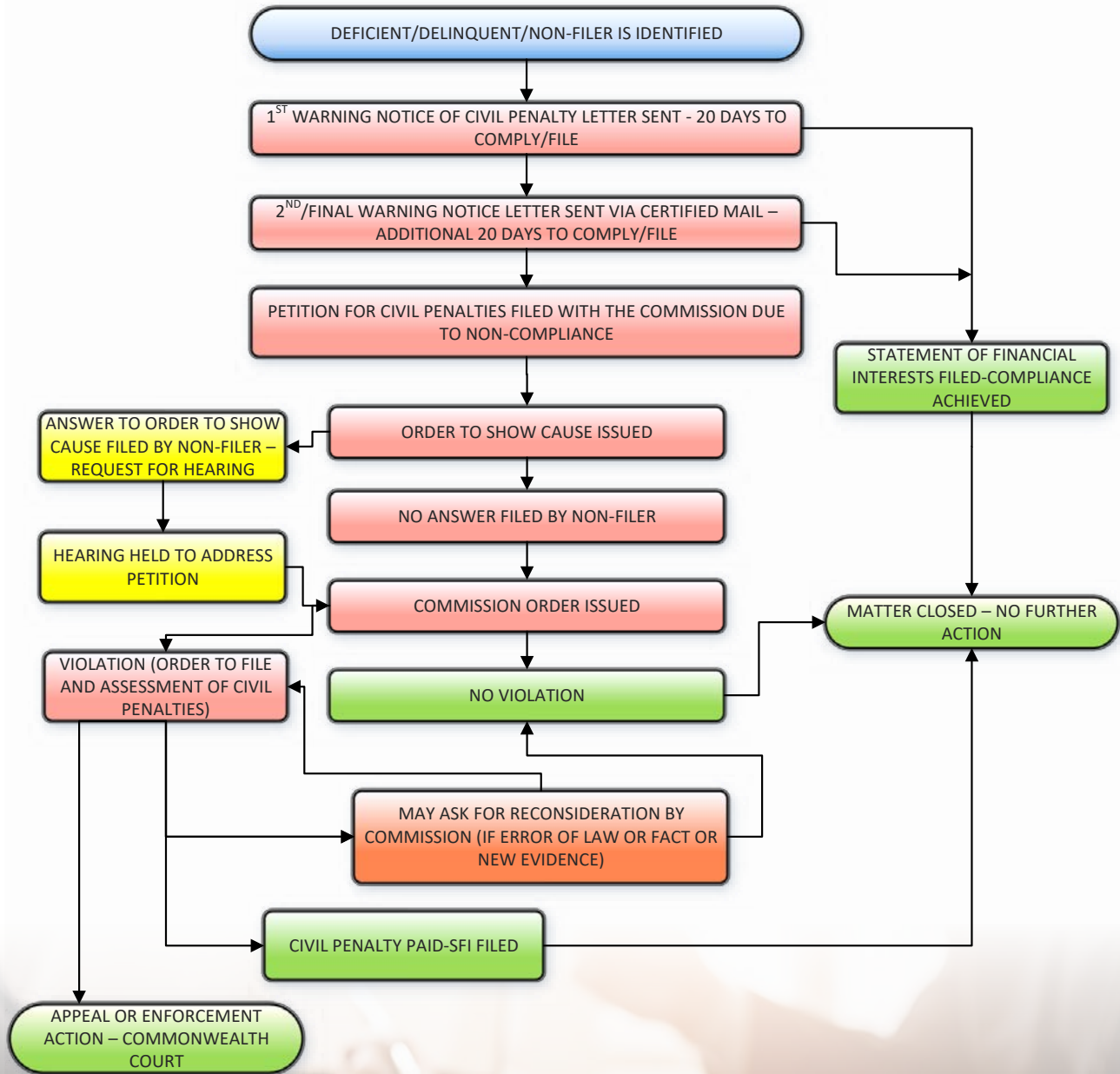
required by the Ethics Act. This included 831 individuals who failed to file a Statement of Financial Interests and 223 individuals who filed a deficient Statement of Financial Interests. The Commission's Administrative Division issued Warning Notice Letters directing those identified to file and/or correct any deficiencies within 20 days to avoid any further action by the Commission. The Warning Notice Letters resulted in 858 individuals filing/amending Statements of Financial Interests by the end of calendar year 2021. Of the remaining 196 individuals who failed to file or amend a Statement of Financial Interests, Petitions for Civil Penalties were filed with the Commission against 17 of those so identified. Approximately 179 more of these identified delinquent/deficient filers had yet to file within the cure period and will become subject to civil penalty proceedings filed by the Investigative Division. The offices (e.g., State Level Board Member, Constable/Deputy Constable, etc.) held by those identified 1,054 deficient/non-filing public officials/public employees are detailed in the illustration below.

The Commission's Investigative Division also conducted 11 on-site Compliance Reviews resulting in the identification of 168 delinquent/deficient filers. The issuance of Warning Notice Letters produced a 96% compliance rate (161 filers). The remaining non/delinquent filers will be subject to civil penalty proceedings. In addition to the issuance of Warning Notice Letters and other enforcement efforts, namely the filing of Petitions for Civil Penalties, during calendar year 2021, the Commission issued a total of 44 Orders that levied civil penalties against public officials/public employees who failed to correct delinquent/deficient Statements of Financial Interests, as required by the Ethics Act.

Delinquent/Deficient Non-filers Identified in Calendar Year 2021 by Category



CIVIL PENALTY ENFORCEMENT FLOWCHART



OPINIONS AND ADVICES

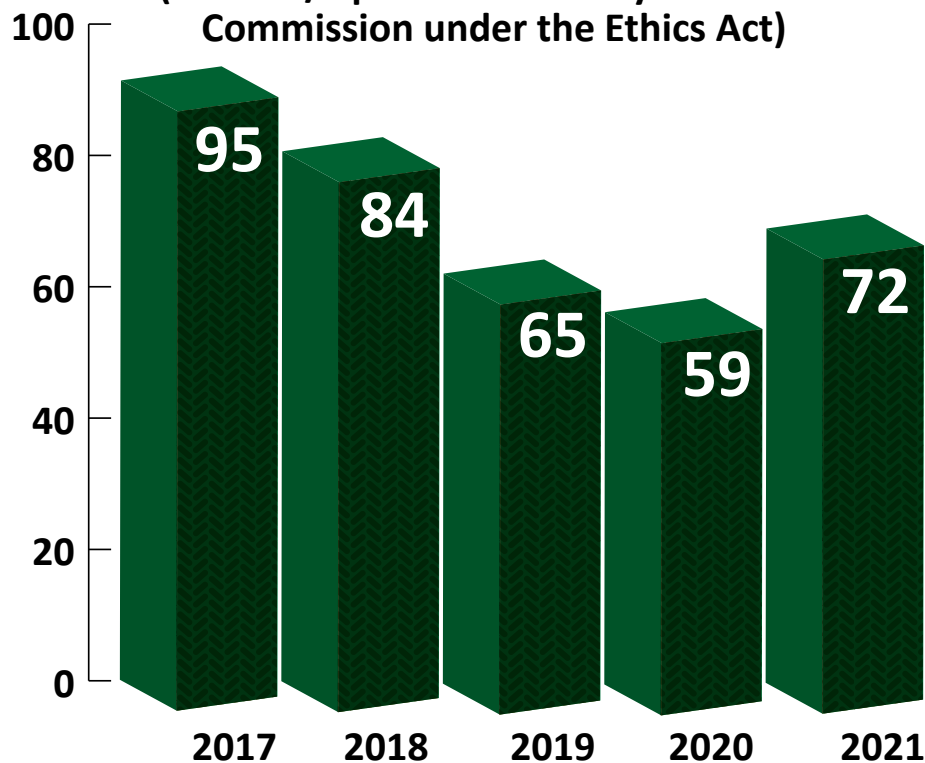
Sections 1107(10)-(11) of the Ethics Act direct the Commission to provide an Opinion or Advice to any person about his or her duties under the Ethics Act. An Opinion or Advice may also be provided to the employer or appointing authority of such person. Opinions and Advices provide a complete defense 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, 2021, through December 31, 2021, the Commission issued a total of 72 advisories under the Ethics Act, consisting of 2 Opinions and 70 Advices of Counsel. The Commission received multiple requests for advisories that could not be processed for various reasons.

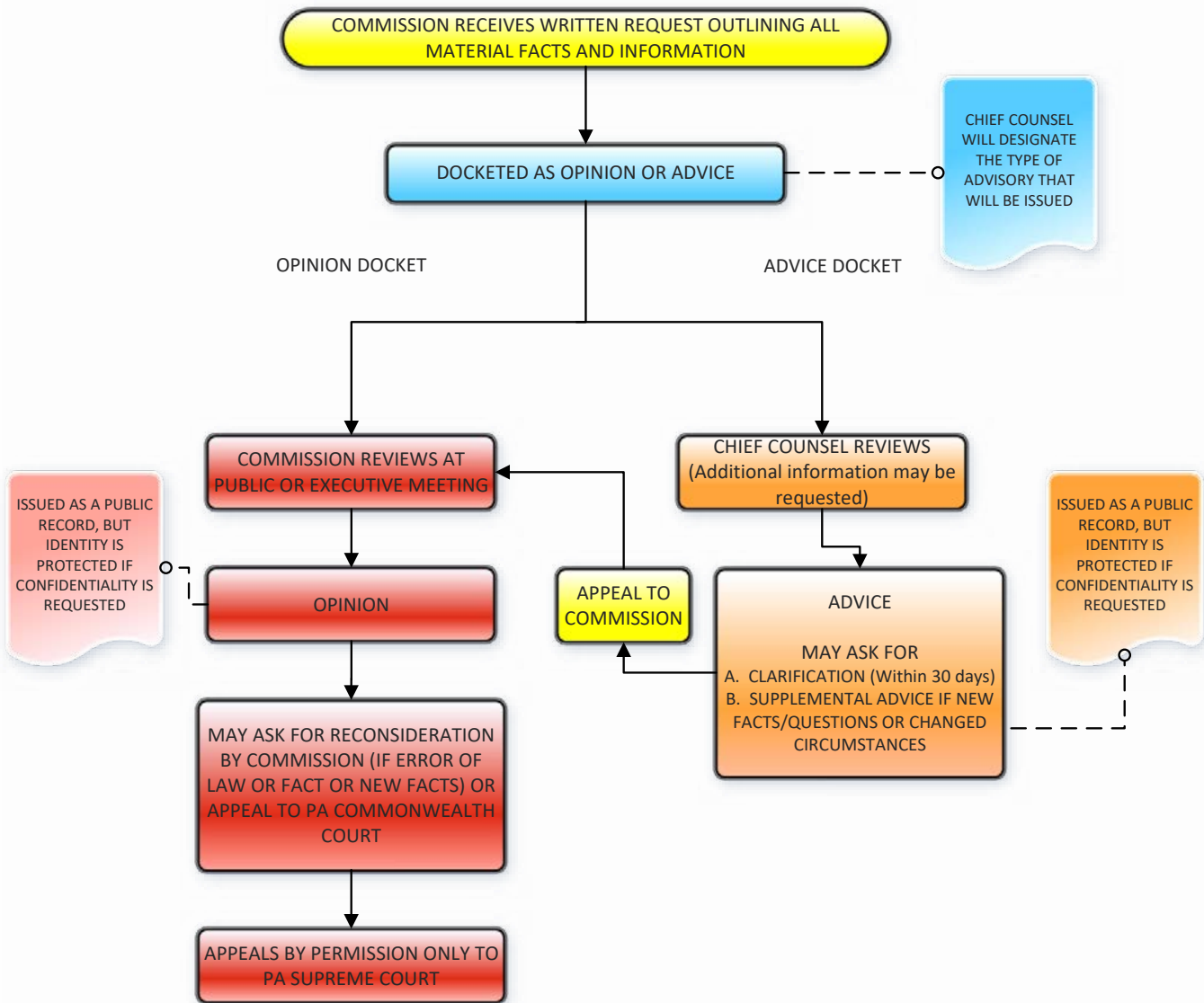
Opinions and Advices are public records. However, a requester may require that the Opinion or Advice contain such deletions and changes as shall be necessary to protect the identity of the persons involved. Pursuant to the Ethics Act, the Commission is required to provide specified libraries throughout 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 free of charge at www.ethics.pa.gov.

Advices/Opinions Statistics 2017-2021

(Advices/Opinions issued by the Ethics Commission under the Ethics Act)



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. For a sworn complaint to be valid, it must include the full name and address of the complainant(s) and respondent(s); contain allegations related to a specific individual(s); be signed by the complainant; and be properly notarized.

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 the matter is opened as a full investigation, the complainant will be notified within 72 hours, and both the complainant and the 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 360 days of the initiation of the full investigation. The respondent must file an Answer to the Investigative Complaint/Findings 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.

During 2021 the Investigative Division received 352 complaints which were all processed in 2021. Of those 352 complaints processed in 2021, 34 were opened as full investigations. The reduction in the number of complaints received in 2021 is in part attributed to the COVID pandemic. Consequently, the number of investigations initiated by the Commission has also decreased. The Commission ultimately issued 22 public Orders finding violations of the Ethics Act by public officials/public employees.

The Orders issued by the Commission in 2021 resulted in findings of violations of the Ethics Act and the imposition of financial penalties against a number of public officials/public employees including the Pittsburgh Public School District Superintendent, the Commonwealth Victim Advocate, multiple Commonwealth employees, and local public officials of boroughs, townships, school districts, and authorities. The

Orders found violations for conflicts of interest and prohibited honorarium, including diverting public monies for personal gain, and violations for delinquent and deficient Statements of Financial Interests.

Orders of note issued by the Commission in 2021 included the following:

Order No. 1791: Anthony Hamlet. Issued July 26, 2021.

Anthony Hamlet, Superintendent of the Pittsburgh Public School District, violated Section 1103(a) of the Ethics Act when he received travel expense reimbursements which had already been paid by the District. He also violated Section 1103(a) when he utilized leave for days when he was absent from the District for non-District related travel and was subsequently paid for such days, and when he carried over unused vacation/personal days when his contract prohibited such. He violated Section 1103(d) when he accepted honoraria in recognition of appearances, speeches, and/or presentations which were directly related to his public position. Additionally, he had numerous deficient Statements of Financial Interests.

Finally, he violated Section 1103(a) when he took part in a trip to Cuba sponsored by The Flying Classroom at a time when The Flying Classroom was seeking a contract with Pittsburgh Public School District.

Hamlet was directed to make payment/surrender leave time totaling \$20,265.01 and file Statements of Financial Interests for calendar years 2016, 2017, and 2018.

Order No. 1789: Jennifer Storm. Issued June 28, 2021.

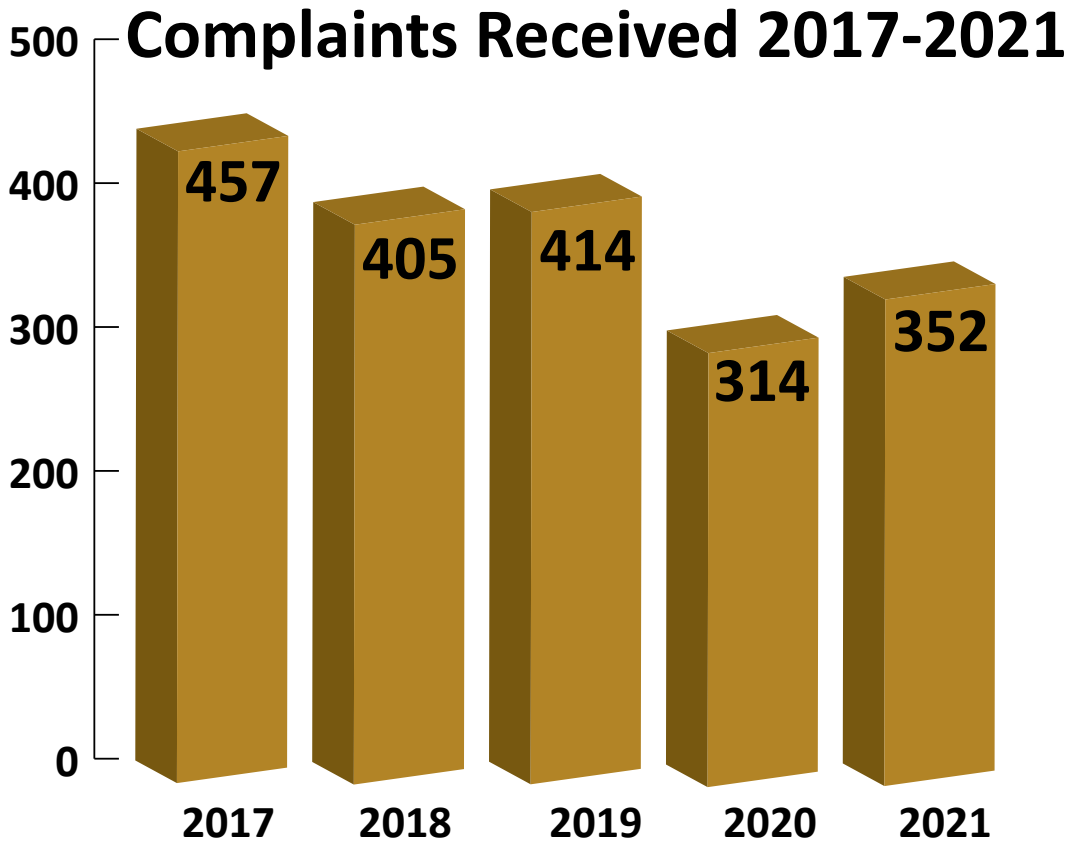
Jennifer Storm, the Victim Advocate for the Commonwealth of Pennsylvania, violated Section 1103(d) when she received honorarium payments from the State of Delaware for presentations which included portions related to her position as the Victim Advocate. She also had multiple deficient Statements of Financial Interests relating to failure to report travel/hospitality/lodging, and income.

Storm was directed to make payment in the amount of \$3,000.00 and file Statements of Financial Interests for calendar years 2017, 2018, and 2019.

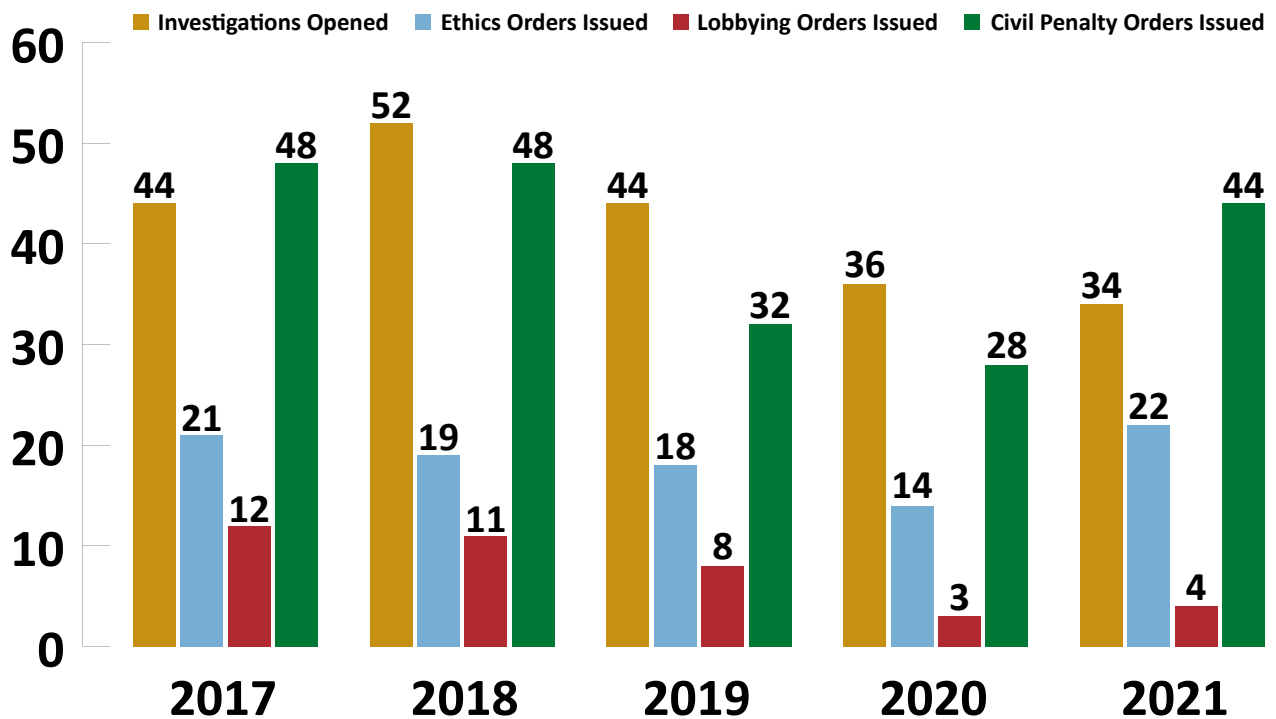
Order No. 1796: Robert Ayers. Issued December 2, 2021.

Robert Ayers, an Information Technology Executive 1 for the Enterprise Information Security Office in the Office of Information Technology within the Governor's Office of Administration for the Commonwealth of Pennsylvania, violated Section 1103(a) when he utilized confidential information and his access as a public employee to obtain contracts with county governments to provide IT services, when he engaged in private business activity during Commonwealth business hours, and when he utilized Commonwealth resources/property/equipment, resulting in a private pecuniary benefit to himself and Cyber Risk Services, LLC. He also had multiple deficient Statements of Financial Interests.

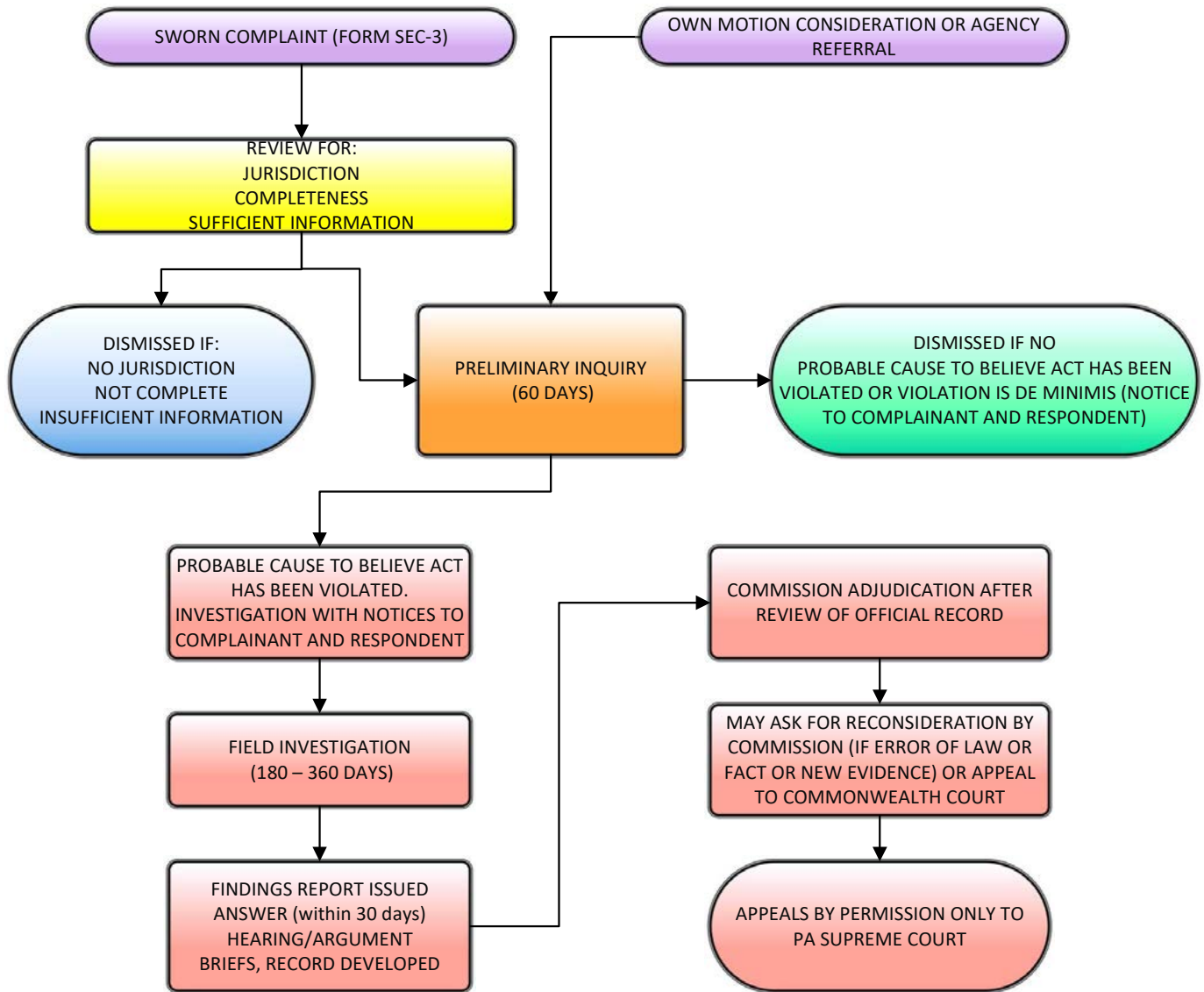
Ayers was directed to make payment in the amount of \$11,000.00 and to file Statements of Financial Interests for calendar years 2016, 2017, 2018, and 2019.



Investigative Statistical Summary 2017-2021



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, 2021, through December 31, 2021, the Commission issued one Opinion and no Advices under the Lobbying Disclosure Law.

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 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 Pennsylvania Office of Attorney General ("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) 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). 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 2021. The Commission, through the Investigative Division, monitors and enforces the Lobbying Disclosure Law 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 2021 the Pennsylvania Department of State did not identify any lobbyists, principals, or lobbying firms which had filed deficient Registration Statements and therefore, the Commission did not pursue any penalties against same.

During the reporting period for calendar year 2021, the Commission issued a total of 30 Warning Notice Letters to principals regarding their failure to file Quarterly Expense Reports as required by the Lobbying Disclosure Law. Four of those principals so notified did not file their Quarterly Expense Reports and/or otherwise comply with the Warning Notice Letters within the cure period. Those four principals were the subjects of Notices of Alleged Noncompliance, an action undertaken by the Investigative Division of the Commission seeking the assessment of monetary penalties against non-complying principals. In all, the Commission directed that a total of \$376,600.00 in penalties be paid to the Commonwealth.

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)).

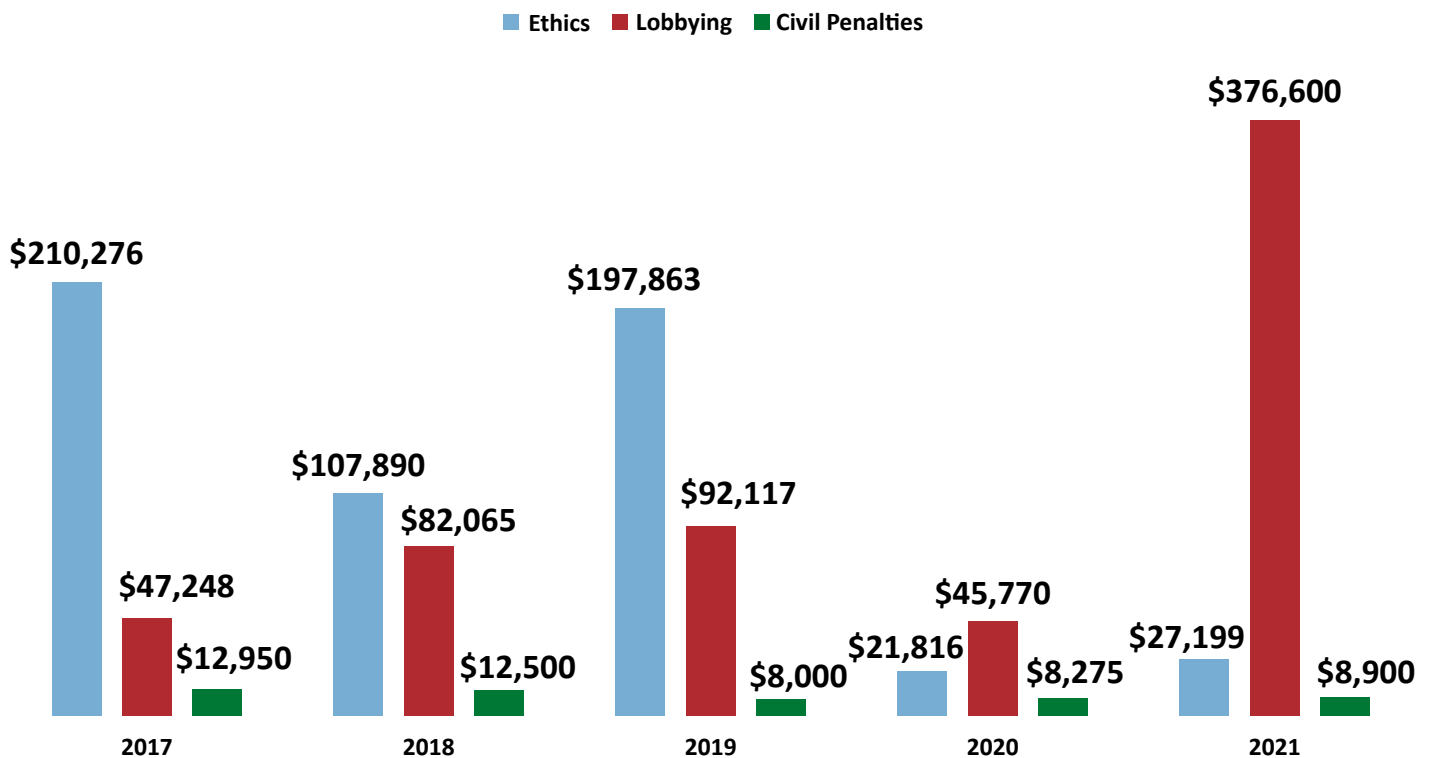
During calendar year 2021 the Commission ordered the payment of \$27,199.32 in restitution. This amount is attributable to Orders issued from both negotiated settlements and contested matters following evidentiary hearings.

In addition to any other civil remedy or criminal penalty provided for 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 \$8,900.00 in civil penalties during calendar year 2021.

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 the Act of February 14, 2018, P.L. 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 2021, the Commission levied penalties totaling \$376,600.00 for late/deficient lobbying Registration Statements and/or Quarterly Expense Reports.

Restitution/Penalties Ordered 2017-2021



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

From January 1, 2021, through December 31, 2021, the Commission did not receive any requests for Determinations under the Gaming Act.

Paper copies of Commission Determinations are available at cost from the Commission. Determinations are also available within the Commission’s e-Library, which may be accessed via the Commission’s website at www.ethics.pa.gov.

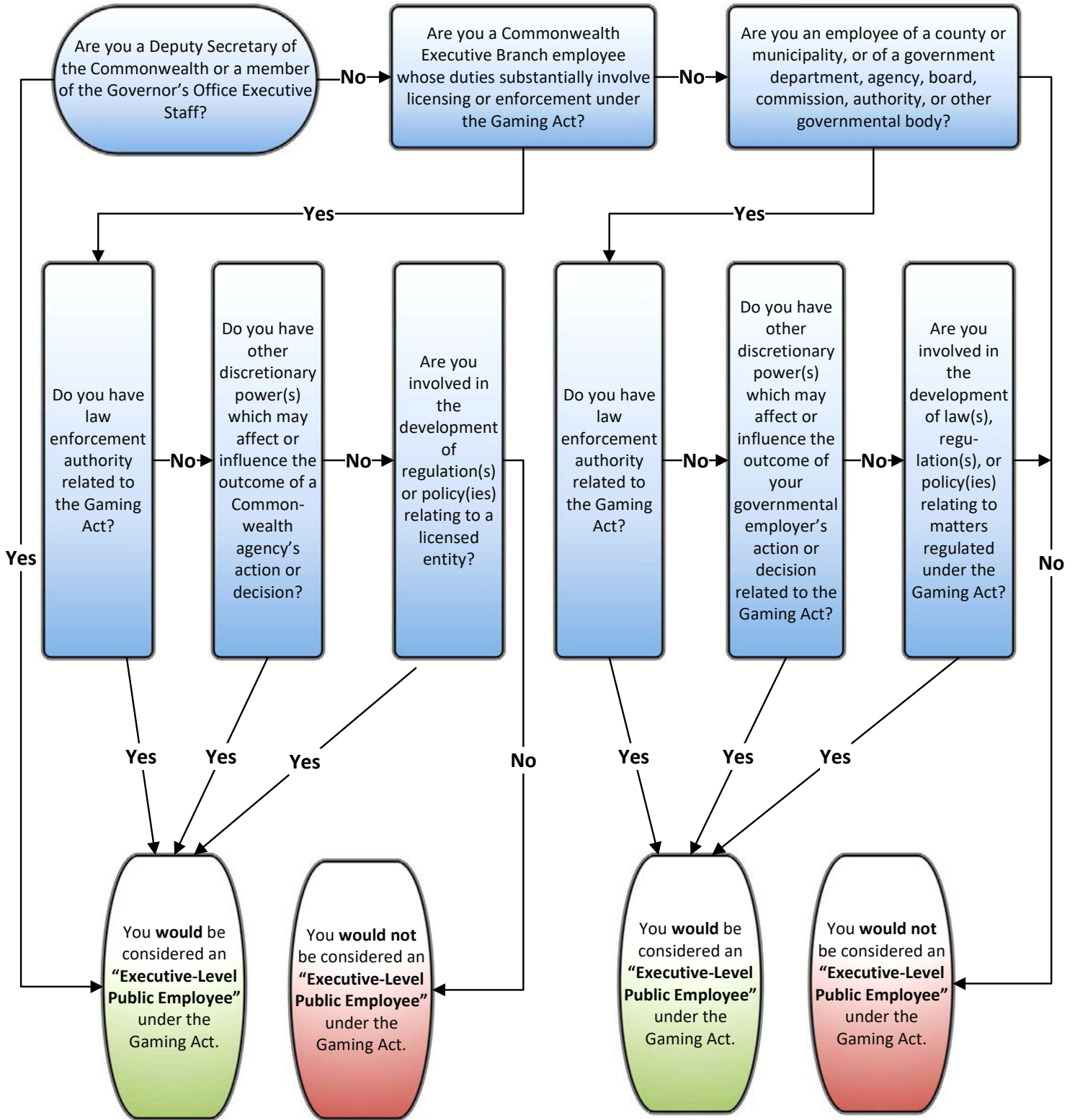
Gaming Lists

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 and via the Pennsylvania Gaming Control Board’s website at www.gamingcontrolboard.pa.gov, which features a link to the Commission’s e-Library.

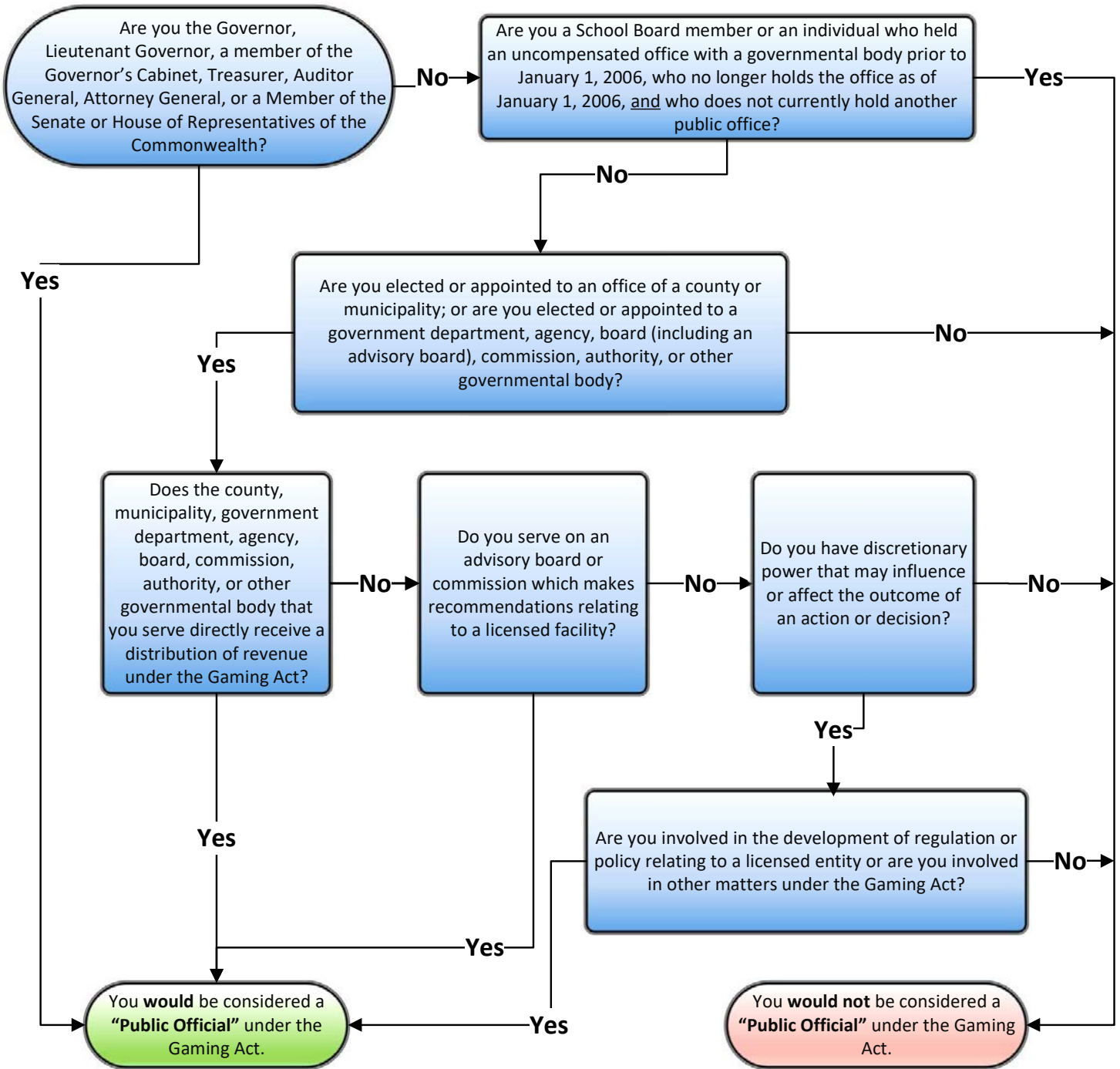
Status as an Executive-Level Public Employee or Public Official

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

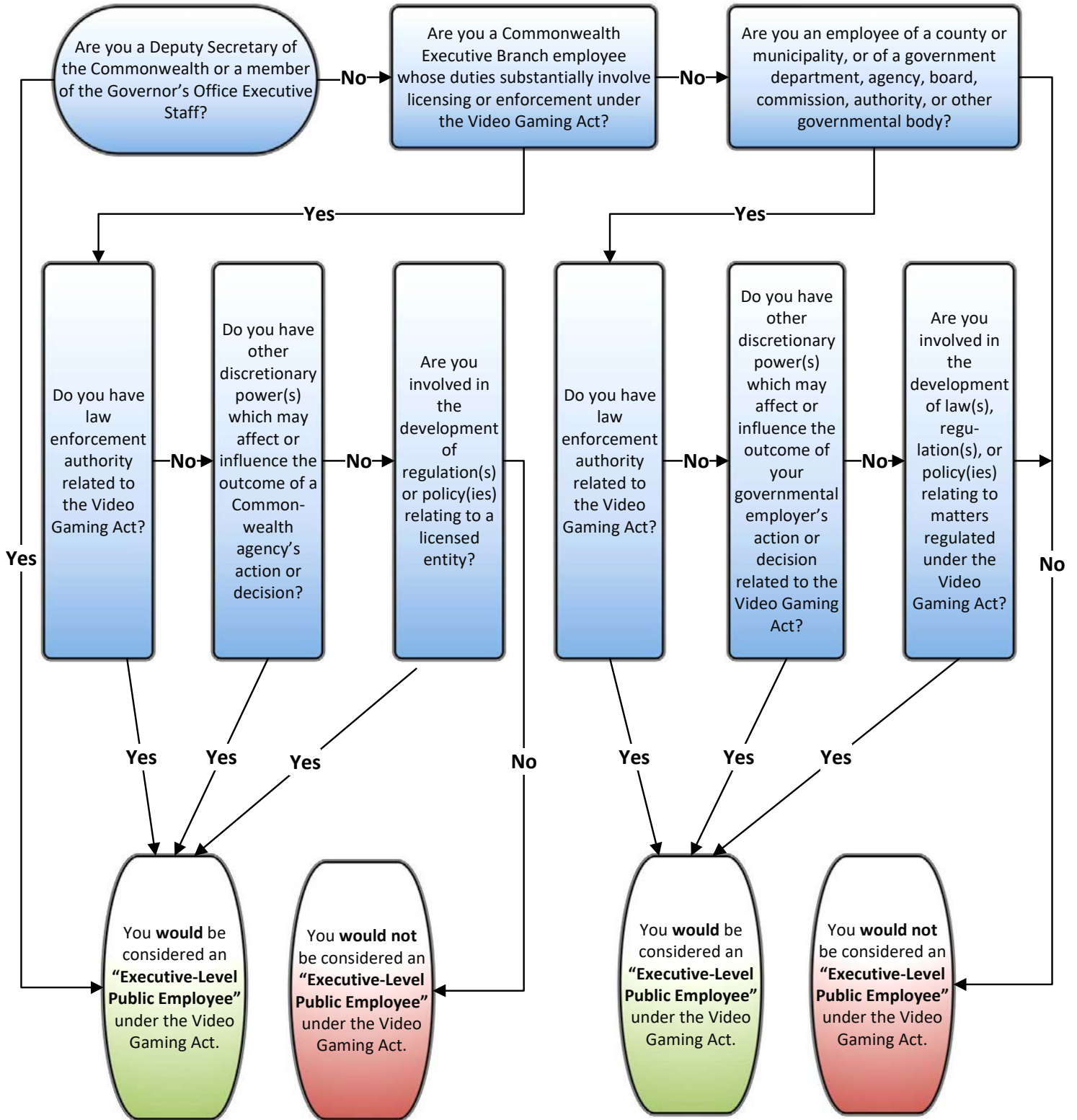
From January 1, 2021, through December 31, 2021, there were no requests submitted to the Commission for a Determination under the Video Gaming Act.

Status as an Executive-Level Public Employee or Public Official

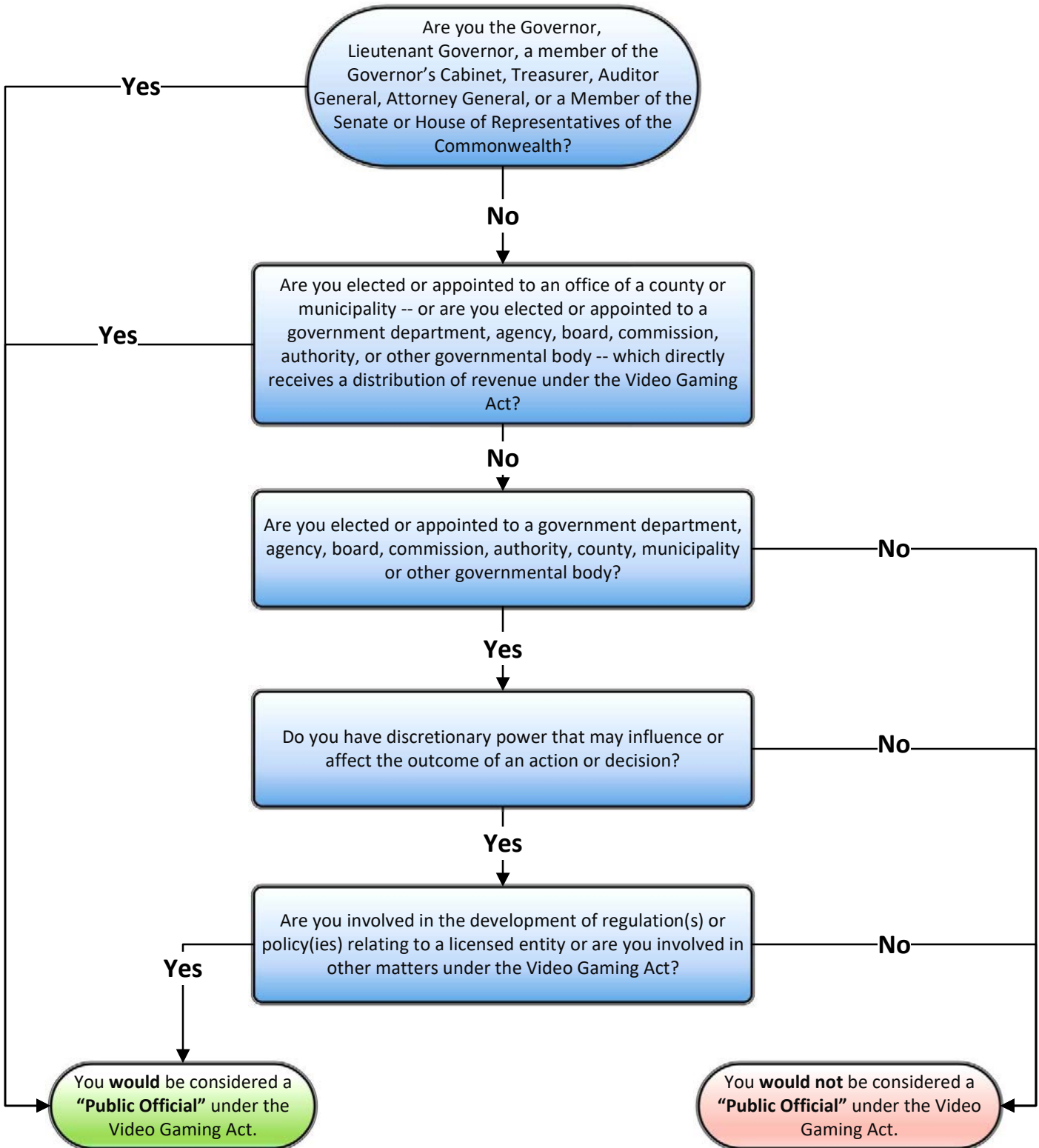
The term “executive-level public employee” is defined in Section 3102 of the Video Gaming Act. The term “public official” is defined in Section 4303(g) of the Video Gaming Act.



VIDEO GAMING ACT: Executive-Level Public Employee Flowchart



VIDEO GAMING ACT: Public Official Flowchart



PENNSYLVANIA MEDICAL MARIJUANA ACT (MMA)

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, 2021, through December 31, 2021, there were no requests submitted to the Commission for a Determination under the Medical Marijuana Act. 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.

Medical Marijuana Act Lists

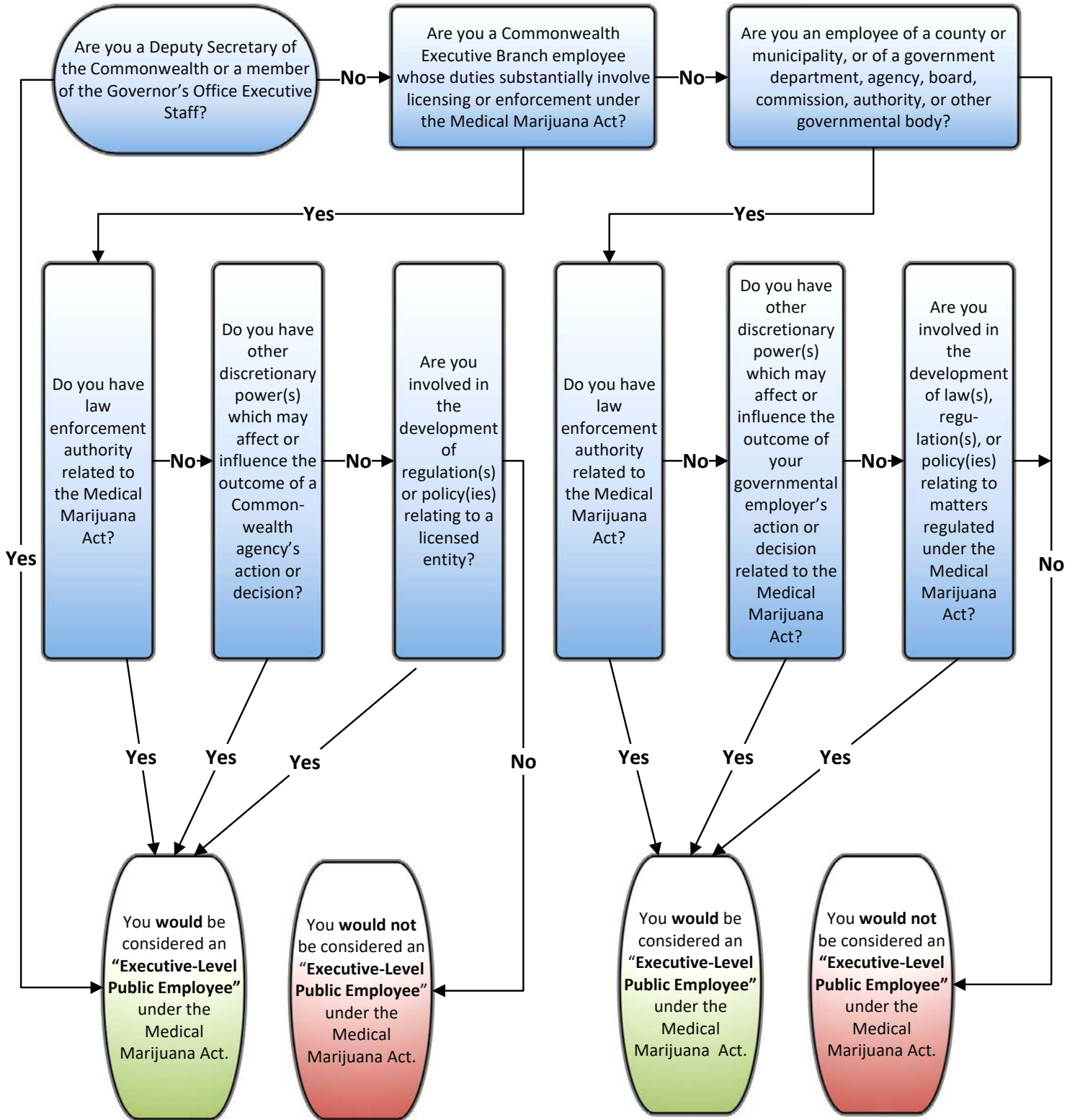
Lists developed by the Commission pursuant to the Medical Marijuana Act will be published biennially in the Pennsylvania Bulletin and can also be accessed via the Commission’s website at www.ethics.pa.gov.

Status as an Executive-Level Public Employee or Public Official

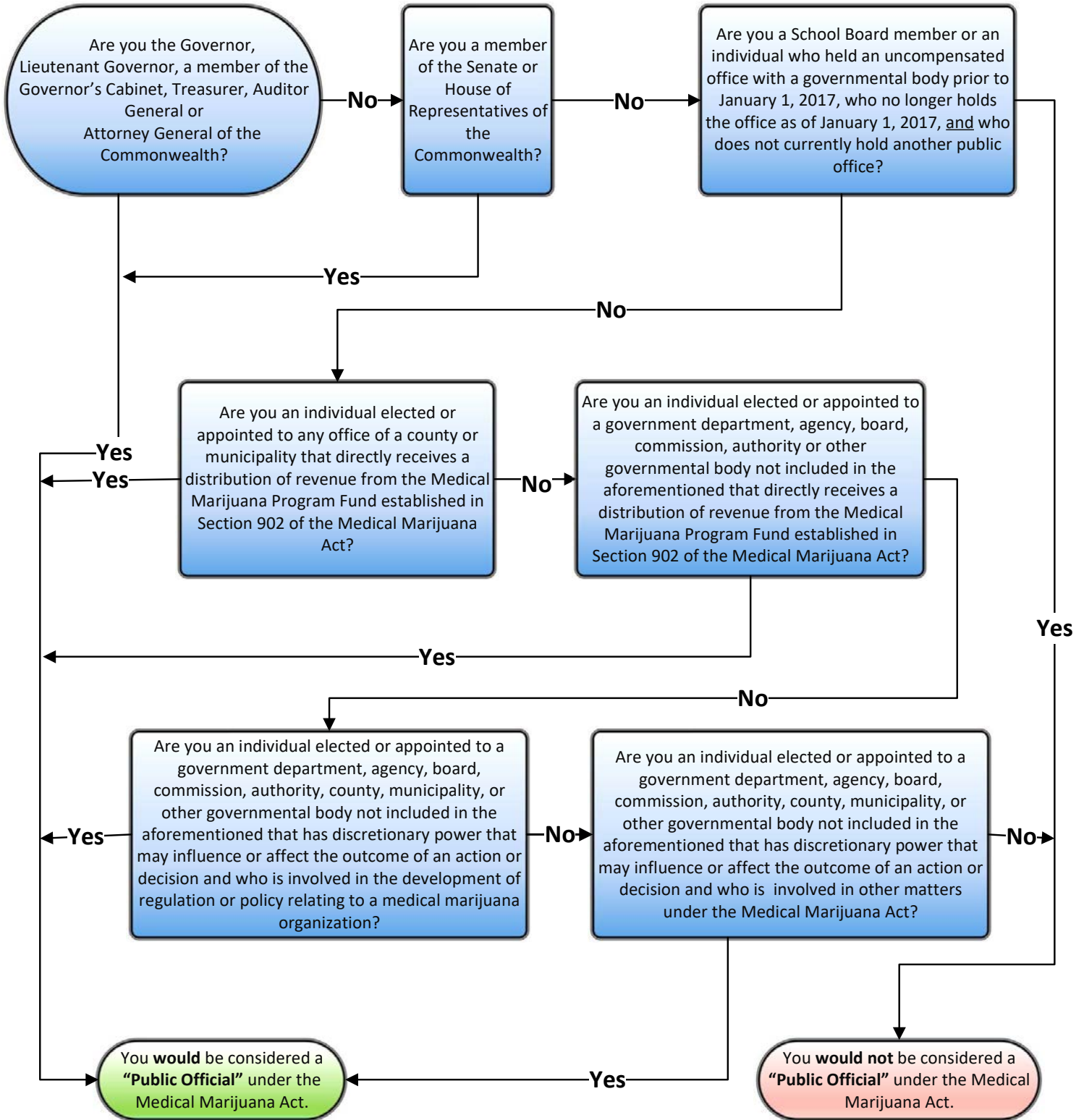
The term “executive-level public employee” is defined as it is defined at Section 1103 of the Gaming Act, 4 Pa.C.S. § 1103, with any references to “this part” referring to the Medical Marijuana Act rather than the Gaming Act. See, Knox, Determination 17-3001. The term “public official” is defined in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



MEDICAL MARIJUANA ACT: 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.

Two staff members attended the 2021 Virtual COGEL Conference.

The 2022 Annual COGEL Conference will be held in Montreal from December 4-7, 2022.

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 or virtual setting.

During calendar year 2021, the Commission staff completed twenty-one Ethics training events. Four of the twenty-one Ethics trainings were presented in person, and the remaining seventeen were virtual. The in-state training and outreach programs consisted of presentations geared towards local and state public officials and employees.

In 2021, a board member training was conducted virtually for the Pennsylvania Municipal Authorities Association (PMAA) in the spring. In addition, Commission staff presented at PMAA's 2021 Virtual Conference in the fall. Three virtual training sessions for the Pennsylvania State Association of Boroughs (PSAB) were conducted in the spring, in addition to PSAB's Annual Virtual Conference in the summer. Additional trainings/presentations were conducted at the Annual PA Chapter of the American Planning Association

Conference in Pittsburgh and the State Association Conference for Newly Elected Officials in Dubois.

Ethics Trainings/Presentations were also given to the following state agencies: Public School Employees' Retirement System and Office of General Counsel's Labor and Employment Practice Group and Transactions Practice Group. Commission staff also participated in a webinar with the PA Association of Conservation Districts.

Local trainings occurred at the Local Government Academy, Bucks County Intermediate Unit, Bradford County Commissioners' Office, West Goshen Township Building, Greater Johnstown School District and Falls Township. Furthermore, virtual presentations were provided to Criminal Justice Professors and students at Penn State, as well as Millersville University staff who are primarily affected by the Ethics Act.

The Commission hopes to resume more in person Ethics training sessions in calendar year 2022; however, it will continue to do as many virtual sessions as possible. 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.





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