

A MATTER OF PUBLIC TRUST

A quarterly newsletter of the Pennsylvania
State Ethics Commission

Winter, 2024

**“...the people have a right to be assured that the financial interests of holders of or nominees or candidates for public office do not conflict with the public trust.”
Ethics Act, Section 1101.1(a), Purpose.**

COMMONWEALTH OF PENNSYLVANIA
SEC-1 (Rev. 01/24)

STATEMENT OF FINANCIAL INTERESTS
SEE INSTRUCTIONS FOR ADDITIONAL DETAILS

PENNSYLVANIA STATE ETHICS COMMISSION
(717) 783-1610 • TOLL FREE 1-800-932-0936

01 LAST NAME FIRST NAME MI SUFFIX

02 ADDRESS office (business or governmental) or home City State Zip Code Area Code Phone

NOTE: IF YOU ARE INCLUDING ATTACHMENTS, DO NOT INCLUDE ANYTHING THAT BEARS YOUR SOCIAL SECURITY NUMBER OR FINANCIAL ACCOUNT NUMBERS.

03 STATUS Check applicable box or boxes, more than one box may be marked.

A Candidate (including write-in) C Public Official (Current) D Public Employee (Current) E Check this box if you are filing as a solicitor Check this box if you are amending an original filing

B Nominee C Public Official (Former) D Public Employee (Former)

04 PUBLIC OFFICE OR PUBLIC EMPLOYMENT (i.e. administrator, member, Commissioner, job title, etc.) seeking hold held

A seeking hold held

B seeking hold held

05 GOVERNMENTAL BODY in which you are/were an Official, Employee, Candidate or Nominee (e.g., dept, agency, authority, borough, board, commission, county, school district, twp, etc.)

A

B

06 OCCUPATION OR PROFESSION (This may be the same as block 4)

07 YEAR SEE INSTRUCTIONS

Statements of Financial Interests (SFIs) are due May 1, 2025.

Get your SFI done right! Get your SFI done on time!

You are invited to attend a **free, virtual, and interactive live session** offered by representatives of the State Ethics Commission on **Thursday, January 30, 2025 from 12:00 noon - 1:00 p.m.**

This session will walk you through completing and filing your SFI so you can be confident it is done right and done on time!

Register on the State Ethics Commission [website](https://events.gcc.teams.microsoft.com/event/5b691c95-d72a-4ce6-a719-888827925aeb@418e2841-0128-4dd5-9b6c-47fc5a9a1bde), or at this link: <https://events.gcc.teams.microsoft.com/event/5b691c95-d72a-4ce6-a719-888827925aeb@418e2841-0128-4dd5-9b6c-47fc5a9a1bde>

STATEMENTS OF FINANCIAL INTERESTS

MUST BE FILED BY MAY 1, 2025



WHO MUST FILE?

Public Officials, Public Employees, and Solicitors (all as defined in the Ethics Act).

HOW DO I KNOW IF I MUST FILE?

Governmental bodies generally keep a list of required filers, or you may contact the State Ethics Commission for guidance.



WHAT DO I FILE?

The SEC-1 form either in electronic or paper format, both of which are available on our website at www.ethics.pa.gov.

WHERE DO I FILE?

State-Level Public Officials - with the State Ethics Commission and each Agency, Board, Commission, Department, or Governmental Body in which you are employed or appointed.

Other Public Officials - with the governing authority of your respective local political subdivision (i.e., your County, Borough, Township, Municipal Authority, School District, etc.).

Public Employees - with your employer or political subdivision.

Solicitors - with the governing authority of each political subdivision for which you are a Solicitor.



WHAT HAPPENS IF I DON'T FILE, OR MAKE A MISTAKE?

Errors with filing can and should be corrected by filing a new or amended form. However, failure to file or correct a form can result in a penalty of up to \$250.

NEED MORE INFORMATION?

For more information, and for information regarding filing requirements for Candidates and Nominees, visit our website at www.ethics.pa.gov.

LESSONS LEARNED FROM RECENT COMMISSION CASES

Don't use reward and benefit points received through government travel for personal travel.



A Director-level employee of a Commonwealth agency, whose job duties required her to frequently travel overnight to various locations throughout the Commonwealth, violated the Conflict of Interest provision of the Ethics Act when she used hotel points earned as a result of traveling for the Commonwealth for hotel stays of a personal nature. Commonwealth policy allows employees who travel on Commonwealth business to open and maintain frequent flyer/guest accounts with airlines, hotels, and other suppliers of travel services. However, any credits, promotions, certificates, or other considerations earned in a frequent traveler program must be used for official Commonwealth travel. Despite this policy, the employee earned travel points from various hotel chains for her Commonwealth-related travel by listing her husband's hotel accounts on her hotel folios. The employee then used those travel points for free hotel stays in Orlando, Marco Island, elsewhere in Florida, and South Carolina for nine nights in 2021 and 2022, with a total value of \$2,519.42. As a result of a negotiated settlement between the Director and the Investigative Division, the Director agreed to make payment of \$1,000 to the Commonwealth and also agreed to use travel rewards program points accrued during Commonwealth travel only for future Commonwealth travel, in accordance with Commonwealth policies. Raymond, Order No. 1840.

MORE LESSONS LEARNED FROM RECENT COMMISSION CASES



Don't invoice a nonprofit on School District letterhead and then direct the District's Accounts Payable Secretary to issue you a personal check.

A School Superintendent violated the Conflict of Interest provision of the Ethics Act when he requested payment to the District for his participation on behalf of the District with a nonprofit organization, and then instructed the District's Accounts Payable Secretary to cut checks to pay the Superintendent.

The Superintendent participated in nine meetings held by a nonprofit organization whose goal was to improve the economic future for residents within the School District. The District was to receive payment of approximately \$10,000 for its participation, and was required to submit invoices to receive payment. District invoices signed by the Superintendent were submitted for payment, and checks were issued to the District. The Superintendent then instructed the District's Accounts Payable Secretary to cut him a check in the amount of \$3,334. Although the Board voted to approve the bill list that included the check to the Superintendent, a subsequent audit discovered the payment to the Superintendent, and he was ultimately terminated by the District. As part of a negotiated settlement between the Superintendent and the Investigative Division, the Superintendent agreed to make payment of \$3,334 to the District. Dalmas, Order No. 1841.

MORE LESSONS LEARNED FROM RECENT COMMISSION CASES

Don't vote to approve guest attendance and expenses associated with guest travel to business-related conferences. Don't charge personal expenses to your governmental body when traveling on government business and then vote to approve payments for the personal expenses.

After a full evidentiary hearing, the Commission found that an Authority Board Member violated the Conflict of Interest provision of the Ethics Act when she participated in Authority Board votes to approve guest attendance at conferences, expense payments associated with guest attendance, and payments for personal expenses associated with attendance at the conferences. These personal expenses included hotel upgrades, hotel charges for unnecessary early arrivals, baggage fees for guests, meals for guests and on days that were unnecessary early arrivals, and sightseeing tours including a swamp/plantation tour, bicycle rentals, jazz brunch, a Ferris wheel ride, and a speedboat tour.

The Commission rejected the Board Member's argument that she should not be subject to payment of restitution or other penalties because she was provided (erroneous) advice by the Solicitor that the Authority Board should adopt a policy to allow Authority Board Members and spouses/guests to travel to conferences and receive reimbursement for their expenses. However, the Commission also rejected the Investigative Division's request to impose treble penalties due to the Solicitor's advice.

The Commission ordered the Authority Board Member to make payment of restitution in the amount of \$3,519.83 to the Authority. The Commission also imposed five civil penalties totaling \$1,250.00 against the Authority Board Member due to her repeated failure to disclose necessary information each time she filed or amended a Statement of Financial Interests for calendar years 2016 through 2020. The Commission stated: "**Transparency is a hallmark of public service in the Commonwealth.**"

This case is currently on appeal before the Commonwealth Court of Pennsylvania.

GET TO KNOW US:



DAVID L. REDDECLIFF, ACTING VICE CHAIR

David L. Reddecliff was appointed as a member of the Commission on September 16, 2022, by the Honorable Bryan D. Cutler, former 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.

“Receiving the appointment to and serving on the Commission has certainly been an honor. I could not have asked for a more stimulating part-time assignment, which includes working with smart, dedicated, pleasant and dynamic staff, and a truly outstanding board of Commissioners.” - Dave Reddecliff

WELCOME

We would like to welcome Assistant Counsel Julie Karabin to our team!

Originally from the Pittsburgh area, Julie received both her undergraduate and law degrees from the University of Pittsburgh. Prior to joining the Commission, she served as a Staff Attorney for Neighborhood Legal Services where she had the opportunity to hone her litigation skills.

Julie will provide legal support to the Commission's Administrative and Investigative Divisions and training to public officials and public employees!



CONTACT US FOR ASSISTANCE AND GUIDANCE:

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