

State Ethics Commission

Fiscal Year 2025
Annual Report

Commonwealth of Massachusetts State Ethics Commission

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State Ethics Commission – Fiscal Year 2025

State Ethics Commission Members



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Associate Justice of the Supreme Judicial Court (ret.)



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Hon. Thomas A. Connors (ret.)

Regional Administrative Justice for Norfolk County (ret.)



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* Service ended October 2024

** Service began June 2025

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EXECUTIVE SUMMARY

The State Ethics Commission is a non-partisan, independent state agency which administers, provides advice and training concerning, and civilly enforces the state conflict of interest and financial disclosure laws. There are five Commissioners: three, including the Commission Chair, are appointed by the Governor, one is appointed by the Secretary of the Commonwealth, and one is appointed by the Attorney General. No more than two of the Commissioners appointed by the Governor, and no more than three Commissioners overall, may be from the same political party. Commissioners are appointed to five-year terms and each year one Commissioner's term expires and the term of their successor begins. No one may be appointed to more than one full five-year term as a Commissioner.

The Commission's Executive Director is responsible for the day-to-day management of the agency and its staff and reports to the Commission. The Commission's Chief Financial Officer and three Division Chiefs report to the Executive Director, except that the Legal Division Chief, who is also the Commission's General Counsel, reports to both the Executive Director and the Commission.

The Commission has three Divisions. The Legal Division provides advice to public employees and others on how the conflict of interest law applies to them, helps those required to file a Statement of Financial Interests and public agencies comply with the financial disclosure law, advises the Commission during adjudicatory proceedings, and administers the Statement of Financial Interests filing process. The Enforcement Division investigates alleged violations of the conflict of interest and financial disclosure laws and, when appropriate and authorized by the affirmative votes of at least three Commissioners, civilly prosecutes alleged violators. The Public Education and Communications Division provides educational programming on the conflict of interest law, responds to news media and other requests for information about the Commission, its activities, and the conflict of interest and financial disclosure laws, and maintains the Commission's website.

The Commission received an appropriation of \$3,664,121 in FY 2025, an increase of \$179,090 over FY 2024. In FY 2025, the Commission assessed \$118,000 in civil penalties. In addition, the Commission assessed \$25,000 in economic advantage damages and \$10,900 in restitution. In total, the Commission collected \$128,714 in civil penalties, financial advantage damages, and restitution in FY 2025. None of the penalty, damages, or restitution payments were retained by the Commission.

In FY 2025, the Legal Division responded to 5,166 requests for advice concerning the conflict of interest and financial disclosure laws, the Enforcement Division received 1,127 complaints alleging violations of those laws, and the Public Education and Communications Division conducted 47 seminars and responded to 443 requests for information about the Commission and the two laws.

Mission Statement

The mission of the State Ethics Commission is to foster integrity in public service in state, county, and local government, to promote the public's trust and confidence in that service, and to prevent conflicts between private interests and public duties. We strive to accomplish this mission by conducting educational programs, providing clear and timely advice, and fairly and impartially interpreting and enforcing the conflict of interest and financial disclosure laws.

INTRODUCTION

The Massachusetts conflict of interest law, General Laws chapter 268A, has regulated the conduct of public officials and employees in the Commonwealth since 1963. Chapter 268A governs what public employees may do “on the job,” “after hours” or “on the side,” and after they leave public service, and sets standards of conduct for all state, county, and municipal employees, including elected officials. The law requires that public employees give their undivided loyalty to the level of government for which they work, and that they act in the public interest.

Chapter 210 of the Acts and Resolves of 1978 established the state financial disclosure law, General Laws chapter 268B, requiring candidates for public offices for which one is nominated at a state primary or chosen at a state election, public officials holding such offices, and state and county employees in designated major policymaking positions to annually file a Statement of Financial Interests (SFI) for the preceding calendar year.

The Commission
administers and civilly
enforces the
provisions of the
conflict of interest law
and **financial
disclosure law**.

Chapter 210 also created the State Ethics Commission and empowered it to interpret and civilly enforce G.L. c. 268A and G.L. c. 268B. Commission staff provide advice on how to comply with the conflict of interest and financial disclosure laws, investigate allegations of violations of those laws, and conduct educational programs and provide information about the laws and the Commission. The Commission serves as the primary civil enforcement agency for the two laws.

Chapter 28 of the Acts of 2009 strengthened the conflict of interest law and enhanced the Commission’s ability to civilly enforce both the conflict of interest law and the financial disclosure law by: increasing the maximum penalties for violations of G.L. c. 268A and G.L. c. 268B (the Commission may impose a civil penalty up to \$10,000 per violation, except that a civil penalty of up to \$25,000 per violation may be imposed for violations of G.L. c. 268A, § 2); creating a statute of limitations specifically for Commission civil enforcement actions; giving Commission summonses the same force and effect as those issued by a superior court justice; prohibiting gifts of substantial value to public employees because of their official positions; empowering the Commission to order restitution and repayment of the economic advantage obtained through certain conflict of interest law violations; adding a false or fraudulent claims provision; and mandating conflict of interest law education and training for all public employees. Chapter 28 also amended the financial disclosure law to ban gifts of any amount from lobbyists to certain public officials and their immediate family members. Chapter 28 directed the Commission to prescribe and publish, pursuant to G.L. c. 30A, rules and regulations providing exemptions to certain sections of G.L. c. 268A. Pursuant to this direction and after completing the formal process to issue regulations, the Commission approved new regulations codified at 930 CMR 5.00 and 6.00.

Chapter 93 of the Acts of 2011 added section 6B to the conflict of interest law, requiring each candidate for state employment to disclose in writing as part of the application process the names of certain of their relatives employed by the Commonwealth. Chapter 194 of the Acts of 2011 added section 5(b½) to G.L. c. 268A, imposing a one-year restriction on any former state, county, or municipal employee who worked on any expanded gaming legislation or its implementation from becoming employed by a gaming licensee or from having a financial interest in an applicant for a gaming license or a gaming licensee. Chapter 194 also amended section 6 of the financial disclosure law to include gaming licensees and gaming license applicants within the definition of “legislative agents” for the purposes of that section.

EXECUTIVE ADMINISTRATION

Personnel

The Commission was staffed with 31 full-time and part-time employees, including one part-time contract employee, at the beginning of FY 2025 and 29 at the end of the fiscal year. The long-serving Public Education and Communications Division Chief, a Receptionist, and an Administrative Assistant left the Commission staff and a Receptionist joined the staff during fiscal year 2025.

Case Management System Replacement Project

During FY 2025, work continued on the project to replace the Commission's legacy case management system, Ethos, which had been in service since June 2005. The new Legal Case Management System (LCMS) is a software application designed to manage the Commission's legal cases and is part of a larger project to update the agency's internal systems. The new LCMS went live on March 4, 2025. Commission staff continued to work with the LCMS vendor throughout the fiscal year to implement additional features and system functionality. This multi-year project has been a collaboration with the Executive Office of Technology Services and Security (EOTSS) and four partner agencies: the Department of Labor Relations, the Department of Mental Health-Legal, the Department of Criminal Justice Information Services, and MassHealth's Board of Hearings.

Statements of Financial Interests Electronic Filing System Replacement Project

The Commission began to plan and seek capital funding for a project to replace the existing decade-old software application used to electronically file Statements of Financial Interests (SFIs) online. The Commission secured the opportunity to present the project to the state Information Technology Investment Advisory Board in December 2024. As a result of the presentation, the Commission was awarded \$1 million in capital project funding for FY 2025 and began work on the project. The Commission hired a consultant in June 2025 to assist with defining the project's technical requirements and selecting a vendor to develop the new SFI electronic filing application.

International Fellowship Program

In September 2024, an Enforcement Division Special Investigator visited Honduras through the Institute for Training and Development’s Professional Fellowship Program, a project sponsored by the U.S. Department of State’s Bureau of Educational and Cultural Affairs. The visit was part of a program through which the Commission had previously hosted a Professional Fellow from Honduras who served as an advisor to Honduran legislators on anti-corruption and transparency measures. During his time in Honduras, the Special Investigator accompanied the Professional Fellow to a meeting with two members of the National Congress in Tegucigalpa during which the Professional Fellow outlined her proposed reforms to Honduras’ Code of Ethical Conduct which she developed, in part, using the knowledge gained while a Fellow at the Commission.

Council on Governmental Ethics Laws (COGEL) Annual Conference

The Commission is a member of the Council on Governmental Ethics Laws (COGEL), an international organization for government agencies and other organizations working in government ethics, elections, freedom of information, lobbying, and campaign finance. A Commission delegation, consisting of the Executive Director, a Legal Division Attorney, an Enforcement Division Attorney, a Special Investigator, the Senior Public Information Officer, and the Senior Program Coordinator, attended the 46th annual COGEL conference from December 8-11, 2024, in Los Angeles, California. The Enforcement Division Attorney participated as a panelist in a conference session on enforcement updates and presented on the Commission’s significant enforcement cases from the previous year.

Staff Training

During FY 2025, Commission staff participated in trainings on topics chosen with staff input: Generational Diversity, facilitated by the Massachusetts Councils on Aging; Providing Communication Accessible Programs and Services, facilitated by the Massachusetts Commission for the Deaf and Hard of Hearing; Preventing and Addressing Harassment in the Workplace, facilitated by the Massachusetts Commission Against Discrimination. These trainings were the continuation of a series of staff trainings that began in FY 2024.

LEGAL DIVISION

Public employees and others who fall within the jurisdiction of G.L. c. 268A, the conflict of interest law, and G.L. c. 268B, the financial disclosure law, may ask for and receive free confidential advice about how those laws apply to them and their specific circumstances.

Requests for advice may be made by telephone, through the Commission’s website, by letter or email, or in-person, and are answered by Legal Division attorneys. The Legal Division strives to respond to telephone requests for advice on the same day or next business day and to requests for written advice within 30 days. Division attorneys will confirm oral advice by email if the requestor needs written confirmation. Advice is not given about past conduct or about the conduct of a third party who has not authorized the request. Division attorneys provide confidential advice based on

prior Commission rulings. If there is no Commission precedent for the issue to be addressed, the issue may be submitted to the full Commission for a formal opinion. Although formal opinions are also confidential, the Commission publishes summaries and public versions of such opinions which do not include the requestor's identifying information unless the requestor consents to their inclusion. The Commission did not issue any formal opinions in FY 2025.

In addition to providing advice, the Legal Division reviews conflict of interest law opinions issued by municipal counsel under G.L. c. 268A, § 22, to ensure that these opinions are consistent with Commission precedent.

Legal Division attorneys also review for completeness conflict of interest law disclosures filed with the Commission by state and county employees. Such disclosures are available to the public upon request and are listed on the Commission's website. In addition, Division attorneys serve as legal advisors to the Commission in adjudicatory proceedings. At the direction of the Commission or the presiding officer, Division attorneys prepare orders, rulings on motions, and drafts of decisions and orders in adjudicatory proceedings. In addition, the Commission's General Counsel is appointed by the Attorney General as a Special Assistant Attorney General and represents the Commission in civil litigation and appeals involving the Commission.

The financial disclosure law, G.L. c. 268B, requires all state and county elected officials, candidates for state and county office and appointed state and county employees in designated major policymaking positions to annually disclose their financial interests and private business associations by filing a Statement of Financial Interests (SFI).

The Legal Division administers the SFI filing process. The Legal Division Deputy Chief/SFI, the Special Assistant to Administration and SFI, the Legal Division Administrative Assistant, and the Commission IT Specialist comprised the Commission's SFI Team in FY 2025. The SFI Team handles all the administrative duties related to the filing of SFIs, including oversight of the SFI electronic filing system. The SFI Team also assists filers who have questions about how to complete their SFIs as well as agencies that have questions about designating positions as major policymaking positions.

SFIs are public records and are available upon request. Requestors may either complete a written request form or register online to view SFIs using the Public Inspection Module of the electronic SFI system. In either case, certain information exempt from disclosure under the Public Records Law is redacted before an SFI is made available to a requestor. In addition, G.L. c. 268B, § 3(d) requires that all requestors provide identification acceptable to the Commission, including their affiliation, if any, and that the Commission notify SFI filers of each request for their SFIs.

Without having to register as an SFI requestor, however, anyone may use the online Public Inspection Module to view a searchable index of all the public employees, public officials and candidates required

The Legal Division
staff answered 5,166
requests for advice in
FY 2025.



to file an SFI for a selected calendar year, beginning with CY 2018, and may search for specific filers by name, or for all filers from a particular agency, and learn whether required filers have completed their SFI filing for the year selected.

Throughout FY 2025, the Legal Division consisted of the General Counsel/Legal Division Chief, the Legal Division Deputy Chief/SFI, a Senior Assistant General Counsel, two Assistant General Counsels, two Staff Counsels, and an Administrative Assistant

FY 2025 Legal Division Activities

Advice

During FY 2025, the Legal Division answered 5,166 requests for advice. These requests consisted of 4,462 telephone or walk-in requests and 691 written requests, including by mail and email. The Division continued its practice of responding to telephone requests on the same day, or the following day, in most cases. The Division's average monthly backlog of written opinion requests older than 30 days was 1.4 during FY 2025, a decrease from an average of 2.4 the previous year. Overall, the Division answered 8.3% fewer requests for advice in FY 2025 than in FY 2024. This was due in part to the new reporting methods of the new Legal Case Management System that was implemented March 4, 2025. The Division also reviewed 13 municipal counsel conflict of interest law advisory opinions issued under G.L. c. 268A, § 22, pursuant to 930 CMR 1.03(3), and approximately 294 conflict of interest law disclosures filed by state and county employees. The number of disclosures received by the Division in FY 2025 increased by approximately 24% from FY 2024.

Adjudicatory Proceedings

During FY 2025, Legal Division attorneys acted as Legal Advisors in nine Commission adjudicatory proceedings alleging violations of G.L. c. 268A or G.L. c. 268B, six of which commenced in FY 2025.

The adjudicatory proceedings included: *In the Matter of Joseph Solomon, Docket No. 23-0010; In the Matter of Daniel Galvis, Docket No. 24-0006; In the Matter of Gilda Galvis, Docket No. 24-0007; In the Matter of Scott Callahan, Docket No. 24-0013; In the Matter of Jessica Santiago, Docket No. 24-0020; In the Matter of Thomas Brady, Docket No. 24-0026; In the Matter of Thomas Daly, Docket No. 25-0003; In the Matter of Northeast Material Handling, Inc., Docket No. 25-0004; and In the Matter of David Vigeant, Docket No. 25-0005.*

Litigation

In the case of Commonwealth v. Spaulding, Supreme Judicial Court Docket No.: SJC-13615, the Legal Division submitted an *amicus* letter on behalf of the Commission on the issue of the meaning of "unwarranted privilege" in G.L. c. 268A, § 23(b)(2)(ii). On January 31, 2025, the Supreme Judicial Court issued a decision concluding that G. L. c. 268A, §§ 23 (b) (2) (ii) and 26 are not unconstitutionally vague either on their face or as applied in that case. In its decision, the Court acknowledged the Commission's *amicus* letter and noted that the Commission has correctly interpreted "unwarranted privilege" in § 23(b)(2)(ii) to include the misuse of the benefits, privileges, or advantages of office for personal gain.

Other Legal Division Activities

In FY 2025, Legal Division attorneys provided training sessions and presentations on the conflict of interest law for several organizations, including the Mandela Washington Fellows hosted by Bridgewater State University, the Executive Office of Public Safety and Security Gun Control Advisory Council, the New Legislators Academy, Legislative staff training, the Judicial Ethics Program at the Executive Office of the Trial Court Judicial Institute, and the U.S. Department of State International Visitors Leadership Program. In addition, Division attorneys trained a new Commission staff member, participated in the Commission’s legal case management system replacement project, and took the lead on the SFI system replacement project.

Statements of Financial Interests

The filing season for calendar year 2024 SFIs was the most successful one based on every metric the Commission has tracked since 2012. The filing season for CY 2024 SFIs opened January 27, 2025. The total number of persons — appointed state and county employees holding major policymaking positions, elected state and county officials, and candidates for state and county office — required to file an SFI for CY 2024 was 3,872. The filing deadline was May 1, 2025 for appointed public employees and May 27, 2025 for elected public officials. For the CY 2024 SFI filing season, 99.38% of those filers filed by their deadline.

CY 2024 SFI Season

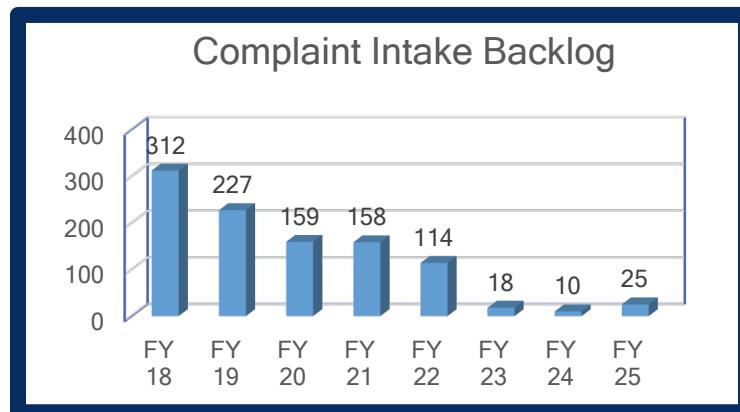
- **3,872 filers**
- **99.38% filed by deadline**
- **24 Formal Notices of Lateness issued**
- **0 Enforcement referrals**

When a filer fails to file by the deadline, the financial disclosure law, G.L. c. 268B, requires that a Formal Notice of Lateness be sent giving the filer an additional 10-day grace period to file without incurring a civil penalty. A total of 24 Formal Notices of Lateness were sent to those who missed the filing deadline, a 62.5% decrease from the previous filing season. No one was referred to the Enforcement Division in FY 2025 for failing to file their CY 2024 SFI.

In FY 2025, as in prior years, most SFI filers chose to file electronically rather than on paper. In FY 2025, 98.88% of all CY 2024 SFI filers filed electronically. The SFI Team encouraged electronic filing, which makes the process simpler and faster for the filer. In addition, an electronically filed SFI is automatically redacted by the SFI system so it is immediately available for review by both the filer and a member of the public using the SFI system’s Public Inspection Module. During the CY 2024 filing season, 45 SFIs were filed manually.

ENFORCEMENT DIVISION

The Enforcement Division investigates alleged violations of the conflict of interest and financial disclosure laws, and, when appropriate and authorized by the affirmative votes of at least three Commissioners, civilly prosecutes alleged violators of those laws. By law, the investigations are confidential and the prosecutions are public. The Division received 1,127 complaints in FY 2025 alleging violations of the conflict of interest law. In FY 2025, the Division negotiated eight disposition agreements and two public education letters, issued three confidential compliance letters, received favorable judgments in two adjudicatory proceedings, filed five Orders to Show Cause and sent 113 private education letters.



At the end of FY 2025, the Division's complaint intake backlog, which is defined as complaints received by the Commission that have been open for more than three months, was 25, a slight increase from the 10 backlogged complaints at the end of the previous fiscal year.

Throughout FY 2024, the Enforcement Division consisted of the Division Chief, a Staff Counsel, a Senior Assistant Enforcement Counsel, two Enforcement Counsels, six full-time Special Investigators, a contract Investigator, and an Administrative Assistant.

Investigations

The Enforcement Division, which generally receives between 750 and 1,100 complaints annually, received 1,127 complaints in FY 2025, compared to 918 in FY 2024. This increase was due, at least in part, to a change in methodology for tracking complaints in the new legal case management system that launched in March 2025. Complaints are made by telephone, mail, email, an online complaint form, fax, and in person. The Division reviews all complaints received by the Commission. If a complaint is about a matter that falls within the Commission's jurisdiction, the Division initiates an informal investigation. Informal investigations, conducted by the Division's investigators, generally include telephone interviews and requests for documents. If, based on this informal investigation, the Division believes there is some credible evidence to support the allegations, the complaint is assigned to a Division attorney for further action.

Many complaints assigned to Enforcement Division attorneys are resolved with private education letters. The Division sends a private education letter to the subject of the complaint if the Division believes that the alleged violation is minor in nature, the subject appears to have genuinely misunderstood the law, or pursuing the matter would be an inefficient use of Commission resources. These private letters explain the legal concerns raised by the alleged conduct and provide the subject with guidance on how to comply with the law in the future.

When the alleged violation is of a more serious nature, the Commission may, by the affirmative votes of at least three Commissioners, authorize a formal investigation called a preliminary inquiry. In connection with a preliminary inquiry, the Commission may, by the affirmative votes of at least three Commissioners authorize the Enforcement Division attorneys to issue summonses for documents and testimony under oath. As required by law, the Commission's General Counsel provides confidential notice to the Attorney General of all preliminary inquiries authorized by the Commission.

If the preliminary inquiry fails to indicate reasonable cause to believe that the conflict of interest law or the financial disclosure law has been violated, the Commission is statutorily required to immediately terminate the inquiry and so notify the subject of the preliminary inquiry and the complainant, if any. If the preliminary inquiry indicates reasonable cause to believe that a violation of the conflict of interest law or the financial disclosure law has occurred which the Commission thinks does not warrant a public resolution, the Commission may, by the affirmative votes of at least three Commissioners, find facts sufficient for reasonable cause and, in lieu of finding reasonable cause and authorizing adjudicatory proceedings, authorize the issuance of a confidential compliance letter. A confidential compliance letter identifies the alleged violations, explains the application of the law to the specific facts at issue, and informs the subject that future violations may be resolved through a public proceeding.

If the preliminary inquiry indicates reasonable cause to believe that a violation of the conflict of interest law or the financial disclosure law has occurred which the Commission concludes warrants a public resolution, the Commission may, by the affirmative votes of at least three Commissioners, find reasonable cause and authorize adjudicatory proceedings. When the Commission so votes, the Enforcement Division then offers the subject the opportunity to resolve the matter without an adjudicatory hearing through a public disposition agreement. In a disposition agreement, the subject of the preliminary inquiry admits to the facts and the violation, waives their right to a hearing, and agrees to pay a civil penalty. The Commission must approve all disposition agreements by the affirmative votes of at least three Commissioners. In FY 2025, the Commission approved eight disposition agreements in which the subjects paid a total of \$96,000 in civil penalties, \$25,000 in economic advantage damages, and \$10,900 in restitution.

Upon voting to find reasonable cause and authorize adjudicatory proceedings, Commission may further authorize the Enforcement Division to draft a public education letter to be issued in lieu of adjudicatory proceedings. Public education letters, which impose no civil penalty, may only be issued with the preliminary inquiry subject's consent. The Commission may authorize the issuance of a public education letter for reasons including novel circumstances or the widespread occurrence of similar conduct. The Commission must approve all public education letters by the affirmative votes of at least three Commissioners. The Commission issued two public education letters in FY 2025.

A preliminary inquiry subject who chooses not to resolve the matter by entering a disposition agreement, or in some cases by consenting to receive a public education letter, has the right to a public adjudicatory hearing at which both the subject and the Enforcement Division present evidence. Based on the evidence presented at the hearing, the Commission decides whether the subject violated the law and, if it so finds, may impose a civil penalty up to \$10,000 per violation, except that a civil penalty of up to \$25,000 per violation may be imposed for violations of G.L. c. 268A, § 2, the corrupt gifts

section of the law. Finding a violation requires the affirmative votes of at least three Commissioners. A Commission final decision is appealable by the subject to the Superior Court. In FY 2025, the Commission concluded two adjudicatory hearings and issued decisions and orders assessing a total of \$26,000 in civil penalties after finding the subjects violated the conflict of interest law.

Enforcement Division FY 2025 Investigations Statistics

Complaints	
Conflict of interest and financial disclosure law complaints pending at the beginning of FY 2025	136
Conflict of interest law complaints received during FY 2025	1,127
Complaints alleging failure to file an SFI	0
Complaints closed after informal investigation with no action by an enforcement attorney	644
Complaints closed after informal investigation with private educational letters to the subjects	113
Complaints assigned for preliminary inquiry recommendation	21
Conflict of interest law complaints pending at the end of FY 2025	147

Subjects of Informal Investigations	
Municipal employees	299
State employees	54
County employees	3
Private entities	9

Enforcement Cases	
Preliminary inquiries and post-reasonable cause matters pending from FY 2024	25*
Preliminary inquiries authorized by the Commission	21*
Preliminary inquiries and post-reasonable cause matters involving the conflict of interest law concluded by the Commission	15
Preliminary inquiries concluded with the authorization of an adjudicatory proceeding	12
Preliminary inquiries terminated by the Commission	1
Preliminary inquiries concluded with authorization of a confidential compliance letter to the subject to at least one party	3
Preliminary inquiries involving financial disclosure law violations resolved by the Commission	0
Preliminary inquiries and post-reasonable cause matters carried over to FY 2024	31*

**Preliminary inquiries involving more than one subject are counted as one preliminary inquiry.*

FY 2025 Public Enforcement Actions

The Commission publicly resolves cases through disposition agreements, public education letters, and adjudicatory proceedings resulting in final decisions and orders. In FY 2025, the Commission negotiated eight disposition agreements and issued public education letters in two cases. Two cases were resolved through adjudicatory proceedings. The cases publicly resolved in FY 2025, listed below, are published on the Commission's website.

In the Matter of Bridget Baker

The Commission approved a Disposition Agreement in which former Bristol Community College Mental Health Counselor Bridget Baker paid a \$4,000 civil penalty for violating section 23(b)(3) of the conflict of interest law through her actions as a state employee regarding a student and counseling client with whom she had a commercial relationship and personal friendship.

In the Matter of Scott Callahan

The Commission issued a Decision and Order entering summary decision against Auburn Water District Foreman Scott Callahan for violating section 23(b)(2)(i) of the conflict of interest law by accepting two free ski trips from a water meter manufacturer and its distributor. Callahan was ordered to pay civil penalties totaling \$6,000.

In the Matter of Edward Correira

The Commission approved a Disposition Agreement in which former Taunton Chief of Staff Edward Correira paid a \$6,000 civil penalty for violating section 18 of the conflict of interest law by, after leaving his City position, advocating on behalf of a subdivision developer and a business owner in connection with matters in which he had participated as Taunton Chief of Staff.

In the Matter of Shawn Crevier

The Commission issued a Public Education Letter to Ware Police Chief Shawn Crevier after finding reasonable cause to believe he violated section 23(b)(2)(ii) of the conflict of interest law by using his official position and public resources to advocate against and rally opposition to proposed gun law reform legislation through a series of posts on the Ware Police Department's Facebook page.

In the Matter of Natasha Halfkenny

The Commission approved a Disposition Agreement in which former Boston Tobin School Principal Natasha Halfkenny paid a \$4,000 civil penalty for violating section 23(b)(2)(ii) of the conflict of interest law by allocating tickets for the musical *Hamilton*, which were donated to the Tobin School for use by its students and their chaperones, to her son and the son of the school's assistant principal, who were not Tobin School students.

In the Matter of Coreen Miranda

The Commission approved a Disposition Agreement in which former Boston Tobin School Assistant Principal Coreen Miranda paid a \$4,000 civil penalty for violating section 23(b)(2)(ii) of the conflict of interest law by allocating tickets for the musical *Hamilton*, which were donated to the Tobin School for use by its students and their chaperones, to her son and the son of the school's principal, who were not Tobin School students.

In the Matter of Erik Ormberg

The Commission approved a Disposition Agreement in which Medfield High School Counselor and Head Football Coach Erik Ormberg paid a \$16,000 civil penalty for violating sections 17(c), 19, 23(b)(2)(ii), and 23(b)(3) of the conflict of interest law by using his public position and public resources to promote and encourage students to attend his private, for-profit football and athletic conditioning camps.

In the Matter of Julian Perez

The Commission issued a Public Education Letter to former Lawrence Building Inspector Julian Perez after finding reasonable cause to believe he violated sections 19 and 23(b)(2)(ii) of the conflict of interest law by using his official position and the access it provided to change the status of his building permit to “approved” after the city had withdrawn the permit and issued Perez a stop-work order.

In the Matter of Jessica Santiago

The Commission issued a Decision and Order entering summary decision against Jessica Santiago for violating sections 23(b)(2)(ii) and 23(b)(4) of the conflict of interest law by, while simultaneously an employee of the state Department of Conservation and Recreation and the City of Revere, repeatedly using paid work time and sick leave from each of her public positions to perform paid work in her other public position, and by submitting false timesheets to each of her employers to be paid for hours she did not work for that employer. The Commission ordered Santiago to pay a \$20,000 civil penalty for the violations.

In the Matter of Floyd Teague

The Commission approved a Disposition Agreement in which former Bristol County Deputy Sheriff Floyd Teague paid a \$40,000 civil penalty and \$25,000 in economic advantage damages for violating sections 6 and 23(b)(2)(ii) of the conflict of interest law by conducting a public auction in which he placed an absentee bid on behalf of his spouse for a seized modular home, then awarded her the home, which she later renovated with his help and sold at a profit.

In the Matter of Christopher Vincent

The Commission approved a Disposition Agreement in which Christopher Vincent, Foreman of the Town of Carver Operations and Maintenance Department, paid a \$10,000 civil penalty for violating sections 19 and 23(b)(2)(ii) of the conflict of interest law by using town resources to replace a fence on his private property.

In the Matter of William Watkins

The Commission approved a Disposition Agreement in which Holbrook Select Board member William Watkins paid an \$8,000 civil penalty and \$10,900 in restitution to a local mason for violating Section 23(b)(2)(i) of the conflict of interest law by accepting work on his home walkways, steps, and porch that was performed for free due to his position as Select Board member.

Civil Penalties

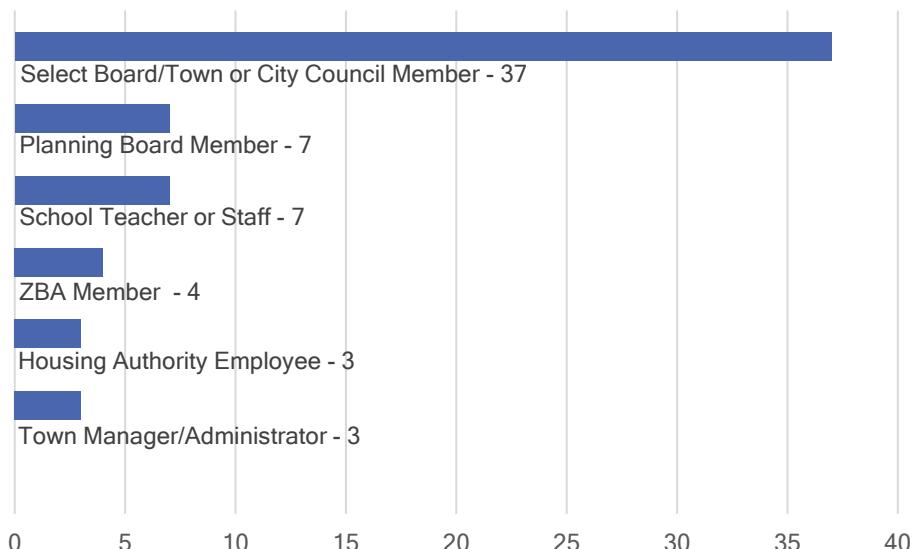
The Commission imposed \$118,000 in civil penalties on conflict of interest law violators, \$25,000 in economic advantage damages payments, and \$10,900 in restitution in FY 2025. The Commission collected a total of \$128,714 in civil penalties, economic advantage damages, and restitution payments in FY 2025. Civil penalties collected by the Commission revert to the Commonwealth’s General Fund. Restitution payments collected by the Commission are forwarded to the person or entity injured by

the violation. Economic advantage damages payments received by the Commission on behalf of the Commonwealth revert to the Commonwealth's General Fund. Payments received on behalf of a county or municipality are forwarded to the county or municipality.

FY 2025 Private Education Letters

The Enforcement Division sends private education letters when it believes the conflict of interest law was violated but the matter does not warrant a public resolution, or when the Division believes the subject of an informal investigation could benefit from more information regarding the law. Letters are sent to ensure the subjects do not continue their apparent misconduct and/or to provide clear guidance on how to comply with the conflict of interest law in the future. The Division sent 113 private education letters in FY 2025. Five of the letters were sent to state employees, two were sent to county employees, one was sent to a private entity, and 98 were sent to municipal employees. The Division sent letters to employees of 65 municipalities.

- The highest number of letters went to those in the following positions:



- The letters issued by the Enforcement Division in FY 2025 addressed the following allegations:

Acting as an agent for a private party before the employing state or municipality (§§ 4 and 17)	6
Accepting compensation in connections with a matter before the employing state or municipality (§§ 4 and 17)	5
Engaging in post-employment restrictions, the one year and forever ban (§ 18)	2
Participating in matters pertaining to abutting property (§§ 6 and 19)	12
Participating in other matters that directly affect the employee's financial interest (§§ 6 and 19)	26

Participating in other matters that directly affect the employee's family member's financial interest (§§ 6 and 19)	20
Participating in other matters that directly affect the employee's private employer or potential employer (§§ 6 and 19)	2
Participating in other matters that directly affect a business organization where the employee serves as an officer, director, or business partner (§§ 6 and 19)	2
Holding multiple state or municipal positions (§§ 7 and 20)	5
Having another financial interest in a contract with the employing state or municipality (§§ 7 and 20)	4
The appointment to a position by one's own board (§ 21A)	0
Employing or entering into a business arrangement with subordinates (§§ 23(b)(2) and 23(b)(3))	2
Using public resources to retaliate against others (§ 23(b)(2)(ii))	1
Using public resources for political activity (§ 23(b)(2)(ii))	2
Using public resources to benefit oneself (§ 23(b)(2)(ii))	9
Using public resources for other private purposes (§ 23(b)(2)(ii))	11
Accepting a gift (§§ 3 and 23(b)(2)(i))	3
Creating the appearance of a conflict (§ 23(b)(3))	32
Releasing confidential information (§ 23(c)(2))	2
Filing a false claim (§ 23(b)(4))	0

Public Education and Communications Division

The Public Education and Communications Division provides free educational seminars both online and in person throughout the Commonwealth, responds to requests for information from the news media and the general public, maintains the Commission's website, prepares and issues press releases and Commission publications, and manages the statutory education and training requirements for public employees. The Division consisted of the Division Chief, a Senior Public Information Officer, and a Senior Program Coordinator at the beginning of FY 2025. The Division Chief left the Commission staff in June 2025 when he retired.

Seminars

The Public Education and Communications Division conducts free seminars on the conflict of interest law for state, county, and municipal employees. In the seminars, Division staff provide an overview of the law, provide illustrative examples, and explain how to avoid potential conflicts that may arise between the private interests of public employees and their public positions and responsibilities. Since May 2022, all seminars have included content specifically informing municipalities and public agencies that contracted vendors, attorneys, and consultants who become public employees for purposes of

the conflict of interest law must comply with conflict of interest law education requirements. In FY 2025, the Division conducted 47 seminars. A total of 1,956 public employees and consultants attended seminars in FY 2025. Twenty-three FY 2025 seminars were conducted remotely by videoconference and 24 were held in person.

Public Information

In FY 2025, the Public Education and Communications Division responded to 443 telephone and email inquiries from members of the news media and the general public. Due to confidentiality restrictions imposed on the Commission by law, the Commission neither confirms nor denies the existence of any complaint or investigation, or whether anyone has sought or received advice from the Commission. The Division does, however, provide general explanations of the law and other public information concerning the Commission and its activities, and will refer individuals to the Commission's website for additional information.

Education and Training Requirements

The conflict of interest law requires that, each year, all state, county, and municipal employees be furnished with a summary of the conflict of interest law prepared by the Commission, their receipt of which they are required to acknowledge in writing. The law requires the Commission to furnish the summary to all elected state and county officials, and to receive for filing their acknowledgments of receipt. The law also requires that, every two years, all state, county, and municipal employees complete the Commission's online training program on the conflict of interest law. Newly appointed public employees and elected officials must complete the education and training requirements within 30 days of their appointment or election.

In January 2023, the Commission launched a new online training program to replace two legacy programs that had been in use since December 2012. The new training program and the summaries of the conflict of interest law are hosted on a vendor-provided learning management system, allowing for easy-to-use self-registration, electronic reminder notifications and employee compliance reporting. Each of the 826 public agencies using the Commission's system, including all 351 of the Commonwealth's municipalities and an additional 475 state and county agencies, charter schools, regional school districts, and independent municipal districts can view employee compliance with the education requirements at a glance without having to store or search paper files or contact employees for their completion records. Public employees now receive and acknowledge receipt of the summary of the conflict of interest law electronically. Digital completion certificates are stored in the system where public employees and the administrators at their agencies or municipalities may view them.

Online Training in FY 2025

- **826** public agencies using Commission's LMS
- **324,759** public employee user accounts
- **437,292** completions recorded

The Public Education and Communications Division maintains records of the conflict of interest law summary acknowledgments and online training program completions from all elected state and county officials. Starting in January 2025, Division staff sent notices to all state and county elected officials requesting that they complete the 2025 education requirements by acknowledging receipt of the summary of the conflict of interest law on the Commission's online training website. By the end of FY 2025, all elected state and county officials completed the acknowledgement of receipt of the summary of the conflict of interest law, and all newly elected state and county officials completed the conflict of interest law online training course.

During FY 2025, the Commission worked with its vendor to create a new branch of online training content for appointed staff of the state Legislature. This new content branch was added to the online training course in June 2025. All conflict of interest law online training content features English audio narration with closed captioning available in English, Spanish, Portuguese, Haitian Creole and traditional and simplified Chinese.

By the end of FY 2025, 324,759 public employees had created user accounts to use the Commission's training site. The Commission's online learning management system issued 437,292 course completion certificates in FY 2025, either for completing the online training program or for acknowledging the summary of the conflict of interest law.

Website

The Public Education and Communications Division manages and maintains the Commission's website, www.mass.gov/orgs/state-ethics-commission, which is part of the Mass.gov platform. The website includes news and announcements from the Commission as well as information about the history, activities, and precedents of the Commission. The Commission's educational materials, disclosure forms and instructions, enforcement actions, advisory opinions (summaries of all – and full texts of most), press releases, lists of state and county employees who have filed conflict of interest law disclosures with the Commission, and meeting minutes and meeting notices are available online. The website contains more than 65 different educational materials, ranging from summaries of the law for specific municipal employees, such as selectmen or school committee members, to primers and advisories which address specific topics or issues. Visitors to the website can also submit complaints, request advice, or request public records through the website.

At the end of FY 2022, the Division began a project to upload to the Commission's website decades-old Commission formal opinions, which had been previously published in print form and were available online from the Social Law Library but had not been uploaded to the website. By the end of FY 2025, all Commission formal opinions dating back to 1984 were available on the website. In addition, approximately 1,000 opinions dating from 1978 through 1983 were uploaded. Of those, 639 were published by the end of FY 2025 and 324 were awaiting publication online pending final review by staff.

Other Public Education and Communications Division Activities

Public Education and Communications Division staff provide support for Commission meetings by preparing electronic versions of monthly meeting packets, posting meeting notices, recording meeting minutes, and providing meeting day videoconference support. Division staff also provide videoconference support to the Legal and Enforcement Divisions, including for hearings and sworn interviews. In addition, the Senior Public Information Officer served as the Commission's Records Access Officer in FY 2025 and responded to 147 public records requests, to which 1,306 records were provided in response. Division staff also participated in the legal case management system replacement project and the development of new online training content. In addition, Division staff manage the Commission's social media accounts on LinkedIn and YouTube.

Public Education and Communications Division Activities	
Press releases issued	17
Educational seminars conducted	47
Seminar attendance	1,956
Inquiries from media and general public	443
Inquiries concerning the education and training requirements	191
Inquiries concerning the online training system	5,593
Website average monthly visitors	22,264
Website average monthly page views	49,981

Information Technology Services

The Commission's information technology and network resources are maintained and updated by the Commission's Information Technology (IT) Specialist, who in FY 2025 reported to the Public Education and Communications Division Chief and to the Legal Division Deputy Chief/SFI. The IT Specialist provides technical support for the Commission's LCMS application, SFI electronic filing application, and online conflict of interest law training program.

In FY 2025, the IT Specialist updated the Commission's Checkpoint firewall network protection equipment and provided support to the legal case management system project and SFI electronic filing application. The IT Specialist researched and made recommendations on the purchase of new IT equipment. The IT Specialist also attended cybersecurity training classes and participated in monthly EOTSS briefings for state agency information officers to receive updates on statewide IT initiatives.



INTEGRITY IN PUBLIC SERVICE

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