

ADVICE



EDUCATION



DISCLOSURE



ENFORCEMENT

STATE ETHICS COMMISSION

Fiscal Year 2010
Annual Report

MASSACHUSETTS STATE ETHICS COMMISSION
One Ashburton Place, Room 619
Boston, MA 02108
617-371-9500
www.mass.gov/ethics



Commissioners

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United States District Court Chief Magistrate Judge (ret.)
Arbitrator-Mediator
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Boston, MA
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Boston, MA
- ❖ **Jeanne M. Kempthorne, Vice Chairman**
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Salem, MA
- ❖ **David L. Veator**
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Arbitrator-Mediator
JAMS, Inc.
Boston, MA
- ❖ **Paula Finley Mangum****
Principal
Law Office of Paula Finley Mangum
Boston, MA

* Term expired October 2009

** Appointed February 2010



INTRODUCTION TO THE STATE ETHICS COMMISSION

Since 1963, the Massachusetts conflict of interest law has regulated the conduct of public officials and employees in the Commonwealth. Massachusetts General Laws c. 268A governs what public employees may do on the job, what they may do after hours or “on the side,” and what they may do after they leave public service. It also sets standards of conduct for all state, county and municipal employees and officials. The law requires that public servants give undivided loyalty to the government for which they work, and that they act in the public interest rather than for private gain. Until the law was revised in 1978, it was enforced solely as a criminal matter under the jurisdiction of the Attorney General and the various local District Attorneys.

In addition to strengthening the conflict of interest statute, Chapter 210 of the Acts and Resolves of 1978 established a financial disclosure law, G.L. c. 268B, requiring public officials, political candidates and state and county employees in designated policy-making positions to file an annual statement of their financial interests and private business associations. Chapter 210 also created the State Ethics Commission, and empowered it to interpret and enforce G.L. c. 268A and 268B. The Commission provides free advice, education and other information regarding the conflict of interest and financial disclosure laws and serves as the primary civil enforcement agency for these laws.

The non-partisan Commission consists of five members appointed to staggered, five-year terms. Three Commissioners are appointed by the Governor, one by the Secretary of State and one by the Attorney General. No more than two of the gubernatorial appointments and no more than three members of the Commission as a whole may be from the same political party. The Commissioners serve part-time and employ a full-time staff.

H I G H L I G H T S

The Commission was established in
1978

The Commission consists of five
members serving staggered
five-year terms

The Ethics Reform Law was signed
into law on July 1, 2009

Ethics Reform Law

On July 1, 2009, Chapter 28 of the Acts of 2009, *An Act to Improve the Laws Relating to Campaign Finance, Ethics and Lobbying*, was signed into law. The law strengthened the Commission’s ability to enforce the conflict of interest law by increasing the maximum civil penalty for violations, codifying and extending the statute of limitations, strengthening the Commission’s summons authority, prohibiting gifts to public employees because of their official position, authorizing the Commission to order restitution and repayment of any economic advantage obtained by a violator, adding a false or fraudulent claim provision to the conflict of interest law, banning gifts by lobbyists to certain public officials, and imposing mandatory conflict of interest law education on all public employees.



INTRODUCTION TO THE STATE ETHICS COMMISSION

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. The Commission strives to accomplish this mission by conducting ongoing educational programs, providing clear and timely advice, and fairly and impartially interpreting and enforcing the conflict of interest and financial disclosure laws.

Commission Staff

The Commission appoints the Executive Director, who supervises a staff of 21 employees. The Commission also appoints the General Counsel who is the chief legal officer of the Commission and head of the Commission's Legal Division. The Legal Division provides free, confidential advice to public employees regarding the legality of proposed activities, advises the Commission during adjudicatory proceedings and represents the Commission in court.

H I G H L I G H T S

During FY 2010, the Statements of Financial Interests ("SFI") Division was eliminated. Administration of the financial disclosure law is now overseen by the Legal Division.

During FY 2010, the Statements of Financial Interests Division ("SFI") was eliminated as a separate division in an agency reorganization. The administration of the financial disclosure law, including the auditing of SFIs filed with the agency, is now overseen by the Legal Division.

The Public Education and Communications Division conducts free educational seminars for public employees on the requirements of the conflict of interest law, maintains the Commission's website, handles media and public relations, oversees the Commission's information technology resources and administers the new conflict of interest law education

requirements.

The Enforcement Division receives and investigates complaints of alleged violations of c. 268A and c. 268B, and publicly prosecutes the more serious violations. It resolves relatively minor violations privately with confidential education letters.

Summary of Fiscal Year 2010

The Legislature appropriated \$1,731,123 for the Ethics Commission in FY 2010. Civil penalties and forfeitures totaling \$59,150 were assessed by the Commission in FY 2010. All penalties and forfeitures collected by the Commission are deposited in the state's General Fund, as the Commission does not retain revenue.

The Legal Division received 5,565 oral and written requests for confidential advice regarding the conflict of interest and financial disclosure laws, and 73 advisory opinions from municipal counsels. The Legal Division

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INTRODUCTION TO THE STATE ETHICS COMMISSION

responded to 4,874 oral requests for advice and issued 684 written opinions, and reviewed and commented on 68 municipal counsel opinions. The Commission issued 1 formal Advisory Opinion. A total of 562 disclosures filed to comply with the conflict of interest law were reviewed by the Legal Division in FY 2010. There were 27 requests for advice pending at the end of FY 2010.

During FY 2010, 4,691 elected officials, candidates and public employees in designated major policy-making positions were required to file SFIs with the Commission. Electronic filing of SFIs decreased to 81%, from 83% in FY 2009, of all filers. While 150 filers missed the May deadline, all but 19 had filed by the end of the fiscal year. Staff responded to more than 1,300 telephone inquiries relating to either the completion or amendment of SFIs.

A total of 4,559 people attended the 113 educational seminars conducted by the Public Education and Communications Division in FY 2010.

The Commission's Enforcement Division reviewed 1,356 complaints either received during FY 2010, or pending at the beginning of FY 2010, alleging violations of the conflict of interest and financial disclosure laws. This is a 25% increase from FY 2009. In reviewing these complaints, the staff conducted interviews, obtained additional information and analyzed documents as part of its initial review. The Enforcement Division issued 191 private educational letters, initiated 68 investigations, recommended 32 cases for formal review by the Commission and concluded 38 formal inquiries. The Enforcement Division issued 3 Orders to Show Cause initiating public adjudicatory hearings, and negotiated 11 Disposition Agreements. Eight adjudicatory hearings were completed, which resulted in Decisions and Orders by the Commission.

H I G H L I G H T S

81% of filers electronically filed their statements of financial interests

38 formal inquiries concluded

113 public education seminars conducted

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LEGAL DIVISION

Advice and Opinions

Individuals who fall within the jurisdiction of G.L. c. 268A and G.L. c. 268B are entitled to receive confidential advice about whether their own proposed activities are permissible under these laws. The Legal Division consists of a Chief, who also serves as the Commission's General Counsel, a Deputy Chief, three staff attorneys, a financial analyst and an administrative assistant. In addition to providing advice, the Legal Division advises the Commission during adjudicatory proceedings, represents the Commission in court and administers the Statements of Financial Interests process and requirements.

Commission Opinions

Opinions of the Commission serve as a legal defense in subsequent proceedings concerning the requesting individual's conduct, unless the request omits or misstates material facts. The Legal Division

strives to answer written requests for advice within four weeks. Most requests for advice are handled over the telephone on the day of the call. In FY 2010, the Commission's Legal Division responded to 684 requests for advice through informal letters, a 91% increase from FY 2009, and 4,874 requests via telephone and office visits, a 50% increase from FY 2009. A total of 733 requests for advice were received online.

H I G H L I G H T S

The Commission received 684 requests for written advice, a 91% increase from FY 2009

In FY 2010, 77% of the written informal opinion requests received a response in less than 30 days

Formal opinions are issued by the Commission. They address issues for which there is no clear Commission precedent and generally take longer to complete. Although advisory opinions issued by the Commission are confidential, the Commission publishes summaries of formal advisory opinions as well as public versions of such opinions with any identifying information deleted.

Informal advice is based on prior formal Commission rulings, is issued by a staff attorney, and is not published. The Commission issued 1 formal opinion in FY 2010. Formal advisory opinions are available on the Commission's website or may be obtained from the Commission.

In FY 2010, the Legal Division responded to all written opinion requests within 45 days. By the end of FY 2010, 524 out of 684 written opinion requests, or 77%, received a response in less than 30 days.

The law requires that the Commission keep confidential whether anyone has sought or received advice from the Commission.

Municipal Opinions

All conflict of interest opinions issued by city solicitors or town counsel must be filed with the Commission for review to ensure that these opinions are consistent with Commission precedent. The Commission



LEGAL DIVISION

has 30 days to notify the municipal counsel of any objections to an opinion; if there are no objections, the advisory opinion can serve as a legal defense in any subsequent Commission proceeding. A municipal counsel's opinion is legally binding only with respect to the person who requested the opinion, and is not binding if material facts were omitted or misstated by the requester, if the opinion was not obtained in advance of the relevant action, or if the requester otherwise acted in bad faith in securing the opinion. In FY 2010, the Commission reviewed 68 municipal opinions.

Disclosures

Each year, the Commission receives from state and county employees and officials disclosures required by several sections of the conflict of interest law. These disclosures, which are available to the public, are reviewed for completeness and accuracy by the Commission's Legal Division. Legal Division staff reviewed 562 disclosures; in 83 of these instances, the filer was contacted and asked to clarify, amend or correct the disclosure.

Regulations

Under the Commission's enabling legislation, G.L. c. 268B, the Commission can promulgate rules and regulations to provide exemptions from certain sections of the conflict of interest law. In FY 2008, the Commission promulgated 930 CMR 5.00, a regulation providing for exemptions from certain sections of the conflict of interest law. Exemptions were created to allow public employees to receive certain gifts, benefits, awards, honoraria, payment for travel and admission; to allow state employees to receive certain payments from the Department of Social Services (now Department of Children and Families); and to allow local school committee members to participate in certain matters involving school fees. The Ethics Reform Law, Chapter 28 of the Acts of 2009, directed the Commission to create exemptions in specified areas. The Legal Division is currently drafting regulations to comply with that directive, and making other revisions to the Commission's regulations.

H I G H L I G H T S

The Commission reviewed 68
municipal counsel opinions
in FY 2010

562 disclosures were filed with the
Commission in FY 2010

Electronic Document Filing Program and Form Scheduling Order

In August 2008, the Commission adopted a new form scheduling order and implemented an electronic document filing program for adjudicatory proceedings. The form scheduling order was designed to eliminate delays and improve schedule predictability and ensure that adjudicatory hearings occur within the 90 days allowed by 930 CMR 1.01(9)(b). The electronic document filing program is voluntary, and it allows parties to file documents electronically instead of in paper form.

Statements of Financial Interests

M.G.L. c. 268B requires that all state and county elected officials, candidates for state office and certain state and county employees annually disclose their financial interests and private business associations. The appointed state and county employees who are required to file financial disclosures are those individuals



LEGAL DIVISION

who hold designated major policy-making positions within their employing agencies. Commission staff are available to assist filers in completing their Statements of Financial Interests ("SFIs").

The SFI functions and requirements are administered by the Legal Division, which assists filers who have questions on how to complete the SFI form. Compliance issues are addressed by the Enforcement Division.

Disclosure and Review

In FY 2010, 4,691 public employees, elected officials and candidates for office were required to file SFIs. Every SFI is reviewed, and this review process takes about nine months. During the review, if a question or a discrepancy arises, the filer is contacted to either clarify or amend his or her SFI. Commission staff responded to more than 1,300 telephone inquiries concerning accessing the electronic filing application or completing the SFI.

Electronic Filing

In 2001, the Commission launched an electronic filing application for SFIs. That year, 40% of filers filed their SFIs electronically. The percentage of electronic filings has generally increased each year, with the exception of FY 2010, when 81% of those required to file SFIs did so electronically, a 2% decrease from the previous year. A total of 3,788 filers submitted their SFIs electronically in FY 2010.

Inspection Requests

SFIs are public records and are available for inspection at the Commission's office. While any individual may inspect and obtain a copy of any SFI filed with the Commission, the law requires that filers be notified whenever their SFIs have been reviewed. As a result, SFIs can only be provided upon completion of an inspection request form and production of valid identification. During FY 2010, the Commission received requests for 1,216 SFIs from 57 sources, including the media, private citizens, state agencies and law enforcement agencies. This is a significant increase from FY 2009, when the Commission received requests for 141 SFIs.

H I G H L I G H T S

4,691 public employees were required to file SFIs in FY 2010, a 3% increase from FY 2009

81% of SFIs were e-filed, a decrease of 2% from FY 2009

1,216 SFIs were provided to the public and media in FY 2010, up from 141 SFIs in FY 2009



PUBLIC EDUCATION AND COMMUNICATIONS DIVISION

During FY 2010, the Public Education and Communications Division consisted of the Chief, a Special Counsel (an attorney in the Legal Division who devotes 20% of her time to the Public Education Division) and an administrative assistant (who also works 50% of her time as the Commission's receptionist). The Division provides free educational seminars throughout the state, maintains the Commission's website and develops educational materials. The Division also serves as the public information office of the Commission and responds to a weekly average of approximately 10 requests for information from the media and from individuals.

Seminars

The Commission provides free seminars on the conflict of interest and financial disclosure laws. A total of 4,559 people attended the Commission's 113 seminars during FY 2010. Seminars were provided to 36 municipalities, with a total of 1,347 attendees; 36 state agencies, with a total of 1,587 attendees; 1 county agency, with 52 attendees; and 16 professional associations whose membership consists of municipal employees, with a total of 793 attendees. The Commission also conducted 12 seminars in connection with the Inspector General's Massachusetts Certified Public Procurement Officer certification program, with a total of 352 attendees; 9 seminars held at the Commission offices, with a total of 137 attendees; and 4 seminars for legislative staff, with a total of 291 attendees.

Publications

The Commission publishes a wide variety of educational materials explaining various provisions of the conflict law, and keeps constituents informed of recent rulings. Most of this information is available on the Commission's website. The Commission's FY 2009 Annual Report was distributed electronically during the fiscal year. Due to limited resources, the Commission has not issued the annual compilation of the Commission's public actions, *State Ethics Commission Rulings*, since the 2006 actions. Commission *Rulings* for 1978 through 2006 are available at the Commission's office and on the database at the Social Law Library website, www.sociallaw.com.

Ethics Reform Law

Chapter 28 of the Acts of 2009, the Ethics Reform Law, was signed into law on July 1, 2009. Among other things, it amended the conflict of interest law to require mandatory education on the conflict of interest law for all public employees at the state, county and municipal levels. Every year, all public employers are required to distribute a summary of the conflict of interest law to all employees, and every two years, all public employees must complete an online training program available on the Commission's website. To implement the new requirements, the Commission posted summaries of the law on its website; directed that all public employees use an existing training program on the

H I G H L I G H T S

More than 4,500 public employees attended one of the 113 public education seminars conducted in FY 2010

The Ethics Reform Law established mandatory education requirements on the conflict of interest law for all public employees



PUBLIC EDUCATION AND COMMUNICATIONS DIVISION

Commission's website to complete the online training requirements; and posted implementation guidelines to assist public agencies and employees in complying with the new education requirements, including guidelines as to when public employers may authorize certain exemptions from the requirements. The Commission notified all elected state and county officials, all state and county agencies and municipalities, and all regional municipal districts and independent municipal agencies about the new requirements and compliance deadlines. Commission staff fielded more than 1,200 inquiries about the new requirements. The Ethics Reform Law also requires all municipalities, including regional municipal districts and independent municipal agencies, to designate a liaison to the Commission so that the Commission can assist these cities and towns as they work to implement the new education requirements.

Website

HIGHLIGHTS

Website visitors increased almost 300% in FY 2010

The Commission responded to more than 1,300 inquiries concerning the new education requirements

The Commission's website is located at www.mass.gov/ethics. The website continues to see significant use: In FY 2010, as a result of the new conflict of interest law education requirements, the website received an average of 12,214 visitors a month. By comparison, in FY 2009, the website received an average of 4,192 visitors per month. The Commission's website is searchable and contains information in various forms on the conflict of interest and financial disclosure laws, including educational materials, formal advisory opinions issued by the Commission, enforcement actions, disclosure forms and information relating to the new education requirements. The public can now request confidential advice, submit confidential complaints, electronically file Statements of Financial Interests and complete the online training program through the website.

Media and Public Relations

The Commission responds to inquiries from the media and the public about the Commission and the conflict of interest and financial disclosure laws. In FY 2010, the Commission responded to more than 500 inquiries from the press and the public. The Commission does not confirm or deny that advice has been requested or given, or that investigations are being conducted, due to strict confidentiality requirements imposed on the Commission by statute. It does, however, provide general explanations of the law, often directing individuals with questions to the Commission's website for additional information.

In FY 2010, the Public Education and Communications Division issued 23 press releases, all related to public enforcement matters resolved by the Commission. Press releases are issued via email to media outlets and interested parties. Press releases are also posted on the Commission's website.

More than 2,100 individuals subscribe to one or more of the Commission's email lists and regularly receive information from the Commission, including press releases and notices of the availability of the Commission's publications.

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ENFORCEMENT DIVISION

The Enforcement Division consists of a Chief, a Deputy Chief, two staff attorneys, five investigators and an administrative assistant. The Enforcement Division investigates and, where appropriate, prosecutes violations of the conflict of interest and financial disclosure laws. In FY 2010, the Commission received a total of 1,167 complaints alleging violations of these laws.

CONFLICT OF INTEREST LAW

Complaints

The Enforcement Division received 1,154 complaints in FY 2010 alleging violations of the conflict of interest law, G.L. c. 268A. In addition, 202 complaints were pending at the beginning of FY 2010. At the end of FY 2010, 298 complaints were pending. Staff reviewed all complaints received, and in many instances, conducted interviews, obtained additional information and analyzed documents as part of its review. The Enforcement Division issued 191 private educational letters, initiated 68 investigations, recommended 32 cases for formal review by the Commission and concluded 38 formal inquiries. The Enforcement Division issued 3 Orders to Show Cause initiating public hearings and negotiated 11 Disposition Agreements. There were 8 adjudicatory hearings concluded in FY 2010, which resulted in Decisions and Orders.

Anyone may call, write or visit the Commission to make a complaint regarding an alleged violation of the conflict of interest or financial disclosure laws. Complaints can also be submitted through the website; and during FY 2010, 319 online complaints were received. In FY 2010, complaints were received from the following sources:

- 457 from private citizens
- 235 from anonymous sources
- 369 from public agencies
- 27 from other law enforcement agencies
- 28 generated by Commission staff
- 38 were "self-reports" by public employees

The complaints received involved the following: 859 municipal employees, 168 state employees, 17 county employees, and 42 private individuals or corporations. In 68 instances, the affiliation of subjects was unknown.

The Enforcement Division closed 683 complaints because the allegations fell outside the Commission's jurisdiction, were clearly frivolous or otherwise did not warrant continued investigation. The Enforcement Division consolidated 97 complaints with existing cases and resolved 191 cases with private educational letters. Finally, the Enforcement Division initiated 68 investigations by assigning those matters to an attorney/investigator team for further review. The remaining complaints were carried over to the new fiscal year.

H I G H L I G H T S

1,154 complaints alleging conflict of interest law violations were received in FY 2010; a 33% increase from FY 2009

319 online complaints were received in FY 2010



ENFORCEMENT DIVISION

Confidentiality

Matters under review by the Commission's Enforcement Division are confidential. The Commission cannot confirm the nature or existence of a complaint or investigation, and must keep the identities of all complainants confidential. If, after a preliminary inquiry has been completed by Enforcement Division staff, the Commission finds that there is reasonable cause to believe that the conflict of interest law has been violated, the matter will be resolved publicly, either through a disposition agreement, public education letter, or adjudicatory hearing.

Staff Investigations

The Commission closed 40 cases following informal staff investigations. As of June 30, 2010, there were 32 ongoing informal staff investigations.

Formal Inquiries

The Commission authorized a total of 32 formal inquiries in FY 2010 regarding alleged violations of the conflict of interest law. Twenty-four subjects of formal inquiries were municipal officials or employees; 3 were state officials or employees; 1 involved a county employee; 3 subjects were unidentified; and 1 was a private citizen. During FY 2010, Enforcement Division staff completed 38 formal inquiries into alleged violations of the conflict of interest law.

In 22 instances, the Commission found reasonable cause to believe that a violation of the law had occurred and authorized adjudicatory proceedings. Eleven cases were later resolved through Disposition Agreements. The Commission also issued 9 confidential compliance letters, advising subjects of their violations and explaining the consequences of future misconduct. Seven cases were terminated, and 1 formal inquiry was resolved with the issuance of 2 public education letters. Eleven formal inquiries were carried over into the new fiscal year.

H I G H L I G H T S

38 Formal Inquiries were completed during FY 2010

8 adjudicatory proceedings were completed during FY 2010

At the end of the fiscal year, the Commission had 2 public adjudicatory hearings pending.

Public Resolutions

In FY 2010, the Commission completed 8 adjudicatory hearings, which resulted in Decisions and Orders. The Commission also entered into 11 Disposition Agreements involving violations of the conflict of interest law: Three with current or former state employees, and 8 with current or former municipal officials or employees. In these agreements, subjects admitted to violating G.L. c. 268A, and agreed to pay civil penalties.



ENFORCEMENT DIVISION

Penalties

In FY 2010, the Ethics Commission assessed civil penalties for violations of the conflict of interest law in the total amount of \$57,500 pursuant to either Disposition Agreements or Decisions and Orders. Penalties imposed in FY 2010 averaged over \$3,800.

FINANCIAL DISCLOSURE LAW

Complaints

In FY 2010, the Enforcement Division reviewed 14 complaints alleging violations of the financial disclosure law, G.L. c. 268B, which were carried over from the prior fiscal year, and generated 13 new complaints. As to the new complaints, 11 involved state employees, and 2 involved county employees.

Resolutions

In FY 2010, the Enforcement Division recommended 14 SFI matters for formal review by the Commission. In addition, 4 formal reviews were pending at the beginning of FY 2010. In 4 instances, subjects entered into Disposition Agreements with the Commission and paid civil penalties. Eleven other matters were terminated by the Commission due to extenuating circumstances. Two formal reviews were pending as of June 30, 2010.

Two Orders to Show Cause were issued alleging violations of the financial disclosure law. One case was settled with a Disposition Agreement and the other case was carried over into the new fiscal year.

The remaining SFI matters were carried over to the new fiscal year.

Late Filing

Failure to file on time or to amend an inaccurate or incomplete statement is a violation of the financial disclosure law. Until applicable provisions of the Ethics Reform Law went into effect on September 29, 2009, the Commission could levy penalties of up to \$2,000 for each violation. For violations occurring on or after September 29, 2009, the civil penalty was increased to a maximum of \$10,000.

H I G H L I G H T S

Total civil penalties assessed by the Commission in FY 2010 for conflict of interest law violations:
\$57,500

The average civil penalty assessed by the Commission in FY 2010:
\$3,833



ENFORCEMENT DIVISION

The following schedule of penalties for late filing an SFI was in effect until November 20, 2009:

• 1-10 days late	\$ 50
• 11-20 days late	\$ 100
• 21-30 days late	\$ 200
• 31 days or more	\$ 500
• Non-filing of an SFI	\$ 2,000

As of November 20, 2009, for SFIs for Calendar Year 2009, the Commission adopted the following schedule of penalties:

• 1-10 days late	\$ 100
• 11-20 days late	\$ 200
• 21-30 days late	\$ 400
• 31 days or more	\$ 1,000
• Non-filing of an SFI	Up to \$10,000

HIGHLIGHTS

A new penalty schedule for failing to timely file an SFI was adopted by the Commission in FY 2010

\$900 in civil penalties was collected in FY 2010 for late filing of SFIs

Penalties for the repeated late submission of an SFI are double those in the schedule above.

Any person who willfully files a materially false SFI may be subject to civil and criminal penalties. In addition, the law provides that, pursuant to G.L. c. 268B, section 5(e), employees who do not file on time may not continue to perform their public duties or be paid until they do so. The Commission notified the employing agencies of employees who failed to file their SFIs by the May 17, 2010 deadline. As a result, all but 19 former public employees who had not filed by the deadline filed their SFIs by June 4, 2010.

A total of 150 filers missed either the May 17, 2010 deadline for appointed public employees, or the May 25, 2010 deadline for elected public officials. They were sent formal late notices. Of this number, 17 filers failed to file within the 10 day grace period after receiving a formal late notice, and those matters were referred to the Enforcement Division. Orders to Show Cause were issued in two cases where former public employees failed to file SFIs as required.

Penalties

In FY 2010, 5 late filers were assessed civil penalties by the Ethics Commission totalling \$900 for violations of the financial disclosure law.



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