

A N N U A L R E P O R T
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ANNUAL REPORT

FISCAL YEAR 1983

This Report covers the activities of the Massachusetts State Ethics Commission during FY83. It is issued pursuant to the mandate of Section 2(1) of Chapter 268B and is intended to serve as a guide to the responsibilities of the Commission and as a record of its major activities and decisions during FY83. Copies of this Report provided to the Governor and General Court include names, salaries and duties of all individuals in the Commission's employ as well as money disbursed by the Commission in FY83.

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SUMMARY OF FISCAL YEAR 1983 ACTIVITIES

The Commission's FY82 Annual Report announced three goals for FY83: (1) implementation of the amendments to Chapter 268A contained in H1235, including publications and seminars explaining the changes and special assistance to those who have new or different responsibilities under the revised law; (2) litigation of civil recovery suits; and (3) continued efforts to educate public employees about the conflict law. Each of these goals has been substantially achieved during FY 83.

(1) Changes in the law

With the passage of Chapter 612 of the Acts of 1982, most of the Commission's proposed changes to the conflict of interest law were adopted. Before the amendments went into effect on March 29th, the Commission staff alerted public employees and officials to the changes by:

- * preparing a special January edition of the BULLETIN summarizing the amendments; and
- * writing directly to those local and state officials who would assume different responsibilities under the revised statute.

By the end of the fiscal year, all existing Commission publications explaining the conflict law were updated to include the amendments. These included the Guide to the Conflict of Interest Law (for state employees), the Annotated version of that Guide, and pamphlets on the law for state and local employees. In addition, a new Guide to the Conflict of Interest Law for Municipal Employees was written and distributed. State and local agencies were also invited to request seminars on the revised law conducted by Commission staff. Twenty-six such meetings were held throughout the state during May and June.

(2) Civil Recovery

In FY83 the Commission, for the second time, recovered damages under its authority to file economic recovery suits. By terms of a settlement agreement, Coolidge Bank and Trust of Watertown paid \$98,757 gained in violation of the conflict law (\$68,757 was returned to Middlesex County and \$30,000, representing costs to the Commonwealth, returned to the state's General Fund). The Commission's suit charged that Coolidge had violated the conflict law by granting private business loans to the Middlesex County treasurer because he opened County accounts at the bank.

The Commission also filed a new civil suit to recover \$1.3 million from two New York residents and their firms who allegedly paid kickbacks to government employees for their help in securing contracts with a local housing authority.

This brings to six the number of civil recovery suits now pending. Significant progress was made in continuing the lengthy discovery process for several of these suits during FY83. It is hoped that FY84 will see successful resolution of some of these pending actions.

(3) Education

A three-hour training module on the conflict law for use in the Bureau of Employee Development's program to train agency instructors was produced early in FY83. The module includes scripted instructions, a case study and a videotape which the instructors can use in the orientation of new agency personnel or in in-service training programs.

Two new publications were prepared during FY83 as well: The Guide to the Conflict of Interest Law for Municipal Employees and "The Massachusetts Financial Disclosure Law", an informational pamphlet. The Municipal Guide was distributed to public officials and municipal counsel throughout the state and formed the basis for a series of workshops for local officials in late spring. In eleven meetings, representatives from forty-one cities and towns discussed the recent changes in the law and their efforts to encourage compliance. The financial disclosure pamphlet was prepared to provide a brief introduction to that process for those filing Statements of Financial Interests for the first time. It answers the most common questions about financial disclosure and outlines the law's basic requirements.

While working to achieve its FY83 goals, the Commission maintained its on-going functions. As discussed more fully later in this report, the Commission issued 186 advisory opinions, reviewed 481 complaints, imposed civil penalties and recovered damages totalling \$134,337, and administered the financial disclosure law.

* * *

After five years of experience in administering and enforcing the conflict of interest and financial disclosure laws, the Commission's goals for FY84 will be to:

- (1) Prepare a special report to the General Court outlining its experience over the last five years in administering

these laws and setting forth any findings or proposals derived from that experience;

(2) Undertake a separate and comprehensive review of Chapter 268B, the financial disclosure law, to make recommendations, as needed, for improving the law and/or the Commission's procedures for administering it; and

(3) Review the procedures for enforcing the conflict of interest law to develop new methods for resolving more quickly those cases warranting minimal attention in order to focus investigatory activity and resources on the most serious abuses.

INTRODUCTION TO THE COMMISSION

The Commission was created by Chapter 210 of the Acts and Resolves of 1978. That statute revised and strengthened the existing conflict of interest law, provided for annual disclosure of business associations and interests by public officials and employees, and empowered the new, independent Ethics Commission to enforce the law with civil penalties and sanctions. Chapter 210 became law on June 5, 1978; the Commission's charge to administer and enforce the new financial disclosure law, Chapter 268B, took effect on November 1, 1978.

The fundamental purpose of this legislation is clear: the proper conduct of the government's business depends upon public officials who are independent and impartial. Public office should not be used for private gain and the public's confidence in that fact is essential to the effective operation of democratic government. Forty other states and the federal government have enacted legislation designed to achieve the same purpose.

MAJOR RESPONSIBILITIES

The State Ethics Commission is an independent, non-partisan agency established to:

- * Render written advisory opinions upon request to those covered by Chapters 268A and 268B;
- * Administer the financial disclosure law, Chapter 268B, covering approximately 4,000 candidates, elected officials, and employees holding major policy making positions in the legislative, executive and judicial branches of state and county government;
- * Provide advice and information to public officials and employees to help them avoid possible conflicts, and meet their responsibilities under the conflict of interest and financial disclosure laws;
- * Investigate alleged violations of the conflict of interest and financial disclosure laws; and
- * Serve as the primary civil enforcement agency for the conflict of interest and financial disclosure laws.

MEMBERSHIP AND ORGANIZATION

The State Ethics Commission consists of five members appointed to staggered terms of five years. They serve part-time, are paid on a per diem basis, and employ a full-time staff. Three members are selected by the Governor, one by the Secretary of State and one by the Attorney General. No more than three may be from the same political party. Commission members and staff are prohibited from certain political activities during their tenure and for one year after leaving the Commission.

The members of the Commission in FY83 were:

- * James Vorenberg, Dean of Harvard Law School, Chairman.
- * Marver Bernstein, President of Brandeis University (term ended during FY83).
- * David Brickman, Publisher and Editor-in-Chief of the Malden Evening News, Medford Daily Mercury, and Melrose Evening News.
- * Frances M. Burns, Supervisor, Student Prosecutor Program, Boston University School of Law.
- * Reverend Bernard P. McLaughlin, former teacher of Philosophical Ethics at St. John's Seminary and present Chaplain at Logan International Airport, Vice-Chairman.
- * Joseph I. Mulligan, partner in Boston law firm, Reed and Mulligan.

LEGISLATION

On December 29, 1983, the Governor signed into law Chapter 612 of the Acts of 1982 which contains most of the Commission's major proposals amending Chapter 268A (the conflict of interest law) and Chapter 268B of the General Laws. Among those amendments which went into effect on March 29, 1983 are the following:

- * Clarification in Chapter 268A of the definitions of "special" employees at all levels of government to require that the designations be a matter of record based on clear standards set out in the law.
- * Changes in Sections 7 and 20 of Chapter 268A to allow public employees to have, under certain limited conditions, financial interests in contracts with the level of government which employs them.
- * An additional exemption from Section 7 of Chapter 268A, allowing state employees under certain circumstances to work part-time at a state mental health, public health or correctional facility, or any other state facility that provides services around the clock, seven days a week.
- * Change in Section 4 of Chapter 268B to allow the Commission to refer evidence which may be used in a criminal proceeding not only to the Attorney General but also to the U.S. Attorney or the appropriate District Attorney.
- * Amendment to Section 21 of Chapter 268A to grant the State Ethics Commission and district attorneys the authority, now held exclusively by cities and towns, to bring civil recovery as a result of a violation of the municipal provisions of Chapter 268A.
- * Amendments to Section 23 of Chapter 268A to 1) extend to former employees the prohibitions against improper disclosure of confidential information which now apply to current employees; and 2) repeal Section 23(f).
- * Amendment to Section 4 of Chapter 268B increasing the maximum penalty which the Commission can impose for a single violation from \$1,000 to \$2,000.
- * Addition of a new Section 8 to Chapter 268B to prohibit officials or employees from taking adverse employment action against an employee for filing a complaint with, providing information to, or testifying before the State Ethics Commission.

INVESTIGATION

INTRODUCTION

Chapter 268B requires the State Ethics Commission to initiate a confidential Preliminary Inquiry into any alleged violation of Chapter 268A or 268B upon the receipt of either a sworn complaint or of other evidence which is "deemed sufficient by the Commission." Anyone may call, write or visit the Commission to make a complaint. Most complaints are unsworn and are initially reviewed by the staff in a screening process. After screening, those regarding suspected violations of either Chapter 268A or 268B which can be corroborated by some independent evidence are submitted to the Commission for authorization to begin a Preliminary Inquiry.

When a Preliminary Inquiry is authorized, the Commission staff investigates the matter and prepares a report of their findings for the Commission. If the Inquiry indicates that there is "no reasonable cause to believe" that either law has been violated, the Commission terminates the Inquiry and notifies the subject and the person who brought the complaint. All Commission records and proceedings of Preliminary Inquiries which are so terminated remain confidential. If "reasonable cause" is found, the Commission has a number of enforcement options which are discussed in the next section.

REVIEW OF FY83 ACTIVITIES

In FY83, 481 matters involving over 500 persons, businesses and government agencies were brought to the Commission for investigation. This represents a 17% increase over the number of complaints made in FY82. More than two-thirds of these complaints alleged violations by municipal officials or employees; another thirty percent involved individuals working for the state. Seventy percent of these complaints came from private citizens, six percent were referrals from government agencies, three percent came from media reports and the remainder from information developed from other investigations and inquiries and the staff's routine inspection of the Statements of Financial Interests.

The following actions were taken on the 481 complaints received during FY83:

Closed because matter not within Commission's jurisdiction	151
Closed because no independent evidence of violation	93
Advisory opinions	5
Referral to other agencies	1
Preliminary inquiry authorized	69
Remain in screening	162
	481

The Commission's authorization of 69 cases for Preliminary Inquiry resulted in 82 Preliminary Inquiries because several cases involved more than one individual or business. In addition, another 76 Preliminary Inquiries authorized during FY82 continued into FY83. Thus the Commission carried on a total of 158 Preliminary Inquiries during FY83.

Seventy-eight of these Inquiries involved alleged violations of the financial disclosure law. The subjects of these Inquiries would necessarily be employees of either state or county government because the law does not cover municipal employees. The eighty conflict of interest-related Inquiries concerned:

Municipal officials or employees	45
State officials or employees	24
Private businesses and individuals	9
County officials or employees	2
	80

The Commission completed 150 Preliminary Inquiries during the year. Eighty-four were terminated with findings of "no reasonable cause to believe" that the law had been violated. The Commission found "reasonable cause to believe" that either Chapter 268A or 268B or both laws had been violated in 66 Inquiries. In 19 cases the Commission issued confidential compliance letters in lieu of finding reasonable cause.

ENFORCEMENT

INTRODUCTION

The State Ethics Commission is required by law to investigate alleged violations and enforce the provisions of the conflict of interest and financial disclosure laws.

If, after investigation, the Commission finds "reasonable cause to believe" that either law has been violated, it has several options. It may, upon majority vote, authorize issuance of an Order to Show Cause. The Order serves as a formal complaint and initiates adjudicatory proceedings to determine whether such a violation has occurred.

If the matter proceeds to adjudicatory hearing, that hearing is governed by Rules of Adjudicatory Procedures promulgated by the Commission (930 CMR 1.00). All Orders to Show Cause and materials filed in the Commission's adjudicatory proceedings are public records and available from the Commission on request.

To make the provisions of both statutes effective and enforceable, Chapter 268B empowers the Commission to impose a range of civil penalties, including fines of up to \$2,000 per violation of either law. In addition, the Commission may refer any matter to the Attorney General, District Attorneys or the U.S. Attorney for criminal investigation, and may bring suit in the Superior Court to rescind any government action influenced by a conflict of interest.

At any time after a finding of reasonable cause, the Commission may resolve a matter on terms it deems to be appropriate and in the public interest. Matters are settled when the Commission and the subject enter into a formal Disposition Agreement. All Agreements entered into by the Commission are matters of public record. They set forth the findings of fact and law, as well as the violations and sanctions agreed to by the Commission and the subject of the inquiry.

As a third option, the Commission may sue to recover for the Commonwealth, a county or a municipality, any economic advantage gained by individuals or businesses in violation of the conflict law and may seek to recover up to three times that amount in additional damages.

In less serious matters, in lieu of finding reasonable cause, the Commission may issue a confidential Compliance Letter to advise an individual of violations and explain the consequences if the prohibited conduct continues.

In FY83, the Commission, for the second time, recovered damages from a private business under its authority to file economic recovery suits. As a result of a settlement agreement Coolidge Bank & Trust Company of Watertown, Massachusetts, paid \$98,757 gained in violation of the conflict law (\$68,757 was returned to Middlesex County and \$30,000, representing costs to the Commonwealth, returned to the state's General Fund). The Commission's suit charged that the Bank had violated the conflict law by granting loans to the Middlesex County treasurer for his private businesses because he opened County accounts at the bank.

In addition to the \$98,757 collected as a result of this civil recovery case, the Commission imposed civil penalties and recouped economic benefits totalling another \$35,580 from 39 individuals and businesses who were found to have violated the conflict of interest law, the financial disclosure law or both. In all, the Commission imposed fines and recovered damages totalling \$134,337 during the year. In nine other cases, the Commission found that an individual had violated the law but did not impose a civil penalty.

Of the 48 individuals who were found to have violated the law, 19 were state and county employees who violated Chapter 268B by failing to file timely Statements of Financial Interests. Two of these employees were not fined because their late filings were determined to have been the result of mitigating circumstances. A total of \$2,950 in fines was imposed on the other 17 late filers.

Of the 29 individuals found to have violated Chapter 268A, 21 were municipal employees, 8 worked for the state. At the municipal level, more than one-third of the violations involved Section 19 of the conflict law. This section prohibits municipal employees from participating in a matter in which they or certain people close to them have a financial interest. The law requires that an employee abstain from participation in such matters unless he has secured written permission to act from his appointing official. Although there is a corresponding section to the law regulating the conduct of state employees, that section did not account for any of this year's violations by state employees. This tends to confirm what common sense would suggest: the chances that a government official may be in a position to act on matters affecting his own financial interests or those of his close relatives and business partners are greater at the local level. On the state level there was no distinguishable pattern of violations, i.e. no one section of the law accounted for most of the violations.

following results:

- * A member of a local Board of Assessors was fined \$10,000. He was found to have violated the conflict law by:
 - improperly lowering the assessment on property in which he and his family had a financial interest, and
 - repeatedly trying to purchase for \$1,000 property offered for sale at \$25,000 by a company which was seeking substantial assessment abatements from the Board of Assessors.
- * The director of a state training school was fined \$6,500. He was found to have violated the conflict of interest law by working for a private firm that was competing with his own agency.
- * A selectman was fined \$1,000 and ordered to pay an additional \$900 to his town. He was found to have violated the conflict law by receiving financial assistance, in the form of loans and loan guarantees, from a developer whose site plans were subject to approval by the board of selectmen.
- * An employee of a state school was fined \$1,000 and ordered to pay the state an additional \$330 in damages. He was found to have violated the conflict law by accepting a trip to the Winter Olympics for himself and his family from an individual whose products he purchased for the school.

The Commission also filed a civil suit to recover \$1.3 million from two New York residents and their firms who allegedly paid kickbacks to government employees for their help in securing local housing authority contracts.

INTRODUCTION

With the enactment of the financial disclosure law in 1978, Massachusetts joined forty other states and the federal government in requiring public officials and employees to disclose certain financial interests. The Massachusetts law, Chapter 268B, requires annual public disclosure of interests and associations which may create a potential for conflict between an individual's official responsibilities and private interests. The law covers all elected officials, candidates and certain designated employees in state and county government. Municipal officials and employees are not included in the disclosure requirements.

Every candidate for state or county office, every elected state or county official and certain designated state and county employees who hold "major policy making positions" must file an annual Statement of Financial Interests for the preceding calendar year with the State Ethics Commission.

Failure to file, or to amend a deficient or incomplete Statement within ten days of receiving a Formal Notice of Delinquency, is a violation of the law. The Commission may levy penalties, including fines of up to \$2,000, for each violation. The statute also provides criminal penalties of fine and imprisonment for filing a false Statement.

FILINGS OF STATEMENTS OF FINANCIAL INTERESTS - FY83

In FY83, the Commission continued its efforts to provide a full and clear explanation of the financial disclosure law and prompt assistance for all reporting persons in meeting their responsibilities under the law, and to bring appropriate enforcement action whenever necessary to ensure full compliance with the law.

By January 1, 1983, the fifty-four heads of state and county agencies submitted lists of individuals holding major policy making positions within their jurisdiction. After these lists were reviewed and compared with prior years' submissions, the Commission mailed 4,465 Statements and Instructions to designated individuals by March 11, 1983.

As always, the Commission staff was available to provide assistance to persons filing Statements with the Commission. In FY83, over 600 reporting persons requested and received such assistance. A major portion of these requests came from individuals filing Statements for the first time, many of whom

were new appointments or candidates in several special state and county elections. A pamphlet outlining the basic requirements of the financial disclosure law was prepared to assist these first time filers.

STATE ETHICS COMMISSION INSPECTION OF STATEMENTS FILED IN FY83

All but 254 of the 4,500 individuals required to file by the May deadline did so on time. This is a great improvement over FY82 when 637 filers missed the deadlines.

Several factors accounted for this marked reduction in late filings: 1) after determining that many of last year's tardy filings were attributable to obsolete addresses supplied for employees who had since changed jobs, the Commission staff this year requested home addresses for all those required to file (as has always been the case, the home addresses need not be listed on the form itself); 2) on April 20, well before the deadlines, postcard reminders were sent to those who had not yet filed; 3) the Commission imposed and announced civil penalties totalling \$2,950 on 17 individuals who missed the deadlines and failed to file their 1981 Statements within ten days of receiving a Formal Notice of Delinquency.

This year, Formal Notices of Delinquency were sent to the 227 individuals who missed the May 1st filing deadline for major policy making employees and the 27 who missed the May 31st deadline for elected public officials. They were warned to file within ten days of receipt of that Notice or face imposition of civil penalties. More than 80% of those so notified filed their Statements within the ten day period. To date, the Commission has initiated 33 Preliminary Inquiries into possible violations of Section 5(g) of Chapter 268B by those who did not file within ten days of receiving the Delinquency Notice.

Each completed Statement of Financial Interests is inspected by the Commission staff. Specific criteria are applied in the inspection process to identify potential conflicts of interests, apparent inconsistencies on an individual's form and the appearance of intent to withhold required information. As of August 21, 1983, approximately 1,000 Statements raised questions in at least one of these categories and are being held for further review. Filers of those Statements will be contacted and alerted to the items in question. In cases where individuals do not have valid explanations for the apparent problems, their forms will be referred to the Commission's enforcement unit. Seventeen such review cases were referred last year.

PUBLIC ACCESS TO STATEMENTS OF FINANCIAL INTERESTS

The law provides that any individual who submits a written request to the Commission can inspect and copy any Statement of Financial Interests.

In FY83, the Commission received and honored 1,286 such inspection requests. This represents a 55% increase in requests over FY82. Much of this increase is attributable to interest in the forms generated during an election year.

Newspaper reporters and other media representatives initiated 74% of the requests. Private citizens and students made the remaining inspections of Statements filed with the Commission. Eighty percent of the requests were for Statements of elected public officials. Statements of legislators were requested most often.

ADVISORY OPINIONS

INTRODUCTION

Any individual covered by Chapters 268A or 268B is entitled to request an advisory opinion regarding his or her duties under the law in a given situation.

The enactment of Chapter 268B transferred responsibility for issuing conflict of interest opinions from the Attorney General to the State Ethics Commission. However, except in unusual circumstances, municipal employees still should seek the opinion of their city solicitor or town counsel. An opinion rendered by the Commission serves as a defense in a criminal action brought under Chapter 268A. It also binds the Commission in subsequent proceedings concerning an employee who requested an opinion and acted in good faith, unless the opinion request omitted or misstated material facts. Since the Commission assumed responsibility for conflict opinions in November, 1978, requests for opinions have been, by law, confidential. The law does permit the Commission to publish its opinions with identifying information deleted.

CONFLICT OF INTEREST - CHAPTER 268A

Chapter 268A of the General Laws--the state's conflict of interest law--has regulated the conduct of public officials and employees in Massachusetts since 1963.

The law limits:

- 1) what public employees may do "on the job";
- 2) what they may do "on the side"; and
- 3) what they may do after leaving public sector employment.

It also sets the standards of conduct required of all individuals serving state, county and municipal government. The law articulates a basic premise--public employees owe undivided loyalty to the government which employs them. Public officials and employees should not be in the position of acting for the government when their private interests are involved.

SUMMARY OF FY83 OPINIONS

The Commission rendered 186 formal advisory opinions during FY83. Most of these were issued to state employees. Four were issued to county employees, 22 to municipal employees and 5 to persons or businesses who were ruled not to be government employees for purposes of Chapter 268A. Of the 22 opinions issued to municipal employees, half were requested by elected officials. Fourteen elected state officials requested opinions.

More than one-third of the requests for opinions from state employees included questions about their outside activities as regulated by Section 4 of Chapter 268A. Nearly half of the questions from municipal employees concerned Section 20 which restricts municipal employees from contracting with their municipality except under certain conditions.

Among the topics addressed in the Commission's FY83 advisory opinions were the following:

- * Clarification of Chapter 612 of the Acts of 1982 which contained many of the Commission's proposed changes to Chapter 268A (see page 7). EC-COI-83-35, 37 and 71 through 73.
- * Clarification of effects of Chapter 107 of the Acts of 1982 which amended Section 20 to allow town employees to serve as selectmen under certain specified conditions. EC-COI-82-106, 107, 180, and 83-1, 51 and 79.
- * Restrictions imposed by Section 23 on the members of a municipal commission which operates a civic center from giving, and state and municipal employees (themselves included) from receiving, ticket reservation privileges at the center not accorded to the general public. EC-COI-83-4.
- * Clarification of status under Chapter 268A, of special boards and task forces. EC-COI-82-157, 83-3, 21 and 30.
- * Conditions under which the financial interest in a state contract of a state employee's spouse will be imputed to the state employee. EC-COI-83-37.
- * Limitations on a legislator's acceptance of expenses paid for outside speaking engagements. EC-COI-83-87, 88 and 93.

PUBLIC EDUCATION

As a major priority, the Commission attempts to explain the conflict of interest and financial disclosure laws to those covered by them and report regularly on the Commission's activities. The goal of the Commission's educational efforts is to enable people who want to comply with the laws to do so. To that end, the Commission prepares and distributes a range of publications, sponsors conferences and seminars, and publishes public versions of all its Opinions and major enforcement documents. In order to reach the many thousands of public employees who need information about these two laws, especially the conflict of interest law, the Commission staff works in close cooperation with other agencies at all levels of government.

REVIEW OF FY83 ACTIVITIES

In FY83, in addition to its ongoing educational programs the Commission undertook three special projects already described in the Introduction to this Annual Report: 1) publications and seminars to explain the changes in the conflict of interest law resulting from passage of Chapter 612 of the Acts of 1982; 2) preparation of a training module on the conflict law for use in programs for agency instructors conducted by the Division of Personnel Administration, and 3) preparation of a new pamphlet on the financial disclosure law.

During FY83, Commission staff also conducted 35 seminars for government agencies and 11 speaking engagements for related organizations such as the Massachusetts Association of Planners, Massachusetts Tax Collectors and Treasurers, and the Massachusetts Association of Housing Authority Members. Commission actions and policies were summarized and explained in 6 issues of the BULLETIN distributed to a growing mailing list now totalling nearly 1,750.