

1980 ANNUAL REPORT

Massachusetts State Ethics Commission

This Report covers the activities of the
Massachusetts State Ethics Commission during 1980.
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
1980.

T A B L E O F C O N T E N T S

INTRODUCTION TO THE COMMISSION

Major Responsibilities.....	1
Membership and Organization.....	2

CONFLICT OF INTEREST

Introduction.....	3
Summary of Opinions.....	4
Changes in the Law.....	5

FINANCIAL DISCLOSURE

Introduction.....	6
Coverage Under the Financial Disclosure Law.....	6
Penalties.....	7
1980 Filings of Statements of Financial Interests.....	7
State Ethics Commission Inspection of Statements Filed in 1980.....	7
Public Access to Statements of Financial Interests.....	8

PUBLIC EDUCATION.....9

INVESTIGATION AND ENFORCEMENT

Introduction.....	11
Investigative and Enforcement Procedures.....	12
1980 Investigation and Enforcement.....	13

I N T R O D U C T I O N T O T H E C O M M I S S I O N

The Commission was created by Chapter 210 of the Acts and Resolves of 1978. That statute revised and strengthened the existing conflict 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 state's conflict-of-interest law, Chapter 268A, and 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:

- * Administer the conflict of interest statute, Chapter 268A, which was previously under the jurisdiction of the Attorney General;
- * Administer the financial disclosure law, Chapter 268B, covering approximately 3,600 candidates, elected officials, and employees holding major policy making positions in the legislative, executive and judicial branches of state and county government;
- * Investigate alleged violations of, and serve as the primary civil enforcement agency for the conflict of interest and financial disclosure laws; and
- * 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.

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 of 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.

Members of the Commission in 1980 included:

- * James Vorenberg, Professor of Law at Harvard Law School, Chairman
- * Linda Kistler, Professor of Accounting at the University of Lowell, Vice-Chairman
- * Marver Bernstein, President of Brandies University
- * David Brickman, Publisher and Editor-in-Chief of the Malden Evening News, Medford Daily Mercury, and Melrose Evening News.
- * Reverend Bernard P. McLaughlin, former teacher of Philosophical Ethics at St. John's Seminary and present Chaplain at Logan International Airport.

On October 1, 1980, Robert Greco took office as General Counsel to the Commission, and Maureen McGee took office as its Executive Director. Mr. Greco had served as the Commission's Associate General Counsel since 1980. Ms. McGee was previously the Commission's Director of Public Education. They direct the 23 person staff who carry out the Commission's mandate to administer and enforce the conflict-of-interest and financial disclosure laws.

The Commission's full-time staff includes attorneys, special investigators, analysts, accountants and other professional and support personnel. The staff is organized into four general areas: investigation/enforcement; legal analysis; disclosure administration and audit; and public education/information.* Members of the investigative unit conduct all investigations and serve as prosecuting attorneys in the Commission's adjudicatory hearings. The legal division drafts conflict of interest opinions, serves as counsel to the Commission in adjudicatory hearings, and conducts legal research on all issues relating to both statutes and other matters as necessary. The staff assigned to the administrative and audit unit is responsible for all aspects of the financial disclosure system including initiating the designation process, providing technical assistance to reporting persons, and reviewing Statements filed with the Commission. The public education and information unit prepares a variety of regular publications to inform public employees and officials about the Commission and the laws it administers; conducts public hearings and seminars, and serves as liaison with the press, public interest groups and others interested in the Commission's work.

* 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 1980.

C O N F L I C T O F I N T E R E S T
Chapter 268A

INTRODUCTION

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. It sets forth 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.

Chapter 268A prohibits the most flagrant kinds of corrupt activities such as bribery and extortion, as well as other activities and relationships which constitute conflicts of interest. The law serves a preventive as well as a punitive function; it defines situations which public employees and officials must avoid so as not to abuse the public trust inherent in their employment. Included are provisions prohibiting official involvement in matters in which employees or those close to them have private financial interests; restricting participation by public employees in certain outside activities; limiting the interests of public employees in public contracts; and curtailing involvement in government matters by former government employees.

To supplement the prohibitions, the law sets forth "Standards of Conduct" in Section 23 which are designed to prevent not only actual conflicts of interest but also conduct which would give the public reason to question a public employee's exclusive commitment to his or her public trust.

Any individual covered by Chapter 268A is entitled to request an advisory opinion regarding his or her duties under the law in a given situation. Chapter 210 transferred responsibility for issuing conflict of interest opinions from the Attorney General to the State Ethics Commission. Municipal employees, however, still should seek the opinion of 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 names and identifying information deleted.

SUMMARY OF OPINIONS

During 1980, the Commission rendered 123 formal advisory opinions. Among the topics addressed in these opinions were the following:

- . private law work of state lawyers;
- . job offers to state employees by private parties having matters before the employees;
- . restrictions on accepting honoraria;
- . associations between lawyer/legislators and lobbyists;
- . members of state boards who resign and then work for the same board;
- . the status of individuals who serve on informal advisory committees;
- . psychological testing and counseling of private patients by state employees;
- . legislators serving as court-appointed lawyers.

Of particular interest are two opinions with potentially widespread application:

Cable Television

In EC-COI-80-85, the Commission concluded that Section 4 of the conflict-of-interest law prohibits a state employee from working for a private company in its efforts to secure cable television licenses in Massachusetts communities. Section 4 prohibits a state employee from receiving compensation from or acting as the agent or attorney for anyone other than the Commonwealth in relation to any particular matter in which the state or any state agency is a party or has a direct and substantial interest; this section also prohibits private parties from giving, offering or promising such compensation. The Commission ruled that applications and decisions regarding the issuance of cable television licenses in local communities involve "particular matters" as that term is defined in the law. Following an exhaustive review of the statutes and regulations which govern the awarding of cable licenses, the Commission's opinion further stated that this extensive regulatory scheme, coupled with the Commonwealth's authority and obligation to monitor, and, if necessary, to intervene in the licensing process, gives the Commonwealth a "direct and substantial interest" in the awarding of municipal cable television licenses.

Teacher as Selectman

In EC-COI-80-89, the Commission departed from its general policy not to render advisory opinions to municipal employees in this case because: 1) town counsel joined in the opinion request; 2) the District Attorney urged the Commission to render an advisory opinion; and 3) the opinion would be of general application to a large number of cases throughout the Commonwealth. In this opinion the Commission advised a selectman that Section 20 of the conflict of interest law prohibits him from also serving as a teacher in the town in which he is a selectman. The Commission concluded that this dual relationship violated Section 20, which prohibits a municipal employee from having a direct or indirect financial interest in a contract made by a municipal agency in his town. However, the Commission noted that it would take no enforcement action during the current school year because a similar prohibition against state employees teaching in state educational institutions was amended by recent legislation, and because legislation regarding the matter will be submitted to the General Court by several major associations during the 1981 session.

CHANGES IN THE LAW

1) On February 28, 1980, the General Court enacted Chapter 10 of the Acts and Resolves of 1980, amending Chapter 268A, the state's conflict-of-interest law. Chapter 10 amends Sections 4 and 11 of Chapter 268A to:

- * ALLOW state and county employees to hold elective and appointive municipal offices and to perform the duties of, and receive the compensation provided for, such municipal offices.
- * PROHIBIT state and county employees who hold elective or appointive municipal offices from acting or voting in their municipal capacities on any matters which are within the purview of the state or county agencies which employ them, or over which they have official responsibility.

The Commission informed the chief elected officials of the Commonwealth's 351 cities and towns of the passage of Chapter 10, and of the provisions of the new legislation.

2) Section 7 of Chapter 268A prohibits a state employee from having a direct or indirect financial interest in a contract made by a state agency. Before the authority to interpret Chapter 268A was transferred to the State Ethics Commission, several opinions of the Attorney General had held that Section 7 prohibited a state employee from entering into a contract to teach at an educational institution funded by the Commonwealth. Section 7 was amended by Chapter 303 of the Acts and Resolves of 1980 which provides that state employees may teach part-time in state educational institutions provided they do not participate in, or have official responsibility for, the financial management of the institution where they will teach.

F I N A N C I A L D I S C L O S U R E

Chapter 268B

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.

However, Chapter 210 which established the State Ethics Commission, directed the Commission to propose legislation establishing financial disclosure requirements for officials and employees of cities, towns and special districts of the Commonwealth. In response to that directive, the Commission drafted and submitted the proposed Chapter 268C, "An Act Requiring Certain Officials and Employees of Cities, Towns and Special Districts in the Commonwealth to File Statements of Financial Interests" and an accompanying Report to the Legislature in December 1979. Since that proposal was not acted upon during the 1980 legislative session, the Commission resubmitted the Chapter 268C legislation for consideration in the 1981 session.

COVERAGE UNDER THE FINANCIAL DISCLOSURE LAW

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 preceeding calendar year with the State Ethics Commission.

Each year, all constitutional officers, cabinet secretaries, public officials and other heads of state or county governmental bodies are required to provide the State Ethics Commission with a list of major policy making positions under their authority. The Executive Director of the State Ethics Commission may add positions to the list.

In 1980, 3785 individuals were required to file Statements of Financial Interests, and virtually 100% met their responsibilities under the law.

PENALTIES

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 \$1,000, for each violation. The statute also provides criminal penalties of fine and imprisonment for filing a false Statement.

1980 - FILINGS OF STATEMENTS OF FINANCIAL INTERESTS

In 1980, the Commission continued to work towards the goals of providing a full and clear explanation of the financial disclosure law and the Commission's interpretation of it, prompt assistance for all reporting persons in meeting their responsibilities under the law, and appropriate enforcement action whenever necessary to ensure full compliance with the law.

By January 1, 1980, the fifty-four heads of state and county agencies submitted lists of individuals holding major policy making positions within their jurisdiction. The Commission mailed 3785 Statements and Instructions to these designated individuals by March 1, 1980. In addition, the Bureau of Systems Operations assisted the Commission staff in establishing a computerized master file of all individuals required to file Statements of Financial Interests. This master file enabled the Commission staff to distribute and to receive and process filings in a more efficient manner. The Commission staff answered over 1000 telephone requests for information in a major effort to provide clear and timely assistance to persons filing Statements with the Commission. Every person who was required to file and failed to do so was contacted by the Commission staff, first by telephone and then by formal letter pursuant to the statute.

STATE ETHICS COMMISSION INSPECTION OF STATEMENTS FILED IN 1980

The Commission received 4187 Statements of Financial Interests in 1980, nearly 400 more than received in 1979. The increase was due to filings of candidates for state and county office as well as the turnover in major policy making positions in state and county government. The Commission staff reviewed every Statement filed in 1980 to ensure that, on its face, it complied with the requirements of the law. More than 200 reporting persons submitted incorrect or incomplete Statements and were sent Deficiency Notices by the Commission staff. All Statements were subsequently corrected by the reporting person.

Those who failed to file by the May deadline were sent postcard reminders urging them to file immediately. At the same time, agency heads were contacted to enlist their support in reminding their employees to file. Sixty-two individuals who failed to file even after receiving postcard reminders were sent Formal Notices of Delinquency warning them to file within 10 days or become subject to a civil penalty of up to \$1,000. Three individuals failed to submit their Statements within the 10 day period. The Commission imposed civil fines in each of the three cases.

Each completed Statement of Financial Interests was carefully inspected by the Commission staff. Specific criteria were applied in the inspection process to identify potential conflicts of interest, apparent inconsistencies on an individual's form and the appearance of intent to withhold required information. Approximately 120 Statements raised questions in at least one of these categories and were held for further review. When the filers were contacted and alerted to the items in question, one-half had valid explanations for the apparent problems; one-quarter subsequently amended their Statements; and in one-quarter of the cases forms were referred to the Commission's enforcement unit for review. Several of the Commission's enforcement actions in 1980 involved violations of Chapter 268B. All documents filed in the Commission's proceedings are public records available upon request.

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 1980, the Commission received and honored 1010 such inspection requests. Reporters from newspapers in Boston and throughout the state initiated one-half of the requests. Government officials made another five percent of the requests. Radio and television stations, private citizens, and representatives of universities made the remaining inspections of Statements filed with the Commission.

The public requested to inspect Statements of public officials much more frequently than those of public employees. The Statements most often requested were those of state representatives, members of the judiciary and state senators.

The vast majority of Statements (98%), however, were not inspected by anyone other than the Commission staff and then only in the course of the regular review required by the law.

P U B L I C E D U C A T I O N

In 1979, the Commission focused its educational efforts on helping people meet the requirements of the new financial disclosure law. Having secured 100% compliance with the reporting requirements of that new law, the Commission turned its primary attention to the conflict of interest law in 1980. As the Commission enforced the conflict law, it became increasingly clear that the statute is not widely understood either by government employees or the public at-large. Yet this law is of fundamental importance to the workings of government; it draws the line between private interest and public trust which must be guarded carefully in the conduct of the government's business. Efforts to clarify and enforce that line are increasingly important as public concern mounts over abuses of the public trust. Consequently, achieving voluntary compliance with the conflict of interest law was one of the Commission's major priorities in 1980. It will continue to be a key part of the Commission's work in the future.

The primary goal of the Public Education project is to enable people who want to comply with the law to do so. To that end, the Commission prepares and distributes a range of publications, sponsors conferences and seminars to inform employees about the conflict-of-interest law and publishes public versions of all its Opinions and major enforcement documents.

In 1980, the Commission published a Guide to the Conflict of Interest Law. The Guide is the first comprehensive attempt to explain the provisions of this 18 year-old law in a clear and readable form. It is designed to help people understand the law so that they may conform their conduct to it.

Five issues of the Bulletin, which reports on important decisions and actions of the Commission, were distributed free of charge to over 1200 officials and employees. The Commission also distributes public versions and summaries of its advisory opinions to approximately 150 officials, state and county agencies, law firms and law libraries.

In addition to expanding the number and distribution of its publications, the Commission sponsored six conferences and workshops on the conflict of interest law in 1980. Approximately 150 individuals attended a conference for state employees in May; 130 local counsel and officials attended a conference for municipal officials in August. The sessions served to inform and educate employees about the requirements of the conflict law and the Commission's work in administering and enforcing it.

As a follow-up to the first two general conferences, seminars on the conflict law were conducted in cooperation with three state agencies.

In 1981, the Commission plans to expand its series of conferences and workshops; cooperate with civic and professional organizations to inform citizens that the conflict law applies to private parties as well as to public officials; prepare short pamphlets on the conflict law for a more general audience than those reached by the Guide and work with other agencies to incorporate information about the Commission and the laws it administers into their regular training and orientation programs.

I N V E S T I G A T I O N A N D E N F O R C E M E N T

INTRODUCTION

The State Ethics Commission is the primary civil enforcement agency for Chapters 268A and 268B. It is required by law to investigate alleged violations and to enforce the provisions of the conflict of interest and financial disclosure laws. 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 \$1,000 per violation of either law.

In addition to imposing its own civil penalties the Commission may refer any matter to the Attorney General for criminal investigation, and may bring suit in the Superior Court to rescind any government action influenced by a conflict of interest and to recover any economic advantage gained by individuals who violate the conflict of interest law.

A growing public awareness that the Commission intended to enforce Chapters 268A and 268B resulted in a more than 100% increase in the number of referrals made to the Ethics Commission in 1980 as compared to 1979. Because 1980 was the first year in which the Commission staff included a full investigation and enforcement unit, referrals received prompt attention in spite of this increase.

During 1980, the Commission adopted a Compliance Policy to contend with matters involving clear but not egregious violations of the law. In accord with this policy and procedures adopted to implement it, matters "which do not involve wilfull misconduct, significant economic advantage or gain, the use of undue influence, significant economic loss to the Commonwealth, or the potential for serious impact on public confidence in Government," are resolved by the issuance of a Compliance Letter. These confidential letters, sent only to the individuals involved, are similar to conflict of interest opinions. They summarize the facts known to the Commission and cite the relevant sections of the law which, in the Commission's view, prohibit the conduct in question. They also advise the individuals that if they continue to violate the law, formal Commission enforcement action will follow.

Compliance Letters are made public in summary form only, and the problems identified in the letters are brought to the attention of the agencies involved when appropriate. Twenty-three Compliance Letters were issued in 1980.

Nineteen-eighty was also the first year in which the Commission exercised its authority to enforce the conflict-of-interest law by filing an economic recovery suit. The Commission is seeking

treble damages on behalf of the Commonwealth in a case involving a group of related individuals and a high-ranking state official.

Such civil actions are an important enforcement tool for the Commission as it seeks to deter and penalize abuses of the public trust. By returning to the state the monetary rewards of corruption in government, civil suits can ameliorate the financial disruption caused when government officials place their private interests above the public trust. The Commission expects these suits to become an increasingly important part of its enforcement actions in the future.

At the close of 1980, the Special Commission Concerning State and County Buildings completed its 2½ year investigation of corruption in the award of design and building contracts. Both in its Final Report, and in referrals to the State Ethics Commission, the Attorney General and the U.S. Attorney, the Special Commission set out a number of allegations of conflict of interest in the award and supervision of such contracts.

The first investigative priority for the Ethics Commission in 1981 will be to review the cases referred to it from the Special Commission. Those allegations which fall within the Commission's jurisdiction and its statute of limitations and which are supported by substantial, credible evidence will be thoroughly investigated, and appropriate enforcement action will be swiftly taken.

The Commission's other major priority is to continue to focus on those improper relationships between public officials who are charged with regulatory responsibility and those they regulate in the private sector. This emphasis stems from the Commission's particular concern about the serious dangers such relationships pose to the public interest and the public trust because the regulator enjoys a position of significant power over those regulated who depend on government approval to stay in business.

INVESTIGATIVE AND ENFORCEMENT PROCEDURES

To carry out its mandate, Chapter 268B directs the Commission to initiate a confidential Preliminary Inquiry into any alleged violation of Chapters 268A or 268B, upon the receipt of either a sworn complaint or of other evidence which is deemed sufficient by the Commission. If a Preliminary 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 the Commission finds "reasonable cause to believe" that either law has been violated, it may, upon a majority vote, initiate formal adjudicatory proceedings to determine whether such a violation has occurred. The adjudicatory process is initiated when the Commission authorizes the issuance of an Order to Show Cause which serves as the formal complaint. In less serious matters, a confidential Compliance Letter may be issued advising the subject of the violations and warning him of the consequences if his conduct continues.

After the issuance of an Order to Show Cause, the Commission conducts a public adjudicatory hearing on the complaint unless the matter is resolved by 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. If the matter proceeds to an adjudicatory hearing, that hearing is governed by the Standard Rules of Adjudicatory Procedure as amended [930 CMR 1.00]. All Disposition Agreements, Orders to Show Cause and materials filed in the Commission's adjudicatory proceedings are public records and available from the Commission on request.

1980 INVESTIGATION AND ENFORCEMENT

In 1980, approximately 225 matters, an increase of 125 over the 100 referrals made in 1979, were referred to the State Ethics Commission for investigation. These matters involved over 300 individuals and businesses. More than half of these referrals came from private citizens, another 20% from state agencies, and the rest came to the Commission's attention through media reports, the staff's routine inspection of the Statements of Financial Interests and information developed during other Commission investigations. As a result of preliminary screening, the majority of these matters were either terminated because they were found not to warrant full investigation or referred to other agencies because they were outside the jurisdiction of the Commission.

The Commission voted to initiate formal Preliminary Inquiries into 57 cases in 1980. Eight of these cases concerned alleged violations of the financial disclosure law; 44 concerned violations of the conflict of interest law; and five concerned violations of both.

During the course of the year, the Commission completed 61 Preliminary Inquiries (including 16 which had been initiated in 1979). Eleven of these Inquiries concerned violations of the financial disclosure law (Chapter 268B); the other 50 concerned the conflict of interest law (Chapter 268A) or a combination of both laws. The subjects of the 50 conflict of interest-related Inquiries held the following positions:

Municipal Officials and Employees	14
Appointed State Officials	9
State Inspectors/Investigators	8
Private Businesses & Individuals	4
Elected State Officials	4
State Regulatory Board Members	2
Other State Employees	9

Of the 61 Inquiries completed in 1980, twenty-four were terminated by the Commission 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 37 Inquiries.

In those 37 cases in which the Commission found reasonable cause to believe the law had been violated, the following actions were taken: seventeen were settled by Disposition Agreement, eleven by compliance action; seven by the issuance of an Order to Show Cause and two by civil suit. Of the seven matters for which Orders to Show Cause were issued, six of these matters were scheduled for hearings in early 1981; one was heard in December 1980, but a final decision had not been reached by the end of the year.

In 1980, the Commission imposed a total of \$18,425 in civil penalties on 17 individuals. Thirteen of these people were fined as a result of Disposition Agreements. Seventeen such Agreements were reached in 1980. Three Agreements, concerned municipal employees; the other fourteen cases involved state employees. Four of the Agreements dealt with violations of the financial disclosure law; the other thirteen concerned violations of the conflict of interest law. Of those, seven involved situations in which public employees or those close to them had undisclosed financial interests in government contracts. Three of the Agreements resulted in penalties to state regulators who had been involved in an improper relationship with those they regulated in the private sector.

Four individuals were fined in 1980 as a result of Commission Decisions and Orders issued after public adjudicatory hearings. The Commission held five such hearings in 1980. Final Decisions were rendered and published in four of these cases. Two of these Decisions concerned violations of the financial disclosure law, the other two involved violations of the conflict of interest law. All four have been appealed to Superior Court. (Those appeals were still pending at the time of publication.)

