

2024 Annual Report of the Ohio Ethics Commission



The Ohio Ethics Commission

Merom Brachman, Chairman
Mark Vander Laan, Vice Chairman
Bruce E. Bailey
Megan Kelley
Marty Ross-Dolen
Elizabeth E. Tracy

Paul M. Nick, Executive Director

Welcome

A Message from the Executive Director

For over fifty years, the Ethics Law has served to guide state and local government officials and employees in their decision-making to promote fairness and objectivity while exercising governmental authority.

The Ohio Ethics Commission achieves this mandate by providing legal guidance on complying with the Ohio Ethics Law, conducting thorough and fair investigations when called for, presenting effective and efficient training to assist in understanding the law, and administering a robust financial disclosure program for those with higher levels of public responsibility and trust. This annual report for calendar year 2024 outlines Commission activities in the past year and highlights the work Commission and staff members undertake daily to maintain confidence in state and local government.

The Commission works closely with state and local agencies and legal departments to promote awareness of and compliance with the Ethics Law. All Ohioans are entitled to public decisions and expenditures that are objective and made with the public's best interest in mind and not the private interests of its public servants.

Sincerely,
Paul M. Nick

About Us

The Ohio Ethics Law became effective on January 1, 1974. These laws set forth a code of ethics for public officials and employees, require financial disclosure requirements for certain public officials, and prohibit public officials and employees from:

- acting on conflicts of interest;
- selling goods or services to their own public entities;
- abusing public positions for private business opportunities.

The Ohio Ethics Commission is authorized to conduct investigations, render advisory opinions that offer immunity, provide a continuing program of education, receive financial disclosure statements, and make recommendations for future ethics related legislation.

The Ethics Commission is an independent, bipartisan commission, comprised of six members serving staggered, six-year terms. Commissioners are appointed by the Governor subject to confirmation by the Ohio Senate. Review current and past members of the Ohio Ethics Commission on our [Commission Members page](#).

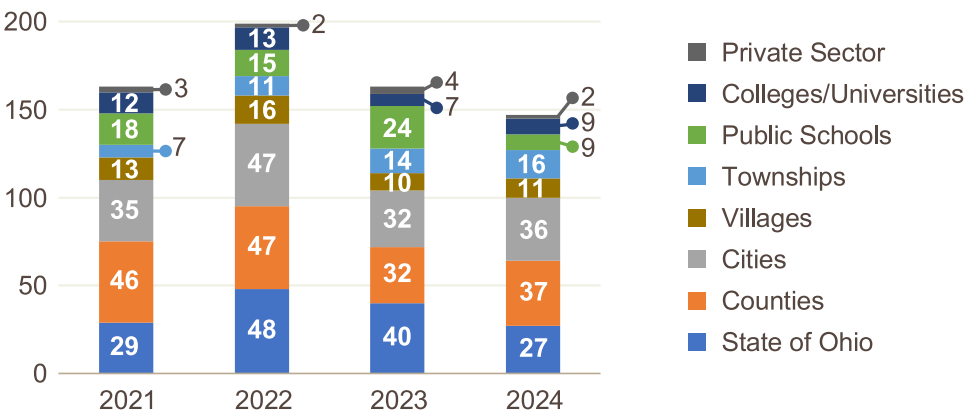
Advisory

The Ohio Ethics Commission has statutory authority to provide guidance to both the public and private sectors. The application of the Ethics Law to specific facts provides a uniform state-wide application that ultimately protects everyone in Ohio from government wrongdoing. Those who comply with guidelines provided through the advisory process receive immunity; a valuable resource available to anyone in public service in Ohio! Responses to thousands of emails in 2024 were just the beginning of the tremendous work of the Advisory Attorneys last year as outlined below:

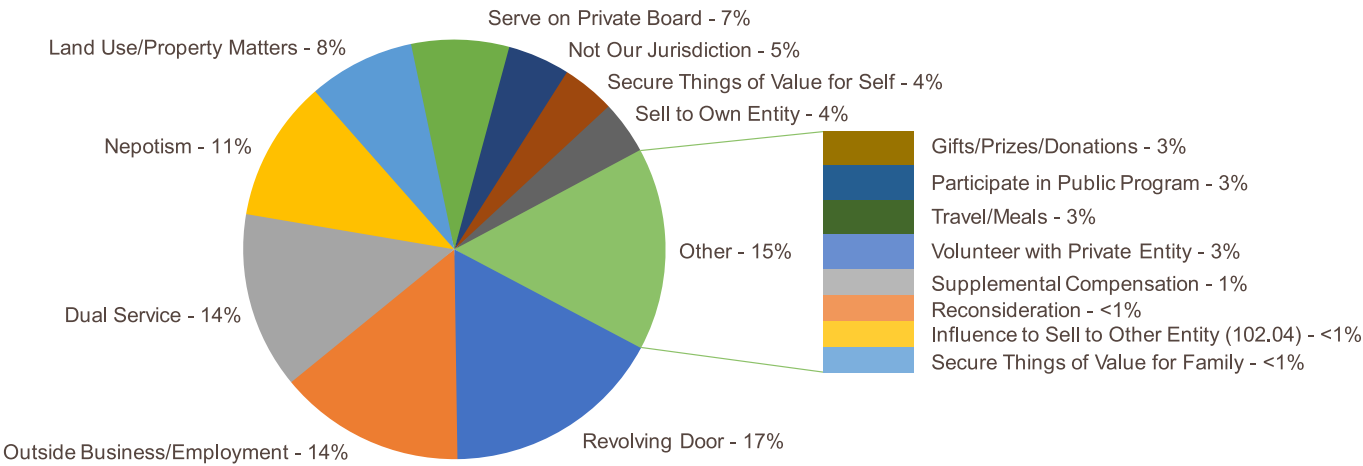
By the Numbers

- 147 written requests for advice
- 1,481 phone calls and emails
- Average of 19 days for response
- Approximately 70 percent of advisory requests come from local governments, including counties, cities, townships, villages, and public schools

Opinions Issued by Entity Type (2021 - 2024)



2024 Opinions Issued by Topic



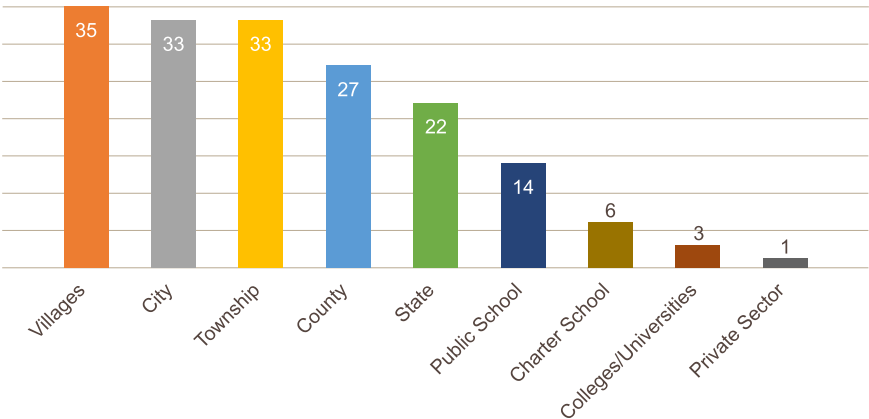
Investigations

The Ohio Ethics Commission is statutorily charged with investigating alleged violations of the Ethics Law and refers cases supported by substantial evidence for prosecution or alternative resolution. This important responsibility of the Ethics Commission holds accountable those who violate both the law and the public’s trust. It also deters violations from public officials or employees and assures all Ohioans of their right to expect that government actions are for the public’s benefit, not for the benefit of individual public officials or employees.

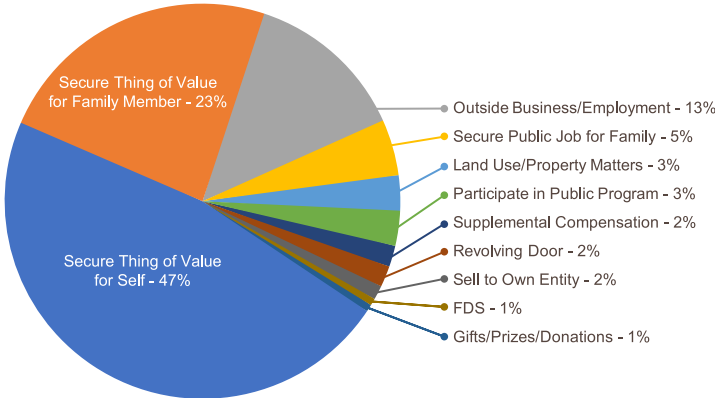
By the Numbers

- 174 cases investigated
- 960 investigative contacts
- 85% of respondents in local government positions, including counties, cities, townships, villages and public schools
- Closed 96 cases, including settlement and censure cases

2024 Investigations by Entity Type



2024 Investigations by Topic



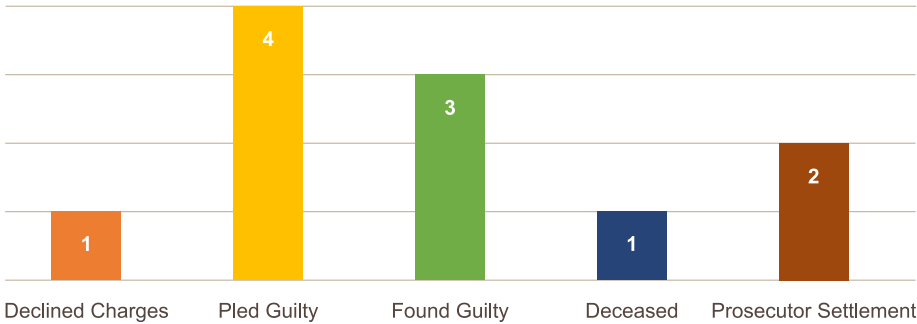
Updates to Administrative Rules

On September 9, 2024, the Commission amended its administrative rules by changing the procedure from issuing a Censure letter to a Respondent to issuing a “Notice of Potential Violation.” This amendment enables the Commission to address less severe violations that it might not otherwise prioritize as an investigation in a timely manner. It also prevents devoting extensive investigative resources to these matters. The time over the past 5 years to process these cases has decreased from averaging 16 months down to 2.5 months.

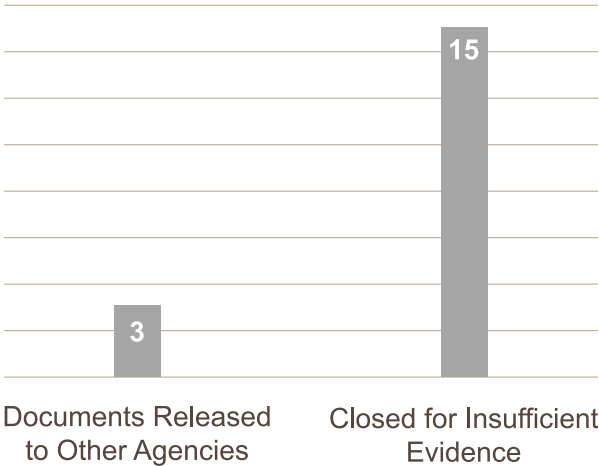
Investigations Closed in 2024

The Investigative Staff had a great deal of progress in closing cases during 2024 and closed a record 96 cases. Below are the types of cases that were closed and the breakdown of how each case was resolved.

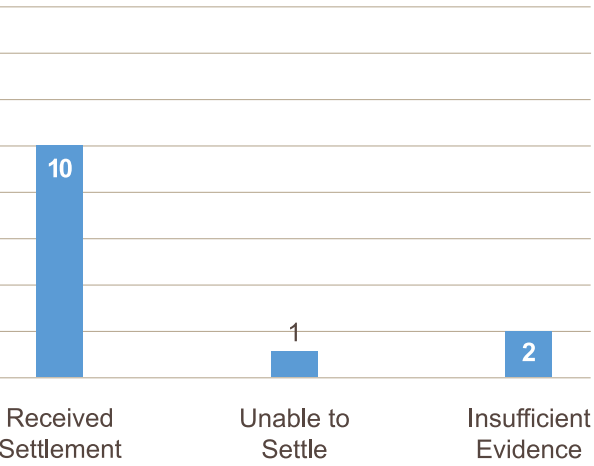
Prosecutor Referrals



Investigation



Settlement



Formal Complaints

The Ohio Ethics Commission received 3 complaints by sworn affidavit that were filed against three county employees. These were reviewed by the Commission during executive session and found to not meet the statutory requirements to constitute a complaint and were unanimously dismissed.

Censures and Notice of Potential Violation

In 2024, **51** cases were closed as either Censure or as a Notice of Potential Violation. Of those, **25** were previously reviewed for Settlement, Investigation or as referrals to the Prosecutor's Office. The Commission and Staff ultimately resolved these **25** cases with a Confidential Censure or Notice of Potential Violation to provide guidance and warning to the Respondents, and to end specific conduct that may continue to violate the Ohio Ethics Laws in the future.

Education and Training

The Education and Training staff at the Ohio Ethics Commission seeks to turn complex legal requirements and prohibitions into easy-to-understand and accessible training opportunities. Thousands of learners took advantage of the numerous options offered by the Ethics Commission to learn more about the Ethics Law and feedback indicates that ethics training doesn't have to be tedious or dry! Here are some of the comments we received in 2024:

Quotes:

Webinars:	"Your webinars are very informative and enjoyable! Thank you for your efforts to make ethics fun!"
In-Person Sessions:	"The way you make ethics engaging, entertaining, and relatable is incredibly unique and I really enjoyed your session."
E-Course:	"I've been through a lot of online training on various topics over the years, and this was absolutely the best."

By the Numbers

- 204 public appearances to 19,727 people
- 55 webinars with 6,763 electronic attendees
- 58,250 learners trained by the 2024 e-course
- 69,278 visitors to our website

Financial Disclosure

As it does each year, the Ohio Ethics Commission efficiently administered in 2024 the financial disclosure program as mandated by statute. Financial disclosure provides significant benefits for both filers and all Ohioans.

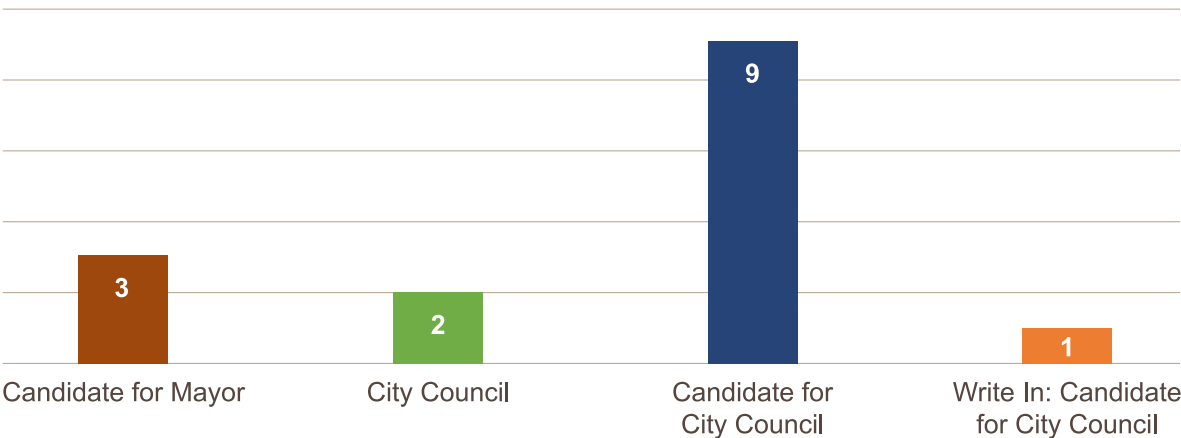
The financial disclosure form is a helpful tool in increasing awareness of potential issues filers may face while serving in their public role. The form helps filers identify potential conflicts between public roles and private lives which likely prevents violations of the law.

The public benefits from financial disclosure through the additional government transparency it delivers. Ohio citizens have the right to know that public officials and employees have the citizens' best interests in mind and not their own when making decisions in their public role. The disclosure form makes that information available in a very accessible way.

By the Numbers

- Over 9,800 filers
- More than 96 percent of filers used the convenient online filing system
- Staff collaborates with nearly 1,300 different filing entities each year
- Confidential reviews are conducted for nearly 800 different entities and 2,400 filers
- The FDS program maintains a near 100 percent compliance rate, with over 99.55 percent of required filings received

2024 Formal Complaints Against Non-Filers by Position



Financial Disclosure Statement Complaints

Total Formal Complaints Brought by the Commission Against Delinquent State and Local Non-Filers in 2024: 15

- Complaints processed for failure to file a 2022 Financial Disclosure Statement: 13
- Complaints processed for failure to file a 2023 Financial Disclosure Statement: 2

Total referred for prosecution in 2024: 10

Complaints Pending in the Franklin County Municipal Court (Cases Referred to the Prosecutor's Office Prior to 2024): 49

Pleas and Convictions in Franklin County Municipal Court for Failure to File a Financial Disclosure Statement in 2024: 6

Dismissal of Charge for Failure to File a Financial Disclosure Statement in Franklin County Municipal Court at the Request of the Prosecutor in the Interest of Justice: 3*

*3 cases (two different filers) were dismissed as a part of plea agreements