

MILWAUKEE COUNTY ETHICS BOARD

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2023 - ANNUAL ACTIVITIES REPORT

ETHICS BOARD MEMBERSHIP

TERM EXPIRATION YEAR

Christopher Meuler, Chair (Nominee of the Milwaukee Bar Association)	February 28, 2028
Christine Hansen, Vice Chair (Nominee of League of Women Voters)	April 1, 2023
Dana Guthrie (Nominee of the Greater Milwaukee Committee)	December 12, 2025
Clarence P. Nicholas (Nominee of NAACP)	March 12, 2026
Richard Donner (Nominee of Wisconsin Policy Forum)	April 30, 2027
Dean Daniels (Nominee of Interfaith Conference of Greater Milwaukee)	September 22, 2028
Elizabeth Lentini (Nominee of League of Women Voters)	May 27, 2029

The Ethics Board elected Christopher Meuler as Chair and Dana Guthrie as Vice Chair of the Ethics Board at its February 2, 2023, meeting. Christine Hansen resigned from the Ethics Board on April 1, 2023. Elizabeth Lentini was confirmed as a member of the Ethics Board on May 25, 2023, with her first Ethics Board meeting on August 3, 2023.

BACKGROUND

MISSION STATEMENT

To ensure public confidence that the Milwaukee County government acts with the highest integrity and in the public interest.

VISION

Milwaukee County has a model ethical culture based on transparency, disclosure, and institutional integrity.

STATUTORY REFERENCE

The Milwaukee County Ethics Code is Chapter 9 of the Milwaukee County General Ordinances and is based largely on Section 19.59 of the Wisconsin Statutes. The Milwaukee County Lobbying Code is Chapter 14, Milwaukee County General Ordinances. The Board must also operate in compliance with other Wisconsin Statutes, such as Public Records and Open Meetings Laws.

HISTORY

The Ethics Board and the Ethics Code it administers were created in February of 1975. The current Rules and Procedures of the Ethics Board (which contains the processes by which the Board conducts its business) were adopted in 2013. The Code sets forth standards of ethical conduct for all County

employees, including elected and appointed officials and members of boards and commissions. The County Board has amended the Code 32 times since its inception. The three most recent revisions to the Code are as follows:

- March 2020: Section 9.02(1) was amended to establish a uniform value threshold for gifts, honorariums, fees and expense throughout the Code;
- September 2021: Section 9.14(2)(a) was amended to modify the Statement of Economic Interests (“SEI”) form (SEI filers now acknowledge whether a gift reported in Item 7A was given to them by or on behalf of a vendor of that filer’s department); and
- December 2021: Sections 9.03 and 9.04 were amended to discontinue the requirement that a notarized Affidavit supplement SEI submissions.

ORGANIZATION

The Board consists of six members appointed by the County Executive and confirmed by the Milwaukee County Board of Supervisors for staggered six-year terms. New members are nominated by one of the following six nominating authority organizations:

- The National Association for the Advancement of Colored People (NAACP);
- The Wisconsin Policy Forum;
- The Greater Milwaukee Committee;
- The Milwaukee Bar Association;
- The Inter-Faith Conference of Greater Milwaukee; and
- The League of Women Voters of Greater Milwaukee.

The goal of this process is to ensure that the Board members reflect the racial and ethnic diversity of Milwaukee County, serve the residents of Milwaukee County according to their oaths of office, and act independently from the nomination and appointing authorities. An action by the Ethics Board requires an affirmative vote of four members. While serving on the Board, and for one year prior to his/her appointment, no member can be a county public official, employee, or candidate for public office.

BOARD RESPONSIBILITIES

The Ethics Board administers the Ethics Code for County officials, employees, and members of county boards and commissions, and it is the primary source of interpretation of the Milwaukee County Ethics Code. The Board has three major responsibilities:

- Directs persons to timely file SEIs as required;
- Upon request, advises any County official, employee, or those who do business with County employees on the propriety of matters to which they may become a part; and
- Addresses investigation requests and verified complaints against county elected or appointed officials, employees, or members of county boards and commissions.

ADMINISTRATION

STAFF

Adam Gilmore, Executive Director, June 2019 to present
Alisha Terry, Paralegal, October 2022 to present
Jenny Kasza, Administrative Assistant, February 2023 to present

2023 BUDGET

The 2023 adopted Ethics Board budget was \$15,050. In 2017, the Ethics Board budget was combined with the Personnel Review Board and Civil Service Commission budgets for efficiency and cost-saving purposes. Thus, the 2023 personnel costs for the three departments are now primarily taken from the Personnel Review Board budget. The budget of the Ethics Board is utilized almost entirely for outside counsel representation when required.

BOARD MEETINGS

In 2023, the Ethics Board met four times. By ordinance, the Ethics Board shall meet at least four times per year, with a February meeting designated as the annual meeting. The Ethics Board schedules additional meetings as necessary to timely respond to requests for advice or to investigate allegations of violations of the Ethics Code.

Although requests for written advice and investigations must be held in closed session pursuant to local ordinance and as permitted by state statutes, the Board gives public notice of the time, place, and general subject of its closed sessions in conformance with the State of Wisconsin's Open Meetings Law. Most of the remaining items on their meeting agenda are discussed in open session.

MEETINGS AND ATTENDANCE

The average Board member attendance rate in 2023 was 96%.

PUBLIC RECORDS REQUESTS

The Ethics Board received five requests from citizens for records pursuant to Wisconsin Public Records Laws. The Board's office provided copies of SEIs in response to the five requests.

Board Member Attendance Data 2021 to 2023

2021		2022		2023	
MEMBER	MEETINGS ATTENDED OF MEETINGS CALLED	MEMBER	MEETINGS ATTENDED OF MEETINGS CALLED	MEMBER	MEETINGS ATTENDED OF MEETINGS CALLED
Christopher Meuler	5 of 5 = 100%	Christopher Meuler	7 of 7 = 100%	Christopher Meuler	4 of 4 = 100%
Christian Flores	1 of 1 = 100%	Christine Hansen	7 of 7 = 100%	Christine Hansen	1 of 1 = 100%
Clarence Nicholas	4 of 5 = 80%	Clarence Nicholas	6 of 7 = 86%	Dana Guthrie	4 of 4 = 100%
Dana Guthrie	5 of 5 = 100%	Dana Guthrie	4 of 7 = 57%	Clarence Nicholas	4 of 4 = 100%
Christine Hansen	5 of 5 = 100%	Rachel Yates	3 of 3 = 100%	Richard Donner	4 of 4 = 100%
Rachel Yates	4 of 5 = 80%	Richard Donner	6 of 7 = 86%	Dean Daniels	3 of 4 = 75%
Richard Donner	4 of 4 = 100%	Dean Daniels	1 of 1 = 100%	Elizabeth Lentini	2 of 2 = 100%
Average Attendance	= 94%	Average Attendance	= 90%	Average Attendance	= 96%

ACTIVITIES RELATED TO THE DUTIES OF THE ETHICS BOARD

STATEMENTS OF ECONOMIC INTEREST

The Code requires that the following individuals file an SEI form with the Ethics Board:

- All County employees fitting the description in Section 9.03(1) and as identified by their department head;
- Certain new employees (Section 9.03(3));
- Elected and Appointed County Officials (Section 9.03(1));
- Candidates for Elected County Office and Incumbents seeking re-election (Section 9.03(2)); and
- Members of Boards and Commissions at the determination of the Ethics Board.

In 2023, 382 people were required to file an SEI with the Ethics Board, an increase from the 370 people required to file in 2022.

SEI ELECTRONIC FILING PROJECT

Throughout 2023, the office of the Ethics Board worked closely with Fiscal Affairs, Information Management Services Division (IMSD), and County vendor Granicus to make improvements to the SEI filing process launched in 2021 on the MyCounty Customer Portal. The Portal was created to increase the accessibility of certain county services by bringing them to a digital forum. The benefits of this transition include:

- A quicker, simpler filing process for employees, officials and candidates for office;
- Increased efficiency in the maintenance and custodianship of records by the Ethics Board's office; and
- An easier and more prominent method by which citizens may request SEIs in an effort to enhance transparency in our County government.

Feedback from user experiences led to a few updates, including the newest addition of a save-as-you-go feature for filers completing their SEIs.

ETHICS COMPLIANCE AND TRAINING

The Milwaukee County Administrative Manual of Operating Procedures (AMOP) requires mandatory, online, annual ethics training for Milwaukee County employees. The content of this training module is reaffirmed on an annual basis by office staff.

The office of the Ethics Board circulates newsletters 3-4 times a year informing on a variety of County Ethics-related topics. Individuals are recommended to visit the Ethics Board's website to review current and past newsletters.

ETHICS BOARD DETERMINATIONS AND ADVISORIES

During 2023, the Ethics Board considered the following requests for advisory opinions, investigation requests, or other matters. Pursuant to rules established by County Ordinance and Statutes, these actions were discussed in closed session, and the synopses are written in a manner that protects the integrity of the closed-session meetings and the confidentiality of the requesters. These summaries are for informational purposes only and should not be relied on as authoritative advice for other factual scenarios. 70 advisories; 1 investigation request:

1. The Board received a request for advice concerning whether a County employee, as a citizen and not in their role with Milwaukee County, could endorse a candidate for public office. The endorsement was determined to be acceptable as it contained no implication of endorsement by Milwaukee County. The employee was advised to review Ethics Code provisions regarding political activity. MCO §9.06.
2. A concerned individual alerted the Office of the Ethics Board that the owner of an organization that contracts with Milwaukee County had paid the bail for an accused individual. The Ethics Board Executive Director ("EBED") advised that because neither the organization's owner nor the recipient of the benefit are Milwaukee County employees or officials, they are outside the jurisdiction of the Ethics Board. The individual provided no information on whether the County department that contracts with the organization had any involvement in the matter.
3. A County employee inquired whether they could perform volunteer work for a non-profit organization that provides services to the community. They confirmed that they interact with the organization in their county role and that the volunteer work would see them interacting with Milwaukee County on behalf of the organization. The EBED advised that there would be concern if the County employee or an immediate family member were "associated" with the non-profit as that term is defined in the Ethics Code, thereby establishing a financial interest. If no such association exists, the volunteer work would not constitute a violation. Due to the overlapping subject matter of their two roles, the employee was advised to review the Ethics Code provision prohibiting disclosure of privileged information. MCO §9.05(2)(d).
4. A County employee inquired whether their department could provide compensation to participants in a focus group the department was organizing. The EBED identified no inherent violations with the effort but recommended that no immediate family members of employees of

the department participate in the focus groups and generally discouraged using current County employees or officials in the focus groups as well to eliminate any potential for an appearance of impropriety. MCO §9.05(2)(a) and (c)(2).

5. A County employee inquired whether their department could enter into an agreement with a charitable organization in which they held the position of “board member.” The Ethics Board Chair (“EBC”) and EBED determined that the County employee is not associated with the organization as that term is defined in MCO 9.02 of the Ethics Code and has no bargaining power on behalf of the organization. The employee confirmed that approval of the agreement would undergo the appropriate County procurement processes. The EBC and EBED advised that, based on the facts presented, no inherent violation of the Ethics Code was present. MCO §9.02(2).
6. A County employee inquired whether they could provide a personal friend with a recommendation for employment with another acquaintance. The EBED advised that, based on the facts presented, the County employee could provide the recommendation but as a matter of best business practice the County employee should avoid involving themselves further.
7. A County employee inquired whether a County elected official could use their title as part of a campaign for another elected office. The EBED advised on the content of MCO 9.06, which covers political activity prohibited by the Ethics Code. The code lists certain activities that are not allowed when an individual is “at their place of employment” and could potentially be “engaged in [their] official duties.” It was advised that the use of one’s County title as part of their overarching campaign for office is not inherently prohibited by the Ethics Code. MCO §9.06(1).
8. A County employee inquired whether an advertisement of a contracted vendor’s reduced rate for County employees could be circulated countywide. The EBED determined that no one involved with the circulation had a significant fiduciary relationship with the vendor. The advertisement was revised to read as a neutral notification and the circulation was approved. MCO §9.05(2)(a) and (c)(2).
9. A County employee inquired whether they could use county funds to attend a fundraising event that provided free beverages. Based on the information provided and with confirmation that the employee does not have any significant fiduciary relationship with the organization hosting the fundraiser, the employee was advised that they could attend the event and advised on reporting requirements depending on whether tickets were purchased with personal or County funds. MCO §9.04 and 9.14.
10. A County employee inquired whether they could accept a secondary employment offer that would see them performing contracted work for another employer. The County employee noted in their inquiry that all work would be done outside of county work hours and that they would not use county resources or privileged information. The County employee would be working as an independent contractor for the other employer and that all work product would become property of said employer. The employee confirmed that the organization does not have a current contract with Milwaukee County and that the employee does not believe they received the opportunity due to their current position with the County. With those confirmations, no violation of the Ethics Code was found. MCO §9.05(2)(a) and (c)(2).

11. A County employee inquired whether their department could enter into a contract with an individual to perform a professional assessment of the department. Said individual is also an employee of a state government entity. The entity the individual works for has semi-regular contact with the County department, though the individual has not directly worked with the County department in their state government role. The County employee confirmed that none of the staff members of the County department are associated with or have a significant fiduciary relationship with the potential contractor. The EBED determined there was no inherent violation but recommended the employee review sections of the Ethics Code and be mindful of the potential for a violation in the future. MCO §9.05(2)(a-d).
12. A County employee inquired whether they could continue to contract with a vendor when the primary contact was a former employee of their department. The EBED advised that, based on the facts presented, there was potential for a violation of the Ethics Code in the scenario under MCO §9.05(3)(a). That provision also provides a process by which the County department could seek a waiver of the prohibition through the County Finance Committee. MCO §9.05(3)(a).
13. A County employee inquired whether they could accept a job offer with an outside employer as secondary employment. The County employee noted in their inquiry that all work would be done outside of county work hours and would not use county resources. The EBED confirmed with the employee that the organization does not have a current contract with the County and the employee does not believe they received the opportunity due to their current position with the County. The EBED advised that no Ethics Code violation was present. MCO §9.05(2)(a) and (c)(2).
14. An individual inquired whether they could use a government-affiliated e-mail address to send political campaign related e-mails to other government-affiliated e-mail addresses. The EBED determined such conduct could potentially violate the Ethics Code and advised the individual to not send political campaign e-mails from their County e-mail address or to government-affiliated e-mail addresses. MCO §9.05(2)(j), §9.05(2)(k), §9.05(2)(l) and §9.06(1)(d).
15. A County department reported that a former employee who had left the department a month prior was contacting department clients with interest in representing them in their business with Milwaukee County. The former employee was also contacting department employees at their offices for information on the clients. The EBED reviewed the language of MCO §9.05(3)(a-d) with the inquirer. The EBED welcomed the inquirer to discuss the provisions with department staff and to encourage staff not to engage with the former employee if they feel the situation resembles one described in the reviewed Ethics Code provisions. MCO §9.05(3)(a-d).
16. A County employee inquired whether they could use their county computer to have a Microsoft® Teams call with an outside agency regarding retirement planning. The EBED explained that avoiding using their county computer for personal business would be best practice but that the question might be better posed to the employee's supervisor.
17. A County employee inquired whether they could create and establish a private limited liability corporation ("LLC"). Based on the facts provided, the EBED determined that there was no inherent violation with the employee incorporating their own LLC. MCO §9.05(2)(c)(1-2), §9.05(2)(d).

18. A County employee inquired whether certain comments made by a County official during a meeting of a local governmental body and later during a campaign event constituted a violation of the Ethics Code. The EBED and the Ethics Board Chair (“EBC”) reviewed footage of the comments made by the individual and agreed that no violation of the Ethics Code had occurred.
19. A County employee inquired whether their department could conduct meetings off-site at the offices of a County vendor. It was determined that such a use of the vendor’s space was not contemplated in any written agreement. The Ethics Board recommended the employee take steps to incorporate the contemplated use of space into the agreement between the vendor and Milwaukee County. MCO §9.05(2)(b).
20. A County employee received two election campaign e-mails for a candidate for elected office in the state of Wisconsin. The EBED advised that more information was needed regarding the sender of the e-mails, specifically whether they are a County employee or elected official and whether they sent the e-mails at their workplace, to establish that the conduct fits a violation of MCO 9.06. No Ethics Code violation was found and the employee was pointed to another venue better positioned to address the issue.
21. A County employee inquired whether their department was able to sell surplus materials to the public to generate revenue for the department. Based on the facts provided, the EBED did not identify any inherent violations in the scenario so long as the buyer was not another employee of the department. MCO §9.05(2)(a) and (c)(2).
22. A County employee has secondary employment with a national non-profit. Through their secondary employment, the employee was offered the opportunity to go to Washington, D.C., to meet with federal legislators regarding topics of focus of the non-profit. As part of the opportunity, the non-profit offered to pay for travel expenses for the employee. The employee affirmed that no honorariums or other paid expenses were being offered or accepted. The EBED advised the employee to report the travel expenses paid by the non-profit on their next SEI if they are a filer. MCO §9.14.
23. A County employee contacted the Ethics Board office with concerns regarding a former employee’s contact with their department. The employee reported that the former employee was operating a business whose advertisements suggested an ability to fast-track a client’s business with Milwaukee County. The employee affirmed that the former employee had left county service more than one year prior. The EBED advised the employee that the only Ethics Code provision that applies to a former employee after one year is MCO 9.05(3)(c). The employee was advised to reach out to the Ethics Board if such a situation occurs. The EBED also advised the employee to reach out to the office of Corporation Counsel with their concerns regarding any potential impropriety the former employee’s advertisements may suggest. MCO §9.05(3)(c).
24. A County employee reported that a former employee had recently left their position in county service and accepted a position with a vendor of the department. The County employee affirmed that the former employee did not interact with the vendor in their county role. The County employee also affirmed that the former employee would not have direct involvement in the vendor’s business with Milwaukee County. The EBED advised the County employee that a

waiver of the prohibitions contained in MCO 9.05(3)(a) would need to be provided by the County Finance Subcommittee. The County employee stated they would provide the information contained in MCO 9.05(3) to the former employee. MCO §9.05(3)(a-d).

25. A County employee informed the Ethics Board office of a part-time secondary employment opportunity in the service industry that they were offered. The EBED identified no potential violation of the Ethics Code.
26. A County official and employee sought to attend an out-of-state conference whose target audience was government officials and staff. They inquired whether they could accept a waiver of the registration fee being offered by the conference organizers. The EBC and EBED advised the official to decline the registration fee waiver, but that attendance was otherwise acceptable under the Ethics Code. The official later notified the EBED that they did not accept the waiver and paid for their conference registration. MCO §9.14(1).
27. A County employee applied for a part-time position with an organization that is a current vendor of Milwaukee County. The EBED advised that there was no violation with confirmation that the employee's role with either entity did not provide authority over the bargaining/contracting process between the two entities. Confirmation was also required that the position with the vendor organization was not offered to the employee due to their current county position. MCO §9.05(2)(a) and (c)(2).
28. A County employee inquired whether they could accept a twenty-five-dollar (\$25) gift card they received from a former County employee as a thank you/honorarium for participating in a panel discussion organized by the former employee. The EBED advised that, as the value of the gift card does not exceed the "anything of value" threshold of fifty dollars (\$50), there is no violation of the Ethics Code. The gesture would not need to be reported on an SEI should the employee be a filer. The EBED advised the employee that they are able to accept honorariums in excess of fifty dollars (\$50) in the future so long as the scenario fits the description in MCO 9.14(1) and the honorarium is reported on their next SEI should they file. MCO §9.14.
29. A County employee was contacted by a vendor of their department to consult on a project the vendor is carrying out in tandem with a project team of other members of the employee's department. The employee was previously instructed to not be involved in said project. The EBED saw no violation of the Ethics Code and recommended the employee bring the matter to the attention of their supervisor or appointing authority.
30. A County employee was asked to volunteer, without pay, to participate in a review panel for a research study. The EBED advised that there was no inherent violation in accepting the volunteer position but pointed out MCO 9.05(2)(d), which prohibits the sharing of any privileged information gained in their county position as a provision to keep in mind. MCO §9.05(2)(d).
31. A County official inquired whether they could vote on an item that would see an organization they work for benefit financially. The EBED advised that there would be concern if the official was "associated" with the organization as that term is defined in MCGO §9.02(2). The official affirmed that they are employed but not associated with the organization. No inherent violation was identified. MCO §9.02(2).

32. A County department inquired whether, with their permission, one of their employees could conduct a field project related to their own higher education coursework while on County time and with County resources. The EBC and EBED advised the department to consider a number of factors before approving the request, including whether the effort the employee would put into the project was consistent with the department's mission, that the results of the efforts would be of tangible benefit to the department, that the employee would not use privileged information to complete the project, and that any work on the project that does not overlap in some way with the employee's county duties as delineated in the employee's Job Evaluation Questionnaire not be performed on County time. MCO §9.05(2)(c)(2).
33. An organization provided County elected officials with large numbers of tickets to a local event with the intent that the officials distribute the tickets to their constituents. Officials were advised that they could choose to return the tickets to the organization, but anything short of that, be it disposal or distribution of the tickets, would require the official to declare the value of those tickets not returned on their next SEI. Officials were encouraged to use the "circumstances" section of the report form to explain what they chose to do with the tickets they received (disposed of, how they distributed, etc.). Officials were also advised to avoid distributing the tickets to family or within any outside organizations the officials may be "associated" with as that term is defined in the Ethics Code. It was also recommended that the Comptroller be notified of any distributions made to other County departments/staff. MCO §9.02(1), §9.02(9), §9.05(2)(b) and §9.14(2)(a).
34. A County official, with a guest, was invited to the opening ceremony of a local cultural festival. The value of the ticket package offered was determined to be under the "anything of value" threshold established in the Ethics Code. The official also inquired whether they and their guest could attend a private reception following the ceremony. The EBED advised the official to not accept special VIP access not otherwise open or made available to the general public. MCO §9.05(2)(b).
35. A County department inquired whether a job candidate could be hired if they own an LLC that could potentially work with clients of the County department. The position the new hire would be entering has the potential to interact with and have access to information regarding clients of the LLC that wouldn't necessarily be available to them otherwise. The EBC and EBED recommended a process be put in place (should they hire the candidate) to shield the employee from being involved with or accessing confidential information related to clients of the employee's LLC. MCO §9.05(2)(a), §9.05(2)(c)(1), §9.05(2)(c)(2) and §9.05(2)(d).
36. A County official received two complimentary general-admission tickets and a parking pass for a local event and inquired whether they could be accepted. The EBED verified that the combined value of the tickets and parking pass being offered was under the "anything of value" threshold set in the Ethics Code. The official was advised that the tickets and parking pass could be accepted and that they would not need to be reported on the official's next SEI. MCO §9.05(2)(b).
37. A County department inquired whether a new employee's secondary employment created a conflict of interest with their county position. The secondary employer provided a letter on the employee's behalf regarding the details of the situation. The EBED confirmed that the new

employee possessed no contracting or bargaining authority in their county position and determined that no violation was present.

38. A County official inquired whether they could attend a conference if they paid with personal funds and did not accept subsidized lodging from conference organizers. The EBED advised that the conference could be attended if the official paid the full attendance fee and for lodging. Food and beverage could be accepted as part of the conference. MCO §9.14.
39. A former County employee, having recently left county service, began working for a vendor that contracts with Milwaukee County. At the time they left the county, the former employee was not working on any projects that involved the vendor. The vendor asked the former County employee to review a project related to their contract with Milwaukee County. The EBED advised that there was a potential Ethics Code violation as the proposed work would fall under the provisions regarding limits on contact with former employees. It was recommended that the department contracting with the former employee's consulting firm seek a waiver of the prohibition in MCO 9.05(3)(a) through the Committee on Finance. MCO §9.05(3)(a).
40. A County department administered a contract between a separate county agency and a non-profit partner agency. The non-profit submitted a credit application that listed the County department as a credit reference. The County department inquired whether it was allowable under the Ethics Code for them to complete and submit a reference form for the non-profit. The EBED advised that, while no particular issue with the Ethics Code could be identified, the department should reach out to Procurement to determine best business practices for handling such requests.
41. A County employee was interested in purchasing county property no longer in use. The department's only other stated option was to recycle the property. The EBED advised that there was no violation if the employee purchased the property at the same rate that the department would otherwise sell it to external customers or receive from a recycling facility and to not discount the employee on the purchase to avoid the appearance of a private benefit. MCO §9.05(2)(a).
42. On behalf of their department, a County employee delivered a bequeathment to an organization. An employee of the organization, out of personal gratitude, offered the County employee a gift of two tickets valued at forty-five dollars (\$45) apiece (ninety dollars [\$90] total). The EBED advised that both tickets could be accepted and that the employee should report the total value of the tickets (ninety dollars [\$90]) on their next SEI if they file. If the employee only accepted one ticket, the value would not exceed the "anything of value" threshold of fifty dollars (\$50) and the single ticket would not need to be reported on the employee's next SEI if they file. MCO §9.14.
43. A County department wished to share information about a citywide event with department staff. The weeklong event included various activities around the community that would feature discounted food and beverages. Based on the facts presented, none of the items offered appeared to be in excess of the "anything of value" threshold of fifty dollars (\$50). The EBED advised that there was no inherent violation in circulating the information, as the event was open to the public and department staff were not receiving a private benefit from the circulation.

44. A County employee inquired whether they could continue to volunteer with a community group that organizes events in a particular city neighborhood. The employee is not associated with the community group as that term is defined in the Ethics Code. In the employee's county position and volunteer role, they do not have bargaining power or contracting authority. The Ethics Board Paralegal ("EBP") advised that there is no inherent violation with the continuation of volunteering. MCO §9.02(2).
45. A County department inquired whether they could hire a contractor who was a former employee. In their new role, the potential contractor would be under the direction of a family member employed with Milwaukee County. The potential contractor had been out of county service for over one year and none of the Ethics Code limits on contact provisions applied to their scenario. As for the familial connection, its immediacy would require the department to verify that neither family member was dependent on the other in regard to their financial and living situations. The Ethics Board acknowledged that gray area remains regarding the application of Ethics Code provisions to county contractors. The department confirmed that an appropriate degree of separation existed between the family members for the proposed working relationship to be acceptable. MCO §9.02(9).
46. A County employee inquired whether they could begin a volunteer opportunity through an organization. The volunteer opportunity is in another county at a state-owned facility. The organization does not have a contract with Milwaukee County, and the employee affirmed they did not hold the authority to contract with the organization on behalf of Milwaukee County. The EBP advised the employee that there is no inherent violation of the Ethics Code. MCO §9.05(2)(a).
47. A County employee inquired whether they could volunteer time with an organization. Although the organization is run from another county, the opportunity itself is in Milwaukee County. The employee confirmed the work would not be on County time, that there is no contract between the organization and Milwaukee County, and that there was no potential for the employee to be involved in a contract bargaining process in the future while working with the organization. The EBP found no inherent violation of the Ethics Code in the scenario. MCO §9.05(2)(a).
48. County employees were invited to participate on an advisory board. For their participation, advisory board members were to receive a stipend reflective of their meeting participation. The stipend would amount to one thousand dollars (\$1,000) issued over a 12-month period. The County employees were invited to participate because of their county roles and expertise. The employees would participate during county time and using county resources. The EBED advised that the stipend should not be accepted, as the work for the advisory board would be conducted on county time and with county resources. MCO §9.14(3).
49. A County department inquired about a former employee working with a department vendor on County projects. As the employee had only left county service a month prior, the EBP advised the department to seek a waiver of the prohibition of limits on contact from the County Finance Subcommittee. MCO §9.05(3)(a).

50. A County department is interested in hiring a candidate. The candidate owns an LLC related to the area of expertise of their county position. Once hired, the potential employee would be involved in the selection process for three other contracted positions that would support their own county position. The potential employee's LLC does not have a contract with the County department. The EBED advised that no inherent violation was present, however, the potential employee and their direct supervisor should be aware of Ethics Code provisions relevant to the unique dynamic. It was also established whether, if hired, the potential employee would need to complete an SEI within 30 days of their hiring date and annually going forward. MCO §9.05(2)(a), §9.05(2)(b), §9.05(2)(c), §9.05(2)(d), §9.05(2)(g) and §9.03(1).
51. A County employee reached out with questions regarding a complaint they had received in the course of their county duties. The complaint alleged that an official had used county funds to pay for membership fees with a local organization. No evidence was provided that such a use of funds was for personal benefit or didn't serve a county purpose and the Ethics Board determined that no violation could be found without more information.
52. A County employee inquired regarding a potential conflict of interest as a company they were associated with was in the process of responding to a Request for Proposal (RFP) issued by the County. The EBED advised that the Procurement office provides a conflict-of-interest form as part of the RFP process but suggested they reach out if they had further questions related to the Ethics Code.
53. A County official reached out to request further guidance related to the large batch of local event tickets provided to officials earlier in the year (see #33). The official did not distribute the tickets they received. The official contacted the donating organization to return the tickets, but the event had passed and the tickets were no longer valid. The organization could see from their records that the tickets were unused and advised that the tickets could be disposed of. The official affirmed that they had disposed of the tickets and wanted to confirm what other actions would need to be taken. Because the tickets were never returned, the EBED advised the official to report the value of the tickets on their next SEI. The EBED recommended that the official add a comment that the tickets were unused and disposed of in the "Circumstances" section of the reporting item. MCO §9.14.
54. A County official was invited by a personal friend to a ticketed event. The EBED advised that, while the value of the ticket was over the "anything of value" threshold set by the Ethics Code, the invitation was extended due to the personal relationship between the official and their friend. The EBED advised that the official could accept the ticket and the value would not need to be reported on their next SEI filing.
55. An official was invited to an event in their official county capacity. The value of the ticket was over the "anything of value" threshold set by the Ethics Code. The EBED advised the official to report the value of ticket on their next SEI. MCO §9.14.
56. A County employee inquired whether it was appropriate for an individual interning with a County department to be supervised by a family member. The Ethics Board advised on potential violations in the scenario as it was presented. It was advised that if said intern fits the definition

of "Immediate family," as defined by MCO 9.02(9), their internship should be ceased or transferred to a different County department. MCO §9.02(9), §9.05(2)(a) and §9.05(2)(c)(2).

57. A County official planned to attend a conference. During the conference, the official planned to also attend a dinner presentation hosted by a current/potential county vendor occurring adjacent to the conference. The EBED recommended the official report the value of the dinner presentation on their next SEI filing. If the dinner host was a current vendor of the department, that fact should be acknowledged in the reporting. The official was advised to double the reporting amount should they bring a guest. MCO §9.14.
58. A County department inquired whether they could establish a new employee benefit of discounts on goods and/or services available to department employees. The department was in the process of seeking County Board approval for the benefit. The EBC and EBED advised of the possible implications of MCO 9.05(2)(a), but acknowledged that the same provision provides that County Board approval would supersede any potential Ethics Code issues. MCO §9.05(2)(a).
59. A County official received two tickets to an event. The tickets were valued at thirty-five dollars (\$35) each. The official inquired whether one ticket could be kept for themselves and one given away. The EBED advised that retaining one ticket and returning the other would set the accepted value from the event organizers under the "anything of value" threshold listed in the Ethics Code and the ticket would not need to be reported on the official's next SEI. If the official chose to keep one ticket and give one away, the official would still be exerting control over the two tickets. Because their combined value exceeds the "anything of value" threshold, the official would need to report that value on their next SEI. MCO §9.14.
60. A County official attended a fundraiser event and participated in an auction at the event. The official used their own personal funds to bid for, and in some cases win, items. As a thank you, the official was gifted a third, non-auctioned item. The official did not value the gift as exceeding the "anything of value" threshold set by the Ethics Code, but because the gift was not given to the official because of their county role (but rather their personal purchase), the EBED advised that no violation of the Ethics Code had occurred and the gift did not need to be reported on the official's next SEI.
61. A County employee reached out to the Ethics Board to inform them of an LLC they had incorporated and dissolved within the past year. The employee initially started the LLC to provide private advisory services in their field of expertise, which is directly correlated to their county role as well. In the time the LLC was active, the employee had one client for which they helped facilitate a training session. The employee believes their LLC's services were not procured because of the employee's county role. The employee chose to dissolve the LLC out of concern that it created a conflict of interest with their county role. The Ethics Board advised that there was no inherent violation in the employee owning and managing the LLC as envisioned. It also advised that if the employee were to revive the LLC, the employee should be vigilant and reach out to the Ethics Board regarding a potential violation in a future scenario.
62. A County employee has been invited to an event by a community partner where they would be presented an award. The employee was also offered a free ticket to the event. The EBC and EBED advised the employee that the ticket and award could be accepted and that if their

combined value exceeds the “anything of value” threshold set by the Ethics Code, they should be collectively reported on the employee’s next SEI if they file. MCO §9.14.

63. A County employee inquired whether they could sit on the board of a non-profit organization that receives funding from Milwaukee County. The role on said board would not provide the employee with any decision-making power regarding the funding the organization received from Milwaukee County. The employee did not have any influence or authority over contract bargaining processes between the County and the organization in their county role. The employee had not and would not have any direct interaction with the organization in their county role. The employee did not have access to privileged information that could benefit the organization. The EBED advised that, based on the facts presented, no inherent violation of the Ethics Code could be established. MCO §9.05.
64. A County department received tickets to a local sporting event and inquired whether the tickets could be raffled off to internal employees. The tickets were given by a current vendor contracting with the County department. The tickets were valued at one hundred and sixty dollars (\$160) per ticket. The EBED advised that the value of the tickets exceeded the “anything of value” threshold set in the Ethics Code and that it would be best practice to return the tickets and discuss other methods of incentivization within the boundaries of the Ethics Code. MCO §9.05(2)(b).
65. A County official inquired whether they could draft and sign a fundraising letter on behalf of a non-profit organization they sit on the board of. The official provided the proposed language of the letter. The EBED advised the official to remove mention of their county role from the content of the letter so that the letter was being sent in the official’s capacity with the organization’s board and not in their county capacity. Once done, the letter could be signed and circulated. MCO §9.05(2)(a) and §9.05(2)(c)(2).
66. A County official inquired whether a non-profit they work for in a directorial role could enter into a contract with a County department. In their county role, the official acts in an advisory capacity to said County department. The official was determined to be “associated” with the non-profit as that term is defined in the Ethics Code. The EBED advised that the County department should reach out to the Office of Procurement to confirm whether an RFP should be initiated or if they would recommend proposing the arrangement to the County Board of Supervisors for consideration, input and approval. It was advised that the official play no role in the RFP process, and that they abstain from any discussions, decision-making, or advisement related to the non-profit when acting in their county role. The EBED also recommended that another individual from the non-profit be the main point of contact for the contract/project on behalf of the non-profit. MCO §9.02(2), §9.05(2)(a) and §9.05(2)(c)(2).
67. As a follow-up to #65, a copy of the final circulated fundraising letter was provided to the EBED. While the content of the letter matched what had been discussed, the letter itself ended up being printed on the official’s county letterhead. The EBED clarified to the official that the letter should not have been sent on County letterhead or featured the official’s county title in the signature block. MCO §9.05(2)(a) and §9.05(2)(c)(2).
68. A County employee reached out regarding a department event they were planning. The event would feature refreshments and a raffle for a one-hundred-dollar (\$100) gift card. The EBED

advised that raffling a one-hundred-dollar (\$100) gift card would exceed the “anything of value” threshold set in the Ethics Code. The EBED recommended the employee opt instead for two gift cards with a value of fifty dollars (\$50) each. So long as the cards are won by two different individuals, neither would be accepting a gift that exceeds the “anything of value” threshold. MCO §9.14.

69. A County employee inquired about accepting an invitation to participate in a panel discussion for which they would receive an honorarium of five hundred dollars (\$500). The EBED advised that the honorarium could be accepted and that the employee should report the honorarium on the first SEI they file after the event occurs if they are required to file under MCO 9.03. MCO §9.03(1) and §9.14.
70. A County department received a donation of homemade cookies from a religious organization. The religious organization is not a county vendor. No estimated value was attributed to the homemade cookies. The cookies were made available for department staff. Considering that the religious organization was not a vendor, that the value of the gift was under the “anything of value” threshold set by the Ethics Code, and that the gift was made available to various office staff members, the EBP identified no violation of the Ethics Code.
71. The Board received an investigation request alleging that a public official used their public position to obtain financial gain for the private benefit of another individual, engaged in political activity while on County time and using County resources, and that a conflict of interest existed between the official and their secondary employment. After reviewing the request, the Board determined that it did not produce facts sufficient to merit a conclusion that a violation of the Code occurred, and the Board dismissed the request.

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