

MILWAUKEE COUNTY ETHICS BOARD

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2025 - ANNUAL ACTIVITIES REPORT

ETHICS BOARD MEMBERSHIP

TERM EXPIRATION YEAR

Christopher Meuler, Chair (Nominee of the Milwaukee Bar Association)	February 28, 2028
Elizabeth Lentini, Vice Chair (Nominee of League of Women Voters)	May 27, 2029
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
Clifton Phelps (Nominee of Greater Milwaukee Committee)	March 20, 2031

The Ethics Board elected Christopher Meuler as Chair and Elizabeth Lentini as Vice Chair of the Ethics Board at its February 3, 2025, meeting.

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 34 times since its inception. The three most recent revisions to the Code are as follows:

- December 2021: Sections 9.03 and 9.04 were amended to discontinue the requirement that a notarized Affidavit supplement SEI submissions;
- September 2024: Section 9.04 was revised to expand the scope of information collected by the County’s SEI form; and
- February 2025: Section 9.03 was revised to clarify that current County officials do not need to file an SEI as part of the process for declaring candidacy to a County office as they already have SEIs on file with the Ethics Board.

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, joined office in 2017

Alisha Terry, Paralegal, October 2022 to present, joined office in 2015

Jenny Kasza, Administrative Assistant, February 2023 to present, joined office in 2023

2025 BUDGET

The 2025 adopted Ethics Board budget was \$12,550. 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 2025 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 2025, the Ethics Board met six 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 2025 was 89%.

PUBLIC RECORDS REQUESTS

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

Board Member Attendance Data 2023 to 2025

2023		2024		2025	
MEMBER	MEETINGS ATTENDED OF MEETINGS CALLED	MEMBER	MEETINGS ATTENDED OF MEETINGS CALLED	MEMBER	MEETINGS ATTENDED OF MEETINGS CALLED
Christopher Meuler	4 of 4 = 100%	Christopher Meuler	9 of 9 = 100%	Christopher Meuler	6 of 6 = 100%
Christine Hansen	1 of 1 = 100%	Elizabeth Lentini	9 of 9 = 100%	Elizabeth Lentini	5 of 6 = 83.3%
Dana Guthrie	4 of 4 = 100%	Clarence Nicholas	8 of 9 = 88.9%	Clarence Nicholas	4 of 6 = 66.7%
Clarence Nicholas	4 of 4 = 100%	Richard Donner	8 of 9 = 88.9%	Richard Donner	6 of 6 = 100%
Richard Donner	4 of 4 = 100%	Dean Daniels	9 of 9 = 100%	Dean Daniels	5 of 6 = 83.3%
Dean Daniels	3 of 4 = 75%	Average Attendance	= 96%	Clifton Phelps	3 of 3 = 100%
Elizabeth Lentini	2 of 2 = 100%			Average Attendance	= 89%
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 2025, 447 people were required to file an SEI with the Ethics Board, an increase from the 413 people required to file in 2024.

ELECTRONIC SEI FILING

The Office of the Ethics Board continues to manage the electronic process for filing SEIs through the MyCounty Customer Portal. Instituted in 2021, the benefits of the electronic process 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.

The office takes any received feedback from user experiences to develop updates such as the save-as-you-go feature, allowing for individuals to complete their SEI in multiple sessions.

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. In 2025, ethics training requirements were extended to County Supervisors, who will complete the County's ethics training module on an annual basis.

The office of the Ethics Board circulates newsletters 6 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.

LOBBYING REGULATION DEVELOPMENTS

In 2025, the offices of the County Clerk and Ethics Board developed an update to lobbyist forms prescribed by the Ethics Board as part of its duties under Chapter 14. Separate lobbyist forms are now available for individuals representing for-profit interests versus those representing a non-profit organization, simplifying the filing process and making it easier for parties to adhere to the fee schedule established in County ordinances. MCO §14.08(5) and §14.10.

ETHICS BOARD DETERMINATIONS AND ADVISORIES

During 2025, the Ethics Board considered the following requests for advisory opinions, investigation requests, or other matters. Pursuant to rules established by County Ordinance and State 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. 61 advisories; 2 formal opinions; and 1 investigation request:

1. An official inquired whether they could provide a recommendation on behalf of an individual seeking employment with the County. The official stood to receive no benefit personally or privately from the individual being employed by the County and the person making the request did not offer any kind of benefit in exchange for making the recommendation. The Ethics Board Executive Director ("EBED") advised that there was no inherent violation of the Ethics Code ("the Code"). MCO §9.05(2)(c)(2).
2. Four County employees were invited to an out-of-state tour of a county vendor's headquarters. The vendor offered to pay for the expenses for their travel and lodging. The food provided during the tour would be incidental as part of the tour. The Ethics Board Paralegal ("EBP") advised the employees to not accept the gift of covering travel and lodging expenses from the vendor. If their department saw fit to use funds in its budget to cover such costs, that would be acceptable. The County employees were also advised that they could accept food during the tour up to a value of \$50 per person. If any of the employees accept the full offer and they file a Statement of Economic Interest ("SEI"), the full offer should be reported on their next SEI. MCO §9.14(1) and §9.14(2)(a).
3. A County department was interested in "adopting" clients served by the department and provide them with gifts for the holidays. The EBP advised that there is no violation of the Code as long as it is confirmed that the clients being "adopted" are not immediate family (as that

term is defined in the Code) of any of the department staff participating in the gift giving. MCO §9.02(9), 9.05(2)(a) and (c).

4. An official inquired about using department funds to purchase a jacket and to have it embroidered with the county logo. The official planned to wear the jacket while performing outreach in their official county capacity. The EBP advised that there was no inherent violation of the Code as the purchase is for country-related business. MCO §9.05(2)(a).
5. A County employee inquired whether they could contribute to a public official's campaign. The EBP advised that the employee can in their capacity as a private citizen and using their own private funds contribute to an official's campaign. MCO §9.06.
6. A County employee inquired whether they needed to report their role on a Board of Directors for a County project on their SEI. The employee explained that being a member of this board is a part of their county duties. The EBED advised that the Board of Directors described is considered a governmental body politic which are specifically exempt from requiring listing on an individual's SEI. MCO §9.04.
7. A County employee inquired whether a conflict of interest exists between their County role and their volunteer work with an organization. Their volunteer work includes assisting with fundraising efforts for special events. The EBED advised that as long as the employee has no interaction with the organization in the scope of their County duties and does not conduct work for the organization on County time or using County resources then there is no violation of the Code.
8. A County employee inquired whether it was a violation of the Code for their appointing authority to disclose their employment record with others in the department. The EBED advised that it would not be a violation of the Code as the Code does not have jurisdiction over the conduct described.
9. An official inquired whether they could ask for monetary contributions towards a care package for a colleague. The EBED advised that contributors with County affiliations should limit the value of their donation to the "anything of value" threshold of up to \$50. It was further advised that any fundraising efforts be conducted outside of County time and not using County resources. MCO §9.05(2)(f).
10. An official inquired about using County funds to spotlight an organization that is within their district. The official does not, nor does any other official in the department, have any significant fiduciary relationship with the organization. There is no contractual relationship between the County and the organization. The EBED advised that there was no inherent violation of the Code with the proposed use of funds.
11. Staff from a department were invited to a sporting event as well as a mixer prior to the event celebrating specific community efforts by that department. The inquirer noted that the inviting organization was offering tickets to the sporting event at a discounted rate. The EBED advised the department to determine whether the pre-event mixer is free and open to the public. If not, a value of admittance to the mixer should be determined. The value of the mixer should be combined with the original (not discounted) value of the tickets (to reflect their value to the

public) to determine the total value of the gift being offered. The EBED advised that staff were welcome to accept the offer, but if the value of the gift accepted exceeds the “anything of value” threshold of \$50, any staff that accept who are also required to file an SEI should report the gift on their next SEI submission. There is no reporting requirement for any employees who accept the gift but do not file SEIs. MCO §9.05(2)(b).

12. An official was gifted tickets to a community event from a County department. The official had already purchased tickets to the event for themselves and their family. The official inquired whether they would need to report the gifted tickets on their next SEI filing even if they go unused. The cumulative value of the gifted tickets exceeded the “anything of value” threshold of \$50. The EBED advised the individual that any tickets accepted, even gifted from a County department, and not returned to the giver should be reported on their next SEI. MCO §9.05(2)(b).
13. A County employee inquired whether it was a conflict of interest for their spouse to join a board of directors for a non-profit that maintains multiple contracts with the County. In their County role, the employee manages the payments for some of the contracts with the non-profit as an administrative function. The employee has no contractual bargaining authority over the contracts but ensures that only authorized payments are made to the vendor. The employee’s spouse would be joining the board of directors as a volunteer and would not be receiving compensation for their work. The EBED identified no issue with the employee’s spouse joining the board of directors of the non-profit, as neither the employee nor their spouse was in a position to benefit themselves privately through any actions (or inaction) taken by the employee while performing their county duties. The employee was reminded to not disclose any privileged information that could financially benefit themselves or their spouse. MCO §9.05(2)(a), (c), and (d).
14. Following the conclusion of a committee meeting, an official announced to those in the room information regarding an event taking place in the community during the upcoming weekend and recommended individuals buy tickets. The EBED and the Ethics Board Chair (“EBC”) advised that, while the solicitation effort was not a best business practice, the gesture was not a clear “use of one’s position” and that the gesture was not likely to produce a substantial benefit to the official privately or the organization as a whole. MCO §9.05(2)(c)(2).
15. The staff of a County department completed a two-day training. The training was procured through the County’s purchase order process. At the end of the training, the instructor announced that they would allow all attendees to participate in a two-hour virtual training course at no cost. The normal cost of the virtual training is just under the “anything of value” threshold of \$50. The department established the educational value of the continued training and how the department and County would share the benefit of the training. The department inquired whether the department staff could take advantage of the offer. The EBED advised that staff were welcome to accept the offer as long as they have not accepted similar offers from this instructor previously in the calendar year. Given the value of the gifted training did not exceed the “anything of value” threshold, it would not require reporting on the SEIs of any attendees that are also required to file an SEI. If, however, any staff have accepted or will accept similar offers throughout the calendar year, then it would potentially affect the guidance issued. It was confirmed that this was the only offer of its kind from that vendor over the previous calendar year. MCO 9.05(2)(b).

16. A county employee inquired whether they could accept an offer for secondary employment from a non-profit organization. Their primary duties would be conducting research with a specific scope unrelated to their County work/duties. Additionally, the non-profit was in the early stages of contractual bargaining discussions with the employee's County department. The employee confirmed that they would have no involvement, authority, or input regarding the contractual bargaining process or the management of the contract should it be executed. The non-profit had previously hired the County employee in a similar capacity, prior to any contract discussions between the non-profit's current endeavor and the County. The county employee had spoken with their department supervisors and informed them that they would not be available to work directly with the non-profit in their County capacity. The employee reported that their supervisors agreed that it would not be an issue. The EBED advised there is not an inherent violation of the Ethics Code. The employee was reminded not to disclose any privileged information gained through their County duties. MCO §9.05(2)(d).
17. A County employee inquired whether a County department could hire an individual as a seasonal employee if they had retired from the department within the last five (5) months. The EBED advised that there is no violation since the department is hiring the individual directly and not contracting with them through a temp agency or otherwise. MCO §9.05(3)(a).
18. A County commissioner inquired whether it was a violation of open meetings law for a body to request "new business" during a meeting when the agenda does not feature an item related to "new business". The EBED advised that the Office of Corporation Counsel would be the better office for interpretations of open meetings law but offered as an example how the Board's office handles "new business" with its boards.
19. An employee inquired about a potential secondary employment opportunity that would see them conducting contracted work of a specific scope for a previous employer. At the time of the offer, the secondary employer was working to enter into a contract with Milwaukee County to conduct work for multiple County departments including the employee's own. The employee has no contractual bargaining authority within their County department. The work the employee stands to perform for the secondary employer would not see them interact with the County. The employee would not be involved in the execution or performance of any contract between the secondary employer and the County. Given the information provided the EBED did not identify an inherent violation of the Code or likelihood of a conflict of interest to arise, but the employee was reminded not to disclose confidential and privileged information. MCO §9.05(2)(d).
20. An official inquired regarding how MCO 1.29 Decorum of supervisors in committee meetings is enforced. The EBED advised the official to reach out to the Office of Corporation Counsel for advisement since the provision is outside of the Ethics Board's and the Code's scope (Chapter 9 of the MCO).
21. An official inquired whether they could accept an invitation to attend an informational event on a particular topic. A local agency offered a seat at their table for the event. The official would just be attending and not participating (e.g., speaking on behalf of the County as part of programming). The EBED advised that if the official chooses to attend and determines the value

of ticket to be exceed \$50, then the ticket should be reported on their next SEI. MCO §9.05(2)(b) and §9.14.

22. A County employee inquired whether they needed to amend their last filed SEI since they would be joining the board of directors of a non-profit. The EBP advised that it was not necessary to amend their previously filed SEI, but to report the position on future SEIs filed while holding that position. MCO §9.04.
23. A County department is hosting a donation station where individuals both internal and external of County service can take items as needed. It is not staffed but monitored by 1 or 2 employees to restock as needed. The department wanted to know if they could send an e-mail to the department as a whole and non-County employees asking them to donate. The EBP advised that there is no issue with sending the e-mail as no one stands to profit from the venture.
24. An official inquired whether it is acceptable to use County employees as their security detail for campaign-related activities. The official stated that, at the time, two County officials have security details year-round. The inquirer wanted to know what the security details can and cannot do (i.e., driving them/attending) during the campaigns and while acting in a security role. The EBED advised that Section 9.06 of the Code defines the types of political activity of concern to the Board, there is some gray area in interpreting the “place of employment” element of Section 9.06(1). The EBED advised that the county employees involved in the assignment refrain from speaking on stage on behalf of a candidate or answering questions regarding a candidate when performing this security assignment. MCO §9.06.
25. A County employee was offered a part-time secondary employment opportunity with a County vendor. The employee previously worked for the vendor prior to their County employment. The part-time job would be with a different division of the organization than the employee worked in previously. In their County role, the employee would have no contact with the division of the organization that the part-time job is in and would not have contractual bargaining authority in either role. The EBP advised there would be no violation to accept the part-time job as the employee would not have contractual authority in either role, the basis of the offer of secondary employment had nothing to do with the individual’s County role and no overlap exists between the individual’s County and part-time roles. They were reminded not to conduct work for the organization on County time or with County resources and to not disclose privileged information. MCO §9.05 (2)(b-d).
26. An official inquired whether they could accept a gift from a current County vendor. The official confirmed they would be receiving the gift due to their County role. The official estimated the value of the gift to exceed the “anything of value” threshold of \$50. The EBP advised that accepting the gift in this instance could create an appearance that the gift is a reward for action (or inaction) taken by the official relative to the vendor’s County contract. The official decided to purchase the gift using their personal funds. MCO §9.05(2)(b).
27. An official inquired as to what rules the Code sets for reporting sexual harassment. The EBC advised the inquiring official that MCGO Chapter 9 does not contain reporting requirements regarding sexual harassment as its focus is on the prevention of financial impropriety. The EBC identified the Department of Human Resources as a more appropriate department for considering their concerns.

28. A County department inquired whether it was allowable for one of their department employees to accept an appointment on a school board. The school board is outside of Milwaukee County and the role does not overlap with the employee's County role. The EBP advised that the employee could accept the appointment as school boards are considered a body politic under the Code which are specifically exempt from Code application and reporting requirements. The EBP advised that the employee should be reminded not to conduct work for the school board on County time or using County resources, and to not disclose privileged information. MCO §9.02(13), §9.05(2)(d) and §9.05(2)(c)(2).
29. A County department inquired regarding an opportunity for an employee to participate in a study due to their involvement with a committee they interact with in their County capacity. The study organizers are planning to pay the participants a stipend. The employee is not looking to keep the stipend for themselves but would like the payment to go to their County department instead. The EBP advised that since the employee would not be personally financially benefitting from the stipend, there is no inherent violation. The EBP suggested that the employee/department reach out to Accounts Payable to determine a best method for the study organizers to compensate the department. MCO §9.05(2)(a).
30. A County employee was retiring. Their department hosted a function to celebrate the employee's service. Other County staff were invited to attend. A vendor that contracts with the department volunteered to donate refreshments for the event. While the EBED determined that no employee stood to privately gain from the gesture, further information was gathered about the contracting process between the department and the vendor to determine if the action could create the appearance that the vendor was attempting to curry favor ahead of any upcoming bidding process. It was determined that the vendor has contracted with the department for many years and the term of the current contract has more than ten years remaining. Given these circumstances, the EBED identified no potential violation of the Code. MCO §9.05(2)(f).
31. A County department wanted to host a raffle for employees during an all-staff meeting. One item that an individual wanted to donate was valued over the "anything of value" threshold of \$50. The EBED advised that the item exceeded the "anything of value" threshold and should not be included as a raffle prize to avoid creating the appearance of a potential violation. While an argument that this sort of gift giving (between employees) is not occurring as the raffle randomizes who ultimately receives the item, the potential to generate an appearance of impropriety remains. The EBED also advised to cap the value of any one item an employee can receive to \$50. MCO §9.05(2)(f).
32. A County department inquired whether department staff, during non-work hours and without County resources, could perform services that are related to their County duties outside of the Courthouse provided they meet State Statute requirements to perform said services. The same staff, in their County role, process applications related to the same service. The EBED advised of no inherent violation, but to have the employee(s) avoid any appearance of overlap between their County role and their secondary employment (e.g., advertising themselves as a service provider at the courthouse or discussing it with department customers and attempting to provide discounts if their services are retained).

33. A County employee inquired whether there was any conflict with their outside employment. The employee held the outside employment before joining the County. The employee's work for the outside employer is conducted without the use of County resources and outside of their County working hours. The EBED advised that, because the outside employment role began prior to the start of the employee's County role, there is no potential that it could appear the employee received the secondary employment because of their County role. Based on the description of duties, the employee possesses some degree of contract or bargaining authority in their outside employment role. The EBED advised the employee to continue to conduct the outside employment work outside of County time, without using County resources, and to avoid disclosing privileged information gained through their County role. MCO §9.05(2)(d).
34. A County employee inquired whether they could accept an offer to contract with a County vendor to conduct some limited work on a project. The vendor is looking to compensate the employee. The EBED advised that, while the employee could work on the project, the proposed compensation presents an issue. The employee could either accept no more than the "anything of value" threshold of \$50 or the vendor issue payment to the County department directly. The EBED also advised the employee to avoid accepting any other offers from this vendor over the course of the next year. MCO §9.05(2)(a) and §9.05(2)(c)(2).
35. As a follow up to guidance issued to officials on the distribution of event tickets, one employee inquired whether an official could distribute tickets to organizations in the official's district. The EBED advised that this is acceptable so long as the official nor their immediate family are not "associated" with said organizations. The EBED advised that, while the Ethics Board does not require that the official receive receipts for tickets given out in this manner, the official should be prepared to provide the details of the distribution when they report the gift of the tickets on their next SEI. MCO §9.05(2)(b) and §9.14.
36. A County department reached out regarding a public inquiry they received. An organization contacted the department asking if their staff could circulate an offer to all County officials asking if they would be interested in each receiving a pack of tickets (200 tickets per pack) to distribute to the general public. The EBED advised the department that there is no issue with passing the outside offer along to the officials. The department inquired whether they need to act as an intermediary on similar gestures in the future. The EBED advised that such procedure was not necessary.
37. An official sought to use County funds to host a community event with another County official and an official from another governmental agency. The event would provide information in support of the concepts of final five voting and demonstrate rank choice voting. The County funds would be used to cover room rental and refreshments. The EBED advised that funding the event as proposed created no inherent Code violation as the purpose of the event was not to seek the election or defeat of a specific individual running for office. The official was advised to reach out to the Office of Corporation Counsel to determine whether there are rules outside of the Code to consider. MCO §9.06.
38. A County department inquired whether it would be a violation for a County vendor to provide free food and beverages to County employees and the general public as part of an event. The EBED and EBC advised that there is no inherent violation, but employees should not accept anything that exceeds the "anything of value" threshold of \$50 as part of the event. It was also

recommended that the vendor limit holding these types of events/offers to no more than once a year. MCO §9.05(2)(b).

39. A County department inquired whether the conduct of one of its employees violated any Ethics Code provisions. Specifically, an employee looking to get out of their shift, offered to pay fellow employees cash compensation to cover their shift. Three employees took the offer. When further call-ins occurred during the day, the shuffle created staffing shortages throughout the department. The agreement between the group of employees exacerbated the shortages. The EBED and EBC advised, short of an actual finding of violations, the conduct potentially implicates certain provisions of the Code, and had the employees reached out to the Ethics Board for advisement about the conduct, they would have been advised against their planned action to avoid creating the appearance of a potential violation of the Code. MCO §9.05(2)(a), §9.05(2)(b) and §9.05(2)(c).
40. A County employee inquired whether they could attend a political fundraiser for a Milwaukee County official and whether there are restrictions on political contributions. The fundraiser is being held outside of the employee's working hours and is being held at a private residence. It would be an expectation of anyone attending the fundraiser to make a political contribution to the official's campaign. The official is not the employee's direct supervisor or appointing authority. The EBP advised that the employee could attend the fundraiser in their capacity as a private citizen. The EBP informed the employee on the restriction that the Code makes related to political contributions. MCO §9.05(2)(l) and §9.06.
41. An official and a guest were invited to a gala fundraiser. The value of each ticket was well over the "anything of value" threshold of \$50. The EBED inquired whether the official had taken any official action or inaction in the last 2-3 years that would have benefitted the sponsor/host. If they did not, the official was advised that they could accept the invitation, however they should recuse themselves from any vote actions or discussion related to the sponsor/host in the near future. The official was also instructed to report the total value of the gift on their next SEI filing. MCO §9.05(2)(f).
42. A County official inquired whether a gift could be offered to a County vendor. The EBED advised that the gift could be offered if none of the County-affiliated individuals (or members of their immediate family) involved in the gesture have any significant fiduciary relationship with the vendor, the vendor and the County are not currently engaged in the contractual bargaining process with each other, and those receiving the gift are not themselves County employees. MCO §9.05(2)(f).
43. A County official inquired whether staff in their department could accept lunch offered by a vendor. The EBED advised that the lunches could be accepted as long as they are not worth more than \$50 per team member and the department has not accepted similar offers from the particular vendor this year. MCO §9.05(2)(f).
44. An official inquired about what they should do with gifts they received from two members of the general public. One gift was a greeting card that included a \$50 gift card. The other gift was an item valued under \$50. The EBED advised that neither gift needed to be reported on the official's SEI as neither exceeded the "anything of value" threshold of \$50. Furthermore, no

potential appearance that the gifts were given to influence the official's action/inaction could be established. MCO §9.05(2)(d).

45. A County employee inquired whether it is acceptable to promote a County department's merchandise in the County's weekly news circulation (distributed countywide via e-mail). The EBED advised that there is no violation with the inclusion of the promotion in the updates circulation because the main beneficiary is a County department and not an individual or external entity. MCO §9.05(2).
46. A County vendor is hosting a feedback survey to identify services and resources that customers would like to see. The inquirer stated that the survey was advertised in the County's weekly e-mail updates circulation but wanted to know if a spotlight could be included on the County internal website. The vendor provides the only current County program of its kind. The EBED advised that given the circumstances it would be acceptable to advertise the survey. MCO §9.05(2).
47. A citizen inquired whether it is a violation for a County employee to provide political consultation services as a form of secondary employment to a client that is a direct superior to the employee in their County role. The citizen asked whether it was a violation, in and of itself, if none of the parties involved made an advisory request of the Ethics Board. The citizen asked whether the employee is required to file an SEI themselves. The EBC and EBED advised that it does not in and of itself create a violation if someone does not make an advisory request, but during a hearing process the Board will consider whether the individual sought one. Information regarding the duties and responsibilities that require an individual to be a filer was shared. MCO §9.03(1) and §9.03(4).
48. A County department wanted to celebrate employee appreciation week. As part of the celebration, the department wanted to have a giveaway where randomly selected employees would receive items. A supervisor in the department offered to donate branded merchandise from their own private business. The department would ensure that no one item is valued over \$50. The EBC and EBED advised that the extent of the advertising for the supervisor's secondary employment combined with the individual's supervisory role with the department creates a reasonable appearance to a citizen that the supervisor may be using their County position to create a private benefit for themselves or side business. MCO §9.05(2)(c)(2).
49. An official inquired whether they could write a letter in response to a newspaper article related to their non-County outside employment. The official wanted to refer to themselves as a professional in the field, their County role, and their role with state government. The official wanted to send the letter from their County e-mail address and have their assistant proofread the letter before sending it. The EBP and EBED advised that the official could reference themselves in the roles discussed, send it from their County e-mail, and have their assistant proofread it as it was sufficiently related to their County role/duties. MCO §9.05(2).
50. An official inquired whether they could continue to participate on a board of directors as a co-chair. They also inquired whether they could have County staff assist in circulating communications that would solicit donations and other forms of involvement for an event in the County being arranged by the organization. The event would not occur on County grounds. Also, the official's County role is a requirement for membership with the organization. The EBED

advised that the official's role on the board of directors was acceptable. However, they should refrain from using County staff or resources to conduct any campaign for awareness of or funding for the event. The EBED also advised not sending any materials to County e-mail addresses or using their own County e-mail address to conduct business for the organization. The EBED advised that the official could mention their County role, since that is a requirement of the membership, however, to refrain from using County letterhead or including County title in the signature block. MCO §9.05(2).

51. An official inquired whether they could serve as the president of an organization's board. The main focus of the organization is to fundraise for a County entity. The official also inquired whether a donation QR code could be included on a brochure for an event being held at the Courthouse, whether the official could sign donation solicitation letters, and whether it is a conflict to add the organization to the United Way Giving Campaign list of organizations that County employees can donate to. The EBED advised that the official could serve as the President of the board and to declare it on their SEI filings going forward. There was no inherent violation established around the organization having brand presence at the courthouse event, but it was recommended that donations not be solicited at the event. The official can sign the letters in their capacity as the board's president, but should not use County resources to do so. Adding the organization to the United Giving Campaign is not an issue. MCO §9.05(2)(a-c).
52. A citizen sought to file as a non-profit lobbyist with the County Clerk's office. The individual was instructed that, per §14.08(5), they would need to provide proof of non-profit status with their registration.
53. A County employee was offered a seat at a sponsored table for an event. The individual ticket exceeded the "anything of value" threshold of \$50. The employee attempted to purchase the ticket themselves, but they were sold out. The sponsor was searching for individuals to fill their seats. The EBED inquired whether the sponsor/host had a contract or the potential to have a contract with the County department. If not, the EBED advised the employee they were free to accept, but to report it on their next SEI filing. MCO §9.05(2)(f).
54. An official inquired whether the "anything of value" threshold had been increased and what the State Ethics Code threshold is. The EBED clarified that the Code allows for gifts of any value to be accepted and that gifts received that exceed the "anything of value" threshold require reporting on one's SEI (if they are required to file). The "anything of value" threshold is also important when determining if a gift could violate the Code's Standards of Conduct provisions (along with whether there is an appearance that the gift was given as a reward for any action or inaction on the part of the official). The EBED advised that the County's "anything of value" threshold is \$50, which is the same as the State's. The EBED advised that they are not aware of any state statute that would preclude the County from raising the threshold, but suggested they reach out to Corporation Counsel for an opinion. MCO §9.02(1) and Wis. Stats. §19.42(1) and §19.44(1)(g).
55. An official inquired whether they could accept gifts given to them at their wedding by other County-affiliated individuals and whether they need to be declared on a future SEI. The EBED advised that the gifts could be accepted and do not need to be declared because they are not being given because of the recipient's role with the County. However, they were reminded to

use their best judgement - if they receive a gift of great value from a County vendor, for example, it would be advisable to reach out to the Ethics Board office. MCO §9.05(2)(f).

56. A County employee inquired whether it is a violation for a public official to gift an employee an item, using their own monies (not county funds), valued over \$50. The EBED advised that it would constitute a potential violation of the Code and could be resolved by the employee returning the gift. MCO §9.05(2)(f).
57. A County employee would like to conduct sessions at national conferences related to the work they do for the County. The EBED advised that it would be acceptable to accept opportunities to conduct sessions at conferences and receive an honorarium; the employee will need to report the honorariums on their SEI. MCO §9.03(1) and §9.14.
58. An official inquired whether they could use office funds for a membership to an organization that is related to the official's duties. The EBED advised that the membership has a clear connection to the official's County role and therefore would not constitute a violation. MCO §9.05(2)(a), MCO §9.05(2)(c)(2).
59. An official inquired whether they could use office funds to pay for membership to a press club. The benefits include the ability to attend speaking engagements and using them for networking opportunities. The membership was being offered at a discounted rate to the official as well. The EBED advised that it would not be a violation to purchase the membership. MCO §9.05(2)(a), MCO §9.05(2)(c)(2).
60. A County employee, prior to joining the County, was hired through their own business to work for an official. The same official was interested in hiring the employee again for similar work. While in their County role, the employee is not a direct report to the official, though they work consistently with them. The Ethics Board advised that there could be an appearance of a violation of the Code, specifically, that the employee could be using their position to provide a substantial benefit to the official and by proxy the employee's own business. MCO §9.05(2)(c)(1) and §9.05(2)(c)(2).
61. The Board received an inquiry from a citizen alleging misconduct by various county employees that the individual interacted with in a county department. The EBED advised the individual to reach out to the Department of Human Resources for further assistance as the issues described were not within the jurisdiction of the Ethics Board to consider.
62. The Board issued a formal opinion on conflicts of interest with secondary employment. Specifically, the Board focused on the topic of situations where it can appear that one has used their County role to create secondary employment opportunities or otherwise privately benefit themselves or a secondary employer they are associated with (as that term is defined in Section 9.02(2) of the Code) through action (or inaction) taken in their County role. The full text of the opinion is attached to this report.
63. The Board issued a formal opinion on ethical work conduct. Specifically, the Board focused on the expectations of officials and employees when utilizing public funds. The full text of the opinion is attached to this report.

64. The Board received an investigation request alleging criminal activity on the part of various individuals, some of which have affiliation with the County. The Board dismissed the request as the allegations were not within their jurisdiction to consider. The Board recommended the individual seek private legal advisement or assistance from law enforcement.

- END -



Milwaukee County Ethics Board

DATE: October 6, 2025
FROM: Milwaukee County Ethics Board
SUBJECT: Formal Opinion Regarding Use of Office or Public Funds
CC: Corporation Counsel

INTRODUCTION

Recently, the Ethics Board (the “Board”) has addressed multiple inquiries relating to the use of office or public funds and whether there could be a potential or perceived potential violation of the Ethics Code (the “Code”). The Board has determined that a formal opinion would be appropriate to address this recurring topic.

Section 9.09(2), M.C.G.O. authorizes the Board to issue formal opinions:

The Board may issue a formal opinion interpreting the ethics code or applying the ethics code to postulated facts without a request from a county public official or employee. This process allows the board to interpret the application of the Code to a universal concern and to address an issue that might not otherwise be raised in an advisory opinion request, investigation request or a verified complaint. Formal opinions serve as an educational tool for Code compliance and a means for persons to avoid engaging in an activity that might otherwise become a matter for the investigation request or the verified complaint processes.

- (a) If the Board determines that a formal opinion would provide useful guidance on an issue of broad concern or assist individuals who are subject to the Code to comply with its terms, the ethics board shall adopt a resolution to that effect which identifies the issue the ethics board intends to address.
- (b) Upon adoption of such a resolution, the Board shall discuss that issue in a properly noticed meeting pursuant to the open meetings law.

At its meeting on November 7, 2024, the Board, by unanimous vote, adopted a resolution consistent with the goals of M.C.G.O. §9.09(2) to approve the issuing of a formal opinion providing guidance on compliance with the Code, specifically as it relates to M.C.G.O. § 9.05(2)(a) and (c)(2). ¹ Consistent with the foregoing, the Board now issues this formal opinion.

OPINION

This opinion is intended as a functional reminder for County officials and employees within the Board's jurisdiction to consider the provisions of M.C.G.O. §9.05(2) of the Code, in particular sections (a) and (c)(2), when utilizing public funds in the course of their County duties.

Purpose of M.C.G.O. §9.05 (the Ethics Code's "Standards of Conduct"):

M.C.G.O. §9.05(1) describes the purposes behind §9.05's standards of conduct. Milwaukee County officials and employees hold their position in public trust, and any effort to realize personal gain through official conduct violates that trust. Officials and employees do retain their rights as citizens to their own personal and economic interests and may engage in other pursuits or forms of gainful employment. However, pursuing such interests should not interfere with the full and faithful discharge of their County duties. This means that, when necessary, employees and officials must prioritize their public duties and responsibilities over those personal pursuits and private interests. In order to maintain the public trust, officials and employees must not use their County position or resources in a way that creates a private benefit, directly or indirectly, for themselves. The Code distinguishes between conflicts that may be minor, inconsequential, or unavoidable in society and those that are substantial and material.

Use of Position or Office:

M.C.G.O. §9.05(2) describes specific conduct that would violate the Code. Sections 9.05(2)(a) and (c)(2) prohibit public officials or employees from using their official position or conduct to obtain private benefits or financial gain. The sections read as follows:

9.05(2)(a) *No financial gain or anything of substantial value:* Except as otherwise provided or approved by the county board, no county public official or employee shall use [their] public position or office to obtain financial gain or anything of substantial value for the private benefit of [themselves] or [their] immediate family, or for an organization with which [they are] associated. This paragraph does not prohibit a county elected official from using the title or prestige of [their] office to obtain campaign contributions that are permitted by and reported as required by ch. 11, Wis. Stats.

9.05(2)(c) *No substantial interest or benefit:* Except as otherwise provided in paragraph (1.), no public official or employee shall:

2. Use [their] office or position in a way that produces or assists in the production of a substantial benefit, direct or indirect, for the public official, employee, members of the public official's or employee's immediate family either separately or together, or an organization with which the public official or employee is associated.

Among the many ways these provisions can be applied to one's County duties, there is the way in which officials and employees may use or exercise discretion over public funds (these include funds allocated to projects by bodies of elected officials, funds available through an employee's department's budget, etc.).

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Board Members

CHRISTOPHER MEULER · Chair

ELIZABETH LENTINI · Vice Chair

CLARENCE NICHOLAS · RICHARD DONNER · DEAN DANIELS · CLIFTON PHELPS

All County officials and employees are encouraged to consider the following when spending funds:

1. Is the usage of funds appropriate? Is the primary benefactor of the use yourself or the County?²
2. Is the use directly and clearly related to your County duties? Could it appear to a reasonable citizen that you *could* or *might* be the primary benefactor of the use?
3. Could it appear to a reasonable citizen that the use *could* or *might* appear to be a personal gift of some sort? If so, could that reasonable citizen think the gift *could* or *might* influence your actions and decision-making in your County role?

If an official or employee believes potential conflicts could arise out of the use when considering these questions, they are encouraged to contact the Ethics Board's office for guidance. For further reference, attached to this formal opinion officials and staff will find a copy of the Board's newsletter circulated earlier this year regarding identifying ethical problems and making ethical decisions.

Examples of Potentially Problematic Situations:

- An official wants to procure a membership to a local organization in the interest of lobbying fellow members regarding County interests. Included with the official's membership dues is an offer to attend a large celebratory gala closed to the public, free of cost to the official personally.
- A department wishes to institute an employee recognition program. The department wants to purchase gift cards from local businesses to use as the rewards.
- An employee's county position requires licensing and membership to a trade organization which is paid for by their department. Years go by and the organization wishes to offer a free travel package to the employee in honor of their years of loyal membership.

The examples contained in this opinion are simply general fact patterns. Individuals are encouraged to bring potential conflicts to the Board to receive confidential input on their scenario. If you have any questions about this opinion or have questions about a potential conflict, please reach out to the Board's office for information.

Conclusion:

This opinion highlights the expectations on County officials and employees when utilizing public funds in a way that could be perceived as a potential Code violation. Should officials and employees face a situation that causes them to question whether Code implications exist, they should contact the Board's office for guidance.

Respectfully,

THE MILWAUKEE COUNTY ETHICS BOARD

<u>/s/ Christopher Meuler</u>	<u>10/6/2025</u>
Christopher Meuler, Chair	Date
<u>/s/ Elizabeth Lentini</u>	<u>10/6/2025</u>
Elizabeth Lentini, Vice Chair	Date
<u>/s/ Clarence Nicholas</u>	<u>10/6/2025</u>
Clarence Nicholas	Date
<u>/s/ Richard Donner</u>	<u>10/6/2025</u>
Richard Donner	Date
<u>/s/ Dean Daniels</u>	<u>10/6/2025</u>
Dean Daniels	Date
<u>/s/ Clifton Phelps</u>	<u>10/6/2025</u>
Clifton Phelps	Date

¹ The agenda for the Board meeting on November 7, 2024, provided:
 4.0 Review of Formal Opinion on M.C.G.O. Sections 9.05(2)(a) and (c)(2)
 4.1 Purpose of Discussion: The Ethics Board seeks to issue a formal opinion on the provisions cited above in the interest of public education regarding discretionary use of public funds for the purposes of the Ethics Code. This opinion will be circulated to all employees and officials.

² “Yourself” would also extend to your immediate family, professional associations, and significant fiduciary interests (*see* M.C.G.O. 9.02)



Milwaukee County Ethics Board

DATE: November 10, 2025

FROM: Milwaukee County Ethics Board

SUBJECT: Formal Opinion Regarding Secondary Employment Opportunities, including through Personal Enterprise as well as Leadership Roles in Non-Profit Organizations and Political Campaigns

CC: Corporation Counsel

INTRODUCTION

Recently, the Ethics Board (the “Board”) has addressed multiple inquiries relating to whether an individual may hold secondary employment that sees them receive income from a political campaign for an individual’s election to a county office. The Board has determined that a formal opinion would be appropriate to address this recurring topic.

Section 9.09(2), M.C.G.O. authorizes the Board to issue formal opinions, stating as follows:

M.C.G.O. §9.09(2) *Formal Opinions*: The ethics board may issue a formal opinion interpreting or applying the Code to postulated facts without a request from a county public official or employee. This process allows the board to interpret the application of the Code to a universal concern and to address an issue that might not otherwise be raised in an advisory opinion request, investigation request or a verified complaint. Formal opinions serve as an educational tool for Code compliance and a means for persons to avoid engaging in an activity that might otherwise become a matter for the investigation request or the verified complaint processes.

(a) If the ethics board determines that a formal opinion would provide useful guidance on an issue of broad concern or assist individuals who are subject to the Code to comply with its terms, the ethics board shall adopt a resolution to that effect which identifies the issue the ethics board intends to address.

(b) Upon adoption of such a resolution, the ethics board shall discuss that issue in a properly noticed meeting pursuant to the open meetings law.

At its meeting on November 6, 2025, the Board, by unanimous vote, adopted a resolution consistent with the goals of M.C.G.O. §9.09(2) to approve the issuing of a formal opinion providing guidance on compliance with the Code, specifically as it relates to M.C.G.O. § 9.05(2)(c)(1) and (2).¹ Consistent with the foregoing, the Board now issues this formal opinion.

OPINION

This opinion is intended as a reminder for county officials and employees within the Board's jurisdiction to consider the provisions of M.C.G.O. §9.05(2) of the Code, in particular sections (c)(1) and (2), when considering secondary employment.

Purpose of M.C.G.O. §9.05 (the Ethics Code's "Standards of Conduct")

M.C.G.O. §9.05(1) describes the purposes behind §9.05's standards of conduct. Milwaukee county officials and employees hold their position in public trust, and any effort to realize personal gain through official conduct violates that trust. Officials and employees do retain their rights as citizens to their own personal and economic interests and may engage in other pursuits or forms of gainful employment. However, pursuing such interests should not interfere with the full and faithful discharge of their county duties. This means that, when necessary, employees and officials must prioritize their public duties and responsibilities over those personal pursuits and private interests. In order to maintain the public trust, officials and employees must not use their county position or resources in a way that creates a private benefit, directly or indirectly, for themselves. The Code distinguishes between conflicts that may be minor, inconsequential, or unavoidable in society and those that are substantial and material.

Use of Position or Office Relative to Secondary Employment

The following Code Provisions (contained in relevant part) apply to the issue presented:

M.C.G.O. §9.05(2)(c)(1) *No substantial interest or benefit*: Except as otherwise provided in [§9.05(1)], no public official or employee shall take any official action substantially affecting a matter in which the public official, employee, a member of his/her immediate family, or an organization with which the public official or employee is associated has a substantial financial interest.

M.C.G.O. §9.05(2)(c)(2) *No substantial interest or benefit*: Except as otherwise provided in [§9.05(1)], no public official or employee shall use [their] office or position in a way that produces or assists in the production of a substantial benefit, direct or indirect, for the public official, employee, members of the public official's or employee's immediate family either separately or together, or an organization with which the public official or employee is associated.

Interaction with these provisions in our daily lives can come in many forms. Examples can include secondary employment opportunities, starting your own business, or working for nonprofit organizations or political campaigns.

The bar of concern for the Board is whether it could *reasonably appear* to an observer that your county position affords you the opportunity to benefit yourself privately through your official actions (or inaction). Issues to consider when determining whether there is a potential connection between your secondary employment and the county include the following:

- Does the company you are seeking to work at have a contract with the county (or could it have one in the future)?
- If it's a business you've started yourself, can you seek to be a county vendor?
- Did the secondary employment opportunity (e.g., a position, a potential client) come to you through something you did or someone you met while performing your county duties?
- Do you (or could you potentially) interact with your secondary employer in the scope of your county role?
- Are you taking on a leadership role and/or important duties with a non-profit organization or a political campaign?
- Can you imagine something you could do (or not do) in your county role that could benefit your secondary employer, your personal business, or your search for a secondary employer?
- Do you have access to privileged information in your county role?² Could you imagine a way that it could be used to create a private benefit for yourself or a secondary employer?

If an official or employee believes potential conflicts could arise out of the use when considering these questions, they are encouraged to contact the Board's office for guidance. For further reference, attached to this formal opinion officials and staff will find a copy of the Board's newsletter circulated earlier this year regarding identifying ethical problems and making ethical decisions as they relate to secondary employment.

Examples of Potentially Problematic Situations

The examples contained in this opinion are simply general fact patterns. Individuals are encouraged to bring potential conflicts to the Board to receive confidential input on their scenario. If you have any questions about this opinion or have questions about a potential conflict, please reach out to the Board's office for information.

- A county employee's ("A") work in their county role sees them regularly engaging with a particular vendor ("Vendor") for their department. A finds out that Vendor has a part-time position opening up with their company. If A wants to apply for the job with the Vendor, it would be recommended that A reach out to the Board for advisement on whether taking this opportunity would conform with the Ethics Code.

- Consider an individual (“A”) who, in their county role, provides training to other staff members. A decides to start their own business where they provide consultation services and similar training to other entities. A’s business may want to seek a contract with a different county department or perhaps A has met a potential client for their business through their county role. In these scenarios, it would be best for A to reach out to the Board for advisement on appropriate next steps.
- Consider an individual (“A”) who, in their county role, engages with or reports to an official (“B”) who is running for re-election to their county office. A wants to work on B’s campaign outside of their county work hours. If A is simply volunteering their time, they would not be considered to have a “substantial financial interest” in the work, and they are less likely to be in violation of the Ethics Code. If B is paying A to work for their campaign, however, *it may reasonably appear* to a citizen that A may have used their office in some fashion to secure this secondary employment opportunity. In that case, A would be encouraged to reach out to the Board for further advisement before performing work for the campaign.

CONCLUSION

This opinion highlights the expectations on county officials and employees when it comes to potential conflicts of interest that can arise in one’s personal life. If you are someone with secondary employment, please take the time to consider your role and authority with the county, what types of overlap or interaction you see between it and secondary employment you may have or be considering. Should officials and employees face a situation that causes them to question whether Code implications exist, they should contact the Board’s office for guidance.

Respectfully,

THE MILWAUKEE COUNTY ETHICS BOARD

<u>/s/ Christopher Meuler</u>	<u>11/6/2025</u>
Christopher Meuler, Chair	Date
<u>/s/ Elizabeth Lentini</u>	<u>11/6/2025</u>
Elizabeth Lentini, Vice Chair	Date
<u>/s/ Clarence Nicholas</u>	<u>11/6/2025</u>
Clarence Nicholas	Date
<u>/s/ Richard Donner</u>	<u>11/6/2025</u>
Richard Donner	Date
<u>/s/ Dean Daniels</u>	<u>11/6/2025</u>
Dean Daniels	Date

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Board Members

CHRISTOPHER MEULER · Chair

ELIZABETH LENTINI · Vice Chair

CLARENCE NICHOLAS · RICHARD DONNER · DEAN DANIELS · CLIFTON PHELPS

/s/ Clifton Phelps
Clifton Phelps

11/6/2025
Date

¹ The agenda for the Board meeting on November 6, 2025, provided:

4.0 Review of Formal Opinion on M.C.G.O. Sections 9.05(2)(c)(1) and (2)

4.1 Purpose of Discussion: The Ethics Board seeks to issue a formal opinion on the provisions cited above in the interest of public education regarding potential conflicts of interest related to various forms of secondary employment opportunities including personal enterprise as well as leadership roles in non-profit organizations and political campaigns. This opinion will be circulated to all employees and officials.

² The Code defines privileged information as information obtained under government authority which has not become a part of the body of public information.