

GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ETHICS AND GOVERNMENT ACCOUNTABILITY



Office of Government Ethics

In Re: T. Clements
Case No.: 25-0070-P

NEGOTIATED DISPOSITION

Pursuant to section 221(a)(4)(A)(v)¹ of the Board of Ethics and Government Accountability Establishment and Comprehensive Ethics Reform Amendment Act of 2011 (“Ethics Act”), effective April 27, 2012 (D.C. Law 19 -12 4, D.C. Official Code § 1 -116 1.01 *et seq.*), the Office of Government Ethics (“the Office” or “OGE”) hereby enters this Negotiated Disposition with the Respondent, T. Clements. Respondent agrees that the resulting disposition is a settlement of the above-titled action, detailed as follows:

I. FINDINGS OF FACT

The Respondent serves as a Correspondence Management Specialist with the DC Department of Motor Vehicles (“DMV”). Her tour of duty is 7:30am – 4:30pm, Monday – Friday with an alternative work schedule or “AWS” day every other Friday.

An OGE investigation revealed that Respondent owns and operates a jewelry making business in her personal capacity. In an interview with OGE, Respondent confirmed that she makes jewelry by hand using beads and other items for the purpose of selling the jewelry online or at flea markets. Respondent’s Financial Disclosure forms listed the jewelry business as an outside business activity for calendar years 2022, 2023, and 2024.

During an interview with OGE staff, Respondent stated that, while at work, she sometimes assembles the jewelry at her desk during breaks, lunches, or when she has nothing else to do. Respondent also admitted that on two occasions, she was instructed by DMV management to put the jewelry items away after they were observed by management on her desk. None of these activities were permitted by DMV management during that time.

II. NATURE OF VIOLATIONS

¹ Section 221(a)(4)(A)(v) of the Ethics Act provides, “[i]n addition to any civil penalty imposed under this title, a violation of the Code of Conduct may result in the following: . . . [a] negotiated disposition of a matter offered by the Director of Government Ethics, and accepted by the respondent, subject to approval by the Ethics Board.”

Respondent violated the following provisions of the District Personnel Manual (“DPM”):

Count One: Using government time or resources for other than official business, or government approved or sponsored activities in violation of DPM § 1807.1.(b).

- Respondent violated this rule when she used District government time and resources to assemble jewelry for her outside business. She used her desk, a District government resource, to assemble jewelry. The assembly took place during her tour of duty, which is District government time.

None of the above-referenced actions were authorized by the District of Columbia. Respondent acknowledges that her conduct was a serious violation of the Code of Conduct.

III. TERMS OF THE NEGOTIATED DISPOSITION

Respondent admits that her conduct violated the District’s Code of Conduct. Respondent agrees to pay a total fine of **\$500** to resolve this matter, in accordance with the following terms and conditions:

1. Respondent agrees to pay a lump sum of \$500 on or before August 11, 2025. Payment will be accepted by certified check or money order, made out to the D.C. Treasurer, delivered to and received by OGE at 1030 15th Street NW, Suite 700 West, Washington, DC 20005 or by electronic payment at <https://dcwebforms.dc.gov/pay/bega1/> using transaction ID 25-0070-P;
2. In the event that Respondent’s employment with the District government ceases prior to complete satisfaction of the fine amount or she fails to pay the fine in accordance with the terms herein, Respondent agrees that any outstanding fine amount will be satisfied by deduction in full from Respondent’s final District government paycheck and/or any payment to the Respondent from the District government for unused annual leave;
3. Respondent agrees that the Office of Pay and Retirement Services will transfer any unpaid leave to BEGA to satisfy any unpaid fine amount;
4. Respondent agrees to attend ethics training no later than September 5, 2025, and promises not to engage in such conduct in the future.

In consideration of Respondent’s acknowledgement and agreement, OGE will seek no further remedy and will take no further action related to the above misconduct. By agreeing to settle this matter via a negotiated disposition, Respondent will allow OGE to avoid expending significant time and resources to litigate this matter through a contested hearing, and to focus its finite resources on other investigations. Respondent waives her right to proceed to an adversarial hearing in this matter and voluntarily, knowingly, and understandingly consents to the Board's imposition of a fine against her in this matter.

Respondent also understands that if she fails to pay the \$500.00 fine in the manner and within the time limit provided above, pursuant to section 221(a)(5)(A) of the Ethics Act (D.C. Official Code § 1-1162.21(a)(5)(A)), the Ethics Board may file a petition in the Superior Court of the District of Columbia for enforcement of this Negotiated Disposition and the accompanying Board Order assessing the fine. Respondent agrees that this Negotiated Disposition is not just an admission of wrongdoing but constitutes various factual admissions that may be used in any subsequent enforcement or judicial proceeding that may result from failure to comply with this agreement.

Respondent knowingly and willingly waives the right to appeal the accompanying Board Order imposing a fine in this matter in exchange for the concessions made by this Office in this Negotiated Disposition. Respondent further understands that failure to adhere to this agreement, OGE may instead, at its sole option, send any unpaid fine amount to collections or recommend that the Ethics Board nullify this settlement and hold an open and adversarial hearing on this matter, after which the Ethics Board may impose sanctions up to the full statutory amount (\$5,000.00 per violation) as provided in the Ethics Act for each violation.² Because OGE is, at this time, foregoing requesting that the Ethics Board hold an open and adversarial hearing on this matter, Respondent waives any statute of limitation defenses should the Ethics Board decide to proceed in that matter as a result of Respondent's breach of this agreement. Respondent also understands that if she fails to pay the fine in accordance with the terms set forth hereinabove, pursuant to Section 221 (a)(5)(A) of the Ethics Act (D.C. Official Code § 1-1162.21 (a)(5)(A)), the Ethics Board may file a petition in the Superior Court of the District of Columbia for enforcement of this settlement and the accompanying Board Order assessing the fine.

The mutual promises outlined herein constitute the entire agreement in this case. Failure to adhere to any provision of this agreement is a breach rendering the entire agreement voidable at the Board's discretion. By our signatures, we agree to the terms outlined above.



T. CLEMENTS

Respondent

Ashley Cooks

ASHLEY COOKS

Director of Government Ethics

7/8/25
Date

7/10/2025

Date

This agreement shall not be deemed effective unless and until it is approved by the Board of Ethics and Government Accountability, as demonstrated by the signature of the Chairperson below.

APPROVED:

² Section 221(a)(1) (D.C. Official Code § 1-1162.21(a)(1)).



NORMA HUTCHESON

Chairperson, Board of Ethics and Government Accountability

7/8/2025

Date

GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ETHICS AND GOVERNMENT ACCOUNTABILITY



Office of Government Ethics

IN RE: T [REDACTED] Clements
Respondent

CASE No.: 25-0070-P

ORDER

Based upon the mutual representations and promises contained in the Negotiated Disposition approved by the Board on July 10, 2025, and upon the entire record in this case; it is, therefore:

ORDERED that Respondent pay a civil penalty in the amount of FIVE HUNDRED DOLLARS (\$500.00).

This Order is effective upon approval by the Board of Ethics and Government Accountability, as demonstrated by the signature of the Chairperson below.

NORMA HUTCHESON
Chairperson, Board of Ethics and Government Accountability

7/8/2025

Date