



District of Columbia

## BEGA December 2025 Newsletter

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## Ethically Speaking

Board of Ethics and Government Accountability Newsletter

Volume 10, Issue 6

December 2025

## A Message From the Director

The holiday season -- a time for good cheer! For egg nog, for parties, for friends to be near. But I must be careful! Lest I accept free, a gift not permitted no matter how wee. DPM 1803 explains in detail the relevant bar. It defines the term gift to mean all things worth money. That's NBA tickets or jars full of honey.



Some gifts may be taken but some are verboten. The source is the key -- it's the rule that I'm quotin'. When from me or others the source seeks some act, I must find an exception or I could be sacked.

Some exceptions exist. They're in DPM 1803.5 and should not be missed. For gifts that a friend or my sister might send, the rules recognize I don't want to offend. Regardless of value it only must be, that their motive to give wasn't business, but me. So go forth with good cheer and know there's no reason. To think that the gift rules will ruin your season!

## New and Notable



## BEGA at COGEL

BEGA's Office of Government Ethics and Office of Open Government attended the Council on Governmental Ethics Laws' 47<sup>th</sup> Annual Conference. OGE Director Ashley Cooks and Supervisory Investigator Ronald Cook participated in several panels dealing with investigations, sanctions, and independent ethics commissions.

## 2026 Election Season

As we enter another election year, District government employees should be mindful of the rules governing political activity. Check out the BEGA Quick Guides on the Local Hatch Act linked below for additional guidance or attend one of our monthly training sessions to have

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your questions about what you can and can't do  
answered.

- Local Hatch Act May or May Not
- Permissible and Prohibited Political Activity Guide
- Hatch Act Social Media Quick Guide
- Hatch Act Agencies and Social Media

### Training Opportunities

OGE is in the process of finalizing its 2026 Training Calendar. In addition to the monthly General Ethics Training and Quarterly Outside Employment and Boards and Commission Trainings, we will also be offering a Monthly Hatch Act Training. Look out for more details and register on our trainings page: Register for Training.

#### Upcoming Events

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##### **General Ethics Training**

1/14/26 - 1:00 pm  
2/11/26 - 1:00 pm

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##### **Local Hatch Act Training**

1/21/26 - 2:00 pm  
2/18/26 - 2:00 pm

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##### **Board and Commission Training**

1/28/26 - 11:00 am

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##### **Outside Employment Training**

1/6/26 – 2:00 pm

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##### **Lobbyist Registration & Reporting and E-Filing Training**

12/17/25 - 10:30 am

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##### **Ethics Counselor Brown Bag**

Investigations - Case  
Conclusion to Final  
Disposition  
1/26/26 - 1:00 pm

Reviewing FDS for  
Conflicts of Interest  
2/23/26 - 1:00 pm

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### Enforcement Updates

| 25-0002-F In re Trayon White  | 25-0053-P In re J. Dempson  | FY2025 Q4 complaint summary and Heatmap   |
|---|---|---|
| The Board approved an Amended Notice of Violation in this matter. The Amended NOV includes an additional count for failing to file a Public Financial Disclosure Statement in November 2025 in violation of D.C. Official Code § 1-1162.24(a)(1). | The Director of Government Ethics issued a public reprimand to Respondent Dempson after a preliminary investigation and show cause hearing in this matter. The Director found that Respondent Dempson, an employee of the Department of Youth and Rehabilitation Services ("DYRS"), disclosed confidential information he obtained during the course of his employment to MPD and sought to receive a cash award offered by MPD for the tip in violation of DPM §§ 1800.3(g) and 1807.1(f). | BEGA released the Quarterly Complaint Summary Report and Heatmap for FY2025 Q4. During that period, for closed matters within BEGA's jurisdiction, allegations involving misuse of government property, resources, or vehicles and allegations involving violations of rules government outside employment and outside activities accounted for almost half of the matters closed by the Office of Government Ethics. |
| 25-0029-P In re D. Jackson  |   |   |

## Ethics in the News

President Trump pardoned Texas Representative Henry Cuellar and his wife, Imelda Cuellar, who were facing federal bribery, conspiracy and money laundering charges. The Department of Justice alleged that Representative Cuellar accepted nearly \$600,000 in bribes from the country of Azerbaijan and a Mexican commercial bank; that the money was laundered through shell companies owned by Imelda Cuellar; and that the Congressman took official action to benefit the interests of Azerbaijan. Read more about the pardon and underlying charges here.



The Pew Research Center reports that trust in government is near historic lows with just 17% of Americans saying they trust the federal government to do what is right "just about always" (2%) or "most of the time" (15%). This represents a decrease from the 22% who expressed their trust in government last year. When measured by political party, just 9% of Democrats trust the federal government just about always or most of the time, compared with 26% of Republicans and Republican-leaning independents. Read more about the results of the September 2025 survey here.

## State and Local Ethics

The Anne Arundel Ethics Commission publicly reprimanded the County Executive for partisan political commentary in his official newsletter. The Consent Order found that the County Executive used Anne Arundel County

resources to disseminate partisan political commentary in his weekly newsletter dated November 6, 2025 in violation of the Anne Arundel County Ethics Code prohibiting the use of the prestige of office for the benefit or detriment of a political party or candidate. Read the Consent Order here.

The Colorado Ethics Commission voted to investigate complaints against 17 state lawmakers who attended a private retreat in Vail funded by a political group that does not disclose its donors. The complaints allege that the lawmakers, all members of the Colorado Opportunity Caucus, violated the state's gifts rules when they attended the Opportunity Caucus event and accepted hotel rooms paid for by One Main Street, a separate nonprofit organization. Read more here and here.

The Louisiana Board of Ethics voted to reduce a fine issued to the Orleans Parish Sheriff for missing a filing deadline for filing her campaign finance reports because her attorney was incarcerated. The board reduced her fine from \$2,800 to \$500, accepting the Sheriff's explanation that she did not realize that her political action committee's treasurer was in jail and not able to file the report on time. Read more here.

## Ask BEGA



**Question:** I am resigning my position with District as of Friday, December 19, 2025. I was advised to coordinate with both my agency's Ethics Counselor and BEGA regarding completing the Financial Disclosure process. I already completed a Financial Disclosure earlier this year. Is there anything else I need to complete?

**Answer:** Yes! Financial Disclosure filers must file a Termination Financial Disclosure Statement within 90 days after leaving their District position. Before offboarding, employees should consult with their agency's Ethics Counselor to determine whether they are up to date on their financial disclosure requirements. If not, the employee, the Ethics Counselor, and/or the HR Specialist must contact BEGA for assistance with filing a Termination Financial Disclosure Statement.

When the Termination Financial Disclosure is complete, the soon-to-be former employee can rest comfortably knowing they completed everything before leaving employment. The agency will spend less time tracking down the correct contact information and BEGA will spend more time focusing on current Financial Disclosure filers.

To file a Terminating Financial Disclosure, contact BEGA at [BEGA.FDS@dc.gov](mailto:BEGA.FDS@dc.gov) or file a support ticket at <https://efiler.bega.dc.gov/Support>



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