



2024 ANNUAL REPORT

Hawai'i State Ethics Commission
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Table of Contents

03	➔	Executive Summary
04	➔	Mission & Duties
05	➔	2024 Goal Attainment
06	➔	Advice
07	➔	Education
10	➔	Legislation
11	➔	Enforcement
14	➔	Nepotism & Disclosures
15	➔	Lobbyists
16	➔	Commissioners & Staff



Executive Summary

The Hawai'i State Ethics Commission is steadfast in its commitment to promoting integrity, transparency, and accountability in government. Over the past year, the Commission achieved significant milestones in ensuring that state employees and officials adhere to the highest ethical standards. Our accomplishments include coordinating a record number of state employees in meeting a comprehensive ethics training requirement, imposing the highest administrative fines ever issued for ethics violations in the Commission's history, and implementing a modern approach to addressing conflicts of interest and financial disclosure compliance. These efforts are beginning steps toward fostering a culture of ethical responsibility within Hawaii's public institutions.



Robert D. Harris, Executive Director and General Counsel

The public's trust in government is increasingly fragile in an era marked by national and international uncertainties, ranging from economic instability to geopolitical tensions. This context amplifies the urgency of the Commission's work. Ethics are not simply a matter of compliance; they are the foundation of public confidence in governance. The Commission recognizes that its role is not merely to enforce rules but to serve as a beacon of integrity, reminding public servants and the community of the value of principled leadership and accountability.

This year, the Commission has expanded its outreach and engagement efforts, forging stronger connections with the public and other stakeholders. Initiatives such as enhanced accessibility to ethics resources, public forums, and collaborations with civic organizations have increased transparency and allowed citizens to understand better and participate in ethical governance. These efforts underscore our belief that ethical government is a collective responsibility that requires the active involvement of both officials and the public.

Looking ahead, the Commission recognizes it must continue to evolve, particularly in the face of rapid technological advancements and changing societal expectations. The Commission calls for a renewed focus on building public confidence through bold and decisive actions, including legislative reforms, expanded investigative capacities, and a robust commitment to education and prevention.

The Commission thanks all state employees, officials, and community members who have supported and participated in our efforts this year. While there is more work to be done, we are confident that together, we can establish ethical governmental practices worthy of the people of Hawai'i.

Warmly,
Robert D. Harris
Executive Director & General Counsel

Mission & Duties

Constitutional Mandate

Established in 1968, the Hawai'i State Ethics Commission—the first state ethics commission in the United States—represents Hawaii's commitment to the principles that “public officers and employees must exhibit the highest standards of ethical conduct, and that these standards arise from the personal integrity of each individual in government.” Hawai'i Constitution, Article XIV. The constitution also mandates that the State and its subdivisions establish a code of ethics for public officers and employees.

Ethics & Lobbying Oversight

Pursuant to its constitutional mandate, the Commission is responsible for administering and enforcing the State Ethics Code and the State Lobbyists Law, chapters 84 and 97, Hawai'i Revised Statutes, respectively. The Ethics Code includes laws relating to the acceptance and reporting of gifts, confidential information, fair treatment (the prohibited misuse of official position), conflicts of interests, state contracts, post-employment restrictions, and nepotism. It also requires state legislators, candidates for state elective office, and certain state employees to file financial disclosure statements.

For purposes of the State Ethics Code, the Commission has jurisdiction over approximately 60,000 state officials and employees. This includes state legislators and other elected state officials, employees of the legislative, executive, and judicial branches of government (except for judges and justices), and members of all state boards and commissions. The State Ethics Code's financial disclosure law also applies to all candidates for state elective office.

The Commission also administers the State Lobbyists Law, which applies to lobbying activities at the state level. The Lobbyists Law requires lobbyists to register with the Commission and requires lobbyists and organizations that lobby to report lobbying expenditures and contributions on forms filed with the Commission. The Commission has jurisdiction over 500 lobbyists representing nearly 500 organizations that lobby the state legislature or executive branch.

2024 Goal Attainment

On March 20, 2024, the Commission adopted five staff goals for the year. These goals served as the Commission's roadmap for the year. Each goal was designed to align with our overarching mission of fostering public trust through transparency and ethical integrity. This year's annual report includes the following column reflecting on our progress in tackling these priorities, celebrating our successes, acknowledging areas for improvement, and setting the stage for the year ahead.

85% Training Target for all State Employees

Staff estimates that approximately 88% of all state employees and 95% of state board members have successfully completed ethics training. This achievement sets a new benchmark for the State of Hawai'i system and marks a significant milestone in the Commission's 57-year history.

Update Electronic Filing System to Comply with Statutory Changes

The Commission's electronic filing system has been successfully updated to allow legislators to disclose any financial connections to lobbyists and to allow lobbyists to record the specific bill or item they lobbied on. Quick guides and training sessions have been offered to end users.

Enforcement/ Compliance Modernization

Commission staff successfully reviewed lobbyist testimony in 2023 and 2024 and identified potential situations where unregistered lobbying may have occurred. Advice and enforcement efforts are still underway, as are efforts to develop a proactive method for identifying conflicts of interest using existing financial disclosure data.

Office Modernization

The Commission successfully launched a new case and document management system, allowing for greater remote accessibility, statistic tracking, and modern security protocols. Phone and internet services were overhauled, resulting in significant annual savings. In addition, 225,000 pages (95 banker boxes) of materials were scanned and then securely shredded to allow greater digital access.

Enhancing Public Trust and Awareness

The Commission took significant steps to enhance public trust and awareness. It issued a series of public opinion editorials praising current legislative reform efforts while advocating for further necessary changes. Additionally, the Commission strengthened collaborations with good governance organizations and actively engaged in several public civic education programs to foster transparency and accountability.

Advice



The Commission recognizes that providing timely and meaningful ethical guidance is one of its most essential functions. Through its “attorney of the day” service, the Commission ensures that requests for guidance are addressed promptly and efficiently. In 2024, the Commission’s attorneys responded to an impressive 1,079 requests for advice from state legislators, employees, lobbyists, candidates for state elective office, and members of the public. Many of these requests involved detailed written guidance and follow-up support.

A significant legislative development in 2024 reinforced the confidentiality of the Commission’s advisory process, encouraging state employees to seek ethical advice without hesitation. Requestors may obtain a written summary of the guidance provided and share it as needed.

The Commission also issues binding advisory opinions on the application of the State Ethics Code and the State Lobbyists Law. In 2024, three advisory opinions were published and are accessible on the Commission’s public website:

- **Advisory Opinion No. 2024-1:** Addressed whether former state employees could be rehired through staffing agencies during their one-year post-employment restriction. The Commission determined that such arrangements are permissible if the staffing agency’s sole purpose is to facilitate the employees’ work on behalf of the State, as this does not constitute representing a “business” before a former agency.
- **Advisory Opinion No. 2024-2:** Examined whether state-employed physical education teachers or coaches may offer private sports clinics for compensation. The Commission concluded this is allowable under the State Ethics Code if the clinics are openly advertised, exclude one-on-one lessons with current students, and avoid the use of state resources or coercion of students.
- **Advisory Opinion No. 2024-3:** Considered whether specific University of Hawai’i (UH) employees could negotiate contracts with UH on behalf of their private businesses under the tech transfer law (Hawai’i Revised Statutes §§ 84-10, 304A-1961, et seq.). The Commission confirmed such agreements comply with the law and are exempt from certain ethics code provisions.

These statistics and advisory opinions demonstrate the Commission’s ongoing commitment to fostering ethical practices across Hawai’i’s government.

**Average of 4.12
Requests for
Advice Per Day**

Education

The Commission is statutorily charged with educating state officials and employees about government ethics, as outlined in Haw. Rev. Stat. § 84-31(a)(7). A recent legislative mandate, championed by the Commission and warmly received by the state legislature, now requires all state employees to complete ethics training—either live or online—within 90 days of employment and at least once every four years thereafter.

Commitment to Ethics Education

The Commission places a high priority on ethics education, offering both in-person and videoconference training. In addition to general ethics training, specialized sessions are conducted for lobbyists, teachers, board and commission members, and legislators. The Commission also provides ethics sessions for Continuing Legal Education (CLE) credits, tailored to the needs of government attorneys. A full calendar of videoconference training sessions is available on the Commission's website: <https://ethics.hawaii.gov/training/#signup>.

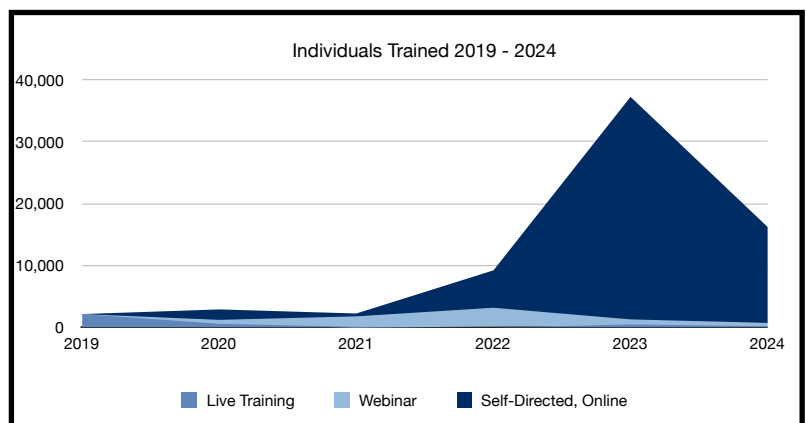
Self-Directed Online Training Modules

The Commission developed self-directed online training modules to efficiently meet the mandatory training requirements. These modules allow state employees to access ethics education anytime, anywhere, using a computer and an internet connection. In 2024, four tailored modules were offered, focusing on state employees, board and commission members, charter schools, and lobbyists.

Each module, designed for convenience and accessibility, takes approximately 35 minutes to complete. The online format offers a flexible, user-friendly approach for state employees to fulfill their training requirements. Direct access to these modules is available at the Commission's website: <https://ethics.hawaii.gov/training/>.

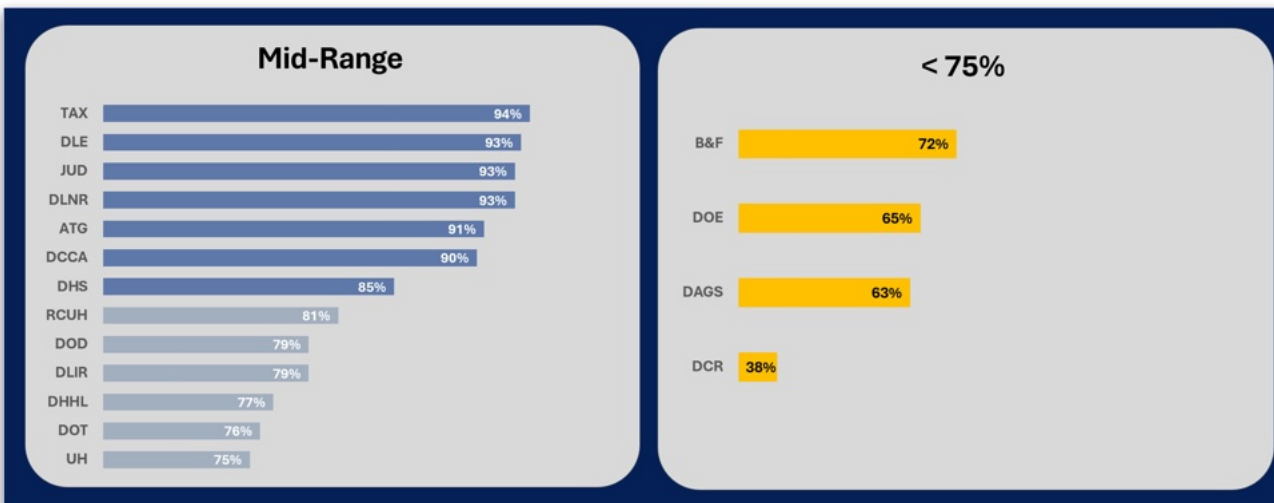
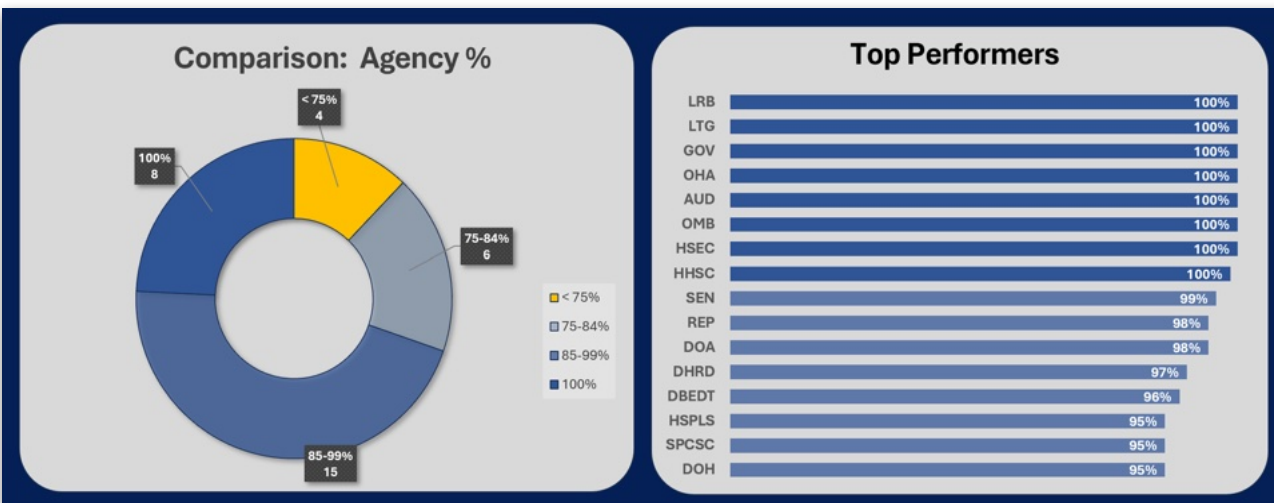
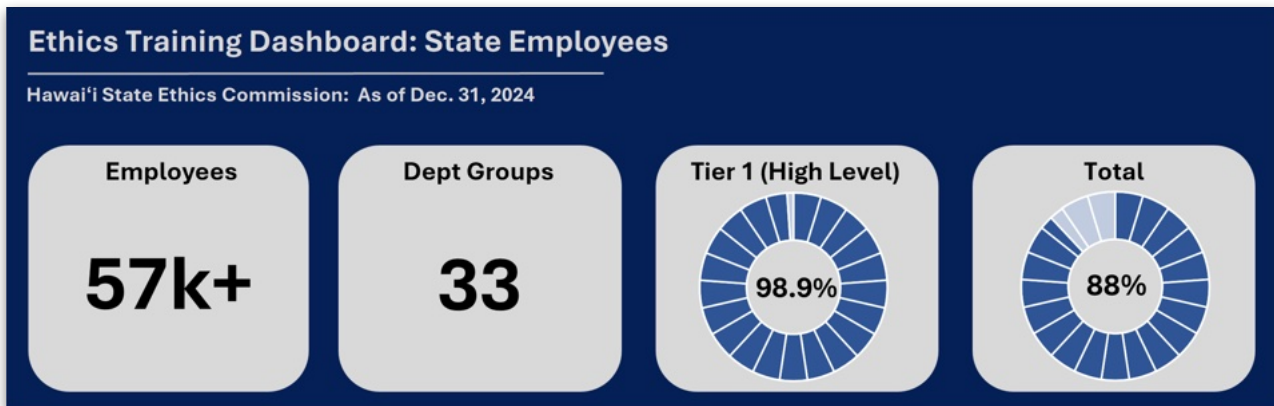
Record-Breaking Participation

The combination of mandatory ethics training and the wide availability of the self-directed training modules has led to record-breaking training participation. In 2023, 35,977 participants completed the training modules—a staggering 500% increase compared to 2022 and an astonishing 7,724% increase relative to 2021. In 2024, this success continued, with an additional 15,506 participants throughout the year (and 707 participants taking a live in-person or webinar class).



Overall, the purpose of the mandatory training program—to ensure that a high percentage of state employees undergo state ethics training—appears to be met. As noted below, a nearly 99% compliance rate for Tier-1 (high-level) officials reflects successful outreach and prioritization of ethics training among leadership. Training efforts spanned all 33 departmental groups, demonstrating a widespread effort to implement the mandatory training program across the state consistently.

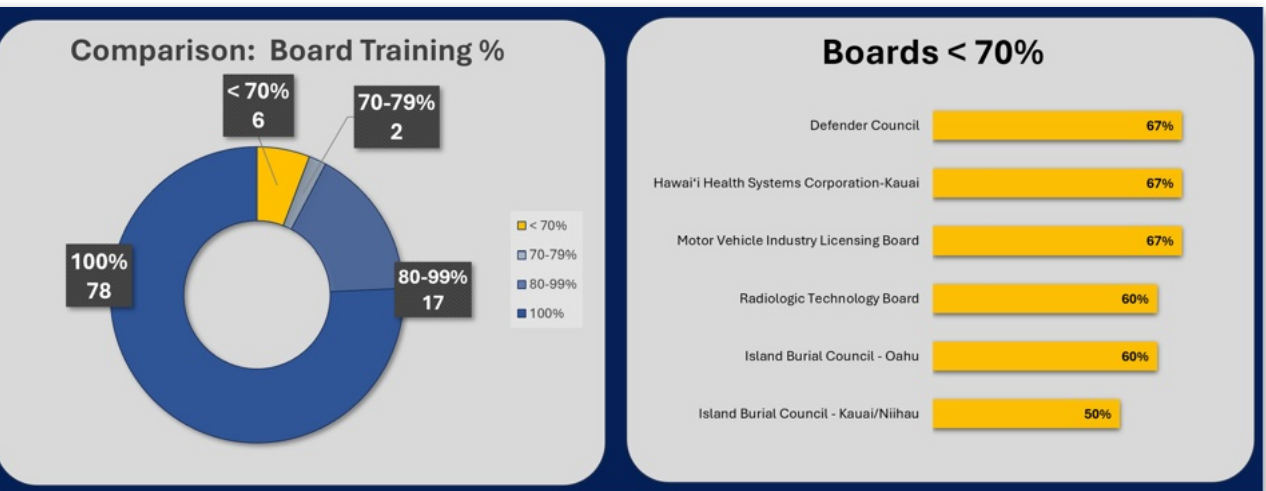
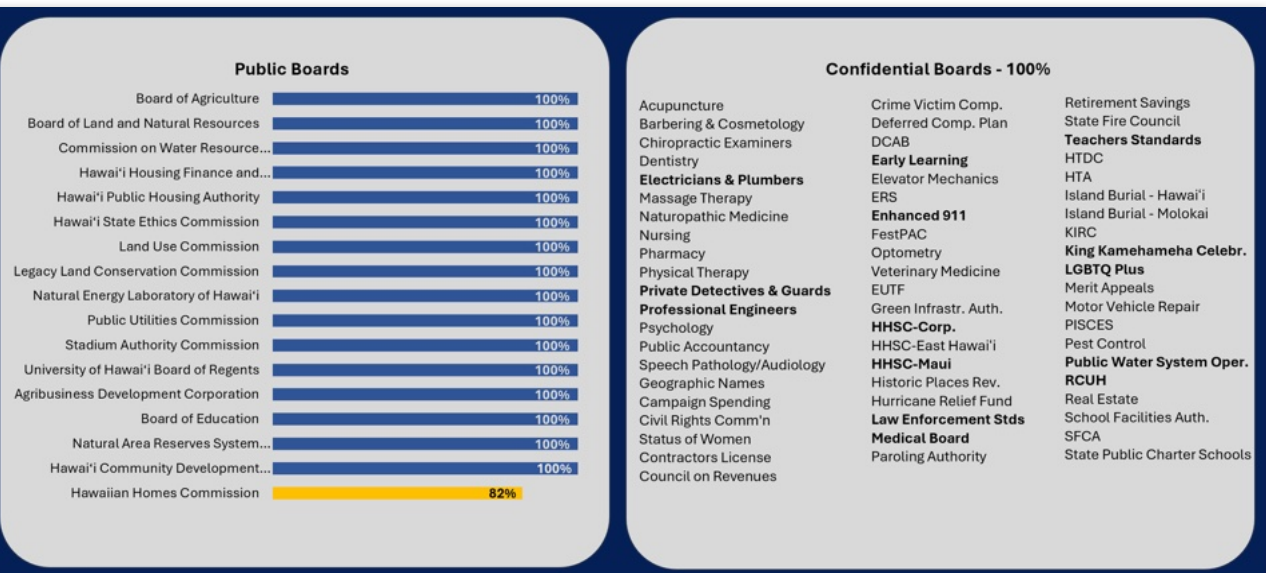
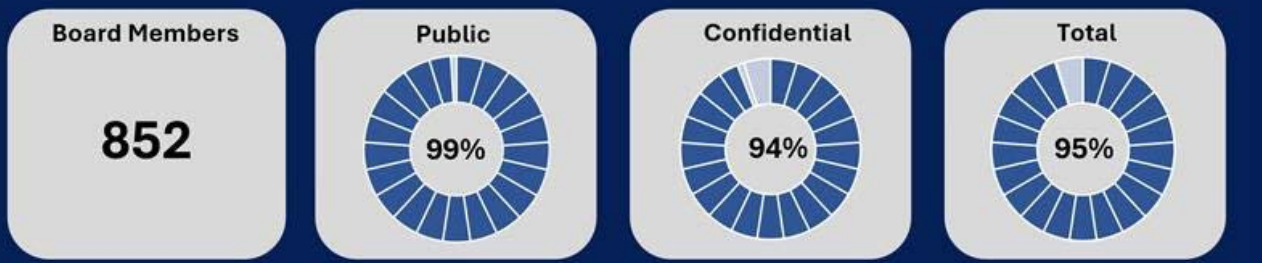
This performance demonstrates the Commission's strong commitment to fostering ethical practices among all state employees.



A majority (78) of boards and commissions (“boards”) successfully achieved 100% training compliance, demonstrating the effectiveness of the outreach efforts and training programs. A smaller segment of boards showed partial compliance, with 17 achieving 80-99% compliance. Six boards fell below the 70% threshold. While tailored strategies are necessary to bring underperforming boards into compliance, this data reflects a successful year in training efforts. As noted last year, these achievements were accomplished without any increase in the Commission’s budget or staffing. The overall results highlight the effectiveness of the Commission’s innovative approach to ethics education and the collective commitment of government agencies across the state.

Ethics Training Dashboard: State Boards

Hawai'i State Ethics Commission: As of Dec. 31, 2024



Legislation

In 2022, Hawai‘i faced a wave of corruption allegations involving state and county employees, prompting widespread public concern and a renewed focus on ethical conduct in government. This heightened awareness catalyzed significant legislative reforms in 2022, 2023, and continuing into 2024.

The Commission, in collaboration with the leadership of the Hawai‘i Legislature, played a critical role in advancing key reforms that strengthened accountability and transparency across state government. These efforts reflect a shared commitment to restoring public trust and ensuring that ethical standards are upheld at all levels of government.

Maximum Administrative Fines

Act 15 (House Bill 1881 HD1 SD1) increased the maximum administrative fines for violating Hawai‘i’s ethics and lobbying laws. Specifically, it raises the cap on fines from \$1,000 to \$5,000 for each lobbying or ethics violation. This adjustment strengthens enforcement and promotes compliance with the state’s ethical standards. It also aligns Hawai‘i closer to the potential national average for ethics administrative fines.

Disclosure Deadline

Act 189 (Senate Bill 2217 HD1 CD1) introduces a phased approach to adjusting the reporting periods for gift disclosures filed with the Commission. It transitions from a calendar year to a fiscal year reporting system, intended to improve the uniformity, efficiency, and effectiveness of reporting and oversight. Additionally, this act mandates electronic filing for certain disclosures, streamlining the submission process and promoting transparency.

Advice Modernization

Act 188 (Senate Bill 2216 SD1 HD1 CD1) enhances the operations of the Commission by updating procedures for providing advice and conducting investigations. The act clarifies the Commission’s authority to conduct investigations confidentially while still ensuring that individuals subject to investigation are allowed to respond if the Commission proceeds further with the Charge process. The act also clarifies the confidentiality of the Commission’s advice and guidance process while establishing a process where the Commission can publicly issue an Advisory Opinion on matters of general and public importance. It also improves the Commission’s processes to improve efficiency and transparency in enforcing ethics laws. The legislation received support from various stakeholders, including the League of Women Voters of Hawai‘i, who emphasized the importance of enforcing ethical actions by public officials.

Enforcement

The Commission enforces the State Ethics Code (Haw. Rev. Stat. Chapter 84) and the State Lobbyists Law (Haw. Rev. Stat. Chapter 97). It receives and reviews complaints alleging violations confidentially and conducts investigations as necessary. When warranted, the Commission initiates formal charges against individuals who appear to have violated the law. If probable cause is found, the Commission may hold a contested case hearing under Hawai'i's Administrative Procedure Act (Haw. Rev. Stat. Chapter 91).

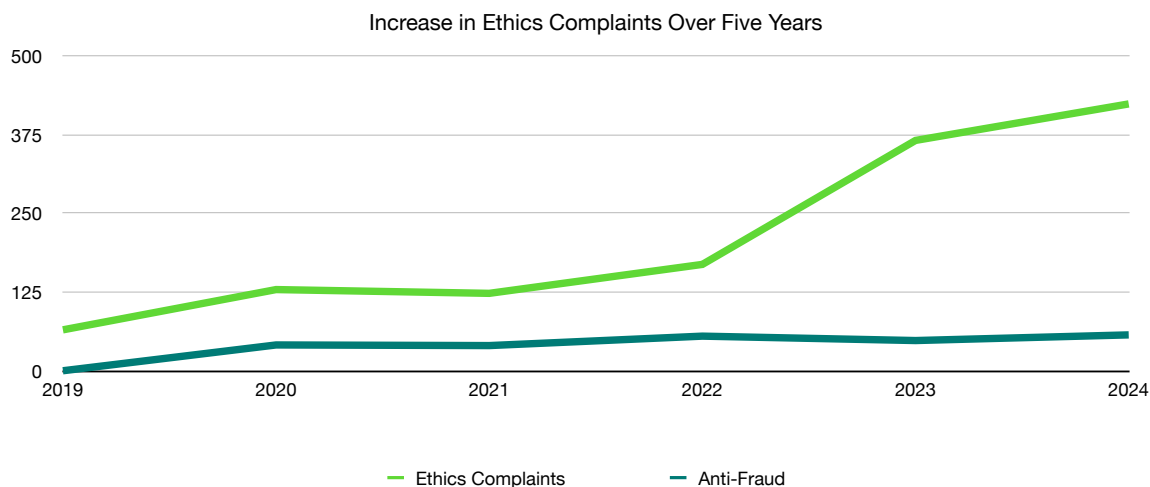
Ethics Complaints Rise Sharply

The Hawai'i State Ethics Commission has seen a substantial increase in the number of new complaints filed over the last five years, as shown in the accompanying graph. Complaints rose from 65 in 2019 to 424 in 2024, representing a 552% growth.

Key factors contributing to this trend include the Commission's online complaint portal launch on August 12, 2020, a mandatory ethics training class requirement enacted in 2022, and an overall increase in public attention to ethics deficiencies. While speculative, increased accessibility and awareness of ethical obligations among state employees and the public likely led to more reporting of potential violations.

**552% Increase in
Ethics
Complaints**

This upward trend underscores a greater awareness of ethical conduct and accountability across the state while highlighting the need for continued support to efficiently handle the growing caseload.



2024 Enforcement Matters

**Department of Education,
Fair Treatment and Conflicts
of Interest:** Resolution of
Charge 2024-1.

On March 20, 2024, the Commission resolved a case involving Glenn S. Nitta, former Athletic Director of Mililani High School, for egregious violations of the State Ethics Code. Over two decades, Nitta misappropriated funds from the school's Athletic Booster Club for personal expenses, including travel, credit card payments, and unauthorized business ventures involving family members. He pleaded "no contest" to related criminal charges and made restitution totaling \$406,000. The Commission imposed a \$274,500 administrative penalty, emphasizing the severe breach of trust and the need to uphold ethical standards in public service.

**State Foundation on Culture
and the Arts, Conflict of
Interest:** Resolution of Charge
2024-2.

On May 15, 2024, the Commission resolved a case involving Allison Wong Daniel, a former commissioner of the State Foundation on Culture and the Arts, for violating the State Ethics Code's conflict of interest provisions. As president of the Jean Charlot Foundation, a nonprofit organization, she used her position as a state commissioner to advocate for and approve the acquisition of a mural by Jean Charlot, benefiting her foundation. Despite disclosing her role, her actions violated the prohibition on taking official actions that directly affect a private organization in which she held a substantial

**ETHICS COMPLAINTS
RECEIVED**

424

Total number of complaints received from sourced or anonymous sources

TOTAL CASES CLOSED

417

Matters resolved due to lack of jurisdiction, guidance or advice given, or settlements/enforcement successfully pursued

**INVESTIGATIONS
LAUNCHED:**

9

Where the Commission found that allegations of an ethical violation had merit and initiated a formal investigation.

CHARGES ISSUED:

5

Times when the Ethics Commission initiated a formal charge into an alleged ethics code violation



**FRAUD, WASTE, AND ABUSE
COMPLAINTS RECEIVED:**

57

Complaints received in conjunction with the Office of the Attorney General

PENALTIES ASSESSED:

\$293,100

Fines assessed and directed to the general fund.

RESTITUTION REQUIRED:

\$48,000

Illegal gifts returned.



HAWAII STATE ETHICS COMMISSION

2024 Enforcement Matters (continued)

financial interest. The Commission's resolution underscored the importance of maintaining impartiality and ethical conduct in public service.

House of Representatives, Fair Treatment: Resolution of Investigation 2024-1.

On June 26, 2024, the Commission resolved an investigation into Kris Coffield, an Office Manager for Representative Jeanne Kapela, for violating the State Ethics Code's Fair Treatment law. Coffield admitted to using state work hours to send emails on behalf of the Democratic Party of Hawai'i, a private nonprofit organization, which constitutes misuse of state time and resources under HRS § 84-13(a). Coffield fully cooperated with the investigation, resigned from his position with the Democratic Party, and agreed to pay a \$100 administrative penalty. The Commission also referred the matter to the House of Representatives for further action.

Department of Education, Fair Treatment and Gifts Law: Resolution of Charge 2024-3.

In 2024, the Commission resolved a case involving Vera Alvarez, a teacher at Moanalua Elementary School, for violating the State Ethics Code's Fair Treatment and Gifts laws. Alvarez accepted \$48,000 in cashier's checks from a school volunteer, depositing \$34,000 for personal use and retaining \$14,000 in undeposited checks. These funds were provided under the guise of aiding teachers but violated state ethics laws as unwarranted benefits derived from her employment. Alvarez agreed to pay \$34,000 in restitution, return the remaining \$14,000, and pay a \$5,000 administrative penalty. The matter was referred to the Department of Education for disciplinary action.

House of Representatives, Financial Disclosure: Resolution of Charge 2024-4.

On September 19, 2024, the Commission resolved a case against State Representative David Alcos III for failing to disclose substantial financial information on required financial disclosure forms, as mandated by the State Ethics Code. Alcos admitted to omitting numerous creditors, including significant tax liens, legal debts, and judgments related to his construction business, D.A. Builders, LLC. He also failed to disclose his state salary and ownership interests in two businesses. Alcos cooperated with the investigation, voluntarily disclosed additional information, and acknowledged the importance of adhering to financial disclosure requirements for transparency and public trust.

Anti-Fraud, Waste, and Abuse Hotline

In partnership with the Department of the Attorney General, the Commission hosts an anti-fraud hotline to identify fraud, waste, and abuse of government funds. The agencies developed a website and online complaint form (antifraud.hawaii.gov), a dedicated phone hotline (808.587.0000), and a dedicated email address (antifraud@hawaii.gov) where individuals can confidentially report suspected violations. These anti-fraud resources were created to empower the public with confidential, easy-to-use methods to report potential violations.

In 2024, the Commission received 57 anti-fraud complaints.

Nepotism

The Commission enforces a nepotism law that generally prohibits state employees from taking employment actions regarding their relatives or household members. However, exceptions can be granted for “good cause.” To obtain such an exception, the employee or agency must show that complying with the nepotism law is impractical. For example, in hiring situations, this could involve demonstrating that a position was widely advertised, yet no qualified applicants came forward, necessitating the hiring of a relative. Similarly, for supervisory roles, if delegating duties to another employee is not feasible, an exception may be considered. The Commission stresses that any granted exceptions will be managed transparently to maintain public trust.



In 2024, the Commission considered eight nepotism exception applications. These include cases where specialized positions had a limited pool of qualified candidates, making hiring a relative necessary, and situations in rural areas where staffing shortages required supervisory roles to be filled by family members. Each exception was evaluated individually, ensuring that the decisions upheld the integrity of the state’s employment practices. Each decision can be found at https://hawaiiethics.my.site.com/public/s/ethics-advice/Ethics_Advice_c/00B6R00000AwpdxUAB.

For more detailed information on the nepotism law and the process for applying for a good cause exception, the Commission issued a Quick Guide on Nepotism available at https://ethics.hawaii.gov/wp-content/uploads/quickguide_nepotism.pdf.

Financial & Gifts Disclosures

The Commission oversees the filing requirements of the financial disclosure law and the gifts disclosure law, which contribute to accountability and transparency in government. In 2024, the Commission received 1,882 financial disclosure statements. Public disclosure statements (for elected officials, department directors, and other designated state officials) can be found in the Commission’s “public data” section of its website. The Commission also received and published 253 gifts disclosure statements, all accessible in the “public data” section of the Commission’s website.



Lobbyists

The Commission administers Haw. Rev. Stat. Chapter 97, the Lobbyists Law, which requires lobbyists to register with the Commission and file periodic expenditure reports. Lobbyists are required to register and file their periodic expenditure reports electronically. These reports are available on the “public data” tab of the Commission’s website.

The Commission continually upgrades and enhances its e-filing system for lobbying, financial disclosures, and gift disclosures. In 2024, the Commission introduced a series of improvements to simplify the process for filers and comply with recent statutory changes. Recent updates include allowing legislators to report financial ties to lobbyists and enabling lobbyists to specify the particular bill number or issue they lobbied on.

As of April 19, 2023, Act 20 requires all lobbyists to complete mandatory training before registering and to renew it at least every two years. This legislation emphasizes the importance of equipping lobbyists with a clear understanding of ethical standards and compliance requirements.

In 2024, the Commission’s lobbyist training program saw an impressive turnout, with 584 participants successfully completing the training. This record number underscores the growing commitment to ethical practices and transparency within the lobbying community. The Commission continues to prioritize high-quality, accessible training programs to meet the demands of this new regulatory framework.

2024 LOBBYING REPORT

586

Lobbyist Registration
Statements Filed

1,408

Lobbying Expenditure
Reports Filed

581

Total Number of
Registered Lobbyists

498

Lobbying Organizations

Commissioners & Staff

The Commission comprises five members nominated by the State Judicial Council and appointed by the Governor for four-year terms. Following the passing of former Vice Chair Harry McCarthy on January 8, 2024, Governor Josh Green appointed Roderick Becker on September 16, 2024, to fill the vacancy. The Commission's current members are Wesley Fong (Chair), Beverley Tobias (Vice Chair), Robert Hong, Cynthia Thielen, and Roderick Becker.

As of December 2024, the Commission employs twelve staff members: Executive Director Robert D. Harris, Compliance Director Bonita Chang, Enforcement Director Kee Campbell, three staff attorneys (Nancy Neuffer, Jennifer Yamanuha, and Jodi Yi), Investigator Jared Elster, Investigatory Analyst Barbara Gash, Computer Specialist Patrick Lui, Office Manager Caroline Choi, Secretary Lynnette O'Ravitz, and Administrative Assistant Myles Yamamoto.

The Commission prioritizes fiscal prudence and efficiency. In 2024, it returned \$72,229.54 of its allocated budget to the General Fund. Several key efforts guided the reduced expenses, including successfully renegotiating the Commission's office lease and changing phone and internet systems to provide greater accessibility and reduced cost.



Wesley F. Fong, Chair



Beverley Tobias, Vice
Chair



Robert Hong



Cynthia Thielen



Roderick Becker