



**HAWAII STATE
ETHICS COMMISSION**

*Komikina Ho'opono Kulekele
o Hawai'i Moku'āina*

2025 Annual Report

Introduction

The Hawai'i State Ethics Commission remains firmly committed to promoting integrity, transparency, and accountability in government. In 2025, that commitment translated into measurable progress. Over 90 percent of all state employees—and nearly all board and commission members—have now completed mandatory ethics training, reflecting a broad and meaningful engagement with the principles that guide public service in Hawai'i. This level of participation marks a significant cultural shift: ethics is no longer peripheral to government work, but an expected and shared responsibility.

At the same time, the Commission took decisive enforcement action where the law was violated. In 2025, the Commission assessed some of the highest administrative penalties in its history. These outcomes are not an end in themselves; they represent a concrete and necessary response to past corruption scandals that undermined public confidence in government. Effective ethics oversight requires both education and accountability. Where guidance and training are insufficient to prevent misconduct, enforcement serves as an essential safeguard for the public trust.

Public confidence in government remains fragile, both nationally and locally. In this environment, ethics compliance cannot be viewed as a technical obligation or a box-checking exercise. It is foundational to democratic governance. The Commission's work—training thousands of public servants, providing timely ethics guidance, and pursuing enforcement when warranted—reflects a balanced approach grounded in prevention, fairness, and transparency.

Looking ahead, the Commission recognizes that continued progress will require sustained investment in ethics education, modern investigative tools, and thoughtful legislative refinement. The milestones reflected in this report demonstrate that meaningful reform is possible when expectations are clear and accountability is real.

The Commission extends its appreciation to the many state employees, officials, and members of the public who have engaged with and supported this work. While challenges remain, the progress documented in this report affirms a shared commitment to ethical government worthy of the people of Hawai'i.

Warmly,
Robert D. Harris
Executive Director & General Counsel

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.

MISSION & DUTIES

ETHICS OVERSIGHT

The Commission oversees the State Ethics Code, Haw. Rev. Stat. Ch. 84, which includes oversight over the acceptance and reporting of gifts, confidential information, fair treatment (the prohibited misuse of an official position), conflicts of interest, state contracts, post-employment restrictions, and nepotism. It also requires certain state individuals to file financial disclosure statements.

LOBBYIST REGULATION

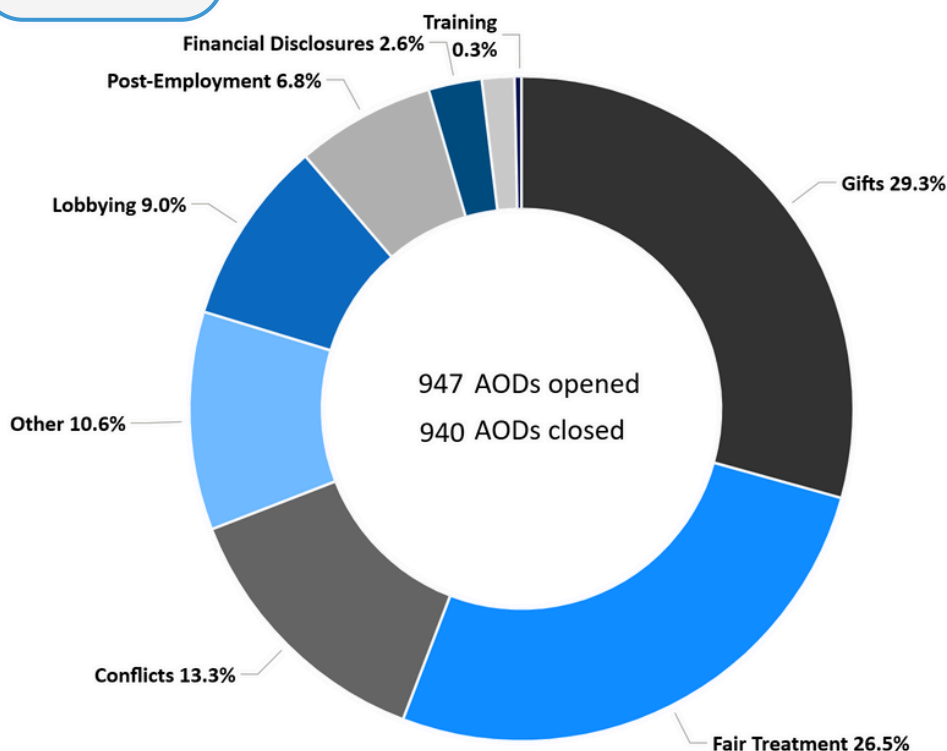
The Commission also oversees the State Lobbyist Law, Haw. Rev. Stat. Ch. 97, which applies to lobbying activities at the state level. Lobbyists must register with the Commission and report lobbying expenditures and contributions. Effective in 2025, lobbyists must also disclose which specific bills or items they lobbied on. The Commission has jurisdiction over 616 lobbyists representing 470 organizations that lobby the state legislature or executive branch.

ETHICAL GUIDANCE

Through its “attorney of the day” service, the Commission ensures that requests for guidance are promptly and efficiently addressed. Requestors may obtain a written summary and share it as needed. Requests are otherwise confidential.

2025

ATTORNEY OF THE DAY TRENDS



GIFTS	260
FAIR TREATMENT	235
CONFLICTS	118
POST EMPLOYMENT	60
LOBBYING	80
FINANCIAL DISCLOSURES	23
NEPOTISM	14
TRAINING	3
OTHER*	94

* “Other” includes any matter that does not fall neatly into an assignable ethics category

169 Written Summaries Issued
12 Guidance Letters Issued

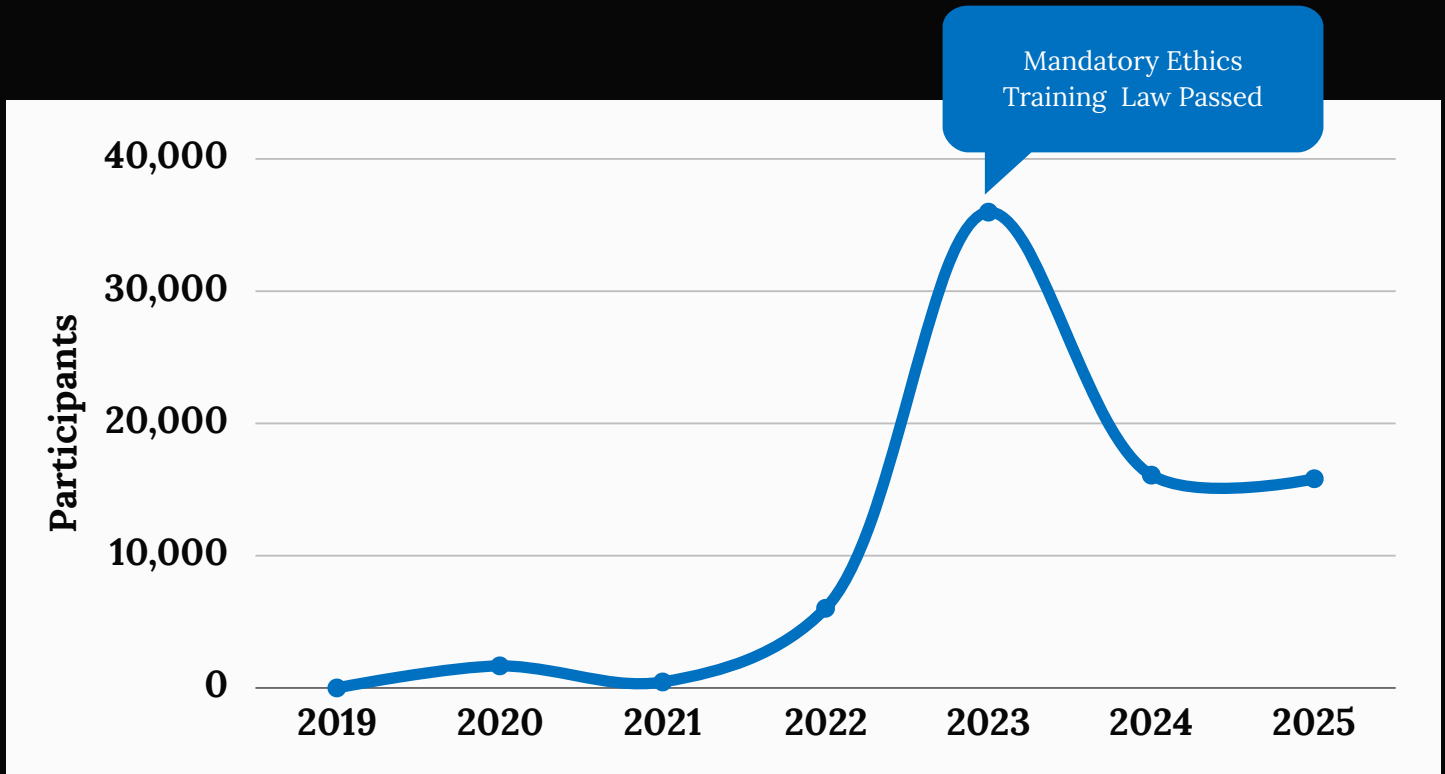
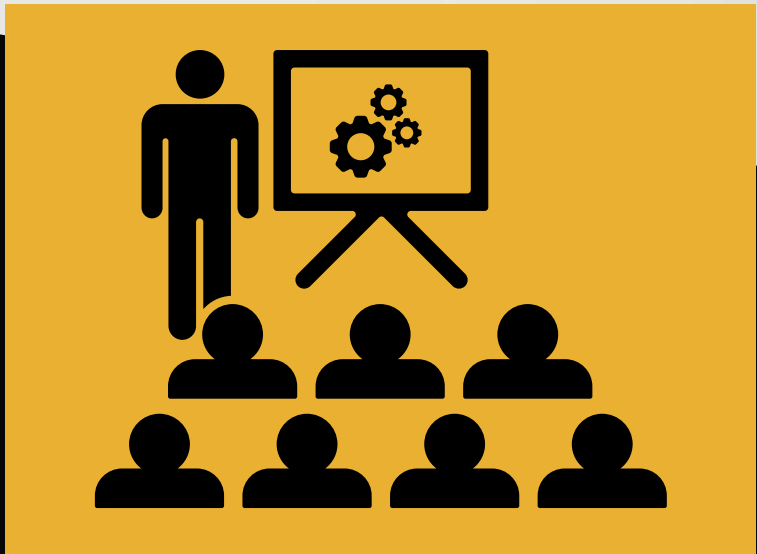
ADVISORY OPINION

The Commission also issued an informal advisory opinion ([2025-1](#)). It stands for the proposition that the Commission will defer to established personnel procedures absent specific ethics concerns.

**947 ATTORNEY
OF THE DAY
REQUESTS IN
2025**

MANDATORY ETHICS TRAINING

A mandatory training law took effect in March 2023, requiring each state employee to complete an ethics training within 90 days of employment and at least once every four years thereafter. In 2025, the Commission delivered ethics education and training to more than 16,000 state officials and lobbyists through its online training module, as well as in-person and webinar sessions. In 2025, approximately 93% of state employees and 97% of board members have completed ethics training at least once.



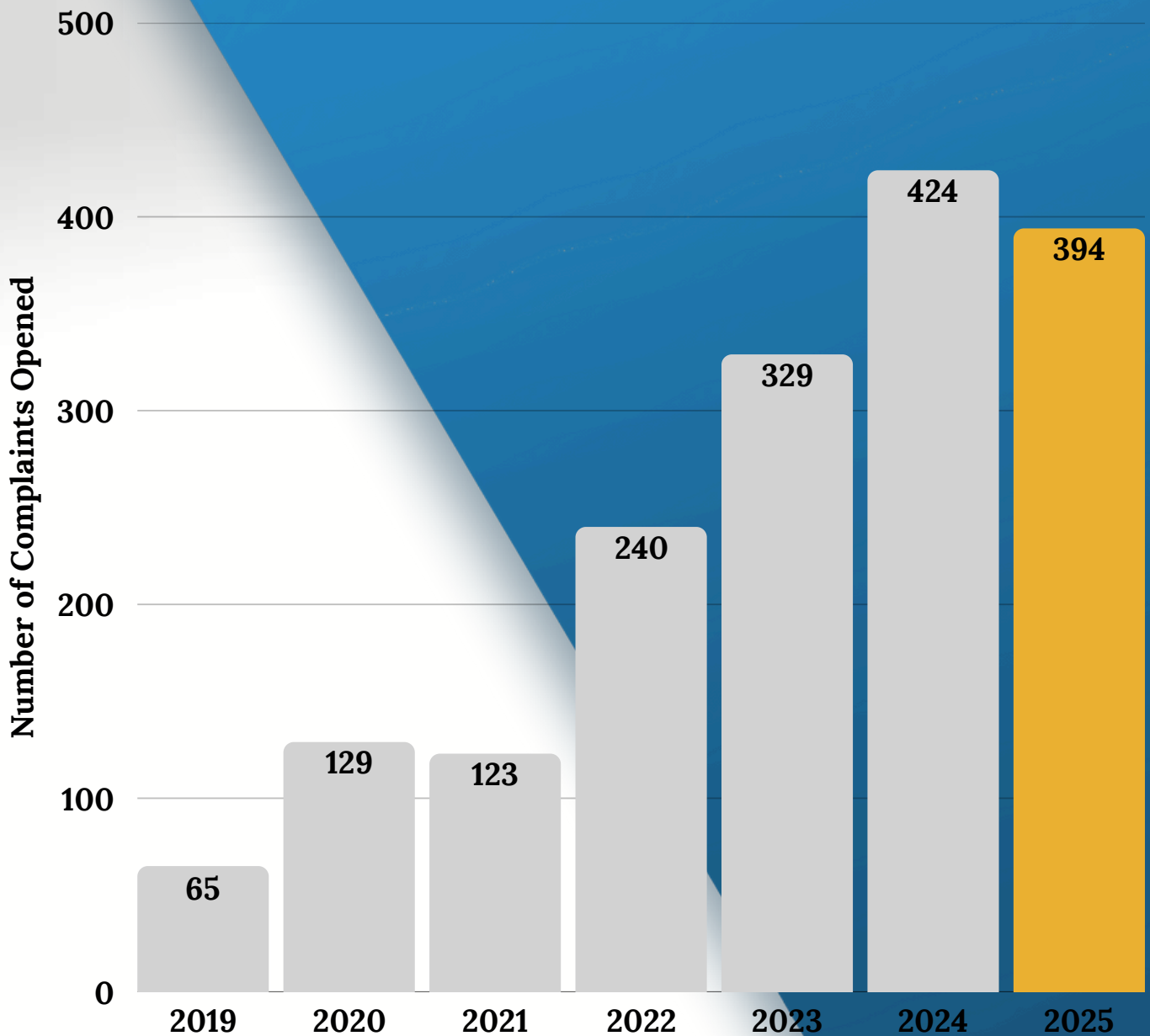
*Act 165 (2023) requires all state employees to take ethics training every 4 years

ENFORCEMENT

25

Median Days to Close

The Commission receives and investigates complaints alleging ethics and lobbying law violations confidentially. When warranted, the Commission initiates formal charges against individuals who appear to have violated the law. Most cases are settled with terms made public, although where necessary the Commission may hold a public contested case hearing.



2025 COMPLAINT STATISTICS

Fair Treatment 40%

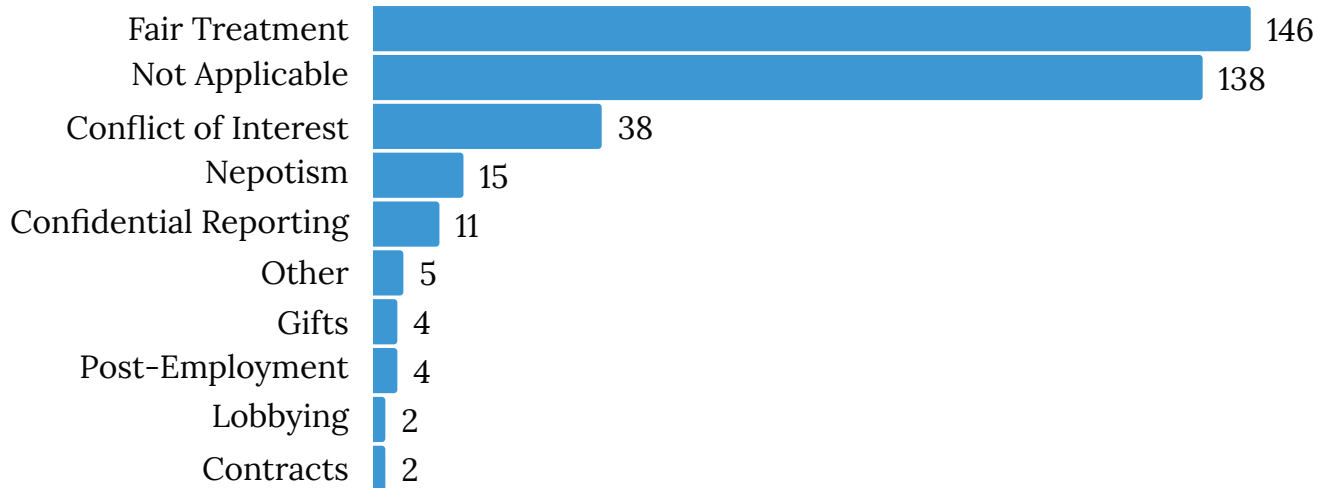
Not Applicable 38%

Conflict of Interest 10%

Nepotism 4%

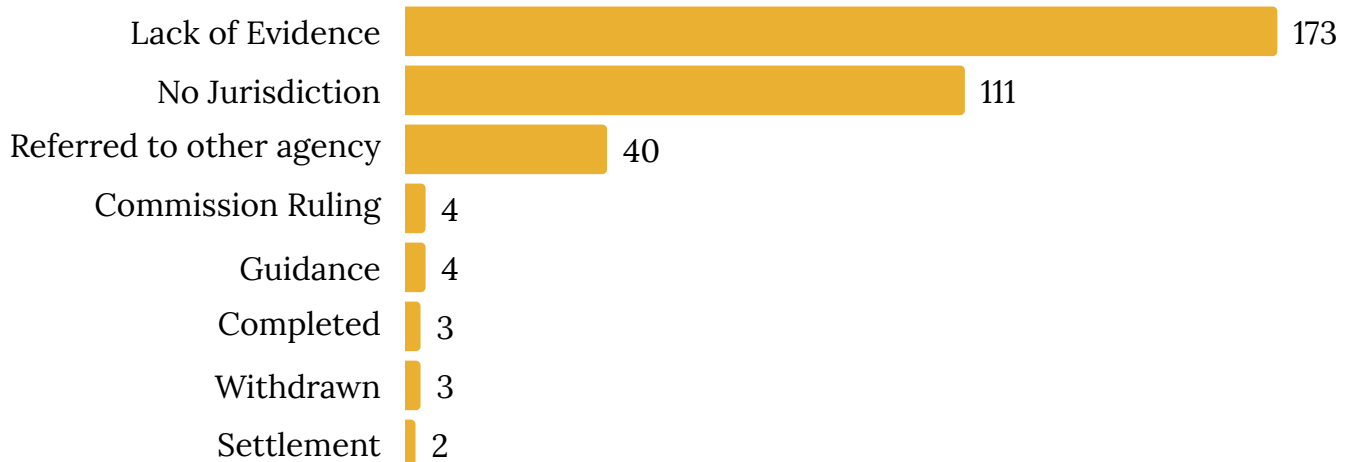
Gifts 1%

Type of Alleged Violations Received



How Were the Complaints Resolved?

Number of Complaints



ENFORCEMENT STATISTICS

ETHICS COMPLAINTS RECEIVED

394

Total number of complaints received from sourced or anonymous sources

TOTAL CASES CLOSED

392

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

FORMAL INVESTIGATIONS

12

All complaints are investigated. Where a matter is unable to be resolved and a subpoena may be required, the Commission may launch a formal investigation



CHARGES ISSUED

4

Situations where the Commission initiated a formal charge into an alleged ethics code violation



Penalties Assessed:

\$22,999.99

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.



69

Anti-Fraud
Complaints Received

NEPOTISM

The Commission enforces an anti-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. The Commission’s analysis of each exception request, whether granted or denied, is made public.

NO “GOOD
CAUSE”
Exceptions Were
Granted in 2025



2025 LOBBYING REPORT

616

Registered Lobbyists

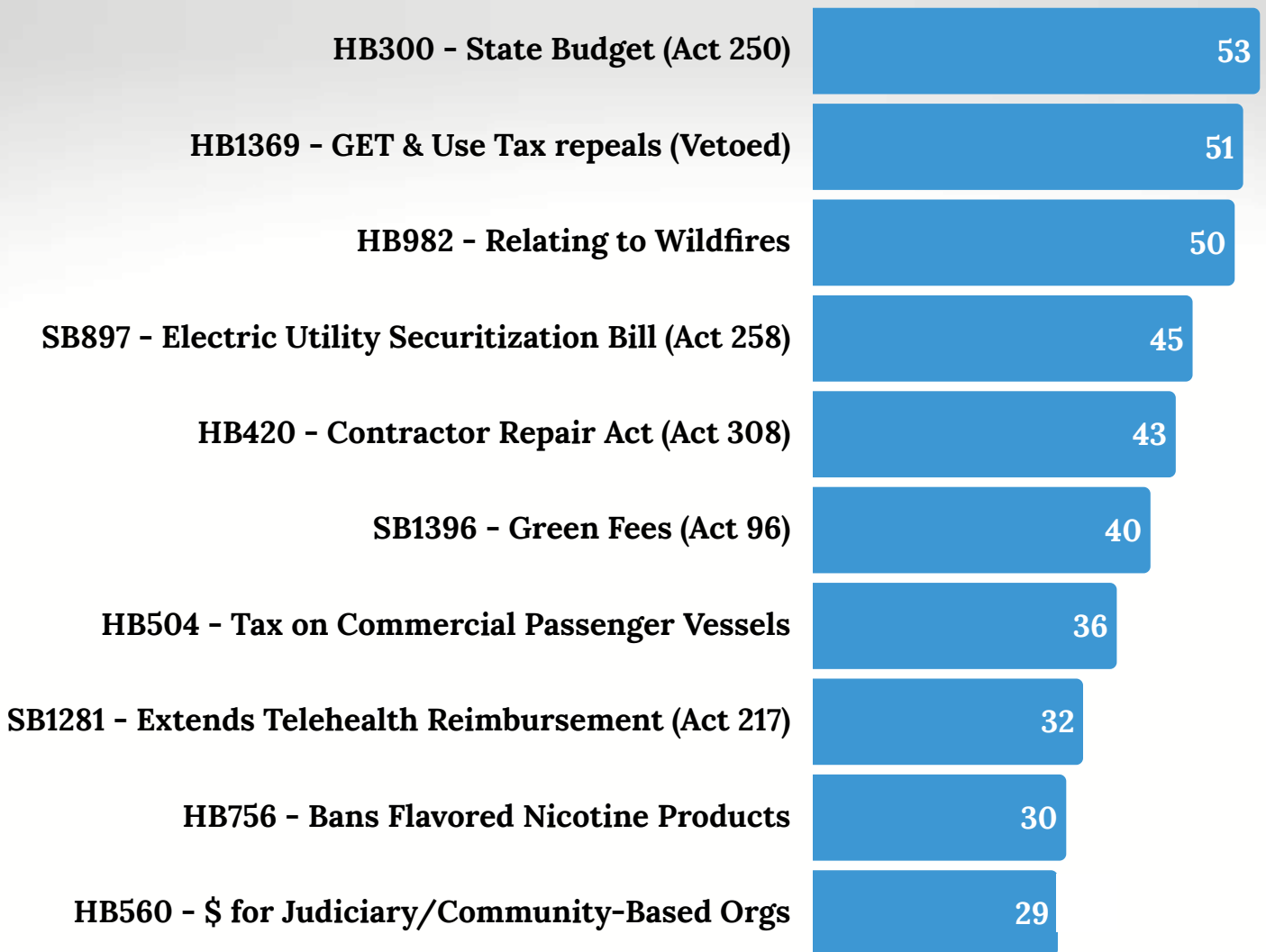
470

Lobbying Organizations

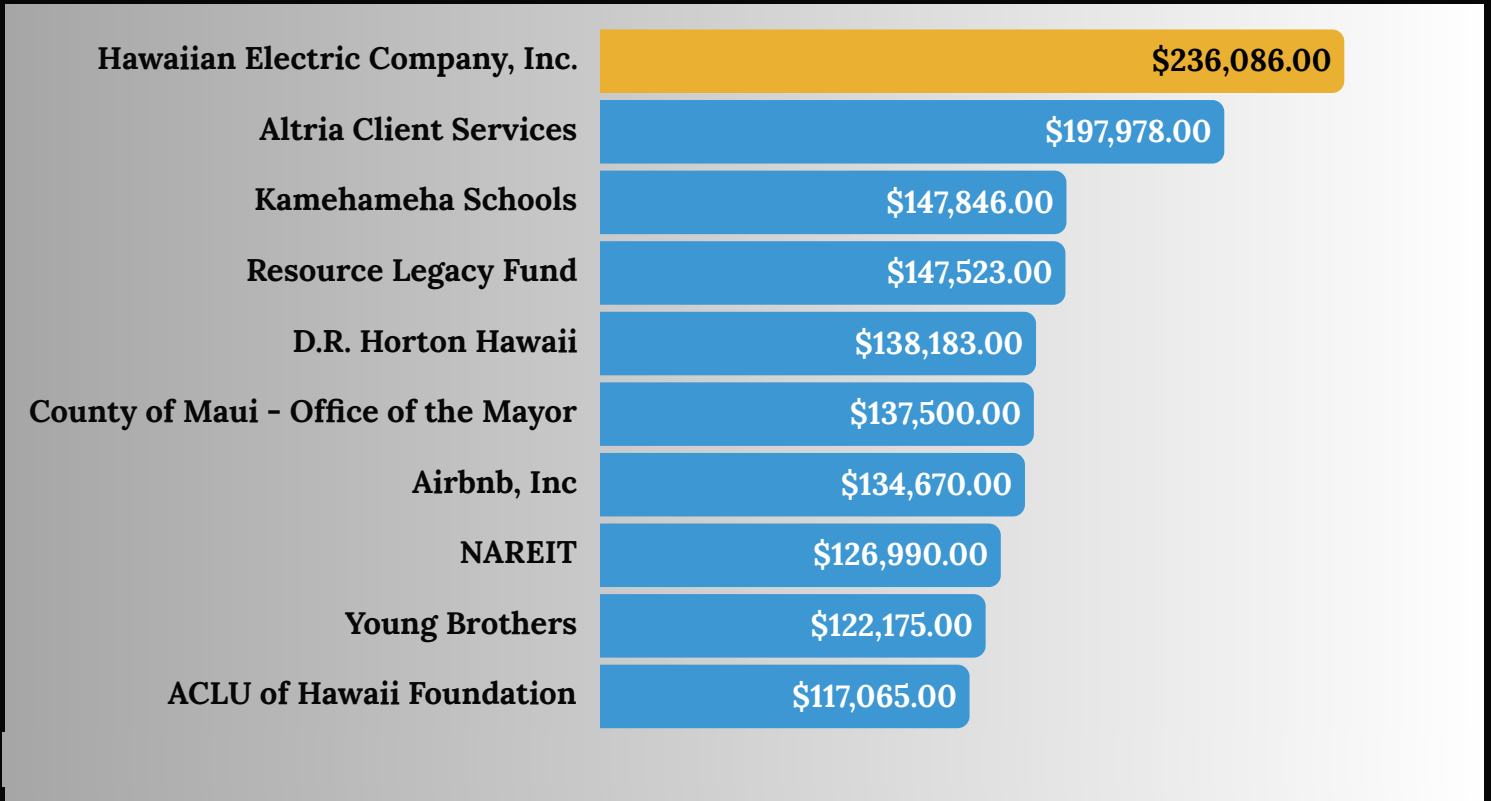
\$10,246,356

Total Lobbyist Compensation

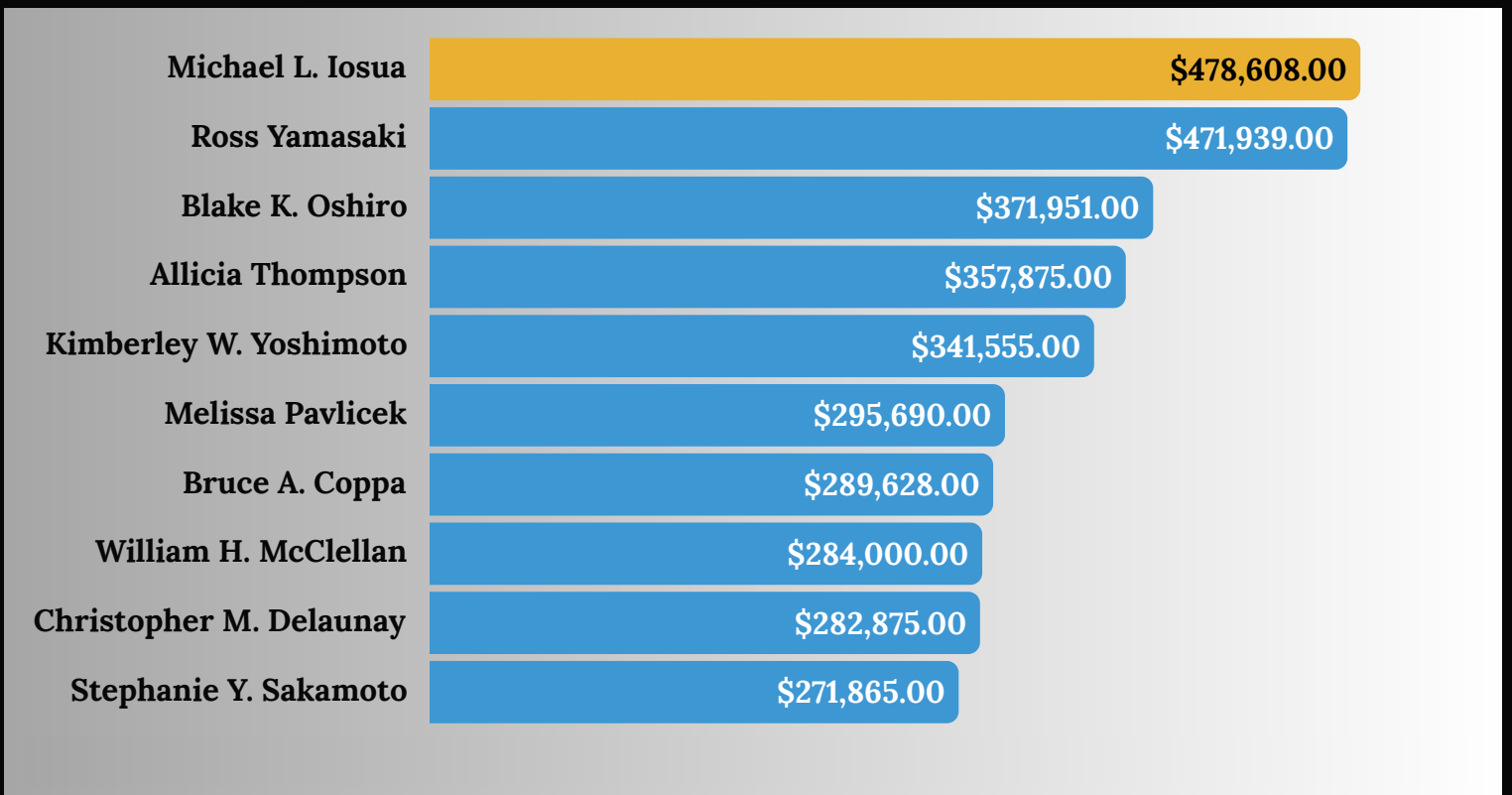
Top 10 Bills Lobbied On



TOP SPENDING ORGANIZATIONS



TOP PAID LOBBYIST



*Total \$ amount reported as of 2/2/2026

