

# **SUNSHINE LAW MEETING**

## Sunshine Law Attachments

- Attachment 1: Sunshine Law Meeting Minutes of the January 21, 2026, Hawai‘i State Ethics Commission Meeting
- Attachment 2: 2026 Training Statistics
- Attachment 3: 2026 Guidance and Assignment Statistics
- Attachment 4: 2025 Annual Report
- Attachment 5: Testimony in Support of SB 2246
- Attachment 6: Testimony in Support of SB 2248
- Attachment 7: Testimony in Support of SB 2245
- Attachment 8: Testimony in Support of HB 2110
- Attachment 9: Testimony in Support of HB 1885 with a Proposed Amendment
- Attachment 10: Testimony in Support of SB 2970 with a Proposed Amendment
- Attachment 11: Testimony in Support of SB 2661 with a Proposed Amendment
- Attachment 12: Testimony Commenting on SB 2778



# HAWAI'I STATE ETHICS COMMISSION

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

## NOTICE OF MEETING OF THE HAWAI'I STATE ETHICS COMMISSION

### Commissioners:

Wesley Fong, Chair

Robert Hong • Cynthia Thielen • Roderick Becker • Moya Gray

Date: February 18, 2026

Time: 9:00 a.m.

Location: Zoom Videoconference or Phone:

Videoconference: [Join Zoom Meeting](#)  
<https://us06web.zoom.us/j/82367585233?pwd=rIgFqP NMZX2Coxb6Q14GHmQKQzeS4f.1>

Phone: +1 (669) 444-9171 or +1 (669) 900-6833

Phone passcode: 248383

Meeting ID: 823 6758 5233

Passcode: ZFK45Q

### Public Meeting Location:

Hawai'i State Ethics Commission Conference Room  
1001 Bishop Street  
American Savings Bank Tower, Suite 970  
Honolulu, Hawai'i 96813

Pursuant to Hawai'i Revised Statutes section 92-3.7, the State Ethics Commission will meet remotely using interactive conference technology. The public may attend the meeting in person at the public meeting location above or participate remotely via the Zoom meeting information above. If participating remotely, please mute your phone/device except while testifying. If the Commission's videoconference connection is lost during the meeting, please visit the Commission's website ([ethics.hawaii.gov](http://ethics.hawaii.gov)) for more information, including reconnection information.

Public meeting materials for this meeting are available on the Commission's website at [ethics.hawaii.gov](http://ethics.hawaii.gov).

A G E N D A

CALL TO ORDER

I. Consideration and Approval of the Minutes of the January 21, 2026 Meeting

*Attachment 1: Sunshine Law Meeting Minutes of the January 21, 2026, Hawai‘i State Ethics Commission Meeting*

II. Proposed Meeting Date Change

*Description:* The Commission will discuss moving the March meeting to March 25, 2026.

III. Directors' Report

1. Education & Disclosures – Report/Updates

*Attachment 2: 2026 Training Statistics*

2. Guidance and Assignment Statistics – January 2026

*Attachment 3: 2026 Guidance and Assignment Statistics*

3. Miscellaneous Office Projects/Updates

*Attachment 4: 2025 Annual Report*

IV. Discussion of Media Reports Concerning Ethics or the Ethics Commission Since the Last Meeting

*Description:* The Commission will discuss recent media coverage related to ethics in government or the Hawai‘i State Ethics Commission. The discussion may include consideration of potential responses, clarification of public information, or other appropriate actions.

V. 2026 Legislative Matters

New bills of interest, introduced in 2026, are described briefly below. The blue house or senate bill number is a clickable hyperlink that goes directly to the bill language online. Bills can also be looked up at “capitol.hawaii.gov” by typing the bill number in the box located near the top of the window.

**Budget:**

- [\*\*HB2240\*\*](#) - Appropriates funds to provide for the expenses of the Legislature, Auditor, Legislative Reference Bureau, Ombudsman, and Ethics Commission.

**State Ethics Commission Package:**

- [\*\*HB2106/SB2246\*\*](#) - Expands the scope of persons who are subject to public financial disclosure requirements to include executive directors and executive officers and board and commission members for: the Employees’ Retirement System, the Hawai‘i Employer-Union Health Benefits Trust Fund, the Hawai‘i Green Infrastructure Authority, the Hawai‘i Technology Development Corporation, and the School Facilities Authority. **SB2246 is scheduled to be heard in JDC on 2/13/2026 at 9:00 am.**

Attachment 5: Testimony in Support of 2246

**Proposed Motion:** Recommendation to support an amendment removing express reference to the special assistant to the state librarian of the public library system and adding broad language indicating that public filers, regardless of the titles by which they are designated, must file.

- [\*\*HB2107/SB2247\*\*](#) - Prohibits any Executive Branch employee who is nominated or appointed by the Governor to a compensated position subject to confirmation by the Senate from engaging in certain campaign fundraising activities.
- [\*\*HB2108/SB2248\*\*](#) - Expands the scope of persons who are required to file financial disclosures to include certain gubernatorial nominees subject to Senate confirmation. Makes technical amendments relating to legislators. **SB2248 was amended in JDC with an effective date of 1/1/2027.**

Attachment 6: Testimony in Support of SB 2248

- [\*\*HB2109/SB2245\*\*](#) - Prohibits new state employees from taking official action for two years on matters they worked on before state employment. Prohibits former permanent employees of the Office of the Governor and Office of the Lieutenant Governor from representing persons or businesses for a period of

12 months after termination from state employment. **SB2245 LBT moved the measure unamended. Referred to the Senate Committee on Judiciary.**

Attachment 7: Testimony in Support of SB 2245

- **HB2110 /SB2244** - Subjects legislative and judicial employees to the same ethical standards prohibiting nepotism that are applicable to other state employees. **The LMG hearing was cancelled due to a storm; awaiting rescheduling.**

Attachment 8: Testimony in Support of HB 2110

**Procurement:**

- **HB1885** - Prohibits a state agency from entering into any contract to procure or dispose of goods or services, or for construction, with any business that is owned or operated, or in which a controlling interest is held, by a relative or household member of a director or deputy director of a principal state department. **JHA deferred the measure on 2/3/2026.**

Attachment 9: Testimony in Support of HB 1885 with a Proposed Amendment

- **SB2970** - Prohibits a state agency from entering into any contract to procure or dispose of goods or services, or for construction, with any business that is owned or operated, or in which a controlling interest is held, by a relative or household member of a director or deputy director of a principal state department. **GVO amended per the Ethics Commission recommendations and defected the effective date.**

Attachment 10: Testimony in Support of SB 2970 with a Proposed Amendment

**Proposed Motion:** Support SB 2970 and HB 1885 with the proposed amendment included in Attachment 9.

**Anti-Nepotism:**

- **SB2661** - Repeals language in the State's Code of Ethics that exempts the legislative and judicial branches from prohibitions against nepotism in public employment. **Scheduled to be heard in JDC on 2/13/2026 at 9:00 am.**

Attachment 11: Testimony in Support of SB 2661 with a Proposed Amendment

- [\*\*SB2778\*\*](#) - Requires a Governor, Lieutenant Governor, member of the Legislature, department heads and their deputies, and any spouse or dependent child of a Governor, Lieutenant Governor, member of the Legislature, or department head and their deputies to place certain financial interests in a blind trust. Prohibits a Governor, Lieutenant Governor, member of the Legislature, department head, and their deputies, and any spouse or dependent child of a Governor, Lieutenant Governor, member of the Legislature, or department head and their deputies from acquiring certain financial interests during their term of service. **Scheduled to be heard in LBT on 2/11/2026 at 3:00 pm.**

Attachment 12: Testimony Commenting on SB 2778

**Proposed Motion:** Adopt a position supporting the intent of this measure, but noting concerns with implementation.

VI. Adjournment

Disruption of Interactive Technology:

If the Commission loses internet or Zoom connection, the meeting will be automatically recessed for up to 30 minutes to restore communication. **Audio-Only Communication:** If audio-only communication is available, all Commissioners, staff, members of the public, and other interested individuals may continue to participate in the meeting via teleconference by dialing the telephone number and Meeting ID number noted above. If communication cannot be restored within thirty minutes, the meeting will be automatically continued to a date and time to be posted on the Commission’s website at [ethics.hawaii.gov](http://ethics.hawaii.gov). Alternatively, if a decision is made to terminate the meeting, the termination will be posted on the Commission’s website.

Public Testimony:

Anyone wishing to testify may do so during the meeting or may submit written testimony in advance of the meeting by email ([info.ethics@hawaii.gov](mailto:info.ethics@hawaii.gov)), facsimile (fax) (808-587-0470), or U.S. postal mail (State Ethics Commission, 1001 Bishop Street, American Savings Bank Tower, Suite 970, Honolulu, Hawai‘i 96813). Public testimony must be related to an item on the agenda, and the testifier must identify the item to be addressed by the testimony. Pursuant to Hawai‘i Revised Statutes section 92-3 and Hawai‘i Administrative Rules section 21-1-6(c), oral testimony is limited to three minutes per testifier per agenda item, subject to the reasonable discretion of the Chair.

Auxiliary Aid or Accommodation Due to a Disability:

If you require an auxiliary aid or accommodation due to a disability, please contact the Hawai‘i State Ethics Commission as soon as possible. You may:

- Call (808) 587-0460 and press 1# to leave a message; or
- Email the Commission at [info.ethics@hawaii.gov](mailto:info.ethics@hawaii.gov)

We encourage requests at least 48 hours before the meeting to allow us time to assist you. We will accept requests made closer to the meeting, but please note that last-minute accommodations may be difficult to provide.

Upon request, this notice is available in alternate/accessible formats.

SUNSHINE LAW MEETING  
AGENDA ITEM I

CONSIDERATION AND APPROVAL OF THE MINUTES OF THE  
JANUARY 21, 2026 MEETING

Attachment 1: Sunshine Law Meeting Minutes of the January 21, 2026  
Hawai'i State Ethics Commission Meeting

**SUNSHINE LAW MEETING**  
**MINUTES OF THE HAWAII STATE ETHICS COMMISSION**

## STATE OF HAWAII'

Date: January 21, 2026

Time: 9:00 a.m.

Location: Hybrid meeting held via Zoom video and audio conference

Recorded video available at  
[https://ethics.hawaii.gov/category/commissionmeetings/comm\\_videos/](https://ethics.hawaii.gov/category/commissionmeetings/comm_videos/)

### Public Meeting Location

Hawai'i State Ethics Commission Conference Room  
1001 Bishop Street  
American Savings Bank Tower, Suite 970  
Honolulu, Hawai'i 96813

Attendance: State Ethics Commission Members

Wesley F. Fong, Chair (in person)  
Robert Hong, Commissioner (in person)  
Cynthia Thielen, Commissioner (via Zoom)  
Roderick Becker, Commissioner (in person)  
Moya Gray, Commissioner (via Zoom)

## State Ethics Commission Staff

Robert D. Harris, Executive Director (in person)  
Bonita Y.M. Chang, Compliance Director (via Zoom)  
Kee Campbell, Enforcement Director (via Zoom)  
Jodi L. K. Yi, Staff Attorney (via Zoom)  
Jared Elster, Investigator (via Zoom)  
Barbara Gash, Investigatory Analyst (via Zoom)  
Patrick Lui, Computer Specialist (via Zoom)  
Melissa Vomvoris, Administrative Assistant (in person)

### Guests and Members of the Public

Candace Park, Deputy Attorney General (via Zoom)

1    **CALL TO ORDER (0:05)**  
2

3    Chair Fong called the meeting to order at 9:05 a.m. Chair Fong, Commissioners Hong and  
4    Becker attended in person. Commissioners Thielen and Gray participated via Zoom. All  
5    Commissioners participating remotely confirmed that no one else was present at their  
6    respective locations. Executive Director Harris reminded participants that the meeting was  
7    being recorded for the official record and would be posted online.  
8

9    Executive Director Harris noted that Deputy Attorney Candace Park was present via Zoom  
10   and that there were no members of the public present or on Zoom.  
11  
12

13    **Agenda Item No. I: Introduction of Commissioner Moya T. D. Gray (2:56)**  
14

15    Chair Fong congratulated and welcomed new commissioner, Moya Gray. Commissioner  
16   Gray introduced herself and gave a brief background of her history with government  
17   employment. Each Commissioner shared a brief background of themselves to  
18   Commissioner Gray.  
19  
20

21    **Agenda Item No. II: Election of Officers for 2026 (6:59)**  
22

23    Chair Fong opened the floor for nominations for Officer positions. The Commission's  
24   administrative rules provide for the annual election of a Chair and Vice-Chair with terms  
25   commencing on January 1 of each year. However, the Commission had elected to defer  
26   elections until a new commissioner had been appointed.  
27

28    **Election of Chair**

29    Commissioner Hong nominated Commissioner Fong for the position of Chair. As no further  
30   nominations were offered, the nominations were closed. Chair Fong then turned the gavel  
31   over to Commissioner Hong to conduct the roll-call vote. All Commissioners present (Fong,  
32   Thielen, Hong, Becker, and Gray) voted in the affirmative, electing Commissioner Fong as  
33   Chair of the Hawai'i State Ethics Commission.  
34

35    **Election of Vice-Chair**

36    Chair Fong opened the floor for nominations for the position of Vice-Chair and nominated  
37   Commissioner Hong. As no further nominations were offered, the nominations were  
38   closed. All Commissioners present (Fong, Thielen, Hong, Becker, and Gray) voted in the  
39   affirmative, electing Commissioner Hong as Vice-Chair of the Hawai'i State Ethics  
40   Commission.  
41  
42  
43  
44  
45

1 **Agenda Item No. III: Consideration and Approval of the Minutes of the November 19,**  
2 **2025 Meeting (12:06)**

3  
4 Upon a motion by Commissioner Thielen, seconded by Commissioner Hong, the  
5 Commission approved the minutes of the November 19, 2025 meeting. Commissioner Gray  
6 was recused, and all other Commissioners present (Fong, Thielen, Hong, Becker,) voted in  
7 the affirmative.  
8  
9

10 **Agenda Item No. IV: Consideration and Approval of the Sunshine Executive Session**  
11 **Minutes of the November 19, 2025 Meeting (12:48)**

12  
13 Upon a motion by Commissioner Thielen, seconded by Commissioner Becker, the  
14 Commission approved the executive session minutes of the November 19th meeting.  
15 Commissioner Gray was recused, and all other Commissioners present (Fong, Thielen,  
16 Hong, Becker,) voted in the affirmative.  
17  
18

19 **Agenda Item No. V: Directors' Report (13:40)**

20 **1. Education & Disclosures – Report/Updates (13:56)**

21 Compliance Director Bonita Chang provided an update on the ethics training statistics for  
22 2025:  
23

24

- 25 • Overall compliance – 97%
- 26 • Public board and commission members - 99% (as of December 31, 2025)
- 27 • State agencies – 93% of approximately 57,000 employees (based on aggregated  
28 agency data reported in December 2025)

29  
30 The priority for 2026 is to update the self-guided training and the Commission's website to  
31 comply with the new federal ADA requirements. The deadline for compliance is April 2026.  
32

33  
34 Financial disclosure statements for legislators are due on February 2, 2026. Staff and  
35 attorneys have been responding to inquiries and assisting filers with reporting  
36 requirements.  
37

38 Chair Fong congratulated staff on reaching such high percentages for ethics training  
39 compliance.  
40

41 **2. Guidance and Assignment Statistics – November and December 2025 (18:34)**

42 Enforcement Director Kee Campbell presented the following year-end statistics:  
43

44

- 45 • Complaints: 394 complaints were received and 392 were closed in 2025.

1     • Gift/Travel Requests: 445 requests were received with 447 advisory letters issued to  
2     inform requestors whether their trips were permissible or required reporting as a  
3     gift.  
4     • System Enhancements: Ongoing improvements are being implemented to enhance  
5     statistical reporting capabilities.  
6

7     **3. Miscellaneous Office Projects/Updates (19:57)**  
8

9     Executive Director Harris reported that the Commission is currently operating under  
10    budget.

12    Harris also noted that the office recently experienced significant flooding caused by a  
13    broken water line, which affected most of the office, the adjacent offices, and two floors  
14    below. Building management responded promptly with remediation efforts to prevent mold  
15    growth. Staff worked closely with Risk Management throughout the recovery process.

18    **Agenda Item No. VI: Discussion of Media Reports Concerning Ethics or the Ethics  
19    Commission Since the Last Meeting (27:01)**

21    Executive Director Harris reported on several media articles:

23     • November 20, 2025, Citizens Portal article titled "[Committee reports  
reappointment of Sheldon Jim Ahn to the Ethics Commission out for adoption](#)"  
24     • November 24, 2025, Hawai'i Free Press article titled "[Ethics: DeCoite, HECO busted](#)"  
25     • November 27, 2025, Hawai'i Free Press article titled "[Governor appoints Moya Gray  
to the Hawai'i State Ethics Commission](#)"  
26     • November 30, 2025, Civil Beat appointment of Moya Gray in article titled "[The  
Sunshine Blog: Reinforcements Are On The Way For Honolulu Police Commission](#)"  
27     • December 5, 2025, KITV article titled "[Hawai'i State Ethics Commission fines Sen.  
Awa for using government resources in a campaign video](#)"  
28     • December 5, 2025, Honolulu Star-Advertiser "[Hawai'i Ethics Commission fines state  
Sen. Brenton Awa](#)"  
29     • December 7, 2025, Hawai'i News Now article titled "[State senator decries fine for  
video violating campaign law](#)"  
30     • December 24, 2025, Civil Beat article titled "[Who Are Hawai'i's Biggest Tax  
Delinquents? Search Here](#)"  
31     • December 25, 2025, HBR article titled "[Meet these new faces on some of the state's  
prominent boards, commissions](#)"  
32     • January 4, 2026, Civil Beat article titled "[For Cynthia Thielen, Decades Of Public  
Service Are 'Just The Right Thing To Do'](#)"  
33     • January 4, 2026, Civil Beat article titled "[Hawai'i's Transparency Problem Isn't Just  
About Secrecy](#)"  
34     • January 4, 2026, Civil Beat article titled "[The Sunshine Blog: An Ethics Complaint  
Against An Ethics Board](#)"

1     • January 16, 2026, Hawai‘i Free Press article titled "Applicants Wanted for State  
2     Ethics Commission"  
3     • January 16, 2026, Civil Beat article by Michael Lilly titled "[The Maui County Board Of  
4     Ethics Has Been Transformed](#)"  
5  
6

7     **Agenda Item No. VII: Summary and Discussion of the 2025 Council on Governmental  
8     Ethics Laws Conference (30:12)**

9  
10   Executive Director Harris notes that Hawai‘i is a founding member of the Council on  
11   Governmental Ethics Laws (COGEL), an International Association of State and local  
12   agencies focused on promoting good governance.

13  
14   Chair Fong described the conference as a rewarding opportunity to engage with other  
15   ethics commissions.

16  
17   Commission Becker agreed, stating it highlighted Hawai‘i's strong performance and cited a  
18   session on procurement ethics as particularly valuable.

19  
20   Enforcement Director Campbell emphasized COGEL's usefulness for staying current with  
21   trends. He attended a panel on enforcement procedures and investigative planning and  
22   intends to explore ideas mentioned at the conference. He learned that other jurisdictions  
23   have adopted pre-employment restrictions.

24  
25   Compliance Director Chang found the conference insightful, particularly a session titled  
26   "Staying the Course," which addressed uncertainty surrounding democratic institutions.

27  
28   Executive Director Harris echoed these comments, noting COGEL provides practical  
29   strategies from other organizations. He highlighted a session on enforcing fair treatment  
30   laws on social media and referenced a recent U.S. Supreme Court case requiring broader  
31   transparency for legislators' private social media posts. Harris suggested developing a best  
32   practices document on this issue in the future.

33  
34  
35     **Agenda Item No. VIII: Discussion of Possible Legislative Proposals within the  
36     Commission's Jurisdiction (41:30)**

37  
38   Executive Director Harris informed the Commissioners that the House has not yet  
39   introduced the State Ethics Commission's legislative package. However, the Senate has  
40   introduced the bills, which are identified as follows:

41  
42     1. [SB2244 RELATING TO NEPOTISM](#)  
43     2. [SB2245 RELATING TO REVOLVING DOOR RESTRICTIONS FOR STATE  
44        EMPLOYEES](#)  
45     3. [SB2246 RELATING TO FINANCIAL DISCLOSURES](#)

1           4. [SB2247 RELATING TO POLITICAL FUNDRAISING BY EXECUTIVE BRANCH](#)  
2            EMPLOYEES  
3           5. [SB2248 RELATING TO FINANCIAL DISCLOSURES](#)

6           **Agenda Item IX: Consideration and Adoption of Legislative Delegation Policy (43:14)**

8           Executive Director Harris presented a draft written policy to formalize staff authority to  
9           submit testimony on legislation that aligns with the Commission's existing policy. Based on  
10          the Commissioners' discussion at the November 19 meeting, the draft was amended to  
11          reflect the requested changes.

13          The Commissioners agreed with the amendments and expressed appreciation for clarifying  
14          the scope of authority while still allowing the Executive Director to advocate for bills the  
15          Commission supports.

17          Commissioner Hong moved to adopt the Legislative Delegation Policy. Seconded by  
18          Commissioner Gray. All Commissioners present (Fong, Thielen, Hong, Becker, and Gray)  
19          voted in the affirmative.

22          **Agenda Item No. X: Adjournment (47:03)**

24          At approximately 9:49 a.m., Commissioner Hong moved to adjourn the meeting, seconded  
25          by Commissioner Becker. All Commissioners present (Fong, Thielen, Hong, Becker, and  
26          Gray) voted in the affirmative.

28          The meeting was adjourned at 9:49 a.m.

30          Minutes approved on \_\_\_\_\_.

SUNSHINE LAW MEETING  
AGENDA ITEM II

PROPOSED MEETING DATE CHANGE

*Description:* The Commission will discuss moving the March meeting to March 25, 2026.

No attachments.

SUNSHINE MEETING  
AGENDA ITEM IIII

DIRECTORS' REPORT  
February 18, 2026

**1. Education & Disclosures – Report/Updates**

*Attachment 2: 2026 Training Statistics*

**2. Guidance and Assignment Statistics – January 2026**

*Attachment 3: 2025 Guidance and Assignment Statistics*

**3. Miscellaneous Office Projects / Updates**

*Attachment 4: 2025 Annual Report*

## HAWAII STATE ETHICS COMMISSION

## 2026 TRAINING STATISTICS

## (Ethics Workshops and Presentations)

DATE	PRESENTATIONS	IN PERSON PARTICIPANTS	WEBINAR PARTICIPANTS
1/8/2026	WEBINAR: Lobbyists Law Training	0	6
1/28/2026	WEBINAR: General Ethics Training	0	18
3/4/2026	WEBINAR: General Ethics Training		
5/7/2026	WEBINAR: General Ethics Training		
7/23/2026	WEBINAR: Ethics for State Board & Commission members		
8/26/2026	WEBINAR: General Ethics Training		
9/24/2026	WEBINAR: Ethics for State Board & Commission members		
10/28/2026	WEBINAR: General Ethics Training		
11/20/2026	WEBINAR: Ethics for State Board & Commission members		
<b>TOTAL</b>	<b>9 Presentations</b>	<b>0 participants</b>	<b>24 participants</b>

2026	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec	Year to date
<b>Training statistics</b>													
# of In-Person Trainings	0												0
# of People Trained In Person	0												0
# of On-Line Trainings (Self-Directed)	910												910
# of Lobbyists Law Trainings	95												95
# of Training Webinars	2												2
# of Participants in Training Webinars	24												24
<b>New assignments</b>													
<b>Attorney of the Day</b>	79												79
Advisory Opinion	0												0
Anti-Fraud	9												9
Complaint	26												26
Gifts/Invitations/Travel	26												26
Guidance	0												0
Judicial Selection Comm'n	1												1
Nepotism	1												1
Training Request	0												0
Record Request	1												1
Project/Other	7												7
<b>Total</b>	150	0	0	0	0	0	0	0	0	0	0	0	150
<b>Closed Assignments</b>													
<b>Attorney of the Day</b>	71												71
Advisory Opinion	1												1
Anti-Fraud	12												12
Complaint	30												30
Gifts/Invitations/Travel	23												23
Guidance	0												0
Judicial Selection Comm'n	1												1
Nepotism	1												1
Training Request	2												2
Record Request	1												1
Project/Other	8												8
<b>Total</b>	150	0	0	0	0	0	0	0	0	0	0	0	150



**HAWAI'I 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

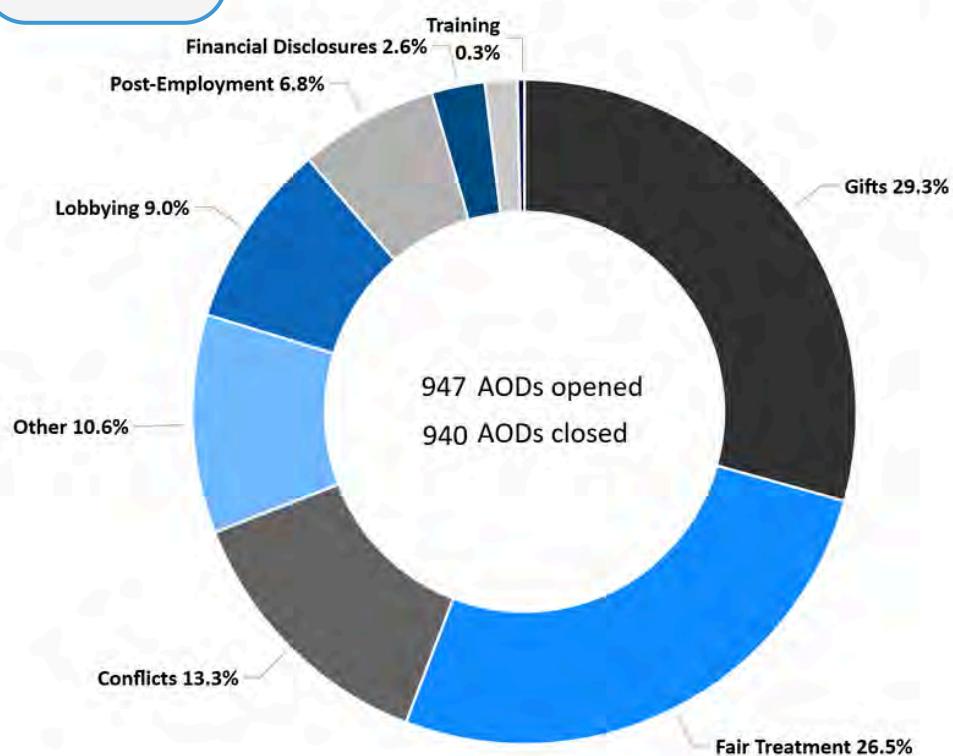
The Commission also oversees the State Lobbyist Law, Haw. Rev. Stat. Ch. 97, which applies to lobbying activities at the state level. Lobbyists must register with the Commission and report lobbying expenditures and contributions. Effective in 2025, lobbyists must also disclose which specific bills or 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



\* “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

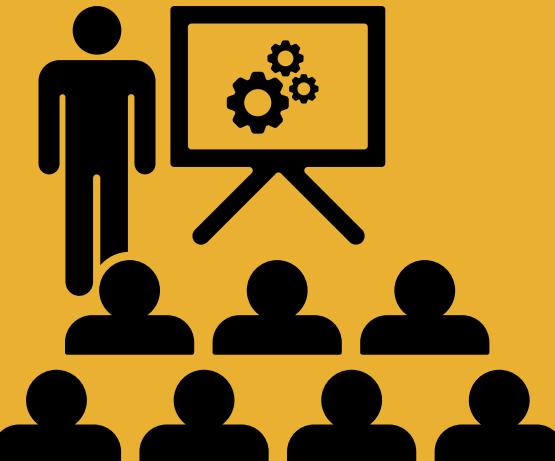
A mandatory training law took effect in March 2023, requiring each state employee to complete an ethics training within 90 days of employment and at least once every four years thereafter. In 2025, the Commission delivered ethics education and training to more than 16,000 state officials and lobbyists 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.

 Employees

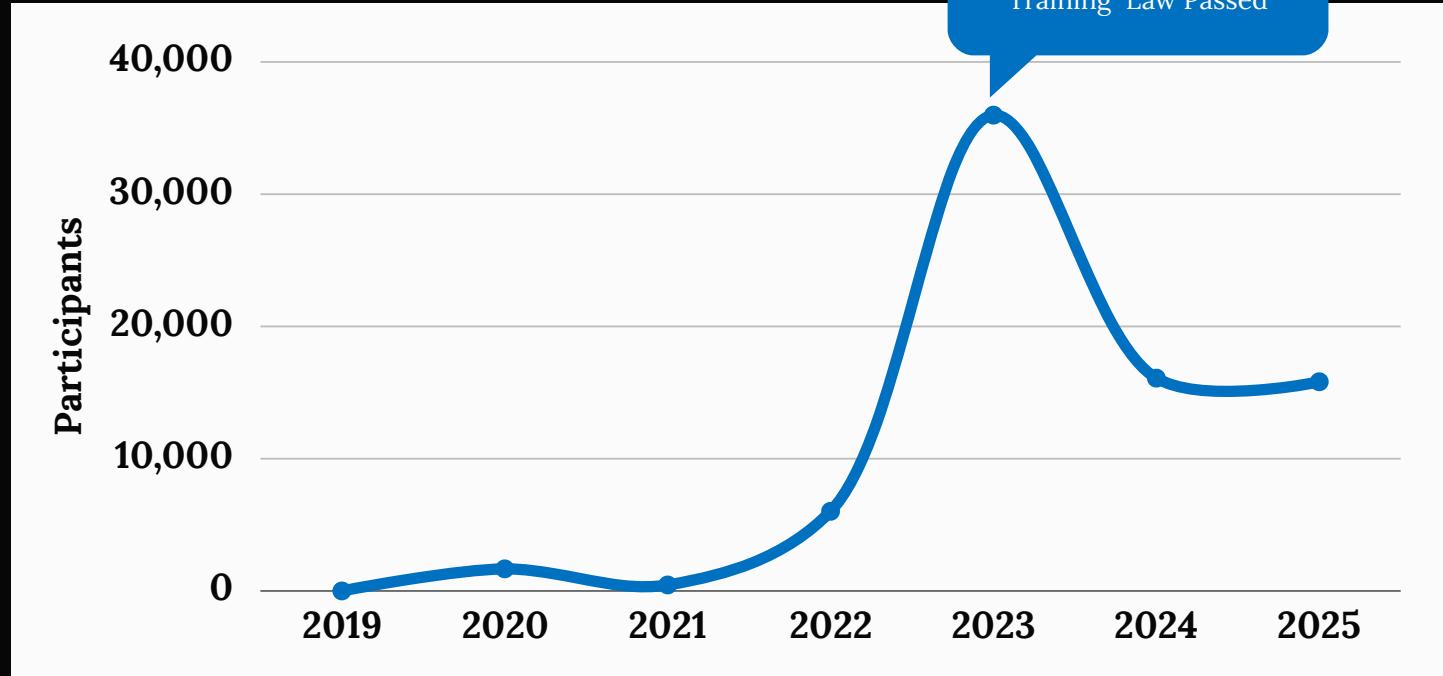
**93%**

 Boards

**97%**



Mandatory Ethics  
Training Law Passed



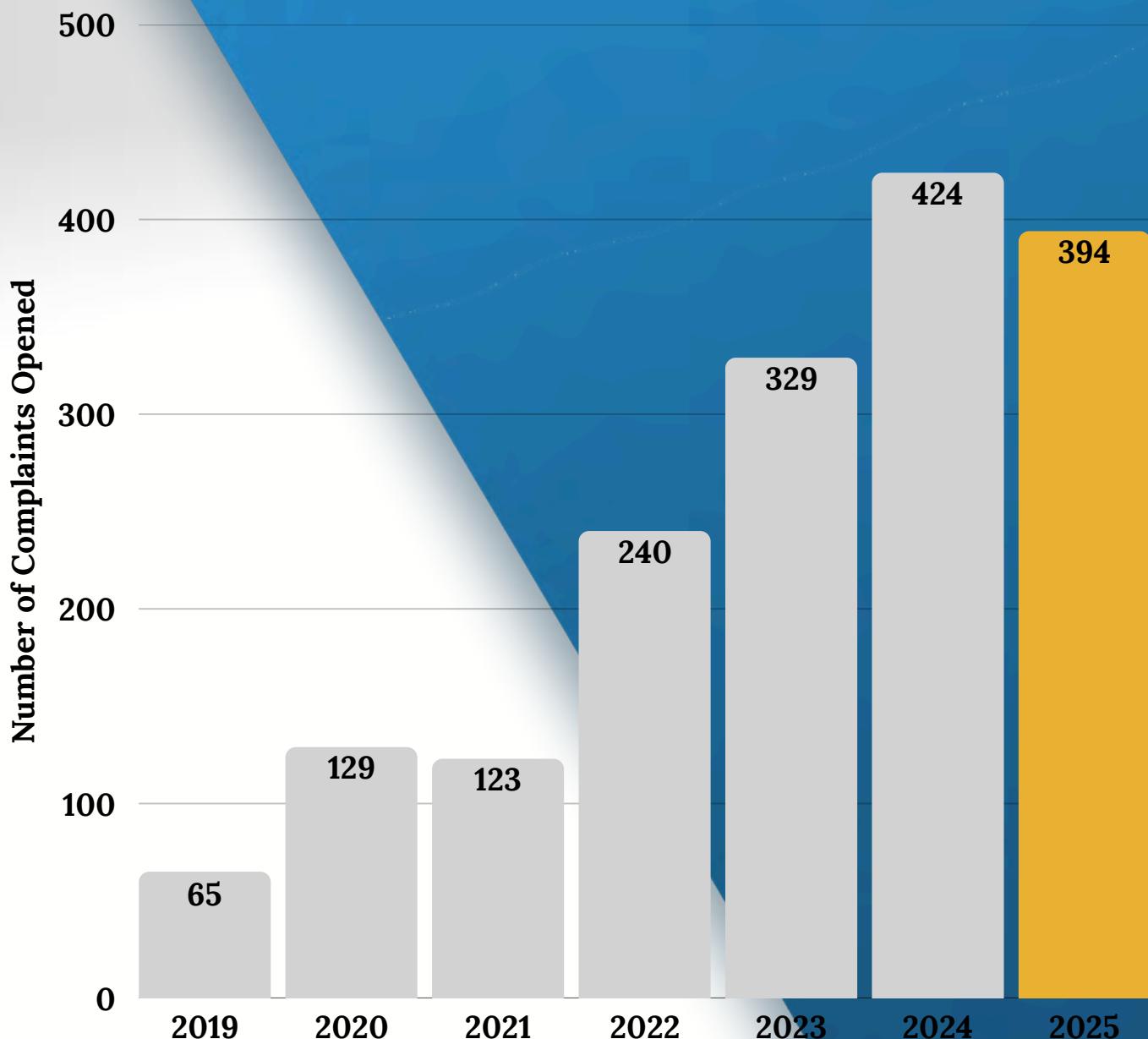
\*Act 165 (2023) requires all state employees to take ethics training every 4 years

# 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%

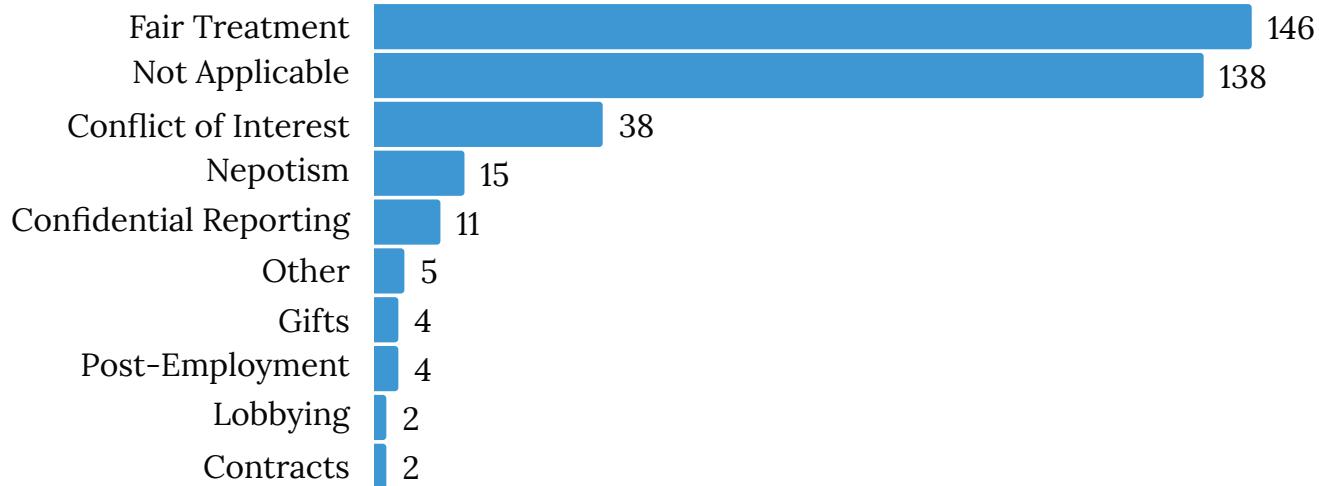
Nepotism

4%

Gifts

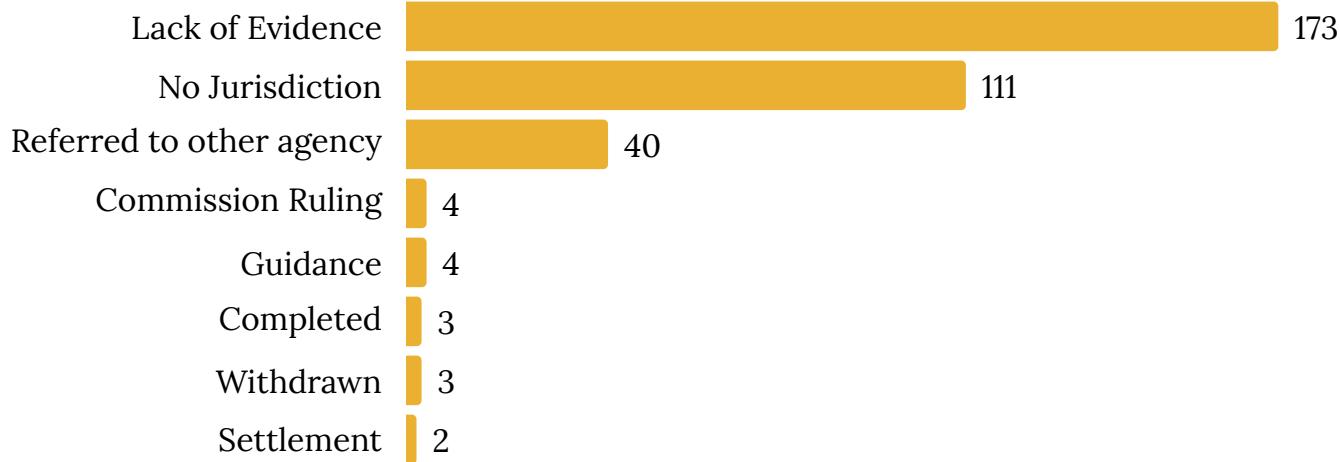
1%

## 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](http://antifraud.hawaii.gov)), a dedicated phone hotline (808.587.0000), and a dedicated email address ([antifraud@hawaii.gov](mailto: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

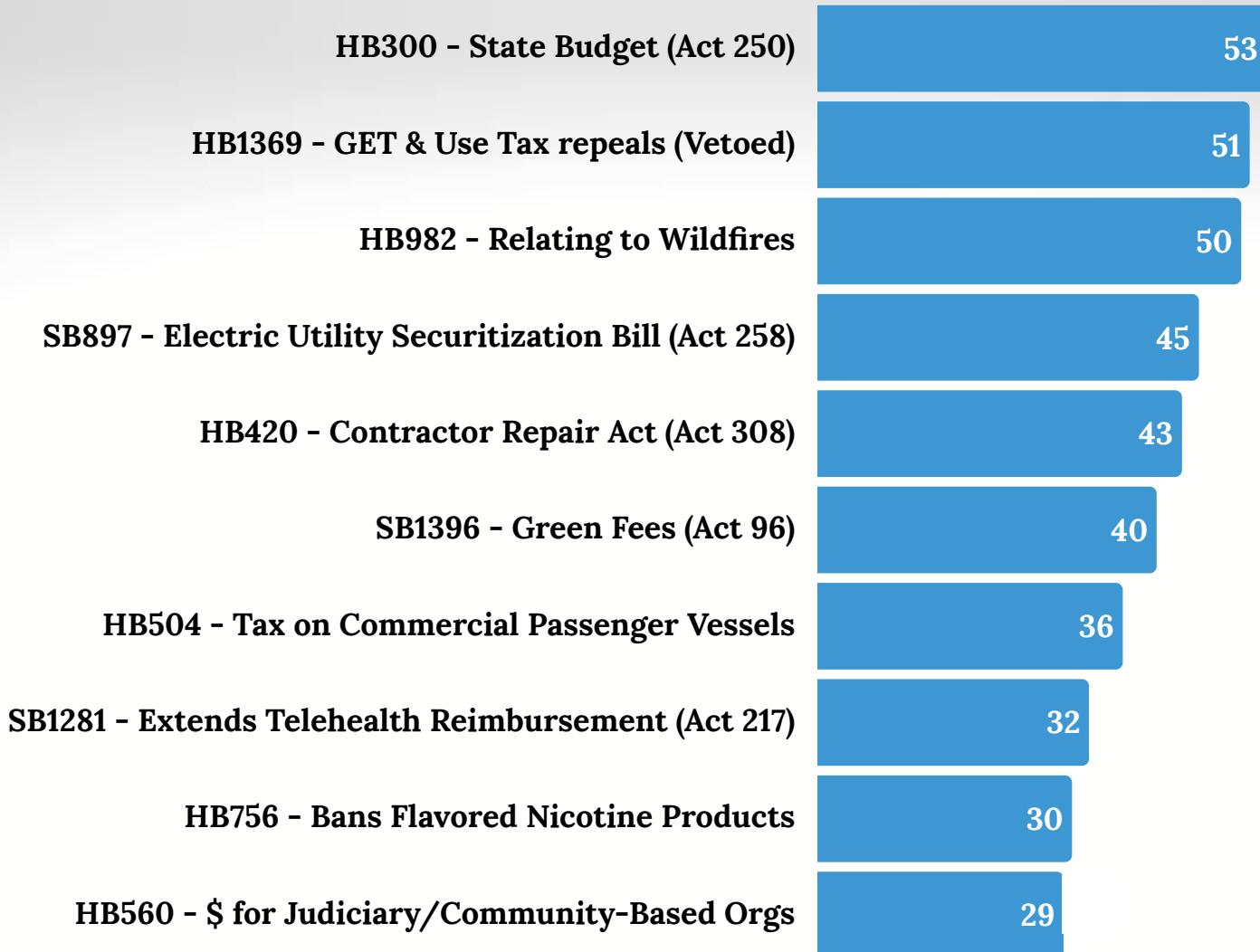
**470**

Lobbying Organizations

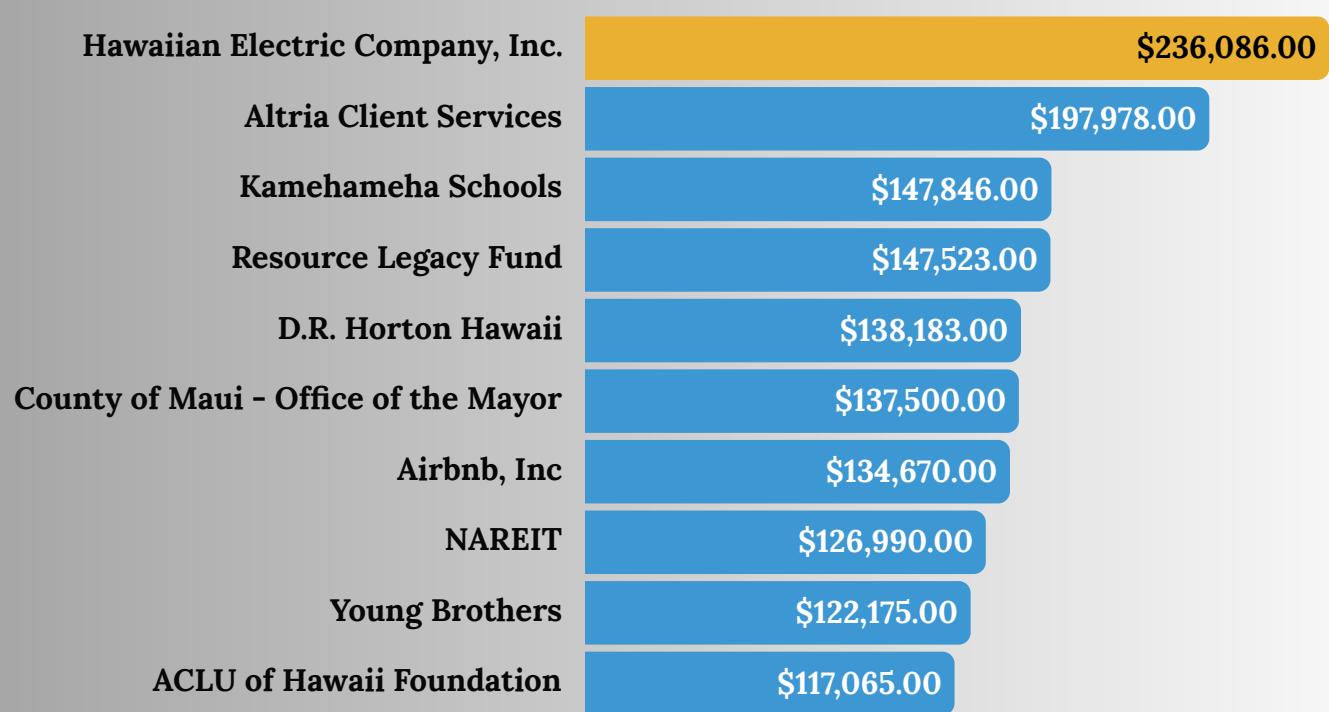
**\$10,246,356**

Total Lobbyist Compensation

## Top 10 Bills Lobbied On



# TOP SPENDING ORGANIZATIONS



# TOP PAID LOBBYIST



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

# COMMISSIONERS & Staff

The Commission comprises five members nominated by the State Judicial Council and appointed by the Governor for four-year terms. The Commission's current members are Wesley Fong (Chair) (till June 30, 2026), Robert Hong (till June 30, 2026), Cynthia Thielen (till June 30, 2027), Roderick Becker (till June 30, 2028), and Moya Gray (till June 30, 2029).

As of December 2025, 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 Melissa Vomvoris.



**Wesley F. Fong**

Chair



**Robert Hong**

Vice Chair



**Cynthia Thielen**



**Roderick Becker**



**Moya Gray**

SUNSHINE LAW MEETING  
AGENDA ITEM IV

DISCUSSION OF MEDIA REPORTS CONCERNING ETHICS OR THE ETHICS COMMISSION  
SINCE THE LAST MEETING

*Description:* The Commission will discuss recent media coverage related to ethics in government or the Hawai'i State Ethics Commission. The discussion may include consideration of potential responses, clarification of public information, or other appropriate actions.

No Attachments.

SUNSHINE LAW MEETING  
AGENDA ITEM V

2026 LEGISLATIVE MATTERS

- Attachment 5: Testimony in Support of SB 2246
- Attachment 6: Testimony in Support of SB 2248
- Attachment 7: Testimony in Support of SB 2245
- Attachment 8: Testimony in Support of HB 2110
- Attachment 9: Testimony in Support of HB 1885 with a Proposed Amendment
- Attachment 10: Testimony in Support of SB 2970 with a Proposed Amendment
- Attachment 11: Testimony in Support of SB 2661 with a Proposed Amendment
- Attachment 12: Testimony Commenting on SB 2778



## HAWAII STATE ETHICS COMMISSION

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

Committee: Senate Committee on Judiciary  
 Bill Number: SB 2246  
 Hearing Date/Time: February 13, 2026, 9:00 a.m.  
 Re: Testimony in Support of SB 2246

Aloha Chair Rhoads, Vice-Chair Gabbard, and Committee Members:

Thank you for the opportunity to provide testimony in support of SB 2246, which strengthens public trust in government by expanding public financial disclosure requirements to members of boards and commissions that exercise substantial financial authority, as well as to certain executive directors and executive officers whose roles involve significant responsibility over the expenditure, investment, or management of public funds.

Public financial disclosure is a cornerstone of transparent and accountable government. Existing law appropriately requires disclosure for officials who exercise significant regulatory authority, fiduciary responsibility, or oversight of substantial public resources. SB 2246 builds on this framework by ensuring that similarly situated decision-makers -- particularly those serving on boards and commissions with substantial financial authority or in senior executive roles -- are subject to consistent disclosure requirements.

By expanding the scope of individuals covered by disclosure laws, this measure promotes uniform ethical standards, enhances public confidence in governmental decision-making, and helps safeguard against real or perceived conflicts of interest.

For these reasons, the Hawai‘i State Ethics Commission respectfully urges the Committee to pass SB 2246.

Mahalo for the opportunity to testify.

Very truly yours,

/S/ Robert D. Harris  
 Robert D. Harris  
 Executive Director and General Counsel



## HAWA'I STATE ETHICS COMMISSION

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

Committee: Senate Committee on Judiciary  
 Bill Number: SB 2248  
 Hearing Date/Time: February 10, 2026, 9:15 a.m.  
 Re: Testimony in Support of SB 2248

Aloha Chair Rhoads, Vice-Chair Gabbard, and Committee Members:

Thank you for the opportunity to provide testimony in support of SB 2248, which promotes governmental transparency and strengthens public confidence in the State's appointments process by requiring nominees subject to Senate confirmation to file financial disclosure statements **before** their confirmation hearings.

Under current law, many appointed officials are not required to file financial disclosures until **after** their appointment, which can delay disclosure until after confirmation proceedings have concluded. This timing limits the public's ability to review and provide input on perceived conflicts of interest. SB 2248 corrects this gap by requiring nominees to submit disclosures within a short timeframe after nomination or before the first confirmation hearing, thereby enabling meaningful public review and informed legislative consideration.

The measure also advances consistency, clarity, and enforceability in Hawai‘i's financial disclosure framework. By extending disclosure requirements to nominees for Senate-confirmed positions and ensuring more uniform reporting standards, SB 2248 helps establish clearer expectations and more effective oversight of reported financial interests. The bill further provides nominees with clear standards for compliance, along with guidance and support in completing required financial disclosures, helping reduce confusion and promote accurate reporting. At the same time, the measure strengthens enforcement mechanisms in cases of omission or noncompliance, ensuring that disclosure requirements are meaningful and consistently applied. By aligning disclosure timing and content across related processes, SB 2248 may also reduce unnecessary duplication and streamline administration for both filers and oversight agencies.

In addition, the bill makes important technical amendments to Hawai‘i's disclosure laws and helps ensure transparency about legislative income from lobbyists and lobbying organizations, thereby supporting the integrity of the legislative process and public confidence in governmental decision-making.

Financial disclosure requirements are a cornerstone of ethical governance. They help identify potential conflicts of interest, promote accountability, and reinforce public trust in government. Requiring disclosures prior to confirmation ensures that transparency meaningfully informs the confirmation process rather than occurring only after the fact.

For these reasons, the Hawai'i State Ethics Commission respectfully urges the Committee to **pass SB 2248**.

Thank you for the opportunity to testify.

Very truly yours,

**/S/** Robert D. Harris  
Robert D. Harris  
Executive Director and General Counsel



# HAWAII STATE ETHICS COMMISSION

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

Committee: Senate Committee on Labor and Technology  
 Bill Number: SB 2245  
 Hearing Date/Time: January 30, 2026, 3:00 p.m.  
 Re: Testimony in Support of SB 2245

Aloha Chair Elefante, Vice-Chair Lamosao, and Committee Members:

Thank you for the opportunity to provide testimony in strong support of **SB 2245**, which strengthens public trust in our government by establishing meaningful restrictions on new state employees from taking official action on matters they previously worked on prior to state employment and by extending post-employment lobbying restrictions to employees in the offices of the Governor and Lieutenant Governor.

### **Reasoning and Policy Rationale**

SB 2245 addresses a well-recognized ethics risk that arises at the point of entry into government service: that a newly hired public employee may take official action on matters directly connected to the employee's prior private-sector work. Without reasonable pre-employment restrictions, even well-intentioned public servants may be placed in positions where their impartiality could reasonably be questioned, undermining public confidence in government decision-making.

Pre-employment restrictions are not novel. At the federal level, conflict-of-interest law prohibits newly appointed federal employees from participating in particular matters in which they were previously involved outside of government. Federal regulations implementing 18 U.S.C. § 208 expressly require recusal where an employee's prior employer or client has a financial interest in a matter, and agencies routinely impose screening and disqualification requirements on incoming employees to ensure compliance. See e.g., 5 C.F.R. §§ 2635.502–2635.503, which require employees to refrain from participating in matters involving former employers or clients where a reasonable person would question the employee's impartiality.

Similarly, the federal Office of Government Ethics recognizes that “cooling-off” or screening requirements at the beginning of public service are essential to maintaining the integrity of governmental processes, particularly where an employee previously represented, advised, or worked on the same matters now before the government.

At the municipal level, several major jurisdictions have adopted explicit pre-employment or “switching-sides” restrictions. For example:

- **Chicago** prohibits a city employee from participating in any governmental matter involving a former employer or client for a specified period following entry into city service. See Chicago Municipal Code § 2-156-111(d) (requiring recusal from matters involving a former employer or client).
- **Denver** similarly restricts new city employees from taking official action on matters in which they were personally and substantially involved prior to public employment. See Denver Revised Municipal Code § 2-61.

These provisions reflect a shared policy judgment: government service should not place an individual in a position to immediately influence the same matters they previously handled from the private side. Such restrictions protect against the appearance that government decisions are being shaped by prior allegiances rather than the public interest.

SB2245 adopts this common-sense approach by establishing focused pre-employment restrictions that prevent new state employees from taking official action on matters they previously worked on. The bill does not bar individuals from entering public service, nor does it impose broad or permanent disqualifications. Instead, it provides narrowly tailored safeguards that allow agencies to benefit from private-sector expertise while preserving public trust in the integrity and impartiality of state decision-making.

Mahalo for the opportunity to testify on this bill.

Very truly yours,

/S/ Robert D. Harris  
Robert D. Harris  
Executive Director and General Counsel



# **HAWAII STATE ETHICS COMMISSION**

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

Committee: House Committee on Legislative Management  
Bill Number: HB 2110  
Hearing Date/Time: February 9, 2026, 2:00 p.m.  
Regarding: Testimony in Support of HB 2110

Aloha Chair Holt, Vice-Chair Ichiyama, and Committee Members:

Thank you for the opportunity to provide testimony in support of HB 2110, which strengthens public trust in government by establishing a uniform nepotism standard across all branches of state government while preserving limited, transparent flexibility for rare and justifiable circumstances.

This measure promotes fairness and consistency by applying nepotism restrictions to the Legislature and Judiciary—entities already subject to the State Ethics Code. A consistent statewide standard helps ensure that employment decisions are based on merit rather than personal relationships and reinforces public confidence in government processes.

The bill also appropriately includes a narrowly tailored good-cause exception for situations involving a demonstrated lack of qualified applicants. This provision allows agencies to meet legitimate operational needs without undermining the underlying ethical safeguards, while ensuring that any exception is publicly accountable.

The Commission believes HB 2110 strikes an appropriate balance between ethical protections and practical governance and respectfully supports its passage.

Mahalo for the opportunity to provide testimony and for your consideration of this measure.

Very truly yours,

**/S/** Robert D. Harris  
Robert D. Harris  
Executive Director and General Counsel



# HAWAII STATE ETHICS COMMISSION

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

Committee: House Committee on Judiciary & Hawaiian Affairs  
 Bill Number: HB 1885  
 Hearing Date/Time: February 3, 2026, 2:00 p.m.  
 Re: Testimony in Support of HB 1885 ***with a Proposed Amendment***

Aloha Chair Tarnas, Vice-Chair Poepoe, and Committee Members:

Thank you for the opportunity to provide testimony in support of **HB 1885**, which strengthens public trust by prohibiting state agencies from entering into contracts with businesses owned or controlled by relatives or household members of department directors or deputy directors. This measure appropriately reduces the risk and appearance of favoritism in state contracting.

Because Hawai'i's Ethics Code is grounded in **individual responsibility**, it may be worthwhile to clarify that **each state employee involved in the contracting process—including contracting officers, evaluators, and approving officials—has an independent obligation to comply with this prohibition**. Ethics compliance does not rest solely at the agency level; it depends on the judgment and conduct of the individuals who take official action in procurement decisions. An express acknowledgment of individual responsibility would promote consistent, practical enforcement of this restriction and complement the bill's agency-level safeguard.

## PROPOSED AMENDMENT:

(c) Each state employee who takes official action on a contract subject to this section shall comply with this section and take reasonable steps to ensure that the contract does not violate this prohibition.

Mahalo for the opportunity to testify on this bill.

Very truly yours,

/S/ Robert D. Harris  
 Robert D. Harris  
 Executive Director and General Counsel



# HAWAII STATE ETHICS COMMISSION

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

Committee: Senate Committee on Government Operations  
 Bill Number: SB 2970  
 Hearing Date/Time: February 5, 2026, 3:01 p.m.  
 Re: Testimony in Support of SB 2970 ***with a Proposed Amendment***

Aloha Chair McKelvey, Vice-Chair Gabbard, and Committee Members:

Thank you for the opportunity to provide testimony in support of **SB 2970**, which strengthens public trust by prohibiting state agencies from entering into contracts with businesses owned or controlled by relatives or household members of department directors or deputy directors. This measure appropriately reduces the risk and appearance of favoritism in state contracting.

Because Hawai'i's Ethics Code is grounded in individual responsibility, it may be worthwhile to clarify that **directors and deputy directors—whose relationships give rise to the potential conflict addressed by this bill—have a personal obligation to ensure compliance with this prohibition**. While the restriction applies appropriately at the agency level, ethics compliance ultimately depends on the conduct of individuals with senior authority over contracting decisions. An express assignment of responsibility to directors and deputy directors, consistent with the Commission's existing approach to post-employment restrictions, would promote clear accountability and support consistent, practical enforcement of this measure.

Further, to the extent Haw. Rev. Stat. Chapter 84, the State Code of Ethics, already has a contract section (Haw. Rev. Stat. § 84-15); it may make sense to simply amend that statute and include this bill's new language after the existing subsection (b). This keeps similar concepts together.

## PROPOSED AMENDMENT:

(c) The director or acting director of a principal state department, and any deputy director of the department, shall be responsible for ensuring that all contracts entered into by the department comply with this section.

(d) Any violation of this section shall be assessed against the director, acting director, or deputy director of the department at the time the violation occurred.

Mahalo for the opportunity to testify on this bill.

Very truly yours,

/S/ Robert D. Harris  
Robert D. Harris  
Executive Director and General Counsel



# HAWAII STATE ETHICS COMMISSION

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

Committee:

Senate Committee on Judiciary

Bill Number:

SB 2661

Hearing Date/Time:

February 13, 2026, 9:00 a.m.

Regarding:

Testimony in Support with a **Proposed Amendment**

Aloha Chair Rhoads, Vice-Chair Gabbard, and Committee Members:

Thank you for the opportunity to provide testimony in support of SB 2661, which strengthens public trust in government by establishing a uniform nepotism standard across all branches of state government while preserving limited, transparent flexibility for rare and justifiable circumstances.

This measure promotes fairness and consistency by applying nepotism restrictions to the Legislature and Judiciary—entities already generally subject to the State Ethics Code. A consistent statewide standard helps ensure that employment decisions are based on merit rather than personal relationships and reinforces public confidence in government processes. The bill also appropriately includes a narrowly tailored good-cause exception for situations involving a demonstrated lack of qualified applicants. This provision allows agencies to meet legitimate operational needs without undermining the underlying ethical safeguards, while ensuring that any exception is subject to public accountability.

**Proposed Amendment.** The Commission notes, however, that for this bill to achieve its intended goal, it would need to address both state employees and “legislators.” The exact language can be found in and copied from SB 2244.

Mahalo for the opportunity to provide testimony and for your consideration of this measure.

Very truly yours,

/S/ Robert D. Harris

Robert D. Harris

Executive Director and General Counsel



## HAWA'I STATE ETHICS COMMISSION

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

Committee: Senate Committee on Judiciary  
 Bill Number: SB 2778  
 Hearing Date/Time: February 11, 2026, 3:00 p.m.  
 Re: Testimony Commenting on SB 2778

Aloha Chair Elefante, Vice-Chair Lamosao, and Committee Members:

Thank you for the opportunity to comment on SB 2778. The Hawai'i State Ethics Commission ("Commission") has not yet had an opportunity to review this measure in a public meeting but will do so at its next regularly scheduled meeting.

Based on an initial staff review, several implementation and policy concerns warrant the Legislature's careful consideration. The bill appears to establish a complex statutory framework to address an issue that may affect a relatively small number of individuals. In addition, certain proposed definitions do not clearly align with Hawai'i Revised Statutes chapter 84 or with the Commission's longstanding interpretations of the State Ethics Code, which could create uncertainty in administration and enforcement.

Successful implementation would also require sufficient time, resources, and funding. For officials who would immediately become subject to the new requirements, the current timeline may not provide adequate opportunity to understand and comply with the law, potentially resulting in confusion and administrative disruption. The measure may also benefit from closer integration with existing conflict-of-interest provisions and financial disclosure requirements under chapter 84.

The Legislature may wish to consider whether alternative or complementary policy approaches could address the underlying concerns in a more integrated and administrable manner. For example, broader refinement of existing conflict-of-interest provisions applicable to public officials, enhanced transparency within the current financial disclosure framework, or periodic, confidential compliance audits may provide more consistent and effective oversight while remaining closely aligned with the structure of chapter 84. Blind trusts can serve an important role – particularly for public officials or employees with active investment portfolios – but they are not a universal solution. Careful consideration of the underlying concern, together with a range of potential policy tools, may help ensure that any reform advances transparency and public trust without creating unnecessary complexity or implementation challenges.

If the bill moves forward, the Legislature may wish to consider the practical costs of implementation, including the likelihood that additional Commission staffing and administrative resources would be required, as well as the potential impact on the willingness of qualified individuals to serve in public positions.

The Commission looks forward to further reviewing this measure and continuing to work with the Legislature to ensure that any changes to Hawai'i's ethics framework remain clear, workable, and effective in promoting public trust.

Mahalo for the opportunity to testify.

Very truly yours,

**/S/** Robert D. Harris  
Robert D. Harris  
Executive Director and General Counsel