

Philadelphia Board of Ethics
Meeting Minutes
June 24, 2020 – 2:00 p. m.
One Parkway Building
1515 Arch Street, 18th Floor

Board Present (via video)

Michael H. Reed, Esq., Chair
Judge Phyllis Beck (Ret.), Vice-Chair
Sanjuanita González, Esq.
Brian McCormick, Esq.
JoAnne Epps, Esq.

Staff Present (via video)

J. Shane Creamer, Jr., Esq.
Michael Cooke, Esq.
Jordana Greenwald, Esq.
Thomas Klemm, Esq.
Dani Gardner Wright, Esq.
Bryan McHale
Hortencia Vasquez
Eileen Donnelly

Due to the COVID-19 pandemic and related City of Philadelphia governmental shutdown, the meeting was conducted electronically via the video-conferencing operating system Zoom.

Vice-Chair Beck convened the Public Session Meeting at approximately 2:10 p.m. At this time, she announced the presence of a quorum.

I. Meeting Minutes

By a 4-0 vote, the Board approved the minutes of the Public Session Meeting held on May 20, 2020, as presented. Chair Reed was not present and did not vote on this matter.

II. Executive Director's Report

Mr. Creamer presented to the Board his Executive Director's Report, a copy of which is attached as Attachment A.

During this discussion, Chair Reed joined the meeting at Approximately 2:15.

III. General Counsel's Report

Mr. Cooke presented to the Board his General Counsel's Report, a copy of which is attached as Attachment B.¹

In addition to his Report, Mr. Cooke informed the Board that on June 23, 2020 he issued General Counsel Opinion 2020-505 to City Councilmember Alan Domb regarding the application of the City's Conflicts of Interest Restriction to his proposed official action regarding legislation affecting City parking taxes and City fire suppression system workers. Mr. Cooke informed the Board that in the next few days a copy of the Opinion would be distributed to the Board's Advisory Opinion email list, announced on Twitter and posted on the Board's website.

Mr. Cooke also informed the Board that the recent ballot measure, whereby Philadelphians voted to amend the Home Rule Charter's restrictions on political activity by City appointed officers & employees, had passed, and because the City Commissioners had officially certified the results on June 22, 2020, it was now effective. Mr. Cooke further informed the Board that Board Staff had taken and was planning to take multiple actions to inform and educate the public regarding the amended rules.

IV. Proposed Amendments to Regulation 8

Ms. Greenwald presented to the Board draft proposed amendments to Regulation 8. After Ms. Greenwald discussed the more significant aspects of the proposed amendments, Board members discussed and agreed to various revisions and modifications to the draft.

After discussion, Chair Reed asked the Board to consider a motion authorizing Board Staff to proceed with the regulatory process and cause the current draft of the Amendments to Regulation 8 to be filed with the City's Records Department subject to the modifications discussed and agreed upon by the Board during the meeting. Board Member Beck made such a motion which was seconded by Board Member Epps. The Board then voted 5-0 to approve the motion.

Chair Reed further asked the Board to consider a motion scheduling a public hearing regarding the proposed Amendments to Regulation 8 to be held on July 15, 2020 at 1:00 p.m. Board Member McCormick made such a motion which was seconded by Board Member González. The Board then voted 5-0 to approve the motion.

V. New Business

No new business was presented.

¹ After the June 2020 Public Session Board Meeting, General Council Staff corrected non-substantive typos in the report.

VI. Questions/Comments

Adam Bonin stated that he found the Questions of Note in the General Counsel's monthly report to be very useful. He inquired whether they could be incorporated onto the Board's website in a more convenient and user-friendly manner. Mr. Cooke informed Mr. Bonin that Staff was currently working on such a project. Mr. Bonin also informed the Board that portions of the Board's website (regarding campaign finance limits) were no longer accurate due to recent monetary adjustments. He also thanked the Board for the presentation today regarding the proposed amendments to Regulation 8.

Deputy Chief Integrity Officer Krystle Baker informed the Board that she included the recent Advisory Alert regarding the amendments to the City Charter in the City Employees' newsletter. She also stated that she enjoyed the presentation regarding the proposed amendments to Regulation 8 and asked if the presentation will be made available to share with the public. Regarding the latter issue, Mr. Cooke said that Staff would work to post a version of the presentation on the Board's website.

City Council's Chief Executive Officer Mary McDaniel informed the Board that she was planning to discuss some financial disclosure issues with Mr. McHale in the following weeks. She also seconded Ms. Baker's request to share with the public the presentation regarding Regulation 8.

Chair Reed, pursuant to Sections 708 and 716 of the Pennsylvania Sunshine Act, announced that the Board would meet after the Public Meeting to address non-public advice, confidential enforcement matters, and personnel matters. In addition, Chair Reed announced that the Board conferred via email on June 17 and June 18 regarding the scheduling of today's meeting sessions.

The Public Session Meeting of the Board was adjourned at approximately 3:35 p.m.

Attachment A

**Philadelphia Board of Ethics
Executive Director's Report
June 24, 2020**

A. FY21 Budget Update

On June 17, 2020, City Council voted the Mayor's revised FY21 Operating and Capital Budgets out of Committee. This is the penultimate step before the final vote before City Council's Committee of the Whole.

Our revised FY21 budget, as voted out of Committee on June 17th, totals \$975,196 and includes \$915,196 in class 100 (personnel), \$52,500 (professional services) and \$7,500 (supplies). The Board's revised budget for FY21 is \$126,434 less than its originally proposed budget for FY21. The revised FY21 budget was submitted to City Council by Mayor Kenney on May 1, 2020 in response to the significant impact of COVID-19 on the City's spending and revenue.

B. Staff Attorney Position Update

On June 9, 2020 we posted an updated job posting through the City's SmartRecruiter website for a staff attorney position. This position is more focused towards enforcement matters, compared to the last staff attorney position we posted, because both enforcement staff attorneys have left the Board this year. We have currently received over 50 resumes for the position which we are in the process of reviewing.

C. Financial Disclosure Update

The new Financial Disclosure Filing System officially opened to filers on June 1, 2020. I'd like to thank OIT for all the hard work they have performed over the past two years designing and building this new system along with our Campaign Finance system. As of last week, there had been over 1200 filings submitted so far this season. Only 17 were filed on paper. While there have been some new launch bugs to work out, we have not had to deal with the serious technical collapses of the old application.

We communicated with City employees, officials, and Board and Commission members who we have identified as needing to file Financial Disclosure forms through email and Twitter.

Reminders have also circulated in the weekly Employee Newsletter. We continue to work with the Chief Integrity Officer, HR, and the Financial Disclosure Department Admins on reminding employees of their need to file through the end of the filing season, which is now July 15, 2020.

We have also conducted six trainings with Financial Disclosure department administrators on how to use the filer administration and reporting end of the filing application. The department administrators have the system permissions to manage the accounts in their departments and to oversee filing compliance by their employees compliance of their employees.

Attachment B



**CITY OF PHILADELPHIA
BOARD OF ETHICS**

APRIL GENERAL COUNSEL REPORT

TO: Board Members
FROM: Michael J. Cooke, General Counsel
DATE: June 19, 2020

I. Advisory Opinions

On June 5, 2020, I issued General Counsel Opinion 2020-503. The Opinion responded to an employee of the Water Department who asked about the application of City and State post-employment rules to her anticipated work after leaving City service. I advised that, under City law, for two years after leaving City service, the former City employee could not become financially interested in any official action she took while working for the City and at no time after leaving City service could she assist another person, with or without compensation, in any transaction involving the City in which she had participated. Regarding State law, I advised that for one year after leaving City service, the former City employee could not represent a client for pay in any matters involving, at a minimum, the Philadelphia Water Department. I further advised that, based on guidance from the State Ethics Commission, the prohibition could extend to other departments and recommended that the requestor seek guidance from the Law Department or State Ethics Commission.

On June 16, 2020, I issued non-public General Counsel Opinion 2020-504. The Opinion responded to an inquiry from a member of a City board who wanted to know how City and State conflict of interest rules would limit their activity. I advised that both City and State law would prohibit them from taking official action that would affect either their personal financial interest or the financial interest of their employer. A conflict of interest would not arise, however, unless they were actually able to take such official action.

Copies of both Opinions follow my report. The Opinions have been posted on the Board's website, distributed to our Advisory Opinion email list, and announced on Twitter.

II. Training

- On May 28th, Dani and I presented ethics training to Police Commissioner Danielle Outlaw and Chief Strategy Officer Blake Norton via Zoom.
- On June 2nd, Tom and Dani presented general ethics to six airport employees during their New Employee Orientation via Microsoft Teams.
- On June 23rd, Jordana and I will lead the first of several information sessions on the political activity changes in the Home Rule Charter via Zoom. Once the June 2nd election is certified, the political activity information sessions will be held bi-monthly throughout the summer months.
- On June 30th, Tom and Dani will provide general ethics training to City employees via Zoom.

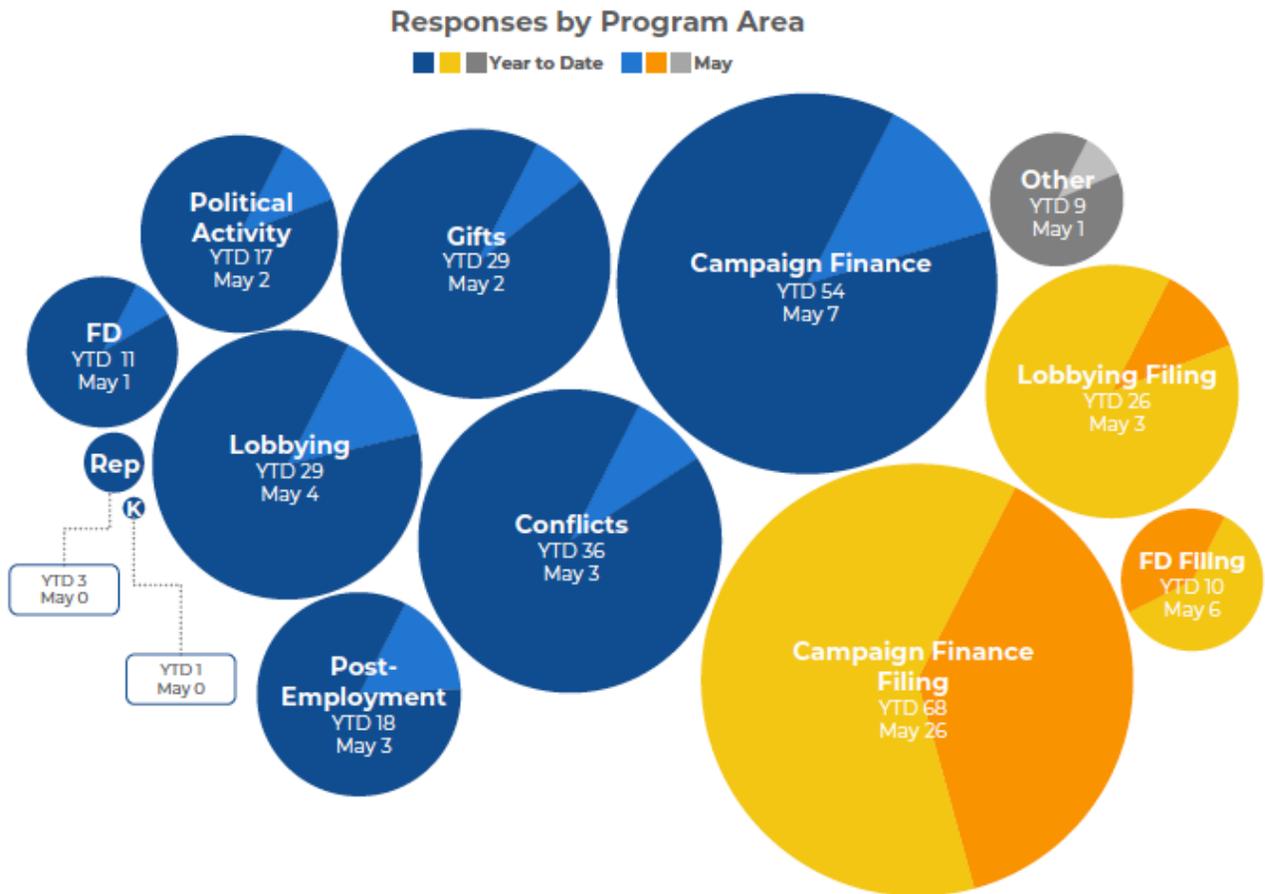
III. Amendment to Charter’s Political Activity Restrictions

Based on unofficial returns, the proposed amendment to the Charter’s political activity restrictions was approved by the voters with approximately 63% voting yes and 36% voting no. The change will become effective upon certification of the election by the City Commissioners, probably sometime in late June or early July. The most notable result of this change is that City officers and employees, except for those who work for the Board of Ethics, City Commissioners, District Attorney’s Office, Police Department, or Sheriff, will be permitted to volunteer in support of candidates for federal, statewide, and non-local offices. In addition, the maximum penalty for violations of the restrictions has been increased from \$300 to \$2,000.

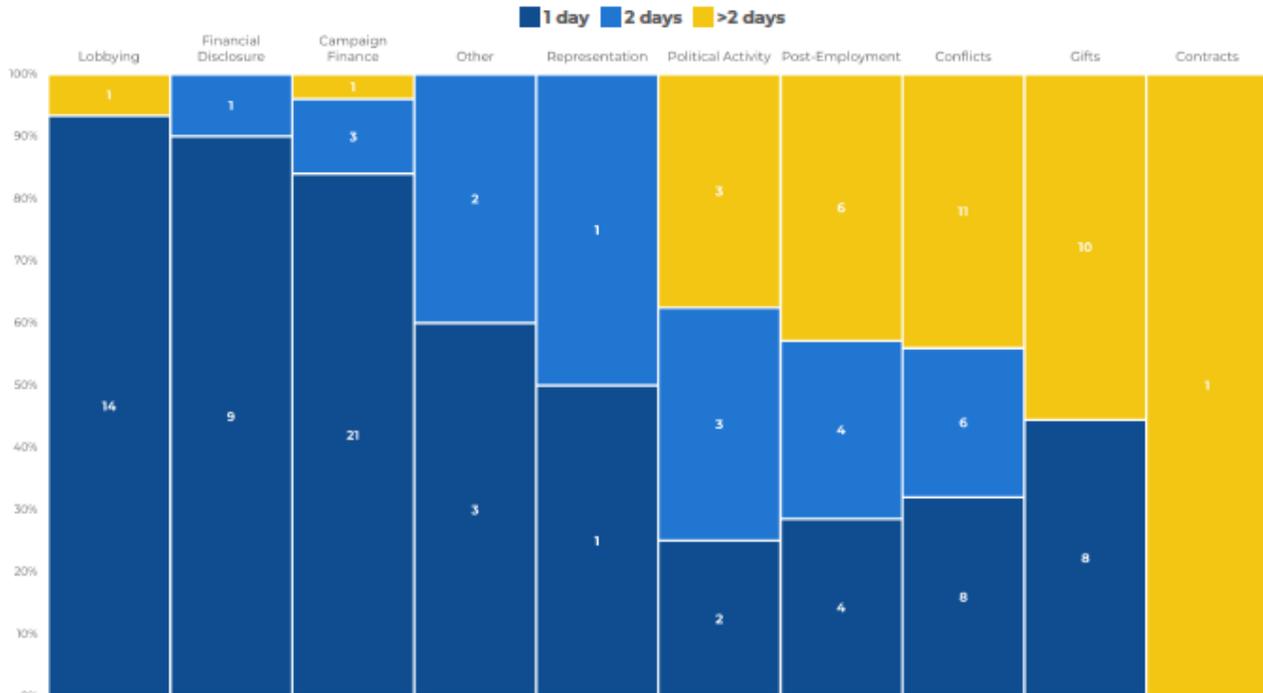
Via our website and Twitter, we have issued an alert regarding the change (a copy of which follows my report) and are working with the Chief Integrity Office to spread the word. We are also beginning to offer information sessions via Zoom in order to introduce the changes to anyone who may be interested, especially City employees.

Lastly, as we will discuss later in the meeting, Staff will propose an amendment to Board Regulation No. 8 in order to conform it to the changed law. We will update and revise our educational documents and training offerings as that regulatory process moves along.

IV. Informal Guidance for May 2020



YTD Request Response Time by Program Area



Questions of Note for May 2020:

Can the candidate committee of a former candidate that is carrying debt incurred to influence the outcome of a covered election accept contributions in excess of contribution limits and transfer them to a SPEC account (i.e., a segregated pre/post-candidacy excess contribution account)?

No. A SPEC account would be a checking account connected to the same candidate committee, as opposed to a separate committee. The law explicitly prohibits acceptance of excess contributions by a former candidate committee that is carrying debt incurred to influence an election, regardless of what the committee does with the money afterwards.

Are efforts to influence the actions of either the City’s Water Rate Board or the Water Department’s process of setting and establishing water rates that affect broad classes of individuals and users “lobbying” under the City’s Lobbying Law?

Yes. This process is an attempt to influence administrative action of City agencies under the City Lobbying Law. It is not representation of a particular client on a specific case or claim. As such, this activity is subject to the registration and reporting thresholds of the Lobbying Law.

Does being an officer of a political action committee preclude someone from serving as a member of a City board?

Yes, as per Home Rule Charter Section 10-107(4).

Can a City official initiate a GoFundMe account to support a local non-profit without violating the City’s gifts and conflicts of interest rules?

Yes, as long as the Councilmember, their staff, and family members of either: (a) are not members of the non-profit; and (b) do not receive any financial benefit from doing so.



CITY OF PHILADELPHIA

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Philadelphia Board of Ethics General Counsel Opinion No. 2020-503

June 5, 2020

Sent via email

Melody Wright
Melody.Wright@phila.gov

Re: Application of Post-Employment Rules to Work with Philadelphia-Based Consulting/Lobbying Firm

Dear Ms. Wright:

You have requested a public advisory opinion regarding the extent to which City and State Ethics rules will apply to you after you separate from City service in June of 2020.

As discussed in more detail below:

- a. For one year after leaving City service, you may not represent a client for pay in any matters involving, at a minimum, the Philadelphia Water Department. This restriction may extend to other departments.
- b. For two years after leaving City service, you may not become financially interested in any official action you took while working for the City.
- c. At no time after leaving City service may you assist another person, with or without compensation, in any transaction involving the City in which you participated while working for the City.
- d. Your ability to apply for certain City grants is limited.

I. Jurisdiction

The Board of Ethics has jurisdiction to administer and enforce all Philadelphia Home Rule Charter and City Code provisions pertaining to ethical matters, including the post-employment rules found in the City's Ethics Code (Philadelphia Code Chapter 20-600). Home Rule Charter Section 4-1100 and Code Chapter 20-600 authorize the Board to render advisory opinions concerning a City officer's or employee's proposed future conduct.

Home Rule Charter Section 4-1100 also gives the Board "concurrent authority" with the Law Department to advise City officials on the application of State law. Our advice on State law, however, does not provide protection from possible enforcement by the State Ethics Commission. For guidance on the State Ethics Act that would provide such protection, I recommend that you contact either the State Ethics Commission or the Law Department.

II. Background

You are an employee of the Philadelphia Water Department, where you serve as the Assistant Deputy Commissioner in Government and Public Affairs. You act as an advisor, advocate, and strategist while representing the Water Department at the municipal, state, and federal level. For example, you helped develop a billing assistance program and worked on legislation that enabled a contract for advanced metering infrastructure. You noted, however, that despite your title and responsibilities, you are technically on the payroll of the Managing Director's Office. You are the Principal and Owner of a consulting and lobbying firm you recently established. Once you leave City employment, you expect your firm will provide the following services:

- a. Business development and engagement for private and public sector entities;
- b. Connecting clients to City employees and government officials;
- c. Lobbying and legislative interpretation;
- d. Organizational restructuring/re-envisioning with an immediate emphasis on the impact of COVID-19; and
- e. Regulatory compliance and community outreach

III. Relevant Law and Discussion

When you leave City employment, you will be subject to post-employment restrictions under the State Ethics Act and the City's Ethics Code.

A. One Year Prohibition - State Ethics Act

Under Section 1103(g) of the State Ethics Act, former public employees are prohibited from being paid to represent someone before their "former governmental body." This restriction applies for one year after leaving City service. Under the State Ethics Act representation includes, but is not limited to, personal appearances, negotiations, lobbying and submitting bid or contract proposals which would be signed by you or contain your name. Importantly, this restriction also extends to participation in phone calls. For example, if you have a construction client who is interested in bidding on a project with the Water Department during this one-year timeframe, you could not represent the client in that transaction.

That said, based on information from the State Ethics Commission, it is not clear if your former governmental body is the Water Department, the Managing Director's Office as a whole, or the Infrastructure and Transportation group within the Managing Director's Office. For guidance on this question, I recommend that you contact either the Law Department or the State Ethics Commission.

B. Two Year Prohibition – City Ethics Code

Philadelphia Code Section 20-607(c) prohibits a City officer or employee from becoming "financially interested" in official action taken "during [their] term of office or employment and until two (2) years have elapsed" since leaving City service. The Code defines official action as "an act or omission taken by an officer or employee in his or her official capacity that requires discretion and is not ministerial in nature." *See* Code § 20-601(17). For example, if you were involved in the RFP process for a vendor who was awarded a contract with the Water Department, you could not, for two years after leaving City service, receive any payment out of that contract. This restriction also extends to your firm, so you cannot have any money flow to your business as a result of official actions you took at the Water Department.

C. Permanent Prohibition – City Code

Philadelphia Code Section 20-603(1) permanently bans a former City officer or employee from assisting “another person, with or without compensation, in any transaction involving the City in which [the officer or employee] at any time participated during their City service or employment.” This rule would prohibit you from providing assistance to clients regarding any transactions with which you were personally involved while working for the City.

As defined in the City Code, a transaction involving the City is “anything that may be subject to City action, involve the City as a party, or involve a direct proprietary interest of the City such as contracts, leases, judgments, and legislation.” *See* Code § 20-601(27). For example, after leaving City service, you could not draft testimony or talking points for a client to present at a hearing on legislation you worked on while you were a City employee.

D. Restrictions on Gifts/Lobbying/Conflicts of Interest

You specifically asked us whether you may apply for grants with the City, such as business or start-up grants. For one year after leaving City service, you cannot apply for grants administered or issued by the Water Department. For two years after leaving City Service, you cannot receive funding from any grants or programs that you helped administer or develop. At no time may you assist someone with a grant application on which you worked on while with the City.

You also inquired about guidelines for lobbying and government relations as a former City employee. All three of the post-employment restrictions described above apply to any lobbying activity that you engage in on behalf of your firm or a client. Specifically, you cannot lobby PWD for one year after leaving City Service. Nor for two years could you be paid for any services, including lobbying, out of a City contract with which you were involved while working for the City. Finally, you cannot *ever* lobby for or against a specific matter in which you participated in while working for the City.

Finally, to the extent that your work with the City and your work with your firm overlap prior to your separation from City service, both City and State conflicts of interest rules will require you to recuse yourself from any official action that would affect your firm. The City Ethics Code will also require you to file a disclosure and disqualification letter in such a situation. You can find a [sample disclosure and disqualification letter](#) on our website. That said, based on the facts you provided, it does not appear that your work at the Water Department is likely to intersect with your firm at present.

IV. Conclusion

Thank you for your concern about compliance with the City's Ethics Code and for seeking advice. Advisory opinions are fact-specific, and this Opinion is predicated on the facts you have provided. Requestors of advisory opinions are entitled to act in reasonable reliance on opinions issued to them and not be subject to penalties under the laws within the Board's jurisdiction, unless they have omitted or misstated material facts in their requests. Code § 20- 606(1)(d)(ii); Board Reg. 4 ¶ 4.12.

Since you requested a public opinion, this Opinion will be made public, including by posting on the Board's website. Please let me know if you have any questions.

BY THE PHILADELPHIA BOARD OF ETHICS

s/Michael Cooke

Michael J. Cooke, Esq.
General Counsel

cc: Michael H. Reed, Esq., Chair
J. Shane Creamer, Esq., Executive Director



CITY OF PHILADELPHIA

BOARD OF ETHICS
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Philadelphia Board of Ethics Non-Public General Counsel Opinion No. 2020-504

June 16, 2020

Re: Conflict of Interest Rules and Membership on City Board

Dear Requestor:

You have requested a non-public advisory opinion regarding the extent to which City and State Ethics rules would restrict your activities as a member of a City board. As discussed in more detail below, City and State law prohibit you from taking official action that would affect your personal financial interest or the financial interest of your employer. A conflict of interest would not arise, however, unless you are actually able to take such official action.

I. Jurisdiction

The Board of Ethics has jurisdiction to administer and enforce all Philadelphia Home Rule Charter and City Code provisions pertaining to ethical matters, including the conflict of interest rules found in the City’s Ethics Code (Philadelphia Code Chapter 20-600). Home Rule Charter Section 4-1100 and Code Chapter 20-600 authorize the Board to render advisory opinions concerning a City officer’s proposed future conduct.

Home Rule Charter Section 4-1100 also gives the Board “concurrent authority” with the Law Department to advise City officials on the application of State law. Our advice on State law, however, does not provide protection from possible enforcement by the State Ethics Commission. Guidance on the State Ethics Act that would provide such protection must come from either the Law Department or the State Ethics Commission.

II. Background

You are a member of a City board that selects nominees for the Mayor to consider. You are also the paid executive director of a local non-profit organization that intends to apply for a contract with the same City entity to which you nominate candidates for selection.

III. Relevant Law and Discussion

As a member of a City board that exercises significant powers of government, you are subject to both City and State ethics rules. *See* Code §§ 20-601(4), (18).

a. City Conflicts of Interest Rule

Philadelphia Code Section 20-607 prohibits you from taking action in an official capacity when either (a) you (or a close family member) have a personal financial interest in that action; or (b) a for-profit business of which you are a member or a fellow member of such business has a financial interest in that action. The Board has advised that a person has a financial interest in matters that have a potential impact on their income, compensation, value of assets, wealth, employment prospects, or business prospects. *See, e.g.*, Board Opinion 2019-002, pg. 3. If such a conflict of interests arises, Code Section 20-608 requires you to submit a letter disclosing the conflict and disqualifying yourself from any official action related to it.

Because your employer is a non-profit organization, a conflict of interest will not arise for you under Code Section 20-607 merely because an action of yours would affect the organization's financial interests. Rather, your action would have to affect your personal financial interest, that is, your compensation by your employer or its ability to employ you. That said, given that you are the executive director of the organization, for the purposes of this Opinion, I will assume that any action by you related to a potential contract for your employer would affect your personal financial interest and would therefore give rise to a conflict.

As such, if any action by you in your capacity as a member of the City board would affect the consideration of your employer's contract application, you would have a conflict and you would need to disclose the conflict in writing and disqualify yourself from any action related to it, as required by Code Section 20-608. In my opinion, however, it is unlikely that such a conflict would actually arise for you. The only action your board takes is to consider and forward to the Mayor potential nominees. Your board has no role in the day to day operations of the entity for which you offer nominees. It is possible that if an individual you vote to nominate is subsequently appointed, they may have a role in the contract for which your employer intends to apply. In my opinion, however, the relationship between your action and the nominee's subsequent action is too attenuated to give rise to a conflict. *See* Board Opinion 2012-001, pg. 5 ("However, in some cases, a financial interest may be too remote to give rise to a conflict of interest under Code § 20-607."); General Counsel Opinion 2017-504, pg. 5 ("Any financial interest you may acquire... would be too attenuated to cause an issue under the Code's...restriction on becoming financially interested in official action you took while employed by the City."). That said, you should not raise or discuss the contract application with anyone in the course of your work on behalf of the City.

b. State Conflicts of Interest Rule

The State Ethics Act, 65 Pa.C.S. §1101, *et seq.*, prohibits you from taking official action that would have a private pecuniary benefit for: (1) you; (2) your immediate family; or (3) a business, whether for-profit or not-for-profit, with which you or a member of your immediate family is associated. This means that, as with the City rule as described above, you must recuse yourself from any official action that would affect the City entity's consideration of the response by your employer to the RFQ.

I can only provide general guidance on the State Ethics Act. Either the Law Department or the State Ethics Commission can provide definitive, protective advice to you on the application of the Act. At your request, I have discussed your situation with the Law Department. They advise that they do not see any conflict of interest for you under the State Ethics Act. If you would like a formal opinion from them, I can put you in touch with the appropriate person.

IV. Conclusion

Thank you for your concern about compliance with the City's Ethics Code and for seeking advice. Advisory opinions are fact-specific, and this Opinion is predicated on the facts you have provided. Requestors of advisory opinions are entitled to act in reasonable reliance on opinions issued to them and not be subject to penalties under the laws within the Board's jurisdiction, unless they have omitted or misstated material facts in their requests. Code § 20- 606(1)(d)(ii); Board Reg. 4 ¶ 4.12.

Since you requested a non-public opinion, the original Opinion will not be made public. As required by the City Code, a version of the Opinion that has been redacted to conceal facts that are reasonably likely to identify you is being made public. Please let me know if you have any questions.

BY THE PHILADELPHIA BOARD OF ETHICS

s/Michael Cooke

Michael J. Cooke, Esq.
General Counsel

cc: Michael H. Reed, Esq., Chair
J. Shane Creamer, Esq., Executive Director

Charter Amendment Alert

June 2020

Based on preliminary returns, Philadelphians voted to amend the Home Rule Charter's restrictions on political activity by City appointed officers & employees. The change becomes effective when the City Commissioners certify the results.

What's new in the Charter?

Certain City employees can volunteer for non-local campaigns

Appointed officers & employees in most City departments can now volunteer in a non-managerial role in support of candidates for non-local public office. Non-local includes federal office, state office outside of Pennsylvania, municipal or judicial office outside of Philadelphia, Pennsylvania statewide office, and Pennsylvania state offices with districts that do not include any part of the City.

Higher penalties

The maximum penalty per violation increased from \$300 to \$2,000.

Some things haven't changed...

Participation in campaigns for local office still prohibited

Appointed officers & employees may not have any role in a campaign for the following offices:

- | | | |
|--|--|---|
| ▶ Mayor | ▶ District Attorney | ▶ City Commissioner |
| ▶ City Council | ▶ City Controller | ▶ Register of Wills |
| ▶ Sheriff | ▶ Judge of the Philadelphia Court of Common Pleas or Municipal Court | ▶ State Senator or Representative any district including part of the City |
| ▶ Elected poll officer in Philadelphia | | |

Campaign activity still prohibited for certain City workers

Appointed officers or employees of the Board of Ethics, City Commissioners, District Attorney, Police Department, and Sheriff may not volunteer in support of a candidate regardless of the office sought.

Political management still prohibited

Appointed officers & employees may not be involved in the management of any campaign, political party, or partisan political group. This includes being a ward leader, committee person, delegate, or an officer of a campaign, party, or group.

Political fundraising still prohibited

Appointed officers & employees may never be involved in any way in soliciting, receiving, or collecting political contributions. This means that if you volunteer for a campaign under the new rules, you are responsible for making sure you are not involved in any political fundraising activity.



Board of Ethics
CITY OF PHILADELPHIA

Charter Amendment Alert

June 2020

Frequently Asked Questions

Below is an overview of how the Charter change impacts some activities that are common subjects of requests for advice. Additional guidance aides, including updated FAQs, will be available soon.

Can I...	Old	New
...volunteer for a campaign for non-local office in a non-managerial role?	No	Yes (for some City workers)
...ask for campaign contributions?	No	No
...sign a nominating petition?	Yes (but not at work)	Yes (but not at work)
...serve as a ward leader?	No	No
...be a campaign manager?	No	No
...register as a member of a political party?	Yes	Yes
...wear campaign buttons while on duty?	No	No
...send emails in support of a candidate from my City computer?	No	No
...retweet a candidate's post on Twitter?	Yes (but not with your City title)	Yes (but not with your City title)
...attend a political rally while off duty?	Yes	Yes

Stay tuned for more details...

Updates to Board Regulation 8 (Political Activity)

Board Regulation 8 remains in effect until a new regulation is approved by the Board except to the extent it is specifically contradicted by the new Charter language. For the latest information on proposed changes to Regulation 8, please visit us on the web or follow us on Twitter.

Information sessions available

Board Staff will be conducting brief information sessions on the Charter changes. Check our website for dates and registration instructions.

We are (virtually) here for you.

Advice BOEGCStaff@phila.gov

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Web phila.gov/ethicsboard

Twitter @PhillyEthicsBd

@EthicsSeal



Board of Ethics
CITY OF PHILADELPHIA