



VIRGINIA

CONFLICT OF INTEREST AND
ETHICS ADVISORY COUNCIL

2016

Annual Report

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Pete W. Stout, III, Vice-Chair
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December 1, 2016

TO: The Honorable Terry McAuliffe, Governor of Virginia
The Honorable members of the General Assembly of Virginia

Pursuant to the provisions of § 30-356 of the *Code of Virginia*, establishing the powers and duties of the Virginia Conflict of Interest and Ethics Advisory Council, and as specifically mandated by paragraph 13 of that section, I have the honor of submitting herewith the Council's annual report.

Very truly yours,

The Honorable Patricia Lee West, Judge (Ret.), Chair

ANNUAL REPORT

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Authority of the Virginia Conflict of Interest and Ethics Advisory Council

Established in 2015, the Virginia Conflict of Interest and Ethics Advisory Council was created as “an advisory council in the legislative branch to encourage and facilitate compliance with the State and Local Government Conflict of Interests Act (§ 2.2-3100 et seq.) and the General Assembly Conflicts of Interests Act (§ 30-100 et seq.) (hereafter the Acts) and the lobbying laws in Article 3 (§ 2.2-418 et seq.) of Chapter 4 of Title 2.2 (hereafter Article 3).” Pursuant to § 30-356 of the *Code of Virginia*,¹ the Council is tasked with furnishing formal advisory opinions or guidelines and other appropriate information, including informal advice, as well as conducting training on the laws under its purview, and establishing a method for the filing of disclosure forms.

The Council is composed of the following nine members: two delegates and a former judge of a court of record appointed by the Speaker of the House of Delegates; two senators and a former judge of a court of record appointed by the Senate Committee on Rules, and three gubernatorial appointees, one of whom is a current or former executive branch employee, one of whom is selected from a list of three nominees submitted by the Virginia Association of Counties, and one of whom is selected from a list of three nominees submitted by the Virginia Municipal League. Pursuant to subsection B of § 30-355, in the appointment of both the delegates and the senators, “equal representation shall be given to each of the political parties having the highest and next highest number of members elected to their respective body” and all of the Council members “are subject to confirmation by the General Assembly by a majority vote in each house of (i) the members present of the majority party and (ii) the members present of the minority party.”

¹ Unless otherwise noted, all section numbers in this report refer to the *Code of Virginia*.

Members of the Virginia Conflict of Interest and Ethics Advisory Council

Speaker of the House of Delegates Appointees

The Honorable Patricia Lee West, Chair
The Honorable C. Todd Gilbert
The Honorable Jennifer L. McClellan

Senate Committee on Rules Appointees

The Honorable Pete W. Stout, III, Vice-Chair
The Honorable Janet D. Howell
The Honorable Thomas K. Norment, Jr.

Governor's Appointees

Walter C. Erwin
Bernard L. Henderson, Jr.
Sharon E. Pandak

Council Staff

G. Stewart Petoe, Executive Director

Michelle LeGates, Filing Coordinator
Corinne Sloan, Assistant
Rebekah Stefanski, Attorney

2016 Summary of Activities

Meetings

The Virginia Conflict of Interest and Ethics Advisory Council (the Council) held five meetings in 2016: on April 26, June 14, August 17, October 3, and November 21.

April 26

At the April 26 meeting, the Council voted to approve the following six Formal Advisory Opinions:

- *2016-F-001 § 2.2-3101; Professional organization membership*
- *2016-F-002 §§ 2.2-3114, 2.2-3115, & 2.2-3116; Departure filing*
- *2016-F-003 §§ 2.2-3117 & 30-111; Board of directors filers*
- *2016-F-004 § 2.2-419; PACs*
- *2016-F-005 § 30-103.1; Lobbyist friends*
- *2016-F-008 §§ 30-103.1 & 30-111; Legislative organization conferences.*

Pursuant to the requirements of subdivision 6 of § 30-356, these opinions have been published on the Council's website (ethics.dls.virginia.gov).

Also considered at the April 26 meeting were two additional proposed Formal Advisory Opinions:

- *2016-F-006 § 30-111; Legislator reporting of an event*
- *2016-F-007 §§ 2.2-3103.1 & 30-103.1; Widely attended events*

The Council agreed, by formal vote, to defer action on each of these proposals until a later meeting. There was discussion that future legislative changes or changes made to the Council's disclosure forms might address the questions posed in the draft opinions.

Also at this meeting, updates to the General Assembly Statement of Economic Interests form, the State and Local Statement of Economic Interests form, the Financial Disclosure Statement form, the Lobbyist Disclosure form, and the Lobbyist Registration form were approved by the Council by formal votes.

June 14

At the June 14 meeting, the Council considered the filing deadline extension requests submitted by eight individuals. After voting to approve all eight requests, the Council then voted to

approve an official form to be used by individuals requesting deadline extensions in the future. The Council voted to delegate the authority over deadline extension requests to the Executive Director of the Council, but since the position was vacant at the time, the Council authorized the Acting Director of the Division of Legislative Services to have this authority until such time as an Executive Director was hired for the Council.

August 17

At the August 17 meeting, the Council reviewed drafts of proposed revisions for all of the Council's disclosure forms. No formal votes were taken on the proposed drafts at this meeting. The public was invited to submit comments on the proposed revisions to the forms by email, with Council staff ensuring all comments would be forwarded to all Council members. A notice to this effect was also placed on the Council's website. Also at this meeting, the Council formally voted to extend the authority to approve or deny filing deadline extension requests to the Executive Director of the Council.

October 3

At the October 3 meeting, after public comment, the Council voted to approve revised versions of all of its disclosure forms. Also at this meeting, the Council considered the issue of whether individuals who had been denied a deadline extension by the Executive Director of the Council should be able to appeal this decision. After deliberation, the Council decided, by a formal vote, that the decision of the Executive Director would be final, with no further appeals allowed.

November 21

At the November 21 meeting, the Council considered six Formal Advisory Opinions. After deliberation, the following Formal Advisory Opinions were approved:

- *2016-F-009 Employer gifts; § 2.2-3101*
- *2016-F-010 Contractor event; §§ 2.2-3101 & 2.2-3103.1*
- *2016-F-011 Events at conferences; §§ 2.2-3101 & 2.2-3103.1*
- *2016-F-012 Service on a private board; § 2.2-3101*
- *2016-F-013 Travel paid for by a public university with the Commonwealth; § 2.2-3101*
- *2016-F-014 Food received at an event while performing official duties; § 2.2-3101*

Pursuant to the requirements of subdivision 6 of § 30-356, these opinions have been published on the Council's website (ethics.dls.virginia.gov).

In addition, pursuant to the directives of subdivision 13 of § 30-356, the Council considered 27 proposals for legislative changes. After deliberation, the Council voted to recommend 26 proposals and did not recommend one proposal. A description of all 27 proposals begins on page 8 of this report.

Formal Opinions and Informal Advice

As noted above, in 2016, the Council formally approved twelve Formal Advisory Opinions. Pursuant to the requirements of subdivision 6 of § 30-356, these opinions have been published on the Council's website (ethics.dls.virginia.gov).

Throughout the course of the year, Council staff answered in excess of 1,500 phone calls and responded to over 2,000 email inquiries for informal advice. Topics ranged from help with filling out disclosure forms, to whether particular gifts could be lawfully accepted and how they should be reported, to conflict of interest questions as to whether it would be lawful for the person to vote on a matter, or if a family member could submit a bid for a contract. Pursuant to subdivision 6 of § 30-356, all informal advice provided by the Council is confidential.

Training Seminars and Educational Programs

Pursuant to subdivision 7 of § 30-356, the Council is directed to conduct training seminars and educational programs for lobbyists, state and local government officers and employees, legislators, and other interested persons on the subject of Virginia's lobbying laws and the Conflict(s) of Interests Acts. In 2016, Council staff conducted substantially more training seminars than in 2015; more than 35 training seminars were provided, both in Richmond and throughout the state. The state and local groups and organizations for whom training was provided include:

The Judicial Conference of Virginia for District Court Judges

The Judicial Conference of Virginia for Circuit Court Judges

Regional Seminars for Substitute Judges

The Virginia Municipal League and the Virginia Association of Counties

The Local Government Attorneys of Virginia

The Treasurers' Association of Virginia

The State Council for Higher Education of Virginia

In addition to in-person training, the Council has developed online training, accessible on the Council's website, for lobbyists, legislators, and state and local government officials and employees. The contents of the online training will be revised and updated to reflect changes made both to the Council's disclosure forms and anticipated changes to Virginia's laws in the 2017 Regular Session of the General Assembly.

Disclosure and Registration Filings

In 2016, the Council received disclosure filings from all members of the General Assembly, all district and circuit court judges, the Governor, the Lieutenant Governor, the Attorney General, all constitutional officers, and all state officers and employees who were required to file. Executive branch board appointees are also required to file their Financial Disclosure Statements with the Council. The total number of individuals in Virginia who file directly with the Council is approximately 11,000. In addition, the Council also received 2,252 lobbyist registrations, and approximately the same number of lobbyist disclosure reports.

It should also be noted that the Council received approximately 80 requests for travel waivers, submitted pursuant to subsection G of § 2.2-3103.1, subsection F of § 30-103.1, and § 30-356.1.

Currently, all lobbyist disclosure reports are filed electronically. A large majority of all lobbyist registrations are filed electronically, although approximately twenty lobbyists chose to file their registrations on paper.

As of July 1, 2016, all Conflict of Interest disclosure forms filed with the Council are required to be submitted electronically. To that end, the Council is currently engaged in updating the electronic filing system, both to ensure the new electronic forms are updated to reflect the Council's revisions, and to ensure the filing system is accurate and easy for filers to use.

Recommendations for Changes in the Laws

Pursuant to subdivision 13 of § 30-356, the Council shall, in its annual report, include “recommendations for changes in the laws.” Council staff identified 25 possible legislative changes that could be made to enhance either the clarity, or efficiency, of Virginia’s lobbying laws, Conflict(s) of Interests Acts, or the operations of the Council. Two additional proposals were offered to the Council for consideration (designated as Proposals 26 and 27) by an advisory committee convened by the Office of the Executive Secretary of the Supreme Court of Virginia to study the relationship between the judiciary and the State and Local Conflict of Interests Act.

Proposal 1: Clarify, in Va. Code § 30-356, that only people who file directly with the Council are required to file their disclosure forms electronically. The existing language in subdivision 3 of the statute is ambiguous and could be taken to mean that all disclosure forms must be filed electronically, including those that are filed locally. The purpose of the subdivision is to require the forms that are filed with the Council to be filed electronically.

After consideration, the Council voted to recommend Proposal 1.

Proposal 2: Clarify, in Va. Code § 30-356, that only the disclosure forms that are filed with the Council are on a searchable electronic database open to the public. The existing language in subdivision 5 of the statute is ambiguous and could be taken to mean that all disclosure forms are to be maintained on the Council’s searchable database. Disclosure forms that are filed locally do not go through the Council and are not included in its database. Therefore, the Council does not have any mechanism to allow an electronic search of those forms in a database system.

After consideration, the Council voted to recommend Proposal 2.

Proposal 3: Specify, in Va. Code §§ 30-110(A), 2.2-3114(C), and 2.2-3115(D) and (G), that disclosure forms are to be made public six weeks after the end of the filing deadline, rather than “six weeks after filing.” This change would reflect the current practice of the Council, as there is no easy method, with the current filing system, to keep a “rolling track” of when disclosures are filed. Also, it is arguably more equitable that the disclosure forms for all filers become available to the public at the same time.

After consideration, the Council voted to recommend Proposal 3.

Proposal 4: Eliminate the requirement that lobbyists disclose, on their registrations forms, all of the other lobbyists who are representing that principal. Lobbyists may not have this information, and may not know which other lobbyists or lobbying firms their principal has hired. Eliminating this information from the disclosure form will not restrict public transparency; the public will still be able to search the Council’s database to see every lobbyist that has registered to lobby on behalf of a given principal.

After consideration, the Council voted to recommend Proposal 4.

Proposal 5: Eliminate from the lobbyist’s registration form the “statement by which a principal may elect to waive the principal signature required on disclosure filings.” The current placement of this waiver on the registration form itself does not make much sense, as lobbyists typically file these registrations electronically, and there is no place on the registration form for the lobbyist’s principal to sign the registration, even electronically. Instead, the principal’s waiver should be on a separate “form,” given to him after the registration has been submitted.

After consideration, the Council voted to recommend Proposal 5.

Proposal 6: Lower from \$10,000 to \$5,000 the limit contained in Va. Code §§ 2.2-3110(A)(3) and 30-106(A)(3). When the \$10,000 limit was lowered to \$5,000 in 2014, to be the new “threshold” at which a “personal interest” would then exist, these two Code sections were overlooked.

After consideration, the Council voted to recommend Proposal 6.

Proposal 7: Amend Va. Code § 2.2-3110(A)(3) to allow the exclusion from the general prohibition on certain contracts, where one of the parties has a personal interest, to apply to counties that have a population of less than 10,000. The exclusion in this subdivision of the statute currently applies to a city or town with a population of less than 10,000. There does not seem to be any reason why counties that also have a population of less than 10,000 should not also qualify for this exclusion.

After consideration, the Council voted to recommend Proposal 7.

Proposal 8: Allow disclosure forms that are released by local clerks or localities to have residential addresses, personal telephone numbers, and signatures redacted. Pursuant to Va. Code § 30-356, subdivision 12, all similar disclosure forms that are released to the public by the Council must have this information redacted. However, in an informal opinion issued by the Office of the Attorney General of Virginia on May 27, 2016, it was held that because there is no express statutory authority for localities to similarly redact this information, they are not permitted to do so. This places the two groups of filers in an unequal position, with state filers having their personal residential information and telephone number kept private, while local filers must have it released to the public.

After consideration, the Council voted to recommend Proposal 8.

Proposal 9: Amend the definition of “gift” in Va. Code §§ 2.2-3101 and 30-101, so as to exclude gifts that “are related to the volunteer service” of an individual. Under the current definition, gifts that are “related to the private profession or occupation” of the individual are excluded; this definition should be slightly modified, so as to similarly exclude rewards or honoraria that individuals receive for volunteer work or charitable contributions.

After consideration, the Council voted to recommend Proposal 9.

Proposal 10: Amend, in Va. Code § 30-129.1, the required length of the mandatory “refresher session” on ethics and conflicts of interest required for all returning General Assembly members. The current statute requires that the training last “at least two hours.” In practice, the refresher training provided by Council staff typically runs for approximately one hour. The language of the statute could be changed to “lasting no more than two hours.”

After consideration, the Council voted that the time requirement should be removed from the statute entirely. The Council then voted to recommend Proposal 10 with this amendment.

Proposal 11: Amend the definition of a “gift” in Va. Code §§ 2.2-3101 and 30-101, to exclude any meal that is provided for attendance at an “official meeting of the Commonwealth, its political subdivisions, or any board, commission, authority, or other entity or charitable organization...to which a person has been appointed or elected or is a member by virtue of his office or employment.” Travel to such meetings is currently excluded from the definition of a “gift,” but under current law those in attendance cannot accept a meal that is provided to them after attending such a meeting.

After consideration, the Council voted to recommend Proposal 11.

Proposal 12: Amend the definition of a “relative,” contained in the definition of a “gift” in Va. Code §§ 2.2-3101 and 30-101, to include a son-in-law and daughter-in-law. The current definition of “relative” includes spouses, children, and fathers-in-law and mothers-in-law, but not sons-in-law or daughters-in-law.

After consideration, the Council voted to recommend Proposal 12.

Proposal 13: Require that lobbyist registrations be filed electronically. Currently, all lobbyist disclosure reports must be filed electronically, with no exceptions. While lobbyists currently have a choice of registering either electronically or on paper, the vast majority of all registrations are done electronically. Out of 2,252 registrations received by the Council last year, only around 20 were submitted on paper.

After consideration, the Council voted to recommend Proposal 13.

Proposal 14: Clarify in Va. Code § 2.2-430 that when a lobbyist ceases working on behalf of his principal, for whatever reason, a final disclosure form must be filed. The current language of the statute implies this, but does not state this precisely.

After consideration, the Council voted to recommend Proposal 14.

Proposal 15: Amend Va. Code §§ 2.2-430 and 2.2-423, to allow a lobbyist’s principal to “officially” fire a lobbyist at any time. Realistically, a principal can terminate the services of a lobbyist at any time, but under Virginia’s current statutory scheme, until the lobbyist files his final disclosure form, the online searchable database will continue to list that lobbyist as working for the principal, at least until the registration expires on May 1. If a principal wishes to

completely separate himself in the public's eye from a lobbyist whom he has just fired, under current law he is unable to do so if the lobbyist refuses to file the final disclosure form.

After consideration, the Council voted to recommend Proposal 15.

Proposal 16: Amend Va. Code § 2.2-431(D) to permit lobbyists' principals, as well as lobbyists, to appeal to the Secretary of the Commonwealth a default that is beyond their control. Under current law, only lobbyists can appeal these defaults. It is unfair to subject a lobbyist's principal to civil penalties if his lobbyist has refused, despite repeated requests, to file a final disclosure statement.

After consideration, the Council voted to recommend Proposal 16.

Proposal 17: Candidates for constitutional offices, statewide offices, and the General Assembly, should file their Statements of Economic Interests with the State Board of Elections, rather than with the Council. These candidates file all of their other paperwork with the Board. It would be less bureaucratic for them to file their Statements of Economic Interests there, too, rather than file their Statements with the Council, and then have the Council confirm with the State Board, after the filing deadline has passed, that the Statements were properly filed.

After consideration, the Council voted to recommend Proposal 17.

Proposal 18: Amend the definition of a "widely attended event" in Va. Code §§ 2.2-3103.1 and 30-103.1 to no longer include events where the individuals "(i)...share a common interest." This change would limit the "widely attended event" exception to the lobbyist "gift cap" to events where the attendees (or at least 25 of the expected attendees) are "members of a public civil, charitable, or professional organization," or are "from a particular industry or profession," or who "represent persons interested in a particular issue." The results of this would be that legislators and state and local officials could still attend events, at the expense of a lobbyist, lobbyist's principal, or contractor, if they were in the nature of such things as a professional organization's award banquet or a trade group's annual holiday party. However, no longer would such events as sporting events or concert performances be eligible for attendance, at the expense of a lobbyist, merely because more than 25 people could be anticipated to be present at the game or concert.

After consideration, the Council voted to recommend Proposal 18.

Proposal 19: Amend the definition of a "gift" given in Va. Code §§ 2.2-3101 and 30-101 to exclude gifts given on a special occasion, such as a birthday or holiday, by an individual in a bona fide personal relationship with the donee, where the circumstances demonstrate that the motivation for the gift arises from the relationship and is not related to the donee's public position, and the donor is not acting as an intermediary for another. Under current law, if a legislator, or state or local official or employee, is in a personal relationship with a lobbyist, lobbyist's principal, or contractor, he must disclose all gifts received that are \$20 or more in value, even if the lobbyist, principal, or contractor works on subjects or policy topics that are completely unrelated to the responsibilities or authority of the legislator, official or employee.

After consideration, the Council voted to amend this recommendation, to include a requirement that there also be a history of reciprocal gift giving between the parties. The Council then voted to recommend Proposal 19 with this amendment.

Proposal 20: Amend the law, so that if a state official or employee is prevented from filing his disclosure form on time, because he was denied access to the form, he can be granted a filing deadline extension upon request, and the late penalty, if any, becomes the responsibility of the agency head or local clerk who caused the late filing. Failure to provide the form or access to the form within 72 hours of the filing deadline would give the filer a three-day extension upon request, and no civil penalties would be assessed. In the event the form or access to the form was not provided until after the deadline had passed, the filer would be able request a five-day extension, and the agency head or local clerk would then be responsible for the \$250 late filing penalty for failure to have the disclosure submitted on time.

After consideration, the Council voted to recommend Proposal 20.

Proposal 21: Create a maximum cap of \$5,000 on the civil penalties for lobbyists and lobbyists' principals for failure to file their disclosure statements. Under current law, the civil penalty provided for in Va. Code § 2.2-431 is \$50 for each of them if the disclosure is not filed within ten days. Starting on the eleventh day, the penalty increases for each of them by an additional \$50 per day, without limit. In theory, a lobbyist and a lobbyist principal could become subject to civil penalties of tens of thousands of dollars. Creating a reasonable maximum for these civil penalties would be fairer to all concerned.

After consideration, the Council did not recommend Proposal 21.

Proposal 22: Amend the immunity provisions of Va. Code §§ 2.2-3121 and 30-124 to provide that if the Council or its designee provides written informal advice to a legislator or a state or local officer or employee, such person cannot be prosecuted for relying in good faith upon that advice, provided that a full disclosure of the facts was originally made in the request for guidance. It would be unfair for a public official to ask Council staff for advice on the correct course of action, and then be prosecuted for following the advice or directions he was given, especially considering that the advice came from the entity that is supposed to "encourage and facilitate compliance" with the state's ethics laws.

After consideration, the Council voted to amend this proposal, so that reliance on the written informal advice of the Council or its designee would not create a complete bar to prosecution, but the advice itself could be offered at trial as evidence that the person did not knowingly violate the law. The Council then voted to recommend Proposal 22 with this amendment.

Proposal 23: Extend the filing period for legislators, constitutional officers, judges, and other state and local officials and employees from two weeks starting on January 1 of each year, to one month starting on January 1 of each year (i.e., through February 1 of each year). Two weeks is a very compressed period of time for all of these filings to be submitted, especially coming immediately after the end-of-year holiday season.

After consideration, the Council voted to recommend Proposal 23.

Proposal 24: Change the deadline for lobbyists to notify legislative and executive officials of gifts and reportable expenses that the lobbyists will be including on their disclosure forms, from December 15 to January 10. This change could help provide consistency in the disclosures of both groups; the reporting period of the lobbyists would be from January 1 through December 31 of the previous year, while legislators and officials would receive this information in January, with sufficient time for completing their own disclosure forms that cover the same time period.

After consideration, the Council voted to recommend Proposal 24.

Proposal 25: Clarify that if an officer or employee is required to file a disclosure statement as a condition of assuming office or employment, the statement must be filed on or before the date the office or position is assumed. The current language in the Code is ambiguous as to precisely when the statement must be filed. The law should be further clarified to require that the reporting period be for the previous 12 months, through the last day of the preceding month. If the office or position is to be assumed in January, the initial filing would be treated as an annual filing and would be due on January 15, or on February 1, if Proposal 23 becomes law.

After consideration, the Council voted to recommend Proposal 25.

NOTE: Proposals 26 and 27 are recommendations of the advisory committee that was convened by the Office of the Executive Secretary of the Supreme Court of Virginia to study the relationship between the judiciary and the State and Local Conflict of Interests Act.

Proposal 26: Remove judges from the “prohibited gifts” section of the State and Local Conflict of Interests Act. Unlike all other state and local employees, who are in the executive branch, judges cannot be “lobbied,” as that term is defined under Virginia law. (Judges do not award contracts, or pass or enforce regulations; more importantly, an attempt to “lobby” a judge would actually be an impermissible ex parte communication that a judge should not hear). By making this legislative change, judges would continue to be able to receive free memberships in bar associations and would continue to be able to attend, gratis, bar events and seminars. They would be required to report these, but would not be prevented from receiving them if the value were over \$100. In all other contexts, judges would still be governed by the Canons of Judicial Conduct, which are actually more prohibitive than the Conflict of Interests Act in terms of the acceptance of gifts. (Frequently, judges are prohibited from accepting even *de minimis* gifts from casual acquaintances).

After consideration, the Council voted to amend this proposal, by including a sentence that judges may not accept any gift, if doing so would constitute a violation of the Canons of Judicial Conduct. The Council then voted to recommend Proposal 26 with this amendment.

Proposal 27: Remove adjudicative functions performed by judges from the “prohibited transactions” section of the State and Local Conflict of Interests Act. The judiciary is best regulated by the Canons of Judicial Conduct, with regard to their role of hearing cases, issuing

court orders, and making judicial rulings. While the Act requires a disqualified official or employee to publicly disclose the nature of a “personal interest” that leads to a disqualification in a transaction, this should not be a requirement for judges. In fact, the Canons of Judicial Conduct frequently mandate that judges not reveal the reason they are recusing themselves from a case, as doing so could result in an unfair commentary on the case or its possible outcome, in violation of Canon 3, subsection B, subdivision 9.

After consideration, the Council voted to recommend Proposal 27.

Conclusion

Throughout 2016, the Council continued to make adjustments and became more effective in carrying out its prescribed duties. More individuals throughout the state have contacted the Council in its second calendar year, requesting informal advice, formal opinions, and opportunities to receive training seminars and educational programs. The Council has updated and revised all of its disclosure forms and is working to ensure that its online filing system, which soon will be used by all constitutional officers, legislators, and state officials and employees, will be both operationally sound and user-friendly.

The Council looks to continue these trends in 2017 and continue to make gains in ensuring statewide understanding and compliance with all of Virginia's lobbying laws and Conflict(s) of Interest Acts.

The Council would like to express its gratitude to all who have participated in the work of the Council for their hard work and dedication.