



2025 ANNUAL REPORT



VIRGINIA
CONFLICT OF INTEREST AND
ETHICS ADVISORY COUNCIL

Malfourd W. Trumbo, Chair
G. Stewart Petoe, Executive
Director



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November 19, 2025

TO: The Honorable Glenn Youngkin, Governor of Virginia
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 subdivision 13 of that section, I have the honor of submitting herewith the Council's annual report.

Very truly yours,

Malfourd W. Trumbo, Chair

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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 (the 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.) and the lobbying laws in Article 3 (§ 2.2-418 et seq.) of Chapter 4 of Title 2.2” of the Code of Virginia.¹ Pursuant to § 30-356 of the Code of Virginia, 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. 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.”² 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.”³

¹ Subsection A of *Va. Code* § 30-355.

² Subsection B of *Va. Code* § 30-355.

³ *Id.*

MEMBERS OF THE COUNCIL

Appointed by the Speaker of the House of Delegates

The Honorable M. Keith Hodges

The Honorable Westbrook J. Parker

The Honorable Vivian E. Watts

The Honorable Bruce D. White*

Appointed by the Senate Committee on Rules

The Honorable Adam P. Ebbin

The Honorable Richard H. Stuart

The Honorable Malfourd W. Trumbo

Appointed by the Governor

John C. Blair

Denise B. Burch

Adam Kinsman

Tracy Retchin**

*Replaced by the Honorable Westbrook J. Parker

**Replaced by Denise B. Burch

Council Staff

G. Stewart Petoe, Executive Director

Rebekah Stefanski, Senior Attorney

Matthew Hawkins, Attorney

Elizabeth Sundberg, Filing Manager

Valerie Mizzell, Filing Coordinator

Jake Mullican, Filing Associate

2025 SUMMARY OF ACTIVITIES

Meetings

The Virginia Conflict of Interest and Ethics Advisory Council met on November 19, 2025.

At this meeting, the Council reviewed House Bill 2702 from the 2025 Regular Session of the General Assembly. The policy question presented by this House Bill is whether a governmental officer or employee should be permitted to have an otherwise impermissible personal interest in a contract, if the contract is for a nonexclusive towing service program regulated pursuant to Virginia Code § 46.2-1217. After deliberation, the Council voted that this proposed exception to having a personal interest in a contract should not be added to the list of exceptions to having a personal interest in a contract provided in Virginia Code § 2.2-3110.

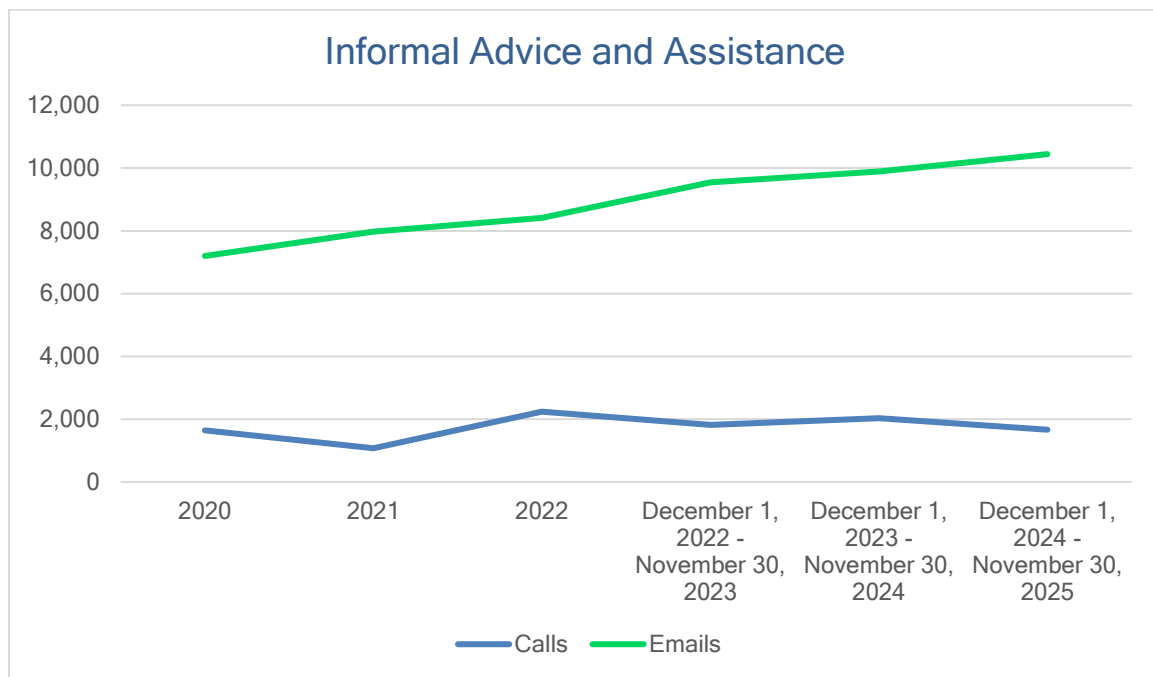
At this meeting, the Council also carried out its statutory duty, pursuant to subsection I of § 2.2-3103.1 and subsection G of § 30-103.1, to increase the gift cap limitation imposed by those sections. Every five years, the Council is mandated to increase the gift cap “in an amount equal to the annual increases for that five-year period in the United States Average Consumer Price Index for all items, all urban consumers (CPI-U), as published by the Bureau of Labor Statistics of the U.S. Department of Labor, rounded to the nearest whole dollar.” In accordance with these instructions, the Council increased the gift cap in 2020, from \$100 to \$108. This year, the Council has increased the gift cap to \$131. This increase is retroactive back to January 1, 2025, and applies to this calendar year and the next four calendar years. The gift cap limitation will next be increased in the year 2030.

Formal and Informal Advice

This year, the Council did not receive any requests for a Formal Advisory Opinion. Council staff provided informal advice and other assistance through email and phone conversations as well as through some in-person and virtual meetings. Requests for informal advice and assistance included the following subject areas:

- Navigating the online filing system;
- Maintaining databases of agency coordinators and clerks;

- Processing and acknowledging emails and receipt of lobbyist registrations and disclosures;
- Completing disclosure forms;
- Generating and providing training reports to agency coordinators and clerks;
- Clarifying whether certain activities constitute lobbying;
- Clarifying whether registration as a lobbyist is required for certain activities;
- Clarifying whether particular gifts can be lawfully accepted and how they should be reported; and
- Answering conflict of interest questions, such as whether it is lawful for a person to vote on a particular matter, whether a family member can have a contract with a particular agency, or whether a local government officer can apply for a grant for his local business.



The number of emails the Council received in 2025 continued to rise, while the number of phone calls decreased and was more in line with the 2023 count.

Training Seminars and Educational Programs

Pursuant to subdivision 7 of § 30-356 of the Code of Virginia, 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 State and Local Government Conflict of Interests Act and the General Assembly Conflicts of Interests Act (the Acts). All state officers and employees who file disclosure forms pursuant to § 2.2-3114 of the Code of Virginia are required to receive training on the State and Local Government Conflict of Interests Act (COIA) within two months of assuming their positions; thereafter, they must receive training at least once every two years. Members of the General Assembly similarly must receive training on the General Assembly Conflicts of Interests Act pursuant to § 30-129.1 of the Code of Virginia.

In 2019, the General Assembly passed legislation creating § 2.2-3132 of the Code of Virginia, which mandates that all local elected officials must receive training on COIA. This training must be provided by the Council and must be completed within two months of such officials assuming office. In 2020, the General Assembly added all members and executive directors of industrial development authorities and economic development authorities to the statute. The most recent change was in 2023 when the General Assembly included appointed school board members to the list of local officials required to complete the biannual training. To satisfy its training responsibilities, the Council maintains a series of online training modules and conducts in-person training sessions throughout the year.

In-Person Training

From December 1, 2024, to November 30, 2025, Council staff conducted 21 in-person training sessions. The groups and organizations for which in-person training was provided include:

State and Executive Branch Agencies, Authorities, and Commissions

- The Art and Architectural Review Board
- Office of the Governor-Elect
- Virginia Department of the Treasury
- Virginia Cannabis Control Authority

Judicial Branch

- Office of the Executive Secretary of the Supreme Court of Virginia

Legislative Branch

- Members of the Virginia House of Delegates
- Members of the Senate of Virginia

Local Elected Officials and Associations

- City of Falls Church - City Council
- City of Falls Church - Employees
- Commissioners of the Revenue Association of Virginia
- Hampton City Council Members
- The Commonwealth Regional Council
- Southampton School Board
- Town of Rocky Mount
- Virginia Municipal League
- Virginia School Boards Association

Online Training

The following modules are available on the Council's website to accommodate the different categories of individuals required to complete training on the Acts every two years. Each of these modules is tailored to the statutory requirements of the role in which an individual serves.

- State Officer or Employee — This training is for all individuals who file statements of economic interests using the Council's online filing system.
- Citizen Members Appointed to a State Board — This module is for all citizens who file financial disclosure statements using the Council's online filing system.
- Local Elected Officials or EDAs/IDAs — This training satisfies the training requirement for local elected officials and executive directors and members of industrial development authorities and economic development authorities.
- General Assembly — This training is for the elected members of the General Assembly.

The number of people who have completed the Council's online training is as follows:

	State Officers or Employees	Local Elected Officials	Citizen Members of State Boards
December 1, 2024-November 30, 2025	3,904	894	441
December 1, 2023-November 30, 2024	3,573	1,190	425
December 1, 2022-November 30, 2023	3,469	1,098	465
November 1, 2021-November 30, 2022	3,108	941	359
November 1, 2020-November 30, 2021	3,528	1,383	3
November 1, 2019-November 30, 2020	5,163	3,088	151*
November 1, 2018-November 30, 2019	3,033	1,578	N/A

** Previously, these members had taken the training for state officers or employees, which contained substantial content that was extraneous for them.*

While the number of local elected officials who took the Council's online training module decreased slightly in 2025, the number of state officers and employees who took the online training module increased, following a trend that began in 2022.

Disclosures and Registrations Filings

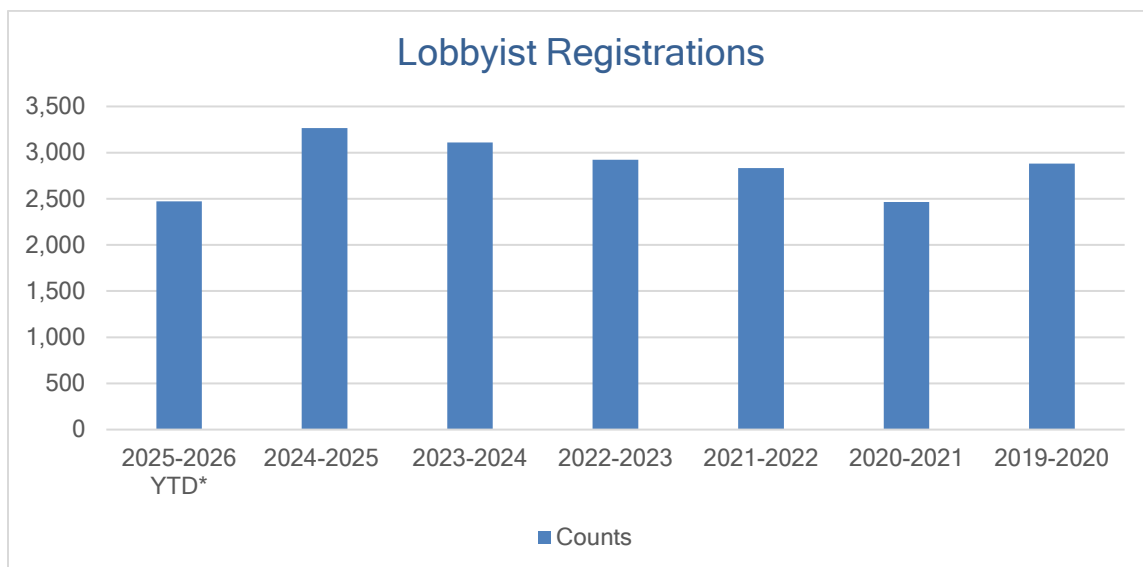
The Council receives financial disclosure statement filings from across the Commonwealth from the following individuals:

- Members of the General Assembly
- District and circuit court judges
- Justices of the Supreme Court of Virginia and Judges of the Court of Appeals of Virginia
- Governor
- Lieutenant Governor
- Attorney General
- Constitutional officers
- State officers and employees who are required to file statements of economic interests
- Executive branch board appointees

In addition to financial disclosure statements, all members of the General Assembly, the Governor and his Cabinet, the Lieutenant Governor, and the Attorney General are required to submit session gift reports after the General Assembly adjourns sine die from its regular session.

	Statements of Economic Interests	Financial Disclosure Statements
December 1, 2024-November 30, 2025	8,995	2,880
December 1, 2023-November 30, 2024	8,997	3,027
December 1, 2022-November 30, 2023	8,990	2,895
January 1, 2022-November 1, 2022	9,016	3,156
January 1, 2021-November 1, 2021	9,085	2,744
January 1, 2020-November 1, 2020	8,870	3,117
January 1, 2019-November 1, 2019	8,742	2,982

The Council also processes lobbyist registrations and disclosures. The lobbying year runs from May 1 to April 30, and all registrations and disclosures must be submitted electronically using the Council's online filing system. Registrations continue to rise in the Commonwealth. Year-to-date, the number of registrations received already exceeds the total number of registrations received during the 2020-2021 lobbying year which coincided with the pandemic and the General Assembly meeting virtually.



*Registrations from May 1, 2025 - November 30, 2025

Travel Waivers

Requests for travel waivers decreased for the period of December 1, 2024, to November 30, 2025; even so, it was the second highest request since 2019.

	Received	Approved	Unnecessary or Withdrawn
December 1, 2024-November 30, 2025	129*	100	27
December 1, 2023-November 30, 2024	160	146	14
December 1, 2022-November 30, 2023	116	96	20
2022	104	86	18
2021	65	53	12
2020	47	34	13
2019	124	95	29

**Two individuals were contacted requesting additional information and never responded.*

Each person who made an unnecessary travel waiver request was contacted by Council staff and informed that a travel waiver was not needed, either because the person requesting the travel waiver was not required to submit one, the entity paying for the travel was not a prohibited donor, or the travel was to be paid by a state agency or locality.

Conclusion

Throughout 2025, the Council continued its normal operations. The volume of emails received increased, continuing the trend of the past several years. The number of phone calls decreased from 2024, and was more in line with the 2023 count. Requests for travel waivers showed a decrease from 2024, but were the second highest number ever received. Requests for in-person training presentations remained at a similar level to the previous year.

The Council continues to be a resource for all state and local officials and employees as well as legislators. The Council looks forward to continuing to serve the needs of state and local officials and employees and registered lobbyists throughout the Commonwealth for all matters related to the Acts and Virginia's lobbying laws.

The Council would like to thank all who have participated in its work throughout the year.