

BILL NO. 32-0003

Thirty-second Legislature of the Virgin Islands

January 24, 2017

An Act amending title 3 Virgin Islands Code, chapters 8 and 37 to enact the Virgin Islands Commission on Ethics and Conflicts of Interest and for other purposes

PROPOSED BY: Senator Janette Millin Young

Be it enacted by the Legislature of the Virgin Islands:

SECTION 1. Title 3 Virgin Islands Code, chapter 8 is amended in section 114, subsection (a), paragraph (17) by striking “administers and”, and after “enforces” by inserting “in conjunction with the Virgin Islands Commission on Ethics and Conflicts of Interest”.

SECTION 2. Title 3 Virgin Islands Code, chapter 37 is amended in the following instances:

(a) Sections 1105 and 1106 are amended by striking the words “Attorney General” and inserting instead “Virgin Islands Commission on Ethics and Conflicts of Interest”.

(b) Section 1108 is repealed and reenacted and sections 1109 to 1116 to read as follows:

1 **“§1108. Membership**

2 (a) The Virgin Islands Commission on Ethics and Conflicts of Interest consists of;

3 (b) seven members. The Governor, the President of the Legislature, the Presiding
4 Judge of the Superior Court shall each appoint one member and four members shall be private
5 citizens jointly nominated by the Governor and the Presiding Judge of the Superior Court of the
6 Virgin Islands with the advice and consent of the Legislature of the Virgin Islands. Before taking
7 office, each appointee to the Ethics Commission shall take the oath of office and execute the
8 loyalty statement required of all officers and employees of the Government of the Virgin Islands.

9 (c) Members of the commission shall serve for terms of three years, until their
10 successors are appointed and qualified, but not longer than 30 days beyond the expiration their
11 term. In order to stagger the terms of the appointees, the initial appointees of the President of the
12 Legislature, the Governor, and the Presiding Judge of the Superior Court of the Virgin Islands shall
13 each serve an initial term of two years. All other members shall serve a full term of three years.

14 (d) No member may be appointed to more than two, full three-year terms on the
15 Commission.

16 (e) An individual while a member or employee of the Commission may not:

17 (1) hold elected public office or campaign for any other public office;

18 (2) hold appointed office in, be an employee in any capacity of, or be a
19 candidate for office in the federal government or the Government of the Virgin Islands,
20 whether or not for compensation;

21 (3) hold office in any political party or political committee for one year prior to
22 appointment;

23 (4) actively participate in or contribute to any political campaign; or

1 (5) directly or indirectly attempt to influence any decision by a governmental
2 body, other than a court of law or as a representative of the Commission on a matter within
3 the jurisdiction of the Commission; or

4 (f) A majority of the Commission by resolution shall declare vacant the position on
5 the Commission of any member who takes part in activities prohibited by subsection (d). An
6 individual appointed to fill vacancy occurring other than by the expiration of a term of office shall
7 serve for the unexpired term of the member the individual succeeds and is eligible for appointment
8 to two full three-year terms thereafter. Any vacancy occurring on the Commission must be filled
9 within 30 days in the manner in which that position was originally filled.

10 (g) The Commission shall elect a chairperson and a vice-chairperson. The vice-
11 chairperson shall act as chairperson in the absence of the chairperson or in the event of a vacancy
12 in that position. The term of the chairperson is one year. The chairperson may be reelected.

13 (h) A majority of the members of the Commission constitute a quorum, and except as
14 provided in section 1110(g), the votes of a majority of the members present are required for any
15 action or recommendation of the Commission. The chairperson or a majority of the members of
16 the Commission may call a meeting, but advance written notice of the meeting must be mailed to
17 each member and to any person who requests notice of such meetings.

18 (i) Members of the Commission must be compensated at a rate of \$250 a day and are
19 entitled to receive reimbursement for their actual and necessary expenses while performing the
20 business of the Commission.

21 (j) The Commission shall employ an executive director, a chief legal counsel and such
22 other staff as are necessary to serve at its pleasure to carry out its duties pursuant to this chapter.
23 The executive director is responsible for the administrative operations of the Commission and shall

1 perform such other duties as may be delegated or assigned by the Commission, but the
2 Commission may not delegate the making of regulations to the executive director. The chief legal
3 counsel is the chief legal officer of the Commission. The chief legal counsel and all other staff
4 counsel of the Ethics Commission must be individuals regularly admitted to practice law in the
5 Virgin Islands.

6 (k) The Commission shall also employ two investigators, two trainers and two office
7 support staff who are appointed by the executive director. The Commission may obtain the
8 services of experts and consultants as necessary to carry out its duties under this chapter. The
9 Attorney General shall make available to the Commission such personnel, facilities and other
10 assistance as the Commission may request to assist in the performance of the Commission.

11 (l) The Commission shall promulgate regulations that provide for a code of conduct to
12 govern the activities and ethical standards of its members, which subjects the members of the
13 Commission to no less than is required for public officials or public employees under this chapter.

14 **§1109. Powers and duties of Commission**

15 In addition to other powers and duties prescribed by law, the Commission shall:

16 (1) Determine whether an individual in the executive branch is a public official for
17 purposes of this title.

18 (A) Provide a training course of not less than two hours for public officials on
19 the requirements of this chapter for an individual who has been identified as a public
20 official;

21 (B) An individual specified in paragraph (1)(A) of this subsection shall
22 complete a training course provided by the Ethics Commission no later than six months
23 after filling a vacancy or a position being identified as a public official position. The

1 training requirement under this subsection does not apply to an individual who is a public
2 official only as a member of a Commission, task force, or similar entity; or has completed
3 a training course provided by the Ethics Commission while serving in another public
4 official position;

5 (2) Promulgate regulations to carry out the provisions of this chapter;

6 (3) Adopt by regulation model provisions for local government that relate to conflicts
7 of interest and financial disclosure;

8 (4) Prescribe forms for statements and reports required by this chapter to be filed and
9 furnish the forms to persons required to file the statements and reports;

10 (5) Prepare and publish guidelines setting forth recommended uniform methods of
11 accounting and reporting for use by persons required to file statements and reports by this chapter;

12 (6) Accept and file any information voluntarily supplied that exceeds the requirements
13 of this chapter;

14 (7) Inspect statements of financial interest which have been filed in order to ascertain
15 whether any reporting person has failed to file such a statement or has filed a deficient statement.
16 If, upon inspection, it is determined that a reporting person has failed to file a statement of financial
17 interests or that any statement that has been filed fails to conform with the requirements of section
18 1105, then the Commission shall in writing notify the person. The notice must state in detail the
19 deficiency and the penalties for failure to file or for filing a deficient statement of financial
20 interests;

21 (8) Make statements and reports filed with the Commission available for public
22 inspection and copying during regular office hours and make copying facilities available at a

1 charge not to exceed actual cost and advise other government departments and agencies of the
2 provisions of this paragraph;

3 (9) Compile and maintain an index of all reports and statements filed with the
4 Commission to facilitate public access to such reports and statements and instruct other local
5 agencies which receive and file financial interest statements in the maintenance of systems which
6 facilitate public access to such statements;

7 (10) Prepare and publish annual summaries of statements and reports filed with the
8 Commission;

9 (11) Preserve statements and reports filed with the Commission for a period of five years
10 from date of their receipt and advise other local agencies that receive and store financial interest
11 statements to preserve the statements for a period of five years from date of receipt;

12 (12) Issue to any person upon such person's request or to the appointing authority or
13 employer of that person upon the request of the appointing authority or an employer an opinion
14 with respect to the person's duties under this chapter. The Commission shall, no later than 14 days
15 after the request is made, either issue the opinion or advise the person who made the request
16 whether an opinion will be issued. A person who acts in good faith on an opinion issued to him
17 by the Commission is not subject to criminal or civil penalties for so acting, if the material facts
18 are as stated in the opinion request. The Commission's opinions are public records and may from
19 time to time be published. The person requesting the opinion may, however, require that the
20 opinion contain such deletions and changes as necessary to protect the identity of the persons
21 involved;

22 (13) Provide written advice to any person or the appointing authority or employer of a
23 person, upon a request with respect to the employee's duties under this chapter. The Commission

1 shall provide the advice no later than 21 working days after the request, but the time may be
2 extended for good cause. It is a complete defense in any enforcement proceeding initiated by the
3 Commission, and evidence of good faith conduct in any other civil or criminal proceeding, if the
4 requester at least 21 working days before the alleged violation requested written advice from the
5 Commission in good faith, disclosed truthfully all material facts and committed the acts
6 complained of either in reliance on the advice or because of the failure of the Commission to
7 provide advice within 21 days after the request or such later extended time. The person requesting
8 the advice may, however, require that the advice contain such deletions and changes as are
9 necessary to protect the identity of the person involved;

10 (14) Initiate an inquiry, pursuant to section 1110, where a complaint has not been filed
11 where there a reasonable belief that a conflict may exist;

12 (15) Issue findings, reports and orders relating to investigations initiated pursuant to
13 section 110 which set forth the alleged violation, findings of fact and conclusions of law. An order
14 may include recommendations to law enforcement officials. Any order resulting from a finding
15 that a public employee has obtained a financial gain in violation of this chapter may require the
16 restitution plus interest of that gain to the appropriate governmental body. The Commission or the
17 Department of Justice, through the Attorney General, may apply to the Superior Court of the Virgin
18 Islands to seek enforcement of an order requiring such restitution. This restitution requirement is
19 in addition to any other penalties provided for in this chapter;

20 (16) Hold hearings, take testimony, issue subpoenas and compel the attendance of
21 witnesses;

22 (17) Make recommendations to law enforcement officials or Attorney General either for
23 criminal prosecution or dismissal of charges arising out of violations of this chapter;

1 (18) Prepare and publish special reports, educational materials, and technical studies to
2 further the purposes of this chapter;

3 (19) Prepare and publish, before June 1 of each year, an annual report summarizing the
4 activities of the Commission;

5 (20) Transmit quarterly, free of charge, copies of each order, advice and opinion that has
6 become a matter of public record to all law libraries in the Virgin Islands and each authority
7 appointing Commission members under this chapter;

8 (21) Hold at least two public hearings each year, of which at least one must be held in
9 the District of St. Croix and at least one must be held in the District of St. Thomas and St. John, to
10 seek input from persons and organizations who represent any individual subject to the provisions
11 of this chapter and from other interested parties.

12 **§1110. Investigation by commission**

13 (a) Upon a complaint signed under penalty of perjury by any person or upon its own
14 motion, the Commission, through its executive director, shall conduct a preliminary inquiry into
15 any alleged violation of this chapter. The Commission shall keep information, records and
16 proceedings relating to a preliminary inquiry confidential. The Commission may, however, refer
17 the case to law enforcement officials or Attorney General during a preliminary inquiry or anytime
18 thereafter without providing notice to the subject of the inquiry. The Commission shall complete
19 its preliminary inquiry no later than 60 days after its initiation. On request of the Ethics
20 Commission, an official or a department, agency, division or instrumentality of the Government
21 of the Virgin Islands, shall provide the Commission in a timely manner with any information
22 necessary for the Commission to perform its duties under this subsection.

1 (b) If a preliminary inquiry fails to establish reason to believe that this chapter has been
2 violated, the Commission shall terminate the inquiry and so notify the complainant and the person
3 who had been the subject of the inquiry. If the Commission determines that a complaint is
4 frivolous, it shall so state.

5 (c) If a preliminary inquiry establishes reason to believe that this chapter has been
6 violated, the Commission may, through its executive director, initiate an investigation to determine
7 if there has been a violation. The Commission shall keep information, records and proceedings
8 relating to an investigation confidential until a final determination is made, except as otherwise
9 provided in subsection (g). No investigation may be commenced until the person who is the
10 subject of the investigation has been notified and provided a general statement of the alleged
11 violation or violations of this chapter and other applicable statutes with respect to such
12 investigation. Service of notice is complete upon mailing and must be by certified or registered
13 mail. The Commission shall notify the complainant no later than 72 hours after the commencement
14 of an investigation, and thereafter, the Commission shall advise the complainant and the person
15 who is the subject of the investigation of the status of the investigation at least every 90 days until
16 the investigation is terminated. The Commission shall, no later than 180 days after the initiation
17 of an investigation, either terminate the investigation pursuant to subsection (d) or issue a findings
18 report pursuant to subsection (e). Upon a showing by executive director of the need for extension
19 of this period, the Commission may extend an investigation for up to two 90-day periods, but each
20 90-day extension must be approved by a majority vote of members, a quorum being present. A
21 findings report may not be issued later than 360 days after initiation of an investigation. The
22 Commission shall promptly refer the complaint to the Commission on Judicial Disabilities, if the
23 complaint concerns a judge of a court established under title 4 of the Virgin Islands Code. The

1 Commission, on request of the Commission of Judicial Disabilities shall provide any information
2 or assistance that is not prohibited by law. The Commission shall promptly refer the complaint to
3 the Legislature's Standing Committee on Ethical Conduct, or any successor committee having
4 jurisdiction, if the complaint concerns a senator or an official of the legislative branch.

5 (d) If an investigation conducted under this chapter indicates that no violation has been
6 committed, the Commission shall immediately terminate the investigation and send written notice
7 of such determination to be complainant and the person who was the subject of the investigation.

8 (e) The Commission, upon the completion of an investigation, shall issue a findings
9 report to the subject of an investigation setting forth the pertinent findings of fact. The subject
10 may respond to the findings and request an evidentiary hearing on the matter. The Commission
11 shall grant any request for a hearing. The hearing must be held in either the District of St. Croix
12 or the District of St. Thomas and St. John. Any response to a findings report must either admit or
13 deny by corresponding number and letter the pertinent facts set forth. The subject of the
14 investigation is entitled to access to any evidence intended to be used by the Commission at the
15 hearing and any exculpatory evidence developed by the Commission in the course of its
16 investigation. Matters not specifically denied in the response are deemed admitted. The response
17 must be filed no later than 30 days from the date of issuance of the findings report unless the time
18 is extended by the Commission for good cause shown. Hearings conducted upon request must be
19 instituted no later than 45 days after the filing of the response.

20 (f) No later than 90 days after the Commission receives the hearing record, or, if no
21 hearing is to be held, no later than 30 days after the commission o receives the response to the
22 findings report, the Commission shall issue an order that is final. Upon receipt of a final order,

1 the subject of the investigation may file a petition for recommendation in accordance with the
2 regulations of the Commission.

3 (g) Hearings conducted pursuant to this section are closed to the public unless the
4 subject requests an open hearing. Any person who appears before the Commission has all of the
5 due process rights, privileges and responsibilities of a party or witness appearing before an
6 administrative agency of the Government of the Virgin Islands. All witnesses summoned for such
7 hearings are entitled to receive reimbursement for reasonable expenses, in accordance with title 5
8 of the Virgin Islands Code. At the conclusion of a hearing concerning all alleged violations and
9 in a timely manner, the Commission shall deliberate on the evidence and determine whether there
10 has been a violation of this chapter. At least four members of the commission present at a meeting
11 must find a violation by clear and convincing proof. The names of the members finding a violation
12 and the names of those dissenting and abstaining must be listed in order. The determination of the
13 Commission, in the form of a final order and findings of fact, are a matter of public record.

14 (h) Orders that become final in accordance with this section must be available as public
15 documents, but the files and records of the Commission relating to the case must remain
16 confidential.

17 (i) Any person aggrieved by an opinion or order that becomes final in accordance with
18 this chapter who has direct interest in such opinion or order may appeal therefrom in accordance
19 with law and court rules.

20 (j) No public official or public employee may discharge any official or employee or
21 change his official rank, grade or compensation or deny him a promotion or threaten to do so for
22 filing a complaint with or providing information to the Commission or testifying in any
23 commission proceeding. No member of the Commission and no employee of the Commission

1 may discharge any employee of the Commission or change his official rank, grade or compensation
2 or threaten to do so for providing any information about the internal operations of the Commission,
3 not required by law to be kept secret, to any senator or legislative staff member or testifying in any
4 legislative proceeding.

5 (k) As a general rule, no person may disclose or acknowledge, to any other person, any
6 information relating to a complaint, preliminary inquiry, investigation, hearing or petition for
7 reconsideration which is before the commission. The identity of the entity that is the subject of
8 the opinion must not be revealed. Before an advisory opinion may be made public, the advisory
9 body shall delete the name of the entity that is the subject of the opinion and to the fullest extent
10 of possible, any other information that may identify the entity. However, a person may disclose
11 or acknowledge to another person matters held confidential in accordance with this subsection
12 when the matters pertain to any of the following:

- 13 (1) Final orders of the Commission as provided in subsection (h);
- 14 (2) Hearing conducted in public pursuant to subsection (g);
- 15 (3) For the purpose of seeking advice of legal counsel;
- 16 (4) Filing an appeal from a Commission order;
- 17 (5) Communicating with the Commission or its staff, in the course of a
18 preliminary inquiry, investigation, hearing or petition for reconsideration by the
19 commission;
- 20 (6) Consulting with a law enforcement official or agency for the purpose of
21 initiating, participating in or responding to an investigation or prosecution by the law
22 enforcement official or agency;

1 (7) Testifying under oath before a governmental body or a similar body of the
2 United States of America;

3 (8) Any information, records, or proceedings relating to a complaint,
4 preliminary inquiry, investigation, hearing or petition for reconsideration which the person
5 is the subject of; or

6 (9) such other exceptions as the commission by regulation may direct.

7 (l) If a public official or public employee has reason to believe the complaint is
8 frivolous as defined by this chapter, or without probable cause and made primarily for a purpose
9 other than that of reporting a violation of this chapter, or a person publicly disclosed or caused to
10 de disclosed that a complaint against the public official or public employee has been filed with the
11 Commission, the public official or the public employee shall notify the Commission, and the
12 Commission, through its executive director, shall conduct an investigation.

13 (m) The Commission may conduct an investigation within five years after the alleged
14 occurrence of any violation of this chapter.

15 **§1111. Penalties**

16 (a) Any person who knowingly violates a provision of this chapter is guilty of a public
17 offense and commits a felony and upon conviction, shall pay a fine of not more than \$10,000 or
18 be imprisonment for not more than five years, or both.

19 (b) Any person who obtains financial gain from violating any provision of this chapter,
20 in addition to any other penalty provided by law, shall pay into the Treasury of the Government of
21 the Virgin Islands a sum of money equal to three times the amount of the financial gain resulting
22 from the violation Treble damages may not be assessed against a person who acted in good faith
23 reliance on the advice of legal counsel.

1 (c) The penalties prescribed in this chapter do not limit the power of the Legislature of
2 the Virgin Islands to discipline its own members or to initiate a recall election of an elected public
3 official, and do not limit the power of agencies or commissions to discipline officials or employees.

4 (d) Any person who violates the confidentiality of a Commission proceeding commits
5 a misdemeanor and shall upon conviction be sentenced to pay a fine of not more than \$1,000 or to
6 imprisonment for not more than one year, or to both such fine and imprisonment. Any person who
7 engages in retaliatory activity prescribed by section 1110(j) commits a misdemeanor and, in
8 addition to any other penalty provided by law, shall upon conviction be sentenced to pay a fine of
9 not more than \$1,000 or to imprisonment for not more than one year, or to both such fine and
10 imprisonment. Any person who willfully affirms or swears falsely in regard to any material matter
11 before a Commission proceeding pursuant to section 1110 commits a felony and shall, upon
12 conviction, be sentenced to pay a fine of not more than \$5,000 or to imprisonment for not more
13 than five years, or to both such fine and imprisonment.

14 (e) In addition to any other civil remedy or criminal penalty provided for in this
15 chapter, the Commission may, after notice has been served in accordance with this chapter and
16 upon a majority vote of its members, levy a civil penalty upon any person subject to this chapter
17 who fails to file a statement of financial interests in a timely manner or who files a deficient
18 statement of financial interests, at rate of not more than \$25 for each day such statement remains
19 delinquent or deficient. The maximum penalty payable under this subsection is \$250.

20 (f) A public official, who acts in good faith reliance on a written, non-confidential
21 opinion of the solicitor general or upon an opinion of the solicitor general publicly stated at an
22 open meeting and recorded in the official minutes of the meeting, shall not be subject to the
23 penalties provided for herein. However, this subsection shall not apply in situations where the

1 solicitor's opinion has been rendered under duress or where the parties seeking and rendering the
2 solicitor's opinion have colluded to purposefully commit a violation of this chapter.

3 **§1112. Wrongful use of this chapter**

4 (a) A person who signs a complaint alleging a violation of this chapter against another
5 is subject to liability for wrongful use of this chapter if:

6 (1) The complaint was frivolous, as defined by this chapter, or without probable
7 cause and made primarily for a purpose other than that of reporting a violation of this
8 chapter; or

9 (2) Publicly disclosed or caused to be disclosed that a complaint against a
10 person had been filed with the Commission.

11 (b) A person who signs a complaint alleging a violation of this chapter has probable
12 cause for doing so if he reasonably believes in the existence of the facts upon which the claim is
13 based and either:

14 (1) reasonably believes that under those facts the complaint may be valid under
15 this chapter; or

16 (2) believes to this effect in reliance upon the advice of counsel, sought in good
17 faith and given after full disclosure of all relevant facts within his knowledge and
18 information.

19 (c) When the Commission determines that a complainant has violated the provisions
20 set forth in subsection (a), the Commission, upon receiving a written request from the subject of
21 the complaint, shall provide the name and address of the complainant to the subject. If the
22 Commission determines that a complainant has not violated the provisions of subsection (a), the
23 commission shall notify the subject accordingly. The subject may appeal the Commission's

1 determination, and the Commission shall schedule an appeal hearing. The subject shall show cause
2 why the complainant violated the provisions of this section. If the Commission grants the appeal,
3 the Commission shall immediately release the complainant's name and address to the subject. If
4 the Commission denies the appeal, it shall present evidence why the complainant's name and
5 address may not be released.

6 (d) When the essential elements of an action brought pursuant to this section have been
7 established, the plaintiff is entitled to recover for the following:

8 (1) The harm to the plaintiff's reputation by a defamatory matter alleged as the
9 basis of the proceeding.

10 (2) The expenses, including any reasonable attorney fees that the plaintiff has
11 reasonably incurred in proceedings before the Commission.

12 (3) Any specific pecuniary loss that has resulted from the proceedings.

13 (4) Any emotional distress that has been caused by the proceedings.

14 (5) Any punitive damages according to law in appropriate cases.

15 **§1113. Ethics Commission Fund**

16 (a) There is established within the Treasury of the Virgin Islands a separate and
17 distinct, non-lapsing fund known as the Ethics Commission Revolving Fund, for the purpose of
18 carrying out the duties and responsibilities of the Virgin Islands Commission on Ethics and
19 Conflicts Law.

20 (b) The Commissioner of the Department of Finance shall administer the Fund, and no
21 amounts therein may be made available for expenditure except as provided in this section and
22 when authorized by the Executive Director of the Virgin Islands Commission on Ethics and

1 Conflicts of Law. The Virgin Islands Commission on Ethics and Conflicts of Law shall establish
2 policies for the expenditures of money contained in the Fund.

3 (c) The Fund consists of all monies appropriated from time to time by the Legislature,
4 all public or private grants, gifts, donations, bequests and devises to the Commission on Ethics and
5 Conflicts of Law, and any appropriation transfers to the Fund.

6 (d) Any balance in excess of \$750,000 in any fiscal year must be deposited into the
7 General Treasury of the Virgin Islands.

8 **§114 Supplemental provisions**

9 Any governmental body may adopt requirements to supplement this chapter, but no such
10 requirements may in any way be less restrictive than the chapter.

11 **§1115. Conflict of law**

12 Except as otherwise provided in this chapter, if any provision of this chapter conflicts with
13 any other statute the provisions of this chapter control.

14 **§1116. Severability**

15 If any provision of this chapter or the application of it to any person or circumstances is
16 held invalid, the invalidity does not affect the remainder of this chapter and its application to other
17 persons and circumstances.”

18 **SECTION 3.** There is appropriated in the fiscal year ending September 30, 2014, the sum
19 of \$500,000 to the Commission on Ethics and Conflicts of Interest for the purpose of implementing
20 and executing its duties and responsibilities.

21 **BILL SUMMARY**

22 Section 1 amends title 3, section 114 of the Virgin Islands Code relating to the duties of
23 the Attorney General. Section 1 divests the Attorney General of the jurisdiction to administer

1 ethics and conflict of interest laws, and instead allows the Attorney General to enforce them in
2 conjunction with the Commission on Ethics and Conflicts of Interest.

3 Section 2 of the bill establishes the Virgin Islands Commission of Ethics and Conflicts of
4 Interest and establishes procedures for investigating, enforcing and appealing from ethical and
5 conflict of interest violations of public officers and employees. Section 2 also establishes the
6 Ethics Commission Fund. Section 3 makes an appropriation to the Ethics and Conflicts of Interest
7 Commission for its operating expenses.

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9 **BR17-0008/January 18, 2017/YLT**

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