

Merom Brachman, *Chairman*
Mark A. Vander Laan, *Vice Chairman*
Megan C. Kelley
Mary M. Ross-Dolen
Jennifer L. Sheets
Christian H. Stickan



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Paul M. Nick
Executive Director

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OHIO ETHICS COMMISSION
MINUTES OF MEETING
APRIL 29, 2026

MEMBERS OF THE COMMISSION

Merom Brachman	Megan C. Kelley	Jennifer L. Sheets
Mary M. Ross-Dolen	Christian H. Stickan	Mark A. Vander Laan

CALL TO ORDER

The meeting of the Ohio Ethics Commission was called to order at 11:38 a.m. in Room 1 on Level 2 of the William Green Building, at 30 West Spring Street, in Columbus, Ohio.

ROLL CALL

The following Commission Members were present: Mr. Brachman, Ms. Kelley, Ms. Ross-Dolen, Ms. Sheets, Mr. Stickan, and Mr. Vander Laan. Staff present: Executive Director Paul M. Nick; Deputy Director/General Counsel Jed Hood; IT and Financial Disclosure Administrator Brian Ring; HR & Fiscal Manager Alan Carlson; Chief Advisory Attorney Chris Woeste; Investigative Attorney Molly Bruns; Investigative Assistant Shana Kaplan, and Assistant Attorney General Brittany Collins. Advisory Attorney Tim Gates joined the meeting after Executive Session.

EXECUTIVE SESSION

MOTION by Mr. Vander Laan, seconded by Ms. Kelley, to go into Executive Session to discuss matters that are statutorily confidential, including pending litigation, updates on investigations and complaints, and the confidential financial disclosure report. Ms. Kelley, Ms. Ross-Dolen, Mr. Stickan, Ms. Sheets, Mr. Vander Laan, and Mr. Brachman voted "yes." The motion was approved, and the Commission, pursuant to Section 102.06 and 121.22 of the Revised Code, went into Executive Session at 11:39 a.m.

The Commission returned to open session at 12:15 p.m.

PREVIOUS MEETING MINUTES

The Commission reviewed the draft minutes from the March 11, 2026, Commission meeting.

MOTION by Mr. Stickan, seconded by Ms. Ross-Dolen, that the Commission approve the minutes of the March 11, 2026 Commission meeting. Ms. Ross-Dolen, Ms. Sheets, Mr. Stickan, Mr. Vander Laan, and Mr. Brachman voted yes. Ms. Kelley abstained. The motion was approved.

The Advisory Committee members reviewed the draft minutes of the April 13, 2026 Advisory Committee meeting.

MOTION by Ms. Ross-Dolen, seconded by Ms. Kelley, that the Advisory Committee approve the minutes of the April 13, 2026 Advisory Committee meeting. Ms. Kelley, Ms. Ross-Dolen, and Ms. Sheets voted yes. The motion was approved.

ADVISORY OPINIONS AND STATISTICS

Mr. Nick introduced the advisory and investigative statistics and the advisory activity report. Mr. Woeste highlighted an advisory opinion issued to an employee of the Ohio Department of Behavioral Health, who asked questions about the revolving door restrictions. Mr. Woeste noted that legal counsel for the Department of Behavioral Health contacted the Commission after the advisory opinion was issued and expressed concern that the requester did not provide all the relevant information. Mr. Woeste explained that legal counsel for the Department sent a letter to the Commission in which she pointed out that in Fiscal Year 2026, the requester oversaw \$1.325 million in grant funds to the organization with which he wanted to accept employment. Mr. Woeste stated that he sent a second letter to the requester that stated that he could not rely on the conclusions of the first opinion due to the omission of key facts.

Mr. Brachman asked about the advisory opinion request involving a professor and surgeon for the University of Toledo. Mr. Gates explained that the request came from legal counsel for the non-profit organization. Mr. Gates also explained that legal counsel for the University provided information about the cost-effectiveness of the services that the non-profit would provide to the University.

Mr. Brachman asked if the advisory opinion request involving the Pickaway County Engineer addressed a common scenario. Mr. Gates explained that in this situation, a key fact was that the funds for the project did not flow through the county that the engineer serves. Mr. Gates explained that the advisory opinion concluded that the county engineer can participate in the grant program in the same manner as any other person as he could not use his county position to receive special treatment from the contractors and consultants on the project. Mr. Brachman also asked whether the Pickaway County Engineer directly requested the advisory opinion, and Mr. Gates confirmed that he did.

Next, Mr. Nick stated that the Advisory Committee met on April 13, 2026 and discussed the request for reconsideration that Jill Schiller, Hamilton County Treasurer, made to the Commission. He noted that the details of that meeting are contained in the meeting minutes.

Mr. Hood summarized the communications with Ms. Schiller and the County Treasurers Association of Ohio. Mr. Hood noted that although Ms. Schiller was not present at today's meeting, she was present at the Committee meeting and she was invited to attend this Commission meeting. Mr. Hood stated that the Committee recommended that the request for reconsideration be denied. Mr. Hood also stated that the Committee members were empathetic to Ms. Schiller's situation but were concerned about the potential

for a conflict and the lack of any statutory authority for county treasurers to recuse themselves from their official duties.

Mr. Brachman noted that Ms. Schiller's letter was well written, and he asked about a statute that Ms. Schiller cited. Mr. Hood explained that R.C. 321.04 also states that the Treasurer is liable and accountable for those that the Treasurer appoints. Ms. Sheets stated that she believed that it was a conflict of interest, particularly in small counties. Mr. Brachman stated that similar conflict situations exist in large counties, too. Mr. Vander Laan noted that the question is whether recusal is possible. Mr. Vander Laan stated that he disagreed with the Commission's 2001 informal advisory opinion to Medina County Treasurer John Burke. Ms. Kelley stated that it was important that the Commission not act outside of its authority by legislating. Mr. Vander Laan stated that there might be a greater ability to delegate duties in a larger county to avoid conflicts of interest. Ms. Sheets noted that the statute does not provide a mechanism for removal.

After the Commission's discussion, Ms. Sheets made a motion that the Commission deny the request for reconsideration as it applies to providing services to taxpayers in Hamilton County. Ms. Kelley seconded the motion. Mr. Brachman, Ms. Kelley, Ms. Ross-Dolen, Ms. Sheets, and Mr. Stickan voted "yes." Mr. Vander Laan voted "no." The motion was approved.

EXECUTIVE DIRECTOR'S REPORT

Mr. Nick briefed the Commission on his meeting with the Joint Committee on Agency Rule Review (JCARR) executive director on April 14, 2026. Mr. Nick summarized some history on past amendments to Ohio Administrative Code 102-5-05. He reported that he shared some potential amendments with the JCARR director and discussed whether these changes would address the concerns raised at the hearing before JCARR on March 2, 2026. Mr. Brachman asked about potential delays if the Commission is required to take all future questions about financial disclosure requirements before JCARR in the future. Mr. Nick responded.

Mr. Nick then reported on his discussion with the Governor's Office about OEC Advisory Opinion No. 2018-01 and end of term financial disclosure filings. He stated that he anticipates that some filers will opt to utilize this extended reporting form for calendar year 2026.

Mr. Nick stated that staff is reviewing whether the Commission should change its document retention schedule for financial disclosure statements. He noted that currently, these documents are retained indefinitely, and we have paper filings dating back to when the Commission was created in 1974. In 2009, the Ohio Historical Society wrote to request that the Commission set a 10 year retention period. Mr. Nick reported that although the Commission reviewed this request at its meeting in February 2010, it did not take action at the time. Ms. Ross-Dolen asked if a potential change in retention schedules is related to only financial disclosure forms and nothing else; Mr. Nick responded that this change would only affect old financial disclosure statements and related forms. Mr. Brachman asked if the Commission is currently receiving public records requests for financial disclosure forms from more than a few years back and Mr. Ring stated we have not.

Mr. Nick then updated the Commission on the status of the Commission's biennial audit by the Ohio Auditor of State and the recent increase in GRF funding through HB 730. He also reported that he had a discussion

with Senator Andrew Brenner's legislative aide concerning a potential land bank fraud prevention bill that would amend R.C. 1724.10.

LEGISLATION UPDATE

Mr. Hood reported that SB 268 is being monitored due to the details of filing disclosure forms. Mr. Brachman asked about the current action in the General Assembly on SB 268, to which Mr. Hood responded. Mr. Hood also stated that SB 752 and HB 779 will continue to be monitored. Mr. Hood asked the commission members to reach out if any questions or thoughts on any current bills shown in the report.

PUBLIC EDUCATION AND INFORMATION

In Ms. Willeke's absence, Mr. Nick summarized the public information report. Mr. Nick added that Mr. Rohrbaugh is updating and redesigning the current Commission website with an emphasis on accessibility, navigation, and data driven improvements.

FINANCIAL DISCLOSURE STATISTICS REPORT/COMPLAINT REPORT

Mr. Ring reviewed the material as shown in the packet. Mr. Ring reminded the Commission that the general financial disclosure filing deadline is next month on May 15th, 2026. He reported that he and his staff expect to receive and process around 3,000 disclosure statements over the next 2.5 weeks.

MOTIONS

Late Fee Waivers:

MOTION by Ms. Kelley, seconded by Ms. Ross-Dolen, to waive the financial disclosure statement late fees for the individuals listed in the packet report. The motion passed unanimously.

Complaints to be Dismissed:

MOTION by Ms. Sheets, seconded by Mr. Vander Laan, to dismiss the financial disclosure complaints filed against the individuals listed in the packet report, for good cause shown. The motion passed unanimously.

Complaints to be Referred for Prosecution:

MOTION by Ms. Kelley, seconded by Ms. Sheets, to adopt the recommendations of the hearing examiner and refer to the Columbus City Attorney's Office the financial disclosure complaints filed against the individuals listed in the packet report, for good cause shown. The motion passed unanimously.

Referrals for Collections:

MOTION by Ms. Sheets, seconded by Mr. Vander Laan, to refer to the Attorney General's Office for collections the individuals listed in the packet report. The motion passed unanimously.

Mr. Brachman asked about the status of collections referred to the Attorney General. Mr. Ring reported that the Commission has received more money than it has in the past two fiscal years.

DATE OF FUTURE MEETINGS

The Commission scheduled its next meeting for Friday, June 5, 2026, at 12:00 p.m., with the Investigative Committee meeting at 11:00 a.m.

The meeting was adjourned at 1:05 p.m.

These minutes are respectfully submitted by:

/s/ Paul M. Nick

Paul M. Nick
Executive Director