



ETHICS BOARD

# Milwaukee County

SUSAN C. SHIELDS · Executive Director

March 30, 2009

The Honorable Scott Walker, County Executive  
The Honorable Milwaukee County Board of Supervisors

RE: 2008 Annual Activities Report

Please find enclosed the Milwaukee County Ethics Board Report for the year 2008. The Ethics Code requires that this report be submitted annually to the County Executive and the County Board of Supervisors.

Respectfully submitted,

MILWAUKEE COUNTY ETHICS BOARD

*Susan C. Shields*

Susan C. Shields  
Executive Director

Enclosures

MILWAUKEE COUNTY ETHICS BOARD

2008- ANNUAL ACTIVITIES REPORT

**GENERAL INFORMATION**

**ETHICS BOARD MEMBERSHIP**

**TERM**

David B. Carr, Chairman	(March 2007 to February 28, 2013)
Rebecca K. Blemberg, Vice Chairwoman	(March 2006 to February 28, 2012)
Rev. Trinette Vernell McCray-VACANT	(February 2004 to February 28, 2010)
Brother Bob Smith-Holdover Apptm.	(May 2006 to February 28, 2009)
Paul Hinkfuss	(March 2008 to February 28, 2011)
Daniel P. Hanley- VACANT	(March 2002 to February 28, 2008)

**EXECUTIVE DIRECTOR**

Ms. Susan C. Shields

**MAILING ADDRESS**

Milwaukee County Courthouse  
Room 212  
901 North 9th Street  
Milwaukee, Wisconsin 53233

**TELEPHONE**

(414) 278-5332

**STAFF**

Executive Director serving the equivalent of 25% of a full-time position.  
Administrative Assistant serving the equivalent of 25% of a full-time position.

**2008 BUDGET**

\$56,996 in the 2008 adopted budget.

**STATUTORY REFERENCE**

Chapter 9, Milwaukee County General Ordinances, and S. 19.59, Wis. Stats.  
Chapter 14, Milwaukee County General Ordinances

## HISTORY AND APPLICATION OF THE CODE

The Ethics Board and the Ethics Code it administers were created in February 1975. The County Board has amended the Code 26 times since its inception. The Code sets forth standards of ethical conduct for all county officials elected or appointed, employees and members of boards and commissions. The Code requires all elected officials of the county, and certain employees whose duties and responsibilities include the awarding and execution of contracts for the purchase of supplies, services, materials, and equipment for or on behalf of Milwaukee County, for the construction of public works or for the sale or leasing of real estate, to identify publicly information about their personal financial interests. These same county officials and employees are also required to file annually a sworn affidavit that they have complied with the provisions of Chapter 9 during each year. It is the intent of the Code that: government decisions and policy be made in the best interests of the people, the community, and the government; public office not be used for personal gain; and the public have confidence in the integrity of the government.

## ORGANIZATION

The Board consists of six members appointed by the County Executive and confirmed by the Milwaukee County Board of Supervisors for staggered six-year terms. An action by the Ethics Board requires an affirmative vote of four members. While serving on the Board, and for one year prior to his/her appointment, no member can be a county public official or employee, or have been a candidate for public office. The County Executive appoints, subject to confirmation by County Board, an Executive Director who performs such duties as the Board assigns, including the duties of overseeing the daily administration of the office.

## BOARD RESPONSIBILITIES

The Ethics Board administers the Code of Ethics written for county officials, employees and members of county boards and commissions, and has three major responsibilities: First, the Board directs persons specified pursuant to the Code, to file with the Board Statements of Economic Interests. These Statements are retained by the Board for public inspection. Second, the Board, upon request, advises any county official or employee or those who do business with county employees on the propriety of matters to which they may become a part, pursuant to the Code. Third, the Board accepts complaints against county officials, employees, or members of county boards and commissions. The Board may conduct a preliminary investigation of such complaints, and make a determination of probable cause of a violation of the Code. If the Ethics Board determines charges should be brought against a county employee or public official, the Board appoints a hearing examiner to conduct a hearing. If a violation of the Code is found by the hearing examiner, the Ethics Board may issue orders which may include a forfeiture up to \$1,000, and/or refer the matter with other recommendations to: the Governor in the case of the County Executive, Sheriff, or Register of Deeds; the Chief Judge to the First Judicial Administrative District of the State of Wisconsin in the case of the Clerk of Circuit Courts; or the County Board in the case of the County Clerk, County Treasurer, or County Supervisor.

## INTERAGENCY RELATIONSHIPS

The Board works with the **Executive Branch**, the **Legislative Branch**, the **offices of the constitutionally-elected officials** of county government, and with **all the departments of Milwaukee County government** in receiving financial disclosure statements, the filing of sworn Affidavits of Code compliance, and in enforcing specified standards of conduct, pursuant to the Code of Ethics. **Members of boards and commissions**, while governed by the Code's standards of conduct, are not initially required to file Statements of Economic Interests nor sworn Affidavits of Code compliance unless in a specific instance a board or commission member is required to do so as a result of a finding of probable

cause resulting from an investigation by the Ethics Board. The filed Statements of Economic Interests by **candidates to elected offices** are initially filed with the Election Commission and subsequently are submitted to the Ethics Board for permanent filing. On December 11, 1975, the Honorable County Board of Supervisors adopted a Resolution that copies of proposed amendments to the Code of Ethics be submitted to the Ethics Board at the time any such referrals are made to the **Judiciary Committee** by the Board of Supervisors and, further, that the Ethics Board be given an opportunity to be heard by the Judiciary Committee when the matter appears on the agenda of that committee. The Ethics Board has responded to requests for reviews, comments, and guidelines relating to potential conflicts of interest of specific practices relating to matters under consideration before the **Purchasing Standardization Committee**, the **Audit Committee**, and **other committees of the County Board**. For legal opinions, the Board generally seeks the services of **Corporation Counsel**. However, in instances where a conflict of interest may develop or exist, the Ethics Board has in its budget an allowance to obtain independent legal counsel for specific situations at the discretion of the Board. Corporation Counsel's legal opinions address whether the law applies to a set of facts, that is, whether or not the law is controlling to a specific set of facts. It remains the province of the Ethics Board to determine whether or not specific facts constitute probable cause of a violation of the Ethics Code. At the invitation of the Ethics Board, a staff attorney of the Corporation Counsel attends all regular meetings of the Board. In conducting an investigation, the Board has sought the assistance of the **Department of Audit** and the **Detective Division of the Sheriff's Department** and has consulted with the **District Attorney's office** on charges relating to the violation of other related statutes. Effective July 2008, the Ethics Board files a copy of all verified complaints and investigation requests with the **District Attorney's Office** and delays further action if so requested by the **District Attorney**. After a determination by the hearing examiner that a violation of the Code exists the Ethics Board contacts the county employee's **appointing authority** or, in the case of various elected officials of the county, the **Governor**, the **Chief Judge**, or the **County Board of Supervisors**, pursuant to s. 9.13, County General Ordinances. Annually, along with all other funded departments in the county, the Ethics Board presents its operating budget to the **County Executive** and appears before the **Finance Committee** of the County Board seeking County Board appropriations for its operation.

**BOARD OPERATIONS**

During the 12 months covered by this report (calendar year 2008), the Ethics Board met four times pursuant to county ordinance for the purpose of carrying out the Board's assigned duties and responsibilities. The meetings were preceded by public announcements of the time, place and matters to be discussed. Although requests for confidential written advice and investigations must, as a matter of ordinance, be held in closed session, the Board gives public notice of the time, place, and general subject of its closed sessions in conformance with the State Open Meeting law. All other items of the meeting agenda are held in public session.

**SELECTED STATISTICS**

<b><u>Statements of Economic Interests</u></b>	<b><u>2006</u></b>	<b><u>2007</u></b>	<b><u>2008</u></b>
Persons required to file Statement.....	315	305	307
Delinquent filing of Statements.....	0	0	0
Requests for review of Statements			
by public, auditors, or press.....	59	62	103

**Requests for Advice by Persons Subject to the Code**

Oral requests with oral responses.....	42	29	32
Formal requests with written responses.....	5	7	2

**Complaints and Investigations**

All complaints (oral & written) received by Ethics Board.....	8	2	1
Formal verified complaints.....	0	0	0
Complaints giving rise to formal investigations	0	0	0
Referrals for a hearing.....	0	0	0

**FINANCIAL DISCLOSURE**

One of the Board's principal duties is to administer the financial disclosure provisions of the Code of Ethics. In this reporting period, the Board has received and maintains 307 Statements on file. This number includes the County Executive, members of the Board of Supervisors, all elected constitutional officers, employees whose job description includes considerable responsibility in the process of purchasing on behalf of the county, and candidates who ran for county elected offices. Required disclosures on the Statements include:

1. OFFICES AND DIRECTORSHIPS. The identity of any organization in which the person who is required to file is an officer, director, or holds a position. Reporting exceptions are positions held in charitable, religious, and educational organizations not doing business with Milwaukee County.
2. SECURITIES. The identity of any business organization, municipal or other corporation in which the person required to file owns securities having a value of \$5,000 or more or an interest of 10% or more in such business.
3. CREDITORS. The identity of any creditor to whom the person required to file owes \$5,000 or more, and the amount owed.
4. REAL PROPERTY. The identity of any real property located in Milwaukee County or a contiguous county in which the person required to file holds an interest valued at \$5,000 or more. Exceptions for reporting are one's own principal residence and any property in which the pro rata share held by the person reporting is less than 10% of the outstanding shares on the real property.
5. TRANSFERS. The identity of the type and amount of any securities or real property valued in excess of \$5,000, or 10% of the business or property which the person required to file has transferred his/her ownership to any member of his/her immediate family within two calendar years.

All persons required to file in the year 2008 did so in a timely fashion.

On December 18, 1996, the Ethics Board adopted a policy regarding the standard determining "real estate value" which is: "Value" shall be defined as the last assessment for real estate property tax purposes which has been issued by the public official responsible to assess property valuation for real estate tax purposes. The tax assessment shall be conclusive evidence of the "value" of said real estate unless a challenge to said assessment has been filed by the declarant at the time of the submission of the Statement of Economic Interests.

#### **EXAMINATION OF STATEMENTS OF ECONOMIC INTERESTS**

Every Statement submitted is reviewed by a member of the staff and has been reviewed by members of the Ethics Board in the past. The Board has changed its policy of having Ethics Board members review the Statements of Economic Interests in 2008 and reviews are now made by staff. Any serious discrepancies are brought to the attention of the Ethics Board for review. Whenever inconsistencies are identified during the review process, additional information may be required from the declarant to bring the Statement into conformity with the law.

All filed Statements are open to public inspection at the Board's office during regular business hours. In this reporting period, 103 requests were made to examine filed Statements. Following a policy of the Ethics Board, requests to examine are made in writing, and persons whose Statements are examined are so notified with the identity of the person requesting inspection.

#### **ANNUAL AFFIDAVIT**

Every person required to file a Statement of Economic Interests is also required to file annually a sworn affidavit attesting that the Code has been read and understood, and that they have complied with the provisions of the county's Ethics Code.

### **STANDARDS OF CONDUCT**

The Code of Ethics for county officials and employees provides:

- A. **NO FINANCIAL GAIN OR ANYTHING OF SUBSTANTIAL VALUE.** Except as otherwise provided or approved by the County Board, no county public official or employee shall use his/her public position or office to obtain financial gain or anything of substantial value for the private benefit of himself/herself or his/her immediate family, or for an organization with which he/she is associated. 9.05(2)(a)
- B. **NO PERSON MAY OFFER ANYTHING OF VALUE.** No person shall offer to give to any public official or employee, directly or indirectly, and no public official or employee shall solicit or accept from any person, directly or indirectly, anything of value if it could reasonably be expected to influence the public official's or employee's vote, official actions or judgment, or could reasonably be considered as a reward for any official action or inaction on the part of the public official or employee. 9.05(2)(b)
- C. **NO SUBSTANTIAL INTEREST OR BENEFIT.** No public official or employee may:
  - 1. **Take any official action** substantially affecting a matter in which the public official, employee, a member of his/her immediate family, or an organization with which the public official or employee is associated has a substantial financial interest. 9.05(2)(c)1
  - 2. **Use his/her office or position** in a way that produces or assists in the production of a substantial benefit, direct or indirect, for the public official, employee, members of the public official's or employee's immediate family either separately or together, or an organization with which the public official or employee is associated. (9.05(2)(c)2
- D. **NO DISCLOSURE OF PRIVILEGED INFORMATION.** No county public official or employee shall use or disclose privileged information gained in the course of, or by reason of, his/her position or activities which in any way could result in financial gain for himself/herself or for any other person. 9.05(2)(d)
- E. **NO USE OF PUBLIC POSITION TO INFLUENCE OR GAIN UNLAWFUL BENEFITS.** No county public official or employee shall use or attempt to use his/her public position to influence or gain unlawful benefits, advantages, or privileges for himself/herself or others. 9.05(2)(e)

- F. **NO OFFER OR GIFTS OR ANYTHING OF VALUE.** No county public official shall offer or give anything of value to a member or employee of a county department or entity, while that member or employee is associated with the county department or entity, and no member or employee of a department shall solicit or accept from any such person, anything of value from a county official or employee 9.05(2)(f)
- G. **LIMITS ON CONTRACTS WITH COUNTY.** No county public official or employee and no business with which he/she or his/her spouse has a significant fiduciary relationship or organization shall enter into any contract with the county unless that contract has been awarded through a process of public notice and competitive bidding in conformity with applicable federal and state statutes and county ordinances.  
9.05(2)(g)
- H. **LIMITS ON LEASE OF REAL ESTATE WITH COUNTY.** No county public official or employee and no business in which that county public official or employee has a ten (10) percent or greater interest shall enter into a lease of real property with the county, except that the county board, upon a publicly filed and considered request, shall waive this subsection when it is in the best interests of the county. 9.05(2)(h)
- I. **NO LIMITS ON LAWFUL PAYMENTS.** Paragraph (c) does not prohibit an elected official from taking any action concerning lawful payment of salaries or employee benefits or reimbursement of actual and necessary expenses or prohibit an elected official from taking an official action with respect to any proposal to modify a county ordinance. 9.05 (2)(i)
- J. **NO SOLICITATION OF AT-WILL EMPLOYEES.** No elected county official shall knowingly solicit a campaign contribution from any "at will employee" defined as an employee who is not under union or labor contract with the county, who is hired for an indefinite term or who is under an independent contract with the county or its subparts or who can be discharged for any non-discriminatory reason. 9.05 (2)(j)
- K. **NO CAMPAIGN CONTRIBUTIONS TO COUNTY OFFICIALS WITH APPROVAL AUTHORITY.** No person(s) with a personal financial interest in the approval or denial of a contract or proposal being considered by a county department or with an agency funded and regulated by a county department, shall make a campaign contribution to any county elected official who has approval authority over that contract or proposal during its consideration. Contract or proposal consideration shall begin when a contract or proposal is submitted directly to a county department or to an agency funded or regulated by a county department until the contract or proposal has reached final disposition, including adoption, county executive action, proceedings on veto (if necessary) or departmental approval. This provision does not apply to those items covered by Section 9.14 unless an acceptance by an elected official would conflict with this section. The language in section 9.05(2)(k) shall be

included in all Requests for Proposals and bid documents.  
9.05(2)(k)

- L. LIMITS ON HONORARIUMS FEES OR EXPENSES.** No county public official or employee shall accept or solicit an honorariums, fees or expense reimbursements, except in accordance with section 9.14.

The foregoing prohibitions in Section 9.05 are not to be construed to prohibit a County Board Supervisor from making inquiries for information on behalf of or representing a person before any county board, commission, or department in discharge of his/her official duties.

#### **LIMITS ON CONTACT AFTER LEAVING COUNTY SERVICE**

Former county officials and employees cannot communicate with the county department with which they were formerly associated as a paid representative for 12 months after leaving public office or county service. 9.05(3)(a)

Former county officials and employees cannot for 12 months after leaving public office or county service, for compensation, represent any person other than the county in connection with any judicial or quasi judicial proceeding, application, contract, claim, or charge in which the individual was personally and substantially involved as a county public official or employee. 9.05(3)(b)

The Ethics Board will accept and review written requests for exemption from these prohibitions.

#### **LIMITS ON POLITICAL ACTIVITY**

Effective July 17, 2008, County public officials and employees are prohibited from wearing or displaying any campaign material, distributing any campaign literature, soliciting contributions for any candidate, engaging in political campaign activities for any candidate or circulating nomination papers for elected office at his or her place of employment while engaged in his or her official duties shall, for the apparent purpose of seeking to elect or defeat a person seeking elective office. 9.06(1)

County public officials and employees are prohibited from coercing or attempting to coerce contributions or services from subordinate employees in support of a political party or a candidate for elective office or for or against a referendum position, or retaliating against or rewarding an employee for refraining from participating in any political activity. 9.06(2)

County public officials and employees are prohibited from promising an appointment to any county position as an apparent reward for any political activity. 9.06(3)

#### **REQUESTS FOR ADVICE**

Anyone subject to this Ethics Code may request of the Ethics Board written advice regarding the propriety of any matter to which he or she is or may become a party. All requests for advisory opinions are confidential unless the privilege of confidentiality is expressly waived by the requestor. In 2008, 32 oral requests for advice were made by county officials and employees,

which requests were satisfied simply by an explanation of the language in the written Code. There were two written requests for advice.

The Ethics Board, directly or through its executive director, received and responded to a number of inquiries from other government units, the press and citizens, regarding the applicability, contents and procedures relating to the Ethics Code.

### **COMPLAINTS AND INVESTIGATIONS**

Pursuant to the Code, the Board accepts verified complaints of alleged violations of the Ethics Code. During this reporting period, the Board reviewed no written or verified complaints of alleged violations of the Ethics Code by a County official or employee. One complaint of a lobbying violation was investigated, but no further action was taken. One lobbying violation was pursued in circuit court to recoup penalties related to the late filing of a lobbyist report.

### **COMMENTS AND INTERPRETATIONS ON SELECTED SECTIONS OF THE ETHICS CODE**

#### **THE PROPRIETY OF OUTSIDE EMPLOYMENT**

Section 9.05(1), County General Ordinances, does not preclude any county elected official or employee from accepting other employment or following another pursuit which in no way interferes with the full and faithful discharge of their duties to the County. The Ethics Board reiterated that all County officials and employees should conduct themselves in a manner and exercise their judgment to reinforce the principle that the appearance of impropriety sometimes may be worse than the impropriety itself. The use of County salaried time and other County resources, such as facilities, supplies, and services, for personal or private gain, not available to all citizens, is prohibited.

#### **COUNTY EMPLOYEES REQUIRED TO FILE A FINANCIAL DISCLOSURE**

Section 9.03(1), County General Ordinances, applies to all County employees whose job duties include the responsibility of writing specifications and/or contain any decision-making capacity relating to the amending or execution of purchase contracts on behalf of the County. (Corporation Counsel opinion of January 30, 1981) Each department head is required to indicate annually to the Ethics Board which subordinates they believe perform assignments within the above purchasing description. The Board has determined that these designations by the department head are not controlling. After a review of these lists, the Board sends a directive to all employees who are required to file their annual Statement of Economic Interests and their accompanying Affidavit of compliance to the Code. The Ethics Board is ultimately responsible to determine who should file. Failure to file after being directed to do so by the Ethics Board could subject that employee to the sanctions of s. 9.03(4), which provides in part: "...no person...may receive his/her salary..." after failing to file.

#### **DUAL BOARD MEMBERSHIP ON BOARDS AND COMMISSIONS**

On December 18, 1996, the Ethics Board adopted the State of Wisconsin Ethics Board interpretation of the words "associated" and "organization relative to dual membership on boards and commissions.

The State Ethics Board stated in an opinion that a county official who was appointed pursuant to a state statute or a county ordinance or resolution, was representing the county's interests on that board and, therefore, was not "associated" with the organization. The elected official serves in a

representative capacity, not an individual one, and protects the county's interests, and is not simply serving the organization.

The State Ethics Board opinion re-affirmed the County Ethics Board's earlier position of February 19, 1996, that, unless otherwise specified by law, a county official may not simultaneously be an officer or director of a private organization (in a capacity other than as a representative of the county's interests) and 1) take official action substantially affecting the organization or 2) use his or her public office to produce a substantial benefit for the organization.

#### **CAMPAIGN SOLICITATION OF AT- WILL EMPLOYEES PROHIBITED**

On December 18, 2003 the County Board of supervisors adopted File No. 03-591 an ordinance amendment to Chapter 9, which prohibits elected County officials from soliciting campaign contributions from "at-will" County employees.

#### **CAMPAIGN CONTRIBUTIONS BY CONTRACTORS RESTRICTED**

On March 18, 2004 the County Board of Supervisors adopted File No. 03-593, an ordinance amendment to Chapter 9 which prohibits a person(s) with a personal financial interest in the approval or denial of a contract being considered by a County department or with an agency funded and regulated by a County department from making a campaign contribution to any elected County official who has approval authority during the contract's consideration.

#### **ETHICS CODE OMNIBUS AMENDMENTS 2004**

On December 16, 2004 the County Board of Supervisors adopted File No. 04-191, an ordinance amendment to Chapter 9 which updated the code; provided a new designation of "appointed official;" required Pension Board members to file quarterly and elected officials to file semi-annually, and Ethics Board and Election Commission members to file reports; provided penalties for failure to report receipt of honorariums; placed a limitation on lobbying by former county officials and employees; and more clearly identified the process for the appointment of an independent fact finder.

#### **REVISIONS TO CHAPTER 14 MCGO CONCERNING LOBBYING ACTIVITIES**

In September 2004, the County Board of Supervisors adopted Resolution, File No. 04-365, directing revisions to Chapter 14, MCGO, regarding the regulation of lobbying. The changes were to: establish reasonable registration requirements to identify lobbyists and principals who seek to influence legislative or administrative actions; require lobbyists and their principals to submit a detailed description of the nature of lobbying efforts; require lobbyists and their principals to submit expense statements that accurately describe the financial value of the lobbying effort including expenses and pro-rated salaries or fees of lobbyists and principals involved in the effort; establish a reasonable system of enforcement and sanctions for violations; and revise the existing registration fee structure for lobbyists and create a fee structure for principals. The Ethics Board was given responsibility for prescribing forms and instructions for preparing and filing registration applications and expense statements and for preparing a manual on the uniform method of accounting and reporting for persons required to provide information or to file statements. The Ethics Board was directed to establish rules to enforce the various provisions of the lobbying chapter, including a schedule of sanctions and forfeitures pursuant to Section 14.11 MCGO and could now levy sanctions and penalties. These provisions went into effect as of January 1, 2006.

In 2006, the Ethics Board approved the forms to be used in registering lobbyists and adopted a schedule of sanctions and forfeitures pursuant to Section 14.11, MCGO. A lobbyist manual is

now available for reference. Lobbyist registration information and forms are now available on the Ethics Board and the County Clerk websites.

### **ETHICS CODE OMNIBUS AMENDMENTS 2008**

On July 17, 2008 the County Board of Supervisors adopted File No. 06-283(a)(a), an ordinance amendment to Chapter 9, which updated the code. The primary changes were as follows: An external appointment process was created to avoid the appearance of political influence for Ethics Board members which also limited board members to two terms. Standards of conduct were set forth in plain language. An advisory opinion process was formalized by requiring individuals to file written or notarized complaints and by authorizing the Office of Corporation Counsel to act in the stead of the Ethics Board where delay is of substantial inconvenience or detriment to the requesting party. A protocol was established for cooperating with the Milwaukee County District Attorney's Office. Bans were placed on political activity in the courthouse. County public officials and employees were prohibited from wearing or displaying any campaign material, distributing any campaign literature, soliciting contributions for any candidate, engaging in political campaign activities for any candidate or circulating nomination papers. County public officials and employees were additionally prohibited from coercing or attempting to coerce contributions or services from subordinate employees in support of a political party or a candidate for elective office or for or against a referendum position, or retaliating against or rewarding an employee for refraining from participating in any political activity. County public officials and employees were prohibited from promising an appointment to any county position as an apparent reward for any political activity. The Statement of Economic Interests form was expanded to cover the reporting of financial activity by spouses.

### **SYNOPSIS OF ETHICS BOARD 2008 ADVISORY OPINIONS**

- An elected official sought advice as to whether or not it was an ethics code violation to have a community, non-profit organization serve as a fiscal agent for an event on safety which was important to constituents. The Ethics Board advised that since the organization did not receive county funding and the official was not signing fund-raising letters as a county supervisor or using county resources for the fund-raising event, there was no code violation in having the organization act as a fiscal agent for the event. December 12, 2008
- An administrator sought advice as to whether off-duty sheriff's deputies could volunteer to provide security services for a community event and receive free tickets to the event in exchange for their services. The Ethics Board advised that since the event was sponsored by a quasi-county organization in a county facility and the services were being provided off-duty and on a voluntary basis, that it was not a code violation for the deputies to accept tickets to the event in exchange for off-duty, volunteer services. May 19, 2008

- END -