

Independent Ethics Commission – Formal Complaint Form

Before the Independent Ethics Commission
of the State of Colorado

For Commission Use Only

Received date: 22-Oct-2018

Case. No.: 18-24

The Complainant is: Tyler J. Boschert

(name)

Mailing Address: 6715 East Union Avenue, Apartment 336

Denver, CO 80237

Daytime telephone number: 719.661.9902

Email address: tyler.boschert@gmail.com

The Respondent is: Wayne Williams, Colorado Secretary of State

(name)

Mailing Address: 1700 Broadway, Suite 200

Denver, CO 80290

Daytime telephone number: 303.894.2200

Email address: WayneWWilliams18@gmail.com

When did the alleged violation occur: At least as recently as 10 July 2018

Describe the specific acts or things complained of, with facts that provide a full understanding of the alleged violation(s). If possible, cite the specific ethical standards alleged to have been violated and describe how the violation(s) occurred. Use additional pages if necessary. Attach any documentary evidence you wish to submit.

See attached letter and supporting documentation.

Description of acts or things complained of (continued):

Advisement regarding remedies and penalties: Pursuant to Colo. Const. art. XXIX, § 6, a covered individual found to have breached the public trust for private gain is liable for double the amount of the financial equivalent of any benefits obtained by such actions. The manner of recovery and additional penalties may be provided by law. The Commission does not assess criminal penalties, award injunctive relief, or award damages to complainants.

I hereby acknowledge that the facts presented herein are true to the best of my knowledge, and I will cooperate in the process regarding this complaint and will appear at any proceeding of the Independent Ethics Commission if the complaint is scheduled for a hearing.

Signature: /Tyler J. Boschert/

Attorney (if applicable): _____

Dated at Denver (City), Colorado, this 20th day of October, 2018.

Created by Article XXIX of the Colorado Constitution, the Independent Ethics Commission may review and hold hearings on matters falling within its jurisdiction as outlined in Article XXIX.

Thursday, 20 October 2018

Colorado Independent Ethics Commission
1300 Broadway, Suite 240
Denver, CO 80203

Via email
iecinfo@state.co.us

Dear Commissioners:

As Colorado Secretary of State, Wayne Williams has, on several occasions, misused state funds to obtain reimbursement for expenses incurred for his own benefit and personal use. In doing so, Mr. Williams has acted in bad faith, failed to preserve and ensure public confidence in the Office of the Secretary of State, and breached the public trust for private gain, in violation of the Constitution of Colorado.¹

Mr. Williams has used the Secretary of State's discretionary fund for the purchase of numerous expensive clothing items for himself. In each of the three years from 2015 to 2017, Williams used state monies from the Secretary of State's discretionary fund for the purchase of personal items of clothing. Specifically, Mr. Williams was reimbursed from the discretionary fund at least for a \$349.80 purchase of tuxedo pants, a \$699.60 purchase of dress boots, and a \$69.96 purchase of socks in 2015; a \$327 purchase of jeans, a \$475 purchase of a hat, and a \$268.50 purchase of dress shirts in 2016; and a \$238 purchase of a sport coat and dress shirt in 2017.

Additionally, Mr. Williams has been reimbursed from state funds for his annual Colorado attorney registration fee on at least one occasion (in 2017, for \$325); billed the state for his continuing legal education (CLE) credits on at least two occasions (in July 2016 and July 2018, for a total of \$35); and made payments to the Colorado Bar Association (CBA), in amounts roughly commensurate with annual membership dues, with a state credit card on at least three occasions (July 2016, July 2017, and June 2018, for a total of \$1,270). Such expenses are typical and expected for a practicing lawyer in Colorado—but Mr. Williams is not required to maintain his membership in the Colorado bar, attend CLEs, or participate in the CBA to carry out his duties as Secretary of State. Instead, Mr. Williams has maintained his bar membership for the sole purpose of continuing his private law practice, for the benefit of private clients, while serving as Secretary of State, which he admits he has done and continues to do.² By using public monies to maintain his license to

¹ Colo. Const. art. XXIX, § 6.

² Specifically, at the Club 20 Secretary of State candidates' debate in Grand Junction on 8 September 2018, Mr. Williams admitted that he has continued to represent private clients in employment law-related matters since taking office. Mr. Williams is known to be representing a Colorado company—whose president has donated at least \$900 to

practice law and otherwise further his private law practice, Mr. Williams has clearly and literally extracted a benefit for himself and his private clients at the expense of the people of Colorado.

On 15 October 2018, the *Denver Post* published an article on Mr. Williams's inappropriate spending.³ The article contains a quote from Deputy Secretary of State Suzanne Staiert, in which Ms. Staiert admitted that the clothing items described above were purchased from the Secretary of State's discretionary fund. In an attempt to defend Mr. Williams, Ms. Staiert told the *Post* that Mr. Williams "wouldn't otherwise buy those things except for official activities he has to attend that require that kind of attire." This excuse is unavailing. Colorado law provides that the discretionary funds available to the Secretary of State and certain other elected state officials are provided "for expenditure in pursuance of official business."⁴ The clothing items Mr. Williams purchased—including jeans, dress shirts, and a sport coat, among others—are not uniquely, or even particularly, suited to the official business of the Secretary of State; they are everyday, general-purpose clothing items. For Mr. Williams to claim that he was required, in his capacity as Secretary of State, to wear jeans to a particular event, and that he did not otherwise own a pair of jeans, would go far beyond the outermost limits of credulity. Even if Mr. Williams had been required by the duties of his office to wear items of clothing he did not already own and intended to use public funds to obtain those items, he could have rented such items; by purchasing the items instead, he has retained them for his own personal use in the future, in violation of Colorado law. Likewise, the expenditures Mr. Williams incurred in the furtherance of his private legal practice are not germane to his official duties as Secretary of State.

It is possible that Mr. Williams' abuse of state funds is not merely unethical, but criminal, and that it bars him from holding any public office in Colorado. The laws of our state prohibit Mr. Williams, a public servant, from "knowingly convert[ing] . . . public moneys or property to his own use or to any use other than the public use authorized by law."⁵ Such an act is considered

Mr. Williams' reelection campaign—in an Americans with Disabilities Act lawsuit currently pending before the U.S. District Court for the District of Colorado. See Lars Gesing, "Moonlighting criticism in Colorado secretary of state race raises new questions about an old practice," *Colorado Independent*, Oct. 6, 2018 (available at <https://www.coloradoindependent.com/2018/10/06/colorado-secretary-of-state-moonlighting-wayne-williams-jena-griswold-2018-colorado-election/>).

³ Ben Botkin, "Colorado Secretary of State spent \$1,500-plus on a hat, pants and boots," *Denver Post*, Oct. 15, 2018 (available at <https://www.denverpost.com/2018/10/15/colorado-secretary-of-state-expenses/>).

⁴ Colo. Rev. Stat. § 24-9-105 (2018).

⁵ Colo. Rev. Stat. § 18-8-407(1).

embezzlement of public property,⁶ a class 5 felony⁷ punishable by up to three years' imprisonment.⁸ Most significantly, conviction for embezzlement of public property would render Mr. Williams "forever thereafter ineligible and disqualified from being a member of the general assembly of this state or from holding any office of trust or profit in this state."⁹ Because Mr. Williams's unethical behavior may rise to the level of felonious, and may make him ineligible for the office he currently holds and to which he is seeking reelection, an investigation by this Commission is more than warranted.

Mr. Williams' conduct constitutes an abuse of his office and of the trust of the people of Colorado. Accordingly, I request that the Independent Ethics Commission investigate this matter fully and impose an appropriate sanction against Mr. Williams.

Sincerely,

Tyler J. Boschert

⁶ *Id.*

⁷ Colo. Rev. Stat. § 18-8-407(2).

⁸ Colo. Rev. Stat. § 18-1.3-401(1)(a)(V)(A), (A.1).

⁹ Colo. Rev. Stat. § 18-8-407(1).

Department of State

Month: January - June 2015

Total	\$1,656.37
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Pay by electronic funds transfer

Other

2040

Total	0.00
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$$\begin{array}{r} 2031 \rightarrow \$434.79 \\ 3110 \rightarrow 349.00 \\ 3128 \rightarrow 871.78 \\ \hline 1,050.37 \end{array}$$

Discretionary Fund Expense Reimbursement Request
Department of State


Division: Administration

Month: July through begin September

Date of Expense	Item Description	Object (For Finance Use)	Amount
7/1/15	Dress Boots	3110	\$699.60
7/1/15	Meal w/ EPC CHF Dep	4100	\$29.89
7/8/15	Comcast	2631	\$55.00
7/23/15	Meal	4100	\$42.66
7/28/15	Meal w/ Gazette	4100	\$19.83
8/5/15	Meal Re Recall Issues	4100	\$21.00
9/11/15	Straw Hat	3110	\$7.58
Total			\$875.56

I certify that in accordance with CRS §24-9-105 (2015) all expenditures are in pursuance of official business; expenditures are reasonable and necessary for the execution of the duties of the Secretary of State; the above schedule is true; that payment of the amounts claimed has not and will not be reimbursed to me from any other sources; and that no claims are included for expenses not authorized by law.

Payee Name: Wayne W. Williams

Payee Signature: 

Date:

Pay by electronic
funds transfer

Approvals

Supervisor (required)



9-24-15

Other

REDACTED BY SOS



Department of State

December

0.00

[illegible]

Discretionary Fund Expense Reimbursement Request					
Department of State					
Division: Administration			Date: 2/5/2016		
Date of Expense	Item of Expense		Amount	Total Reimbursement	
1/29/16	Hat		\$475.00	\$475.00	
Total				\$475.00	
I certify that in accordance with CRS §24-9-105 (2015) all expenditures are in pursuance of official business; expenditures are reasonable and necessary for the execution of the duties of the Secretary of State; the above schedule is true; that payment of the amounts claimed has not and will not be reimbursed to me from any other sources; and that no claims are included for expenses not authorized by law.					
Payee Name: Wayne W. Williams					
Payee Signature:			Date:		
Pay by electronic funds transfer					
Approvals					
Supervisor (required)		2.5.16	Other		
CORE Coding (to be completed by Finance Unit staff)					
Department: VAAA					
Fund	2000	Fund	2000		
Unit	2211	Unit	2211		
Approp.	VCAACV100	Approp.	VCAACV100		
Object	4100	Object	4100		
Amount	475.00	Amount			
Total				475.00	

Department of State

April

Date of Expense	Item of Expense		Amount	Total Reimbursement
4/11/16	Dress Shirts		\$268.50	\$268.50
Total				\$268.50

I certify that in accordance with CRS §24-9-105 (2015) all expenditures are in pursuance of official business; expenditures are reasonable and necessary for the execution of the duties of the Secretary of State; the above schedule is true; that payment of the amounts claimed has not and will not be reimbursed to me from any other sources; and that no claims are included for expenses not authorized by law.

Payee Name:	Wayne W. Williams
-------------	-------------------

Payee Signature:

Date: 15 APR 16

~~Pay by electronic funds transfer~~

Approvals

Supervisor (required)

4.15.12

Other

CORE Coding (to be completed by Finance Unit staff)

Department: VAAA

Fund	2000	Fund	2000
Unit	2211	Unit	2211
Approp.	VCAACV100	Approp.	VCAACV100
Object	4100	Object	4100
Amount	268.50	Amount	268.50
		Total	268.50

Discretionary Fund Expense Reimbursement Request
Department of State

R

Division: Administration Month: May

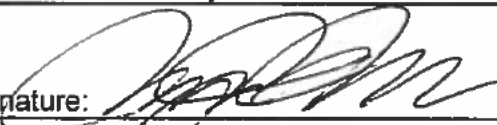
Date of Expense	Item Description	Object (For Finance Use)	Amount
4/25/17	Jos. A. Bank	Sport coat and dress shirt	\$238.00
4/26/17	Apple Briargate	Iphone and Belkin Vent Mount	\$898.95
4/28/17	Best Buy	Case- I7Plus Nomad Leather Wallet Case	\$23.81
Total			\$1,160.76

I certify that:

- I made all expenditures listed above in pursuit of official business in accordance with §24-9-105 C.R.S.;
- The above expenditures were reasonable and necessary for the execution of my duties as Secretary of State;
- The above schedule is true and accurate;
- No expenditures above are prohibited by law;
- I acknowledge that certain purchases may have income tax consequences and I accept responsibility

Payee Name: Wayne W. Williams

Payee Signature:



Date:

5/31/2017

Pay by electronic funds transfer

Reviewed by:

Primary Reviewer:



Other:

[illegible]

[View All 1 of 3](#) | **i** Document submitted successfully - Pending Approval

General Accounting Expense(GAX) Dept: VAAA ID: 2017000000000004167 Ver.: 1 Function: New Phase: Pending

Modified by c moore1 07/13/2016

Header

[General Information](#) [Payee](#) [Additional Amounts](#) [Extended Description](#) [Contact](#) [Document Information](#)

Document Name:

Federalist Society - Reviewing
The Supreme Court 15/16 Term

Record Date:

Budget FY:

Fiscal Year:

Period:

Document Description:

CLE credit for Wayne Williams

Pre-Processing Allowed:

☐

Bank Account:

8

Replacement:

☐

Contract Withholding Exempt:

☐

Cited Authority:

Actual Amount:

\$15 00

Closed Amount:

\$0 00

Closed Date:

Open Amount:

\$15 00

Referenced Amount:

\$0 00

REDACTED BY SOS


REDACTED BY
SOS

8001292425

**State of Colorado
TRAVEL EXPENSE**

Department: Colorado Department of State					Division or Agency: Admin					Month: July 2018				
Date	Travel		Time Depart	Arrival Time	Mileage *			Meals and Lodging					Total Reimbursement	
	From	To			No. Miles	Rate Per Mile (\$0.49)	Total	Bkfst.	Lunch	Dinner	\$5.00 Incidentals	Lodg.		Total
7/11/2018	REDACTED BY SOS	COS Airport												
	Colorado Springs CO 80920		5:30AM	7AM	10	\$ 0.49	\$ 4.90							\$ 4.90
7/11/2018	COS Airport	DFW Airport	8:40AM	11:30AM	0	\$ 0.49	\$ -			\$ 16.00			\$ 16.00	\$ 16.00
7/11/2018	DFW Airport	PHL Airport	12:40PM	5PM	0	\$ 0.49	\$ -						\$ -	\$ -
7/11/2018	PHL Airport	Loews Hotel Philadelphia	6PM	6:20PM	0	\$ 0.49	\$ -				\$ 28.00	\$ 5.00	\$ 235.07	\$ 268.07
7/12/2018	Loews Hotel Philadelphia				0	\$ 0.49	\$ -	\$ 15.00	\$ 16.00	Provided	\$ 5.00	\$ 235.07	\$ 271.07	\$ 271.07
7/13/2018	Loews Hotel Philadelphia				0	\$ 0.49	\$ -	\$ 15.00	\$ 16.00	Provided	\$ 5.00	\$ 235.07	\$ 271.07	\$ 271.07
7/14/2018	Loews Hotel Philadelphia				0	\$ 0.49	\$ -	Provided	Provided	\$ 28.00	\$ 5.00	\$ 235.07	\$ 268.07	\$ 268.07
7/15/2018	Loews Hotel Philadelphia				0	\$ 0.49	\$ -	Provided	Provided	Provided	\$ 5.00	\$ 235.07	\$ 240.07	\$ 240.07
7/16/2018	Loews Hotel Philadelphia	PHL Airport	2PM	2:20PM	0	\$ 0.49	\$ -	Provided	Provided		\$ 5.00		\$ 5.00	\$ 5.00
7/16/2018	PHL Airport	DFW Airport	4:24PM	7:02PM	0	\$ 0.49	\$ -			\$ 28.00			\$ 28.00	\$ 28.00
7/16/2018	DFW Airport	COS Airport	10:40PM	11:20PM	0	\$ 0.49	\$ -						\$ -	\$ -
7/17/2018	COS Airport	REDACTED BY SOS												
	Colorado Springs CO 80920		12AM	12:30AM	16	\$ 0.49	\$ 7.84						\$ -	\$ 7.84
TOTALS					36	\$ 0.49	\$ 17.64	\$ 30.00	\$ 48.00	\$ 84.00	\$ 30.00	\$ 1,175.35	\$ 1,367.35	\$ 1,384.99
Miscellaneous Expenses (please list in rows below and enter values at right -- notify Finance if you require more rows):														
Cabs														\$ 84.42
														\$ -
														\$ -
														\$ -
														\$ -
Purpose of Trip:												Total Expenses	\$ 1,469.41	
NASS Summer Conference 2018; EAC Data Meeting;												Less Travel Advance	\$ -	
Persons and Agencies Contacted:												Total To Be Reimbursed	\$1,469.41	
Leslie D. Reynolds, NASS Executive Director; Stacy Dodd, NASS Executive Assistant														
Comments:														1469.41

"I certify that the statements in the above schedule are true and correct in all respects; that payment of the amounts claimed herein has not and will not be reimbursed to me from any other source; that travel performed for which a reimbursement is claimed was performed by me while on State Business and that no claims are included for expenses of a personal or political nature or for any other expenses not authorized by the Fiscal Rules; and that I actually incurred or paid the operating expenses of the motor vehicle for which reimbursement is claimed on a mileage basis. Further, I hereby authorize the State to deduct from my pay any amount paid to me in excess of my authorized expenses as provided by Fiscal Rule 5-1."

Payee Signature: 	Date: 7/18/18
Payee Name: Wayne Williams	Mailing Address: REDACTED BY SOS Colorado Springs CO 80920

REVIEWED AND RECOMMENDED FOR APPROVAL

Additional Division Approver (if required)					Supervisor				Executive Director (if required)			
FUND	AGCY	ORG - SUB	APPROP	PROG	FUNC	OBJ - SUB	B/S	GBL	RPTG	JOB/PROG	AMOUNT	
2000	VAAA	2211	VAAA	2211			2533			Mileage Per Diem Lodging Taxis	17.64	
							2532				182.00	
							2530				1125.35	
							2531				84.42	
TOTAL											\$	1,469.41

*If request mileage reimbursement:

Is usual method of commute to and from the office with a personal vehicle? _____ Yes _____ No

If Yes, what is the mileage from your home to the office _____

1,469.41



REDACTED BY SOS

Account Number	Payment Date	New Balance	Minimum Amount Due	Enter Amount Paid
**** * REDA	08/19/2016	\$0.00	\$0.00	

WAYNE WILLIAMS
DEPARTMENT OF STATE
1700 BROADWAY
SUITE 200
DENVER CO 80290-1201

Citibank
P.O. Box 78025
PHOENIX, AZ 85062-8025

CITIBANK CORPORATE CARD

Previous Balance	Payments and Credits	New Charges	New Balance	Credit Line
\$0.00	\$0.00	\$0.00	\$0.00	\$10,000.00

Statement Date
07/25/2016

Payment Date
08/19/2016

For customer service call or write 1-800-248-4553 Citibank P.O. Box 6125 Sioux Falls, SD 57117

Send payments to: Citibank P.O. Box 78025 PHOENIX, AZ 85062-8025

Account Number	Cash Advance Limit*	Available Credit Line	Available Cash Line**
**** * REDACT	\$0.00	\$10,000.00	\$0.00

Sale Date	Post Date	Reference Number	Type of Activity	Amount
*****NOTICE MEMO ITEM(S) LISTED BELOW*****				
06/27/2016	06/28/2016	24269796179300409620182	THE EARLY BIRD RESTAUR	WESTMINSTER CO \$48.81
06/30/2016	07/01/2016	24445006182300306011960	KING SOOPERS #0035	DENVER CO \$67.87
07/05/2016	07/06/2016	24493986188207241400778	COLORADO BAR ASSOCIATION	303-860-1115 CO \$420.00
*****TOTAL AMOUNT OF MEMO ITEM(S):				\$536.68

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Account management made easier: Online statements & CitiManager Mobile offer 24/7 access, security, and mobility. Log in at www.citimanager.com/login and click Go Paperless under the Statement tab.

Sign-up for email or text message alerts to know when your statement is ready to view. When on the go, access your account and recent activity through your mobile device at www.citimanager.com/mobile

ACCOUNT SUMMARY		Previous Balance	Payments	Credits	Purchases and Advances	Interest Charges	New Balance
CURRENT PERIOD							
	Purchases	\$0.00					\$0.00
	Advances	\$0.00					\$0.00
	TOTALS	\$0.00					\$0.00
DAYS IN BILLING PERIOD: 030			Purchases	Cash Advances	Payment Due:		\$0.00
Balance Subject To Interest Charges >			\$0.00	\$0.00	Amount Over Credit Limit:		\$0.00
Periodic Rate >			.0000%	.0000%	Amount Past Due:		\$0.00
ANNUAL PERCENTAGE RATE >			0.00%	0.00%	MINIMUM AMOUNT DUE:		\$0.00

* Cash Advance Limit is a portion of your Total Credit Line

** Available Cash Line is a portion of your Available Credit Line



Account Number
XXXX-XXXX-X REDAC

Statement Date
07/25/2017

Sale Date	Post Date	Reference Number	Type of Activity	Amount
NOTICE MEMO ITEM(S) LISTED BELOW				
07/18/2017	07/19/2017	24493987200207241700930	COLORADO BAR ASSOCIATION 303-860-1115 CO	\$420.00
-----TOTAL AMOUNT OF MEMO ITEM(S):				\$2,575.85
<p>Citi is committed to the reduction of paper. Within the Commercial Cards business, you can switch to online statements now by registering your card on CitiManager at https://home.cards.citidirect.com/CommercialCard/Cards.html. Thanks to those who already access statements online, together we are saving 2,170 trees each year through this initiative alone.</p> <p>Account management made easier: Online statements & CitiManager Mobile offer 24/7 access, security, and mobility. Log in at www.citimanager.com/login and click Go Paperless under the Statement tab.</p> <p>Sign-up for email or text message alerts to know when your statement is ready to view. When on the go, access your account and recent activity through your mobile device at www.citimanager.com/mobile</p>				

* Cash Advance Limit is a portion of your Total Credit Line
** Available Cash Line is a portion of your Available Credit Line



REDACTED BY SOS

Account Number	Payment Date	New Balance	Minimum Amount Due	Enter Amount Paid
XXXX-XXXX-XX REDA	07/20/2018	\$0.00	\$0.00	

WAYNE WILLIAMS
DEPARTMENT OF STATE
1700 BROADWAY
SUITE 200
DENVER CO 80290-1201

Citibank
P.O. Box 78025
PHOENIX, AZ 85062-8025

CITIBANK CORPORATE CARD

Previous Balance	Payments and Credits	New Charges	New Balance	Credit Line
\$0.00	\$0.00	\$0.00	\$0.00	\$10,000.00

Statement Date
06/25/2018

Payment Date
07/20/2018

For customer service call or write 1-800-248-4553 Citibank P.O. Box 6125 Sioux Falls, SD 57117

Send payments to: Citibank P.O. Box 78025 PHOENIX, AZ 85062-8025

Account Number

Cash Advance Limit*

Available Credit Line

Available Cash Line**

XXXX-XXXX-XX

\$0.00

\$10,000.00

\$0.00

Sale Date

Post Date

Reference Number

Type of Activity

Amount

*****NOTICE MEMO ITEM(S) LISTED BELOW*****

05/28/2018

05/29/2018

24445008148300339741525

KING SOOPERS #0119

COLORADO SPRI CO

\$17.65

06/05/2018

06/06/2018

24493988157026493185298

PIKES PEAK UNITED WAY

719-457-1321 CO

\$50.00

06/13/2018

06/15/2018

24638188165030028579747

COLORADO BAR ASSOCIATION

303-860-1115 CO

\$430.00

1059087

06/18/2018

06/18/2018

24692168169100892642482

CELLAIRIS #5123

COLORADO SPRI CO

\$201.87

*****TOTAL AMOUNT OF MEMO ITEM(S):

\$699.52

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Sign-up for email or text message alerts to know when your statement is ready to view. When on the go, access your account and recent activity through your mobile device at www.citimanager.com/mobile

ACCOUNT SUMMARY CURRENT PERIOD		Previous Balance	Payments	Credits	Purchases and Advances	Interest Charges	New Balance
	Purchases	\$0.00					\$0.00
	Advances	\$0.00					\$0.00
	TOTALS	\$0.00					\$0.00

DAYS IN BILLING PERIOD: 031		Purchases	Cash Advances	Payment Due:	\$0.00
Balance Subject To Interest Charges	>	\$0.00	\$0.00	Amount Over Credit Limit:	\$0.00
Periodic Rate	>	.0000%	.0000%	Amount Past Due:	\$0.00
ANNUAL PERCENTAGE RATE	>	0.00%	0.00%	MINIMUM AMOUNT DUE:	\$0.00

* Cash Advance Limit is a portion of your Total Credit Line

** Available Cash Line is a portion of your Available Credit Line