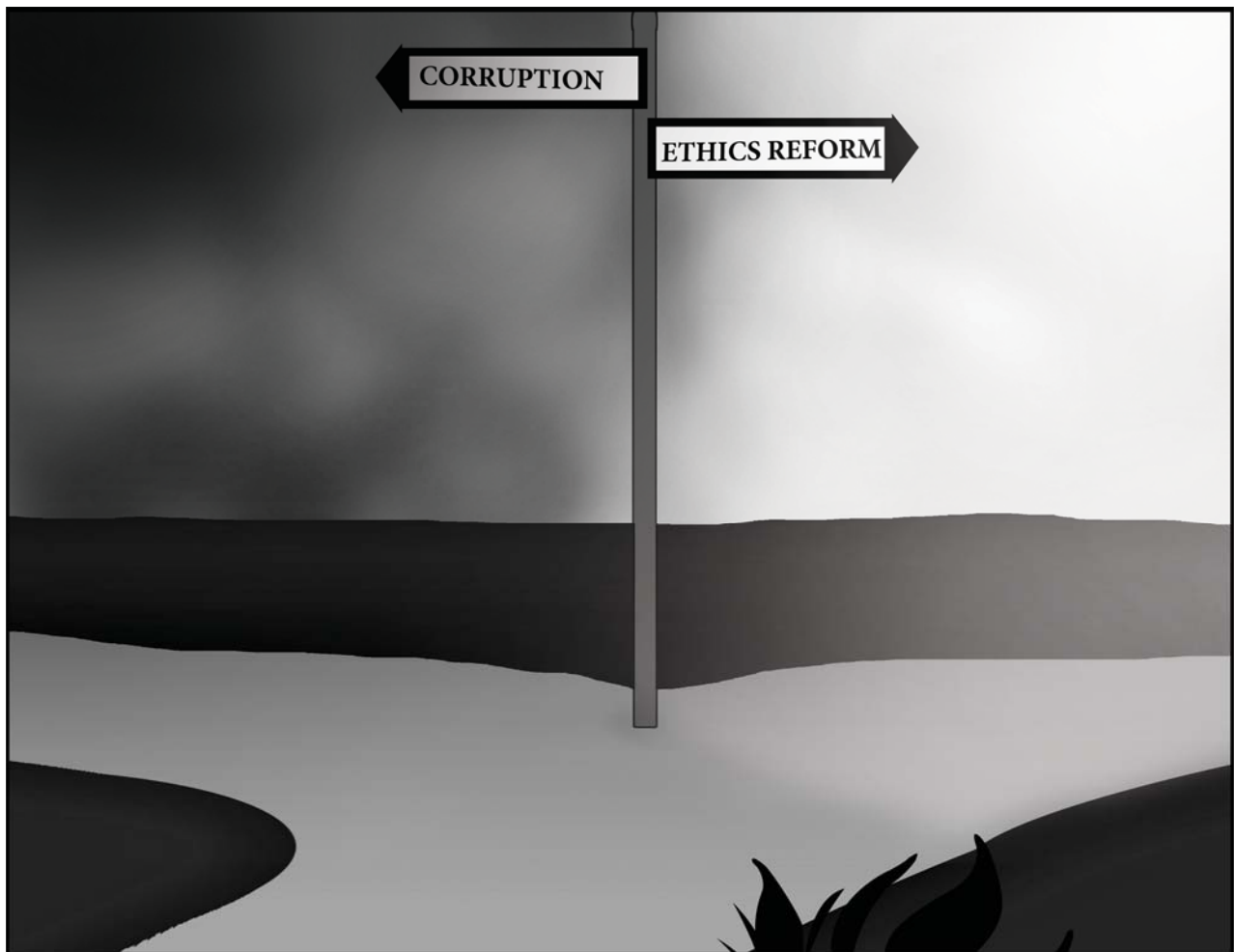


Corruption Risk Report: Florida Ethics Laws

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i n t e g r i t y
FLORIDA

Integrity Florida is a nonprofit, nonpartisan research institute whose mission is to promote integrity in government and expose public corruption.

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Executive Summary

Florida led the U.S. in federal public corruption convictions from 2000 - 2010ⁱ, according to U.S. Department of Justice data. Corruption was a top ten factor *Forbes* magazineⁱⁱ pointed to in 2012 when it named three Florida cities to its list of America's Most Miserable Cities: #1 Miami, #4 West Palm Beach and #7 Fort Lauderdale. Florida also received a failing grade for ethics enforcement agencies on the [Florida Corruption Risk Report Card](#)ⁱⁱⁱ released in 2012 by State Integrity Investigation.

Florida faces a corruption crisis that threatens the state's reputation, its economy and its ability to attract new jobs and capital. While implementing the ethics reform solutions presented in this report may not decrease the number of corruption convictions in Florida, it would certainly help the state move towards an A grade on the Corruption Risk Report Card and begin to improve the state's reputation at a time when there is significant competition for jobs.

Major recommendations that would advance government ethics in Florida and the public's overall confidence in state and local government if adopted by the Florida Legislature

1. **Self-initiate investigations:** As the state ethics law enforcement agency, the Florida Commission on Ethics should be granted the authority to begin its own investigations.
2. **Launch a report corruption hotline:** Report corruption hotline to be managed either by the Florida Attorney General or the Florida Commission on Ethics.
3. **Expand the ethics code to follow the money:** Appropriate aspects of Florida's state ethics code should apply to all who touch public money, including vendors.
4. **Require top officials to disclose major transactions:** Require all cabinet officials, state legislators, state agency heads and local elected officials to disclose details of all major financial transactions over \$1,000 within the previous year, including stock trades, property transactions and changes in business ownership.
5. **Create an online filing system:** Financial disclosure forms should be filed electronically and made publicly available online in a searchable, updatable and downloadable format.

Recommendations the Florida Legislature could adopt that would improve the current state of the ethics laws without major changes to the system

1. **Raise the standard for awarding attorney's fees against complainants.**
2. **Change the burden of proving a violation from "clear and convincing evidence" to a "preponderance of the evidence".**
3. **Require ethics training for public officials, government vendors and lobbyists.**
4. **Increase penalties for ethics law violations.**
5. **Improve collections process for fines owed due to ethics law violations.**
6. **Post all core Ethics Commission documents into an online, searchable database.**
7. **Build an online, searchable database of financial disclosure information.**
8. **Require annual audit of a random sample of financial disclosure forms.**

The public corruption conviction data included in this report is from a time period prior to Governor Rick Scott taking office. Governor Scott issued an executive order^{iv} on his first day in office declaring that "a commitment to ethics and integrity in government is essential to maintaining a public trust." In the same executive order, Scott directed his Special Counsel, in conjunction with his Chief Ethics Officer, to review the Statewide Grand Jury's December 29, 2010 First Interim Report addressing public corruption in Florida and "recommend a plan for implementing all or certain of, as advisable, these recommendations either through executive action, or through legislative proposals seeking necessary statutory modifications."

Integrity Florida has provided three separate research briefings to senior-level Scott Administration officials about Florida's Corruption Risk Report Card produced by State Integrity Investigation. Integrity Florida also shared the State Integrity Investigation results with senior staff of the Florida Commission on Ethics. As a result of these meetings, Integrity Florida is hopeful about the likelihood of seeing ethics reform on the Governor's 2013 legislative agenda.

Integrity Florida was recognized publicly on May 4, 2012 by Florida Commission on Ethics Executive Director Virilindia Doss as "a research group that has taken a strong interest in issues of public integrity, public corruption, public transparency and all of those related issues." Doss noted that Integrity Florida will be attending all of the state ethics commission meetings and issuing research papers promoting legislative ideas for ethics reform. The Florida Commission on Ethics sets its 2013 legislative priorities on June 15, 2012 and Integrity Florida encourages the Commission to consider the research recommendations in this report.

Analysis

In February 2012, the University of Illinois at Chicago Department of Political Science and the Illinois Integrity Initiative of the University of Illinois' Institute for Government and Public Affairs released the report "Chicago and Illinois, Leading the Pack in Corruption"^v. While that publication indicated that Florida was the fourth most corrupt state in the nation, the U.S. Department of Justice data examined was from 1976-2010. In the modern era (2000-2010), there has been an upward trend towards more federal public corruption convictions in Florida. Florida was the top state for federal public corruption convictions five times since 1999 (1999, 2000, 2001, 2004 and 2006)^{vi}. The state's rapid rise to the top position in the nation in five of the last twelve years of available data provides new evidence that reforms are needed to reduce corruption in the Sunshine State. The only states that came close to Florida's record during the modern era were Texas and California (Texas in 2008, 2009 and 2010; California in 2003, 2005 and 2007)^{vii}. 2010 is the most recent data set of federal public corruption convictions from the U.S. Department of Justice.

Since 1976, Florida's federal courts have convicted 1,762 individuals for public corruption^{viii}. That's an average of 50 public corruption convictions a year, or about one a week for the last 35 years. From 2000 - 2010, the average number of federal public corruption convictions per year increased to 71 in Florida, indicating an upward trend in the modern era^{ix}.

Florida statistics versus all U.S. states and territories for federal public corruption convictions include:

- Ranked #1 state in federal public corruption convictions - five times (1999, 2000, 2001, 2004 and 2006) in last 12 years of available data (1999 – 2010), according to U.S. Department of Justice data.^x
- Ranked as a top five state for federal public corruption convictions in 18 of the last 22 years of available data (1989-2010) from the U.S. Department of Justice.^{xi}
- Ranked as a top 10 state for federal public corruption convictions since 1987 (1987-2010), according to available U.S. Department of Justice data.^{xii}

While Robert Wechsler, Director of Research, City Ethics wisely notes that “there are no simple correlations in government ethics”^{xiii}, the range of reports and statistics cited in this report clearly demonstrate that Florida is the national leader for public corruption.

The world’s leading employers regularly evaluate the corruption risk of a marketplace before making investments in jobs and capital. With more than 800,000 out-of-work Floridians seeking jobs, is now not the time for policymakers to modernize state ethics laws, which are essentially frozen in time since the 1970’s? Since it has been 36 years since Florida passed comprehensive ethics reform, is now not the time to do so again in order to reduce the corruption risk in Florida government and the marketplace?

Policymakers in Florida already have three significant reports in the modern era containing extensive details about the problem of public corruption in Florida and recommended ethics reform solutions:

- [The Public Corruption Study Commission report published in 2000 following Executive Order 99-237 by Governor Jeb Bush.](#)
- [The 2009 report of the Palm Beach County grand jury investigation of Palm Beach County governance and public corruption issues.](#)
- [The 2010 report of the nineteenth statewide grand jury called by Governor Charlie Crist.](#)

Unfortunately, the Florida Legislature has failed to act on virtually all of the proposed solutions to the problem of corruption identified in these reports.

Florida received an overall C-minus grade for corruption risk on State Integrity Investigation’s [Corruption Risk Report Card](#)^{xiv}. The Center for Public Integrity, Global Integrity and Public Radio International collaborated with experienced journalists in each state to produce the State Integrity Investigation research. The State Integrity Investigation was an unprecedented, data-driven analysis of each state’s laws and practices that deter corruption and promote accountability and openness. Journalists graded each state government on its corruption risk using 330 specific measures. The Investigation ranked every state from one to 50. Each state received a report card with letter grades in 14 categories, including campaign finance, ethics laws, lobbying regulations, and management of state pension funds. Integrity Florida is using State Integrity Investigation results as a roadmap to focus our state-level research projects and as a scorecard to measure policy results

States that had a “strong” or “very strong” overall performance on the State Integrity Investigation Corruption Risk Report Card on ethics enforcement all have ethics commissions with the power to independently initiate investigations^{xv}:

1. New Jersey 92 (very strong)
2. Connecticut 90 (very strong)
3. Iowa 88 (strong)
4. California 84 (strong)
5. West Virginia 83 (strong)
6. Wisconsin 83 (strong)
7. Washington 82 (strong)

Integrity Florida recommends the following policy changes as a roadmap for Florida to go from an 'F' grade to an 'A' on the State Integrity Investigation Corruption Risk Report Card for Florida in the category of Ethics Enforcement Agencies:

Summary of Integrity Florida recommendations to reduce corruption risk in state ethics laws

Major recommendations that would advance government ethics in Florida and the public's overall confidence in their state and local governments

- 1. Self-initiate investigations:** The state's ethics law enforcement agency needs this important tool to effectively enforce the law. With the bi-partisan Ethics Commission providing oversight and authorization, staff should be able to join the 30 other states that already have ethics enforcement agencies that can begin an ethics investigation on their own.

This would be the single, most effective change in the ethics laws that could be made, both in terms of actually enforcing the law and in terms of popular confidence in government.

The counter-argument is that this power could be misused by a politicized, "witch-hunting" Ethics Commission. However, this possibility could be eliminated by requiring more than a majority vote of the Commission members to proceed, which would require members of the minority party to join the majority party on the Commission and would require legislative appointees to join with the Governor's appointees. It likely will require additional resources for the Ethics Commission.

This would be a major achievement for the people of Florida.

- 2. Report corruption hotline:** Report corruption hotline to be managed either by the Florida Attorney General or the Florida Commission on Ethics.

This allows for better enforcement of the ethics laws. Ethics Commission staff hear from many people who are upset about possible ethics violations (and about other matters,

too), but end up unwilling to file a complaint. This means that ethics violations go unreported and uncorrected.

In order to proceed, the Ethics Commission will need actual witnesses and evidence to even establish "probable cause" to proceed to make a case, so there are safeguards against any anonymous trouble-makers. It likely will require additional resources for the Ethics Commission or the Attorney General.

This is important and would have to be adopted as part of recommendation #1 (you cannot have a hotline and still require a sworn complaint in order to start an investigation).

- 3. Ethics code should follow the money:** Appropriate aspects of Florida's state ethics code should apply to all who touch public money, including vendors.

Ethics laws address the temptation of public officials to compromise their public duties out of consideration for their private interests. That temptation can be initiated by the public official (in an extortionate manner) or by the private entity that stands to gain or lose from the public official's action. To be effective, the ethics laws should apply to both sources of temptation.

We have applied some ethics standards to private sector individuals doing business with government (gift prohibitions and reporting, for example) to lobbyists and their principals, and we have applied some standards to private sector people who exercise governmental powers (e.g., city and county attorneys in Sec. 112.313(16) and privatized City Managers (and managers of other political subdivisions) in Sec. 112.3136. No significant problems have been reported in those areas. So there is good precedent to apply appropriate government ethics standards in this way.

- 4. Require top officials to disclose major transactions:** Require all cabinet officials, state legislators, state agency heads and local elected officials to disclose details of all major financial transactions over \$1,000 within the previous year, including stock trades, property transactions, changes in business ownership, etc.

This will make financial disclosure more effective, and serve as a check on any public official who thinks that he or she may be able to get away with a conflict of interest.

The financial disclosure laws have too many loopholes. They were written in the 1970's and need to be re-written to take into account nearly 40 years of experience. At the same time, disclosure could be handled online, over the Internet. This would be a major accomplishment for Florida, even if a different balance of detail reported is reached and each financial transaction isn't reported.

- 5. Create an online financial disclosure filing system:** Create an online, publicly accessible filing system for financial disclosure statements by all state and local officials.

This is the way of the future. Also, as part of a revision of the disclosure laws it will result in greater transparency and better compliance with the conflict of interest laws, since the more that people understand what will have to be disclosed, the less likely they are to engage in behavior they don't want to disclose.

This will take significantly more up-front funding than the current system. Besides the cost of designing the software and purchasing the hardware, there will also be an ongoing cost for technical support (for the filers who will need help).

Recommendations that would improve the current state of the ethics laws without major changes to the system

1. **Raise the standard for awarding attorney's fees against complainants:** As a way in which to address the perceived "chilling effect" on potential complainants, created by the 1st District Court of Appeal's decision in Brown v. State, Comm'n on Ethics 969 So. 2d 553 (Fla. 1st DCA 2007), the Commission has previously recommended legislatively overturning the case. This would restore the law on recovery of attorney fees to the way it had been construed by the Commission—that Complainants are held to the same standard applicable to media publications regarding public figures.

Right now, a reasonable citizen - who has no personal motivation other than a desire for good government - has to weigh the personal financial consequences of filing a complaint against the potential good to the public of having unethical conduct exposed. Many ask why they should stick their neck out – why not let somebody else do it? And they do not file complaints – this has been true since the District Court changed the law. People with strong political or personal motivations still file complaints, but normal, reasonable people who read or hear about possible unethical conduct do not. Under the former standard, the Ethics Commission awarded attorney's fees only against the most egregious complainants.

2. **Change the burden of proving a violation from "clear and convincing evidence" to a "preponderance of the evidence":** Another way to make the ethics laws more enforceable would be to change the burden of proving a violation from "clear and convincing evidence" to a "preponderance of the evidence." The preponderance standard was used by the Commission from 1974 until the 1st District Court of Appeal ruled in Latham v. Florida Comm'n on Ethics, 694 So. 2d 83 (Fla. 1st DCA 1997) that it should be the "clear and convincing" standard.

Currently, the "clear and convincing" standard has been applied by some judges as strictly as if it were the criminal burden of proof (beyond a reasonable doubt). The "preponderance of the evidence" standard should be sufficient since the consequences of an ethics violation are far from criminal.

3. **Require ethics training:** Mandate 20 hours of ethics, Sunshine Law and public records training for all state and local elected and appointed officials through an annual seminar, which could also be recorded and offered as a free online course to be developed by the

Ethics Commission. Offer a shorter course for government vendors and lobbyists focused on the ethics portion of the training.

Ethics awareness will increase ethical conduct through the organization. Requiring a reasonable amount of time and attention to these standards also will improve compliance with the standards, as people become better acquainted with those standards.

4. **Increase penalties:** Increase the maximum civil penalty for violations of ethics laws from \$10,000 to \$25,000. If the consensus is that the ethics laws lack "teeth," then one approach would be to increase the range of penalties that could be assessed.

The public believes that \$10,000 is not enough of a sanction to discourage unethical conduct. More importantly, the Ethics Commission reserves the maximum fine for the worst conduct, and most violations don't entail the worst conduct, so the fines tend to group around \$1,000. That truly isn't viewed as a significant penalty. Expanding the maximum would give the Commission a greater range of penalty, enabling it to make better distinctions between degrees of culpability.

5. **Improve fine collections:** The problem of officials who fail to pay the automatic fines they receive for failing to make financial disclosure is well-documented. Last year, the Commission proposed amending the law to allow it to record its final orders in these matters as liens on the debtor's real property. This year, the Commission may want to consider expanding its proposal to include putting liens on personal property, and/or requiring the Department of Financial Services to assign the cases to a collection attorney (as opposed to a collection agency) who could reduce the fines to a judgment.

This should apply only to the automatic fines of up to \$1,500 for late-filing or non-filing financial disclosure forms. Other fines (where a complaint was filed and a violation was found) are collected by the Attorney General's office through the courts if necessary. That means there already can be a lien on real property or the basis for a garnishment.

This would improve people's confidence in government and enable the Ethics Commission to achieve its goal of 100-percent financial disclosure compliance.

There should also be a mechanism to allow the automatic fines to be withheld from the government wages (or government contract payments) of someone who currently is in office or employment or otherwise is being paid by Florida governments. Liens on personal property would mean a lien could be applied to automobiles or other significant assets.

6. **Post all core Ethics Commission documents into an online, searchable database:**

This recommendation would ensure online public access to all core public records currently available from the Florida Commission on Ethics. Each opinion rendered by the Commission is published on its website and the Constitution (Art. II, Sec. 8) requires the Ethics Commission to issue a public report on each complaint it receives. Today,

going public means making something available on the Internet, so all findings, opinions and related materials should be available online.

7. **Build an online data archive:** Put online all financial disclosure data from all public officials for all available years, 1974 to present.

This recommendation would increase transparency and provide easier public access to information that already is a public record.

8. **Require annual audit:** Require an annual audit of all financial disclosure forms.

This recommendation would help to ensure the accuracy of financial disclosure statements. Start with a limited audit of a random sampling of 1% of financial disclosure filings (370 audits) and define what would be "audited" in the statute. The Governor's Chief Inspector General or the Florida Division of Financial Services would both be logical managers of this process.

Additional Questions for Policymakers to Consider

1. Should disclosure of voting conflicts occur before votes or after votes? Presently, policymakers have up to 15 days after votes to declare conflicts of interest. An upcoming Integrity Florida research report will examine this question.
2. Should state official voting conflict disclosures be housed in an online, searchable database?
3. Where should the conflict of interest line be drawn for state legislators? Presently, state legislators are allowed to receive income from lobbying firms or organizations with state government lobbyists. An upcoming Integrity Florida research report will examine this question.
4. Should the legislature be the final judge of legislators who violate state ethics laws? Perhaps the voters could be offered a constitutional amendment to provide more independence to the Florida Commission on Ethics by enabling that agency to impose penalties?
5. If the state legislature adopts this report's recommendations to allow the Ethics Commission to begin its own investigations and/or establish a report corruption hotline, should anonymous tips from the public be allowed?

Conclusion

The Florida Commission on Ethics staff does a great job with the tools available to them and their Commissioners have demonstrated a high level of fairness and integrity since 1974. With the bi-partisan Ethics Commission providing oversight, Ethics Commission staff should be able to join the 30 other states that can begin an ethics investigation on their own, especially when they learn about a clear ethics law violation through a media report or another public source. That scenario occurs regularly but the Ethics Commission presently must wait for a citizen to file a legally sufficient complaint in order to begin an investigation.

Imagine a law enforcement officer seeing a crime in progress and not being able to pursue the suspect until a citizen calls 911 and files a report. That is essentially how we are doing state ethics law enforcement in Florida and the legislature needs to change this process to allow self-initiation of investigations by the Ethics Commission.

There is hope that ethics reform can be accomplished based on recent local-level initiatives. Following a successful 2010 ethics reform effort, Palm Beach County might be considered the capital of Florida ethics reform. The County's corruption problem escalated following several Palm Beach County commissioners going to prison and *Time* magazine giving the County the dubious title of "the capital of Florida corruption". Much has changed in Palm Beach for the better since the *Time* article. Palm Beach County voters implemented several ethics reform measures in 2010, including a stronger code of ethics for public officials than the state code. The county put in place an ethics commission with the power to initiate investigations on its own without having to wait for public complaints. Voters also created an independent inspector general in Palm Beach with secure funding to uncover corruption in local government.

These sweeping ethics reforms have earned Palm Beach County a National Association of Counties award and the region is now a national model for how to achieve ethics reform. Palm Beach County was successful because the community came together through a diverse coalition that left the partisanship out of the room. The leader of the reform effort was Marty Rogol, an Integrity Florida board member, who served as chair of Leadership Palm Beach County at the time.

Rogol brought together the League of Women Voters, tea party groups, Republicans, Democrats and independents to all agree that corruption was a problem facing their community and ethics reform was the solution. Integrity Florida has built a similar coalition on its board of directors and is serving as a research resource for local and state groups seeking to replicate the successful Palm Beach County ethics reform model.

Integrity Florida research reports offer state and local Florida policymakers a roadmap for how to reduce corruption risk. If all Floridians come together to agree that the state has a corruption problem, then the environment will be right for a constructive discussion about the most effective solutions for making government in Florida the most ethical, open, responsive and accountable in the world.

Table 1**Total Federal Public Corruption Convictions
by State 2000 – 2010**

State	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	Total
Florida	107	96	52	55	90	42	83	69	66	69	52	781
California	74	66	64	75	77	85	65	76	58	69	44	753
Texas	44	62	49	71	60	69	49	55	112	99	71	741
New York	81	68	82	63	76	82	51	44	48	38	37	670
Pennsylvania	51	61	72	74	41	56	67	40	36	41	54	593
Ohio	56	51	50	37	58	49	43	49	37	56	65	551
Illinois	59	30	30	60	42	74	38	42	56	58	52	541
New Jersey	28	28	28	41	44	39	47	62	49	44	47	457
Virginia	29	25	30	11	37	25	51	36	74	62	62	442
Louisiana	23	32	30	25	30	38	49	42	39	44	55	407
D.C.	46	43	44	20	33	15	25	22	66	28	41	383
Kentucky	25	17	27	26	28	14	27	39	28	41	34	306
Alabama	12	26	28	14	13	26	51	52	20	28	15	285
Puerto Rico	10	9	101	24	31	6	20	2	37	28	17	285
Tennessee	11	15	21	25	30	36	35	42	12	21	21	269
Michigan	11	27	24	24	30	22	25	12	33	18	30	256
Georgia	2	24	33	21	13	32	9	8	24	25	37	228
Maryland	8	8	6	12	28	17	36	21	39	32	21	228
Massachusetts	6	15	8	22	17	15	28	29	19	28	27	214
Mississippi	23	24	20	27	14	5	7	25	17	15	24	201
Missouri	12	10	13	10	10	21	20	20	31	24	25	196
North Carolina	9	13	19	20	25	13	24	26	17	9	18	193
Arizona	8	1	4	10	9	48	16	32	20	19	16	183
Indiana	11	6	6	20	17	14	9	24	14	18	12	151
Oklahoma	9	12	7	4	4	21	18	9	22	22	14	142
Wisconsin	12	13	10	11	13	20	16	12	6	9	4	126
Connecticut	8	14	3	12	8	24	11	17	5	2	4	108
Washington	17	10	6	3	18	13	2	9	12	3	8	101
Colorado	3	22	16	7	8	11	4	3	4	14	6	98
Arkansas	8	0	3	19	18	4	10	8	5	3	17	95
Guam	19	19	13	16	9	5	2	0	3	6	3	95
West Virginia	6	3	4	8	10	17	9	2	6	4	9	78
Montana	16	3	13	2	7	1	8	0	8	7	10	75
Minnesota	4	8	8	3	9	3	6	3	7	13	6	70
South Carolina	13	8	5	8	8	0	3	4	8	7	2	66
Alaska	16	6	5	0	0	1	3	15	8	1	9	64

South Dakota	2	2	4	3	2	3	13	4	11	8	9	61
North Dakota	2	2	5	16	5	9	2	6	4	0	6	57
Iowa	0	0	3	9	2	4	2	9	9	4	11	53
New Mexico	7	2	2	2	5	3	6	3	6	9	7	52
Delaware	1	8	7	3	5	2	7	5	7	1	1	47
Hawaii	3	2	10	4	14	4	5	1	2	1	0	46
Kansas	8	5	6	0	5	3	0	2	5	4	5	43
Virgin Islands	6	4	6	2	2	2	8	3	2	0	7	42
Nevada	6	5	6	6	0	0	3	4	0	7	4	41
Oregon	4	3	1	3	0	4	6	11	3	5	1	41
Utah	2	2	8	5	0	6	1	7	5	3	1	40
Maine	5	2	0	5	2	3	4	4	8	5	1	39
Idaho	5	4	7	4	3	1	1	1	1	1	0	28
Rhode Island	5	2	6	0	2	4	2	1	2	1	3	28
Nebraska	0	0	1	2	2	4	3	0	8	2	4	26
New Hampshire	2	0	5	3	0	2	0	0	4	1	1	18
Vermont	2	2	0	3	0	2	0	1	5	0	2	17
Wyoming	1	0	0	2	1	8	0	1	1	2	1	17

Source: USDOJ Public Integrity Section Reports to Congress 2000-2010

Table 2

Forbes: America's Most Miserable Cities, February 2012

Rank	City
1	Miami, Fla.
2	Detroit, Mich.
3	Flint, Mich.
4	West Palm Beach, Fla.
5	Sacramento, Calif.
6	Chicago, Ill.
7	Fort Lauderdale, Fla.
8	Toledo, Ohio
9	Rockford, Ill.
10	Warren, Mich.

Table 3

USDOJ Federal Public Corruption Convictions (1976-2010)

Rank	State	USDOJ Federal Public Corruption Convictions (1976- 2010)
1	New York	2522
2	California	2345
3	Illinois	1828
4	Florida	1762
5	Pennsylvania	1563
6	Texas	1542
7	Ohio	1405
8	D.C.	1005
9	New Jersey	909
10	Louisiana	906
11	Virginia	896
12	Tennessee	843
13	Georgia	807
14	Alabama	657
15	Michigan	655
16	Kentucky	577
17	Massachusetts	562
18	Mississippi	560
19	Missouri	507
20	Maryland	499
21	Oklahoma	472
22	North Carolina	461
23	Indiana	419
24	Puerto Rico	405
25	South Carolina	401
26	Arizona	329
27	Wisconsin	292
28	Connecticut	277
29	West Virginia	208
30	Guam	204

31	Arkansas	201
32	Washington	200
33	Minnesota	190
34	Colorado	189
35	Kansas	152
36	Iowa	148
37	South Dakota	144
38	New Mexico	139
39	Montana	136
40	Alaska	130
41	North Dakota	118
42	Hawaii	114
43	Maine	105
44	Nevada	100
45	Oregon	91
46	Virgin Islands	87
47	Utah	86
T-48	Nebraska	83
T-48	Rhode Island	83
50	Delaware	80
51	Idaho	78
52	New Hampshire	46
53	Wyoming	45
54	Vermont	30

Source: USDOJ Public Integrity Section Reports to Congress 1978-2010

Table 4

USDOJ Federal Public Corruption Convictions (1976-2010) Alphabetical

Rank	State	USDOJ Federal Public Corruption Convictions (1976- 2010)
14	Alabama	657
40	Alaska	130
26	Arizona	329
31	Arkansas	201
2	California	2345
34	Colorado	189
28	Connecticut	277
8	D.C.	1005
50	Delaware	80
4	Florida	1762
13	Georgia	807
30	Guam	204
42	Hawaii	114
51	Idaho	78
3	Illinois	1828
23	Indiana	419
36	Iowa	148
35	Kansas	152
16	Kentucky	577
10	Louisiana	906
43	Maine	105
20	Maryland	499
17	Massachusetts	562
15	Michigan	655
33	Minnesota	190
18	Mississippi	560
19	Missouri	507
39	Montana	136
T-48	Nebraska	83
44	Nevada	100

52	New Hampshire	46
9	New Jersey	909
38	New Mexico	139
1	New York	2522
22	North Carolina	461
41	North Dakota	118
7	Ohio	1405
21	Oklahoma	472
45	Oregon	91
5	Pennsylvania	1563
24	Puerto Rico	405
T-48	Rhode Island	83
25	South Carolina	401
37	South Dakota	144
12	Tennessee	843
6	Texas	1542
47	Utah	86
54	Vermont	30
46	Virgin Islands	87
11	Virginia	896
32	Washington	200
29	West Virginia	208
27	Wisconsin	292
53	Wyoming	45

Source: USDOJ Public Integrity Section Reports to Congress 1978-2010

Table 5

**USDOJ Federal Public Corruption Convictions in Florida & Florida Commission on Ethics
Complaints 1976-2011**

Year	USDOJ Federal Public Corruption Convictions (Florida)	Florida Commission on Ethics Complaints
1976	5	55
1977	1	69
1978	8	80
1979	1	77
1980	18	63
1981	10	74
1982	5	116
1983	22	112
1984	37	98
1985	16	328
1986	18	145
1987	38	95
1988	43	145
1989	81	163
1990	70	271
1991	48	188
1992	48	227
1993	43	191
1994	56	177
1995	69	170
1996	60	245
1997	54	199
1998	96	210
1999	134	184
2000	107	295
2001	96	186
2002	52	187
2003	55	209
2004	90	243
2005	42	190
2006	83	288
2007	69	256

2008	66	167
2009	69	176
2010	52	190
2011	N/A	169

Source: USDOJ Public Integrity Section Reports to Congress 1978-2010 and data provided by the Florida Commission on Ethics through public records request

Table 6

**Total Federal Public Corruption Convictions
by State 1999**

State	1999
Florida	134
California	88
New York	67
Illinois	60
D.C.	60
Mississippi	59
Pennsylvania	57
Ohio	54
Texas	53
New Jersey	43
Michigan	26
Missouri	26
Virginia	25
Alabama	25
Kentucky	25
Louisiana	24
Tennessee	22
Massachusetts	21
North Carolina	14
Puerto Rico	13
Oklahoma	12
Georgia	11
Virgin Islands	11
South Carolina	11
Washington	11
Indiana	9
Nevada	9
Connecticut	8
Minnesota	8
Maryland	7
Arizona	7
Guam	7
West Virginia	6
Kansas	6
Arkansas	5
Montana	5

Idaho	5
Utah	5
Wisconsin	4
Alaska	4
Oregon	3
Rhode Island	3
Delaware	2
Hawaii	2
Iowa	2
Vermont	2
South Dakota	1
Colorado	1
Wyoming	1
New Hampshire	1
Maine	0
Nebraska	0
North Dakota	0
New Mexico	N/A

Source: USDOJ Public Integrity Section Reports to Congress 1978-2010

Table 7

**Total Federal Public Corruption Convictions
by State 2000**

State	2000
Florida	107
New York	81
California	74
Illinois	59
Ohio	56
Pennsylvania	51
D.C.	46
Texas	44
Virginia	29
New Jersey	28
Kentucky	25
Mississippi	23
Louisiana	23
Guam	19
Washington	17
Montana	16
Alaska	16
South Carolina	13
Missouri	12
Alabama	12
Wisconsin	12
Michigan	11
Tennessee	11
Indiana	11
Puerto Rico	10
North Carolina	9
Oklahoma	9
Connecticut	8
Maryland	8
Arizona	8
Kansas	8
Arkansas	8
New Mexico	7
Massachusetts	6
Virgin Islands	6
Nevada	6

West Virginia	6
Idaho	5
Rhode Island	5
Maine	5
Minnesota	4
Oregon	4
Hawaii	3
Colorado	3
Georgia	2
Utah	2
Vermont	2
South Dakota	2
New Hampshire	2
North Dakota	2
Delaware	1
Wyoming	1
Iowa	0
Nebraska	0

Source: USDOJ Public Integrity Section Reports to Congress 1978-2010

Table 8

**Total Federal Public Corruption Convictions
by State 2001**

State	2001
Florida	96
New York	68
California	66
Texas	62
Pennsylvania	61
Ohio	51
D.C.	43
Louisiana	32
Illinois	30
New Jersey	28
Michigan	27
Alabama	26
Virginia	25
Mississippi	24
Georgia	24
Colorado	22
Guam	19
Kentucky	17
Tennessee	15
Massachusetts	15
Connecticut	14
Wisconsin	13
North Carolina	13
Oklahoma	12
Washington	10
Missouri	10
Puerto Rico	9
South Carolina	8
Maryland	8
Minnesota	8
Delaware	8
Alaska	6
Indiana	6
Kansas	5
Nevada	5
Virgin Islands	4

Idaho	4
Montana	3
West Virginia	3
Oregon	3
New Mexico	2
Rhode Island	2
Maine	2
Hawaii	2
Utah	2
Vermont	2
South Dakota	2
North Dakota	2
Arizona	1
Arkansas	0
New Hampshire	0
Wyoming	0
Iowa	0
Nebraska	0

Source: USDOJ Public Integrity Section Reports to Congress 1978-2010

Table 9

**Total Federal Public Corruption Convictions
by State 2004**

State	2004
Florida	90
California	77
New York	76
Texas	60
Ohio	58
New Jersey	44
Illinois	42
Pennsylvania	41
Virginia	37
D.C.	33
Puerto Rico	31
Louisiana	30
Michigan	30
Tennessee	30
Kentucky	28
Maryland	28
North Carolina	25
Washington	18
Arkansas	18
Massachusetts	17
Indiana	17
Mississippi	14
Hawaii	14
Alabama	13
Georgia	13
Wisconsin	13
Missouri	10
West Virginia	10
Guam	9
Minnesota	9
Arizona	9
Colorado	8
Connecticut	8
South Carolina	8
Montana	7
Delaware	5

Kansas	5
New Mexico	5
North Dakota	5
Oklahoma	4
Idaho	3
Virgin Islands	2
Rhode Island	2
Maine	2
South Dakota	2
Iowa	2
Nebraska	2
Wyoming	1
Alaska	0
Nevada	0
Oregon	0
Utah	0
Vermont	0
New Hampshire	0

Source: USDOJ Public Integrity Section Reports to Congress 1978-2010

Table 10

**Total Federal Public Corruption Convictions
by State 2006**

State	2006
Florida	83
Pennsylvania	67
California	65
New York	51
Virginia	51
Alabama	51
Texas	49
Louisiana	49
New Jersey	47
Ohio	43
Illinois	38
Maryland	36
Tennessee	35
Massachusetts	28
Kentucky	27
D.C.	25
Michigan	25
North Carolina	24
Puerto Rico	20
Missouri	20
Oklahoma	18
Wisconsin	16
Arizona	16
South Dakota	13
Connecticut	11
Arkansas	10
Indiana	9
Georgia	9
West Virginia	9
Montana	8
Virgin Islands	8
Mississippi	7
Delaware	7
Minnesota	6
New Mexico	6
Oregon	6

Hawaii	5
Colorado	4
Maine	4
South Carolina	3
Nebraska	3
Alaska	3
Nevada	3
Washington	2
Guam	2
North Dakota	2
Rhode Island	2
Iowa	2
Idaho	1
Utah	1
Kansas	0
Wyoming	0
Vermont	0
New Hampshire	0

Source: USDOJ Public Integrity Section Reports to Congress 1978-2010

Notes

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- ⁱ U.S. Department of Justice Reports to Congress on the Activities and Operations of the Public Integrity Section for 1978-2010. Available at <http://www.justice.gov/criminal/pin/>.
- ⁱⁱ <http://www.forbes.com/sites/kurtbadenhausen/2012/02/02/americas-most-miserable-cities/>
- ⁱⁱⁱ State Integrity Investigation, *Florida Corruption Risk Report Card*, 19 March 2012, Available at www.stateintegrity.org/florida.
- ^{iv} [#2011-03-Executive Order that adopts a revised Code of Ethics and re-establishes the Office of Open Government.](#)
- ^v University of Illinois at Chicago Department of Political Science and the Illinois Integrity Initiative of the University of Illinois' Institute for Government and Public Affairs "Chicago and Illinois, Leading the Pack in Corruption". Available at <http://www.uic.edu/depts/pols/ChicagoPolitics/leadingthepack.pdf>
- ^{vi} U.S. Department of Justice Reports to Congress on the Activities and Operations of the Public Integrity Section for 1978-2010. Available at <http://www.justice.gov/criminal/pin/>.
- ^{vii} U.S. Department of Justice Reports to Congress on the Activities and Operations of the Public Integrity Section for 1978-2010. Available at <http://www.justice.gov/criminal/pin/>.
- ^{viii} U.S. Department of Justice Reports to Congress on the Activities and Operations of the Public Integrity Section for 1978-2010. Available at <http://www.justice.gov/criminal/pin/>.
- ^{ix} U.S. Department of Justice Reports to Congress on the Activities and Operations of the Public Integrity Section for 1978-2010. Available at <http://www.justice.gov/criminal/pin/>
- ^x U.S. Department of Justice Reports to Congress on the Activities and Operations of the Public Integrity Section for 1978-2010. Available at <http://www.justice.gov/criminal/pin/>
- ^{xi} U.S. Department of Justice Reports to Congress on the Activities and Operations of the Public Integrity Section for 1978-2010. Available at <http://www.justice.gov/criminal/pin/>
- ^{xii} U.S. Department of Justice Reports to Congress on the Activities and Operations of the Public Integrity Section for 1978-2010. Available at <http://www.justice.gov/criminal/pin/>
- ^{xiii} <http://www.cityethics.org/content/problems-new-report-chicagos-level-corruption>
- ^{xiv} State Integrity Investigation, *Florida Corruption Risk Report Card*, 19 March 2012, available at www.stateintegrity.org/florida.
- ^{xv} Data provided directly from Global Integrity