

SETTLEMENT AGREEMENT

This agreement made and entered into between the Executive Branch Ethics Commission (hereinafter the "Commission") and Chris Parsons.

WHEREAS, this agreement involves the matter styled *Executive Branch Ethics Commission v. Chris Parsons*, Case No. 13-003;

WHEREAS, the Commission is designated by statute as the agency responsible for enforcing the Executive Branch Code of Ethics, KRS Chapter 11A;

WHEREAS, on March 18, 2013, the Commission alleged facts in an Initiating Order that Chris Parsons violated the Executive Branch Code of Ethics at KRS 11A.020(1)(b), (c), and (d);

WHEREAS, Chris Parsons was at all relevant times mentioned in the Initiating Order a "public servant" as defined in KRS 11A.010(9) and thus subject to the Executive Branch Code of Ethics; and

WHEREAS, Chris Parsons indicates his desire to resolve all issues in this action by the execution of a Settlement Agreement.

NOW, THEREFORE, in settlement of the above allegations, the Commission and Chris Parsons agree, pursuant to KRS 11A.100, as follows:

1. Chris Parsons admits that he committed violations of the Executive Branch Code of Ethics at 11A.020(1)(b), (c), and (d), as stated in Appendix A to the Commission's Initiating Order of March 18, 2013, attached hereto and incorporated by reference herein.
2. Chris Parsons agrees to pay the Commission a civil penalty of five thousand dollars (\$5,000.00) on or before June 28, 2013.
3. Chris Parsons agrees to cooperate fully with the Commission in any further investigations and will submit complete, accurate, and truthful interviews and provide complete, accurate, and truthful testimony in any Commission proceedings in which he may be called as a witness.
4. Chris Parsons agrees that upon the Agreed Final Order being issued by the Commission that he waives all rights to any further administrative process or appeal pursuant to KRS 13B.140 thereon.
5. The parties further agree that the acceptance of this Settlement Agreement by both parties, and the fulfillment of its express terms, is in full accord and satisfaction

of the herein referenced *Executive Branch Ethics Commission v. Chris Parsons*, Agency Case No. 13-003.

6. This Settlement Agreement constitutes a public reprimand to Chris Parsons, a copy of which will be provided to his former appointing authority pursuant to KRS 11A.100(3)(c).

IN WITNESS THEREOF, the parties have caused this agreement to be executed:


Chris Parsons

5-10-13
Date

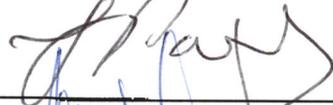
EXECUTIVE BRANCH ETHICS COMMISSION:


Chair, William David Denton

5-20-13
Date


Vice Chair, William G. Francis

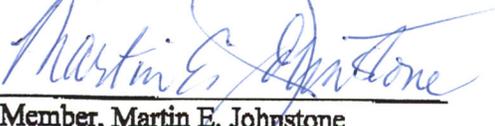
5-20-13
Date


Member, Lewis G. Paisley

5/20/13
Date


Member, Richard L. Masters

5-20-13
Date


Member, Martin E. Johnstone

5/20/13
Date

**APPENDIX A
CASE NO. 13-03
INITIATING ORDER**

ALLEGATION OF VIOLATIONS

The Respondent, Chris Parsons, was at all relevant times an employee of the Commonwealth of Kentucky, serving in two different positions within the Department of Agriculture. As such, the Respondent was subject to the jurisdiction of the Commission. KRS 11A.010(9)(h).

During the course of its preliminary investigation, the Commission found probable cause to believe that Chris Parsons committed the following violations:

COUNT I

Chris Parsons, during his course of employment as Agricultural Inspector I, Office of State Veterinarian, Department of Agriculture, used or attempted to use any means to influence a public agency in derogation of the state at large, used his official position to obtain financial gain for himself, and to secure or create privileges, exemptions, advantages, or treatment for himself in derogation of the public interest at large.

Specifically, during the course of his employment with the Office of State Veterinarian, Parsons was assigned the duties of observing stockyard sales and performing inspections, which required him to appear at designated stockyards and for which he was given a weekly itinerary. While Parsons consistently failed to appear at these stockyards, he, nevertheless, claimed work time on his timesheets for time spent allegedly performing his job duties. In doing so, Parsons collected pay for time that he falsely reported on his timesheets and, further, failed to fulfill his assigned job duties while receiving compensation.

These facts constitute violations of KRS 11A.020(1)(b), (c), and (d).

KRS 11A.020(1)(b)(c) and (d) provide:

(1) No public servant, by himself or through others, shall knowingly:

- (b) Use or attempt to use any means to influence a public agency in derogation of the state at large;
- (c) Use his official position or office to obtain financial gain for himself or any members of the public servant's family; or
- (d) Use or attempt to use his official position to secure or create privileges, exemptions, advantages, or treatment for himself or others in derogation of the public interest at large.

COUNT II

Chris Parsons, during his course of employment as Agricultural Inspector I, Office of State Veterinarian, Department of Agriculture, used or attempted to use any means to influence a public agency in derogation of the state at large, used his official position to obtain financial gain for himself, and to secure or create privileges, exemptions, advantages, or treatment for himself in derogation of the public interest at large.

Specifically, during January, February and March of 2011, the management of the Department reassigned Parsons' work station to Frankfort so as to closely monitor his work activities. Parsons failed to appear in Frankfort during February and March of 2011, but claimed work time on his timesheets and did not otherwise perform any work-related activities for the Department. Parsons also used his state-issued fuel card to purchase fuel on six occasions during that time period for personal use.

These facts constitute violations of KRS 11A.020(1)(b), (c), and (d).

KRS 11A.020(1)(b)(c) and (d) provide:

(1) No public servant, by himself or through others, shall knowingly:

- (b) Use or attempt to use any means to influence a public agency in derogation of the state at large;

- (c) Use his official position or office to obtain financial gain for himself or any members of the public servant's family; or
- (d) Use or attempt to use his official position to secure or create privileges, exemptions, advantages, or treatment for himself or others in derogation of the public interest at large.

COUNT III

Chris Parsons, during his course of employment as Agricultural Inspector I, Weights and Measures Branch, Division of Regulation and Inspection, Department of Agriculture, used or attempted to use any means to influence a public agency in derogation of the state at large, used his official position to obtain financial gain for himself, and to secure or create privileges, exemptions, advantages, or treatment for himself in derogation of the public interest at large.

Specifically, during the course of his employment with the Division of Regulation and Inspection, Parsons was assigned the duties of testing scales at various gas stations and grocery stores, for which he was given weekly and monthly itineraries. Parsons' vehicle was equipped with GPS monitoring equipment. During the months of November and December of 2012, Parsons consistently claimed work time on his timesheets for time that he did not work. Parsons claimed work time for time in which his work vehicle did not leave his home and during which he created no discernible work product. In doing so, Parsons collected wages and benefits for time that he falsely reported on his timesheets and, further, failed to fulfill his assigned job duties while receiving compensation.

These facts constitute violations of KRS 11A.020(1)(b), (c), and (d).

KRS 11A.020(1)(b)(c) and (d) provide:

- (1) No public servant, by himself or through others, shall knowingly:
 - ***
 - (b) Use or attempt to use any means to influence a public agency in derogation of the state at large;

- (c) Use his official position or office to obtain financial gain for himself or any members of the public servant's family; or
- (d) Use or attempt to use his official position to secure or create privileges, exemptions, advantages, or treatment for himself or others in derogation of the public interest at large.

COUNT IV

Chris Parsons, during his course of employment as Agricultural Inspector I, Division of Weights and Measures, Regulation and Inspection, Department of Agriculture, used or attempted to use any means to influence a public agency in derogation of the state at large, used his official position to obtain financial gain for himself, and to secure or create privileges, exemptions, advantages, or treatment for himself in derogation of the public interest at large.

Specifically, during the months of November and December of 2012, Parsons used his state vehicle for non-work related reasons. Parsons drove his work vehicle for extended periods of time through areas not included in his assigned region, while failing to perform any work related activities during this time. Parsons thereby used state resources for his own personal benefit.

These facts constitute violations of KRS 11A.020(1)(b), (c), and (d).

KRS 11A.020(1)(b)(c) and (d) provide:

- (1) No public servant, by himself or through others, shall knowingly:
 - ***
 - (b) Use or attempt to use any means to influence a public agency in derogation of the state at large;
 - (c) Use his official position or office to obtain financial gain for himself or any members of the public servant's family; or
 - (d) Use or attempt to use his official position to secure or create privileges, exemptions, advantages, or treatment for himself or others in derogation of the public interest at large.

COUNT V

Chris Parsons, during his course of employment as Agricultural Inspector I, Division of Weights and Measures, Regulation and Inspection, Department of Agriculture, used or attempted to use any means to influence a public agency in derogation of the state at large, used his official position to obtain financial gain for himself, and to secure or create privileges, exemptions, advantages, or treatment for himself in derogation of the public interest at large.

Specifically, during the months of November and December of 2012, Parsons fraudulently completed inspection reports for inspections he had not conducted. Parsons falsified the signatures of individuals he purported to be employees of, but were not actually employed by, the businesses he claimed to be inspecting. Parsons' submission of inspection reports for inspections he did not actually complete influenced his supervisors into believing Parsons had conducted these inspections, which is in derogation of the state at large.

These facts constitute violations of KRS 11A.020(1)(b), (c), and (d).

KRS 11A.020(1)(b)(c) and (d) provide:

- (1) No public servant, by himself or through others, shall knowingly:
 - ***
 - (b) Use or attempt to use any means to influence a public agency in derogation of the state at large;
 - (c) Use his official position or office to obtain financial gain for himself or any members of the public servant's family; or
 - (d) Use or attempt to use his official position to secure or create privileges, exemptions, advantages, or treatment for himself or others in derogation of the public interest at large.

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