

BEFORE THE BOARD OF ETHICS

COUNTY OF HAWAI'I

In the Matter of the Petition by

NAOMI U.P. O'DELL,

Petitioner.

PETITION NO. 2025-12

INFORMAL ADVISORY OPINION

Initial Review: April 23, 2025

INFORMAL ADVISORY OPINION

By Petition dated April 15, 2025, with the Hawai'i County Board of Ethics (hereinafter "the Board"), Petitioner NAOMI U.P. O'DELL (hereinafter referred to as "Petitioner") who is employed as the Administrator of the Vehicle Registration and Licensing Division ("VRLD") of the County of Hawai'i Department of Finance. Petitioner requested an Informal Advisory Opinion from the Board regarding application of section 2-91.4, Gifts, of the Hawaii County Code. Petitioner sought guidance regarding an anticipated vendor paid trip, to include travel, lodging, and possibly meal expenses, from Kona to Gdańsk, Poland, that would be taken in her professional capacity as an Administrator.

At its duly noticed meeting on April 23, 2025, in an open hearing, the Board reviewed and considered the above-captioned Petition pursuant to Rule 4 of the *Rules of Practice and Procedure of the Board of Ethics*. Petitioner identified she is currently employed as the Administrator of the VRLD. VLRD is responsible for the issuing of driver's licenses and state ID credentials cards in the County of Hawai'i. Petitioner informed the Board that the anticipated trip is funded by VRLD's current contractor, Thales Group, that produces the driver's license and state ID commercials driver's license credentials. The trip is to allow the Petitioner, as

Administrator of the VRLD, to go to the factory where the vendor makes the cards to witness and verify that the new color production method would be satisfactory to the Department.

Petitioner confirmed that the trip is in alignment with the contract that has already been awarded to the vendor and in line with her professional responsibilities within VRLD. Petitioner will be attending this business trip with a representative from the City and County of Honolulu, Director Kim Hashiro.

The Board, having deliberated and considered and giving appropriate weight to the testimony and evidence submitted by the Petitioner, and having considered the arguments presented, hereby renders the following Findings of Fact, Conclusions of Law, and Order.

FINDINGS OF FACT

1. To the extent that any of these Findings of Fact are Conclusions of Law, they are to be so construed.

A. The Petition

2. Petitioner is employed as an Administrator of the Vehicle Registration and Licensing Division, of the Department of Finance.

3. The anticipated business trip is to be paid for by a county contracted vendor, Thales Group, to include travel, lodging, and possibly meal expenses.

4. The Thales Group produces the driver's license and state ID cards for each of the counties, including County of Hawai'i.

5. The purpose of the business trip is to witness and verify that the new color production method by the vendor and determine if it would be satisfactory to VLRD.

6. Petitioner would be attending the business trip in her official capacity with the County, along with a representative of the City and County of Honolulu, Director Kim Hashiro.

7. The business trip is in the interest and of benefit to the County.

B. Board's Ruling

8. Based on the evidence and testimony presented, the Board finds that there is no duty for the Petitioner to disclose the vendor paid business travel as a gift.

9. Board Chair Rachel Short jointly moved that the Board find that there is no duty to disclose the petitioned trip as a gift, because it is business travel that is of benefit to the County, and Petitioner is traveling in her professional capacity in performance of her duties for the County.

10. Board Member Lisa Fukumitsu seconded the motion. The motion passed 5 in favor, 0 against.

CONCLUSION OF LAW

Based upon the evidence presented and the Board's review of the Hawai'i County Charter, Hawai'i County Code of Ethics and the *Rules of Practice and Procedure of the Board of Ethics*, the Board finds and concludes there is no duty to disclose the petitioned trip as a gift, because it is business travel that is of benefit to the County, and Petitioner is traveling in her professional capacity in performance of her duties for the County.

ORDER

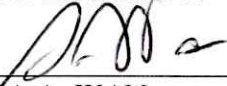
Pursuant to Rule 4.9 of the Rules of Practice and Procedure of the Board of Ethics, this Informal Advisory Opinion shall be filed and a copy shall be sent to the Petitioner.

Dated: Hilo, Hawai'i, May 14th, 2025.

BOARD OF ETHICS, COUNTY OF HAWAI'I

By: 
RACHEL SHORT
Chair

APPROVED AS TO FORM
AND LEGALITY:



SYLVIA A. WAN
Deputy Corporation Counsel

In the Matter of the Petition by NAOMI U.P. O'DELL, PETITION NO. 2025-12,
INFORMAL ADVISORY OPINION