

**ETHICS COMMISSION  
CITY AND COUNTY OF HONOLULU**

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MAYOR

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EXECUTIVE DIRECTOR  
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**ETHICS COMMISSION  
CITY AND COUNTY OF HONOLULU**

Date and Place: June 21, 2017  
Kapālama Hale  
1<sup>st</sup> Floor Conference Room  
and  
371 Alae Road  
Kula, Maui, Hawaii 96790

Present: Hon. Victoria Marks (ret.), Chair  
Michael Lilly, Esq., Vice Chair, via video conferencing

Peter S. Adler, Commissioner  
Hon. Riki Amano (ret.), Commissioner  
Lynette Lo Kanda, Commissioner  
Hon. Allene Suemori (ret.), Commissioner

Jan K. Yamane, Executive Director and Legal Counsel  
Laurie A. Wong-Nowinski, Associate Legal Counsel  
Janice Yonamine, Investigator  
Lisa P. Parker, Legal Clerk III  
Kristine Bigornia, Legal Clerk I  
Joseph Pagkalinawan, Po'okela Fellow  
Moana Yost, Deputy Corporation Counsel,  
Department of the Corporation Counsel (COR)

Alex Balandran, Extern, University of Hawai'i at Mānoa, William S.  
Richardson School of Law  
William Iwaoka, Extern, University of Hawai'i at Mānoa, William S.  
Richardson School of Law  
Anita Hofschneider, Reporter, Civil Beat  
Corey Lum, Photographer, Civil Beat  
Dr. Kioni Dudley, member of the public

Absent: David D. Monk, Commissioner

## MINUTES OF THE JUNE 21, 2017 OPEN SESSION MEETING

### I. Call to Order, Public Notice, Quorum

Chair Marks called the meeting to order at 11:35 a.m. and announced that Commissioners Adler, Kanda, Suemori and Amano were present and that Vice Chair Lilly was also present via video conference using Face Time from Kula, Maui.

Chair Marks introduced Joseph Pagkalinawan, Po‘okela Fellow, and also Lt. Alex Balandran and William Iwaoka, externs from the University of Hawai‘i at Mānoa, William S. Richardson School of Law.

### II. New Business

#### A. Chair’s Report

##### 1. Announcements, Introductions, and Correspondence

Chair Marks informed the Commission that written testimony was received from Natalie Iwasa regarding agenda item IV., strategic planning, and that it would be made part of the Commission’s records. There was also additional distribution of a second draft testimony pertaining to agenda item II.B.7.d.i.

##### 2. For Action: Approval of Open Session Minutes of May 17, 2017

**Chair Marks requested a motion to approve the Open Session Minutes of the May 17, 2017 meeting. It was moved by Commissioner Kanda, seconded by Commissioner Suemori, and unanimously carried to approve the Open Session Minutes of the May 17, 2017 meeting.**

##### 3. For Action: Approval of Executive Session Minutes of May 17, 2017

**Chair Marks requested a motion to approve the Executive Session Minutes of the May 17, 2017 meeting. It was moved by Commissioner Suemori, seconded by Commissioner Amano, and unanimously carried to approve the Executive Session Minutes of the May 17, 2017 meeting.**

#### B. Executive Director and Legal Counsel’s Report

##### 1. Staff Work Reports Summary

The Executive Director and Legal Counsel (EDLC) reported that fiscal year-end is a busy time of year and Legal Clerk III Parker was closing P-Card and other administrative documents. The EDLC thanked Ms. Parker for also locating and indexing COR opinions to the Ethics Commission from 1980 to the present for future researching purposes.

Legal Clerk I Bigornia was managing the private software ethics training program and in-house ethics training software program which is pending completion with the Department of Information Technology (DIT). Ms. Bigornia was also continuing to update and refresh the website. She completed online training in Microsoft Excel, which is used for Ethics Commission statistics and graphs, and attended interview and interrogation training conducted by John Reid & Associates.

The EDLC informed the Commission that Po'okela Fellow Pagkalinawan has been with staff since January and continues to work three (3) days a week. She also stated that U.H. law school externs, Lt. Balandran and Mr. Iwaoka, would be briefing Ethics Commission advisory opinions to include in a more comprehensive research index. Lt. Balandran was assigned to research "gifts and disclosures" and Mr. Iwaoka was assigned to research "fair and equal treatment."

The EDLC reported that Investigator Yonamine continues to carry her case load, develop case management processes, and research software applications for a case management database. Ms. Yonamine's work distribution over the last reporting period also included continuing education on internal investigation and interviewing and interrogation.

Commissioner Amano asked for clarification of Ms. Yonamine's time spent on complaints and the Commission's expectations going forward. The EDLC responded that she and Ms. Yonamine were both out of the office last month attending a four (4)-day internal investigation training and a three-and-a-half (3 ½)-day interview and interrogation training. Those training sessions comprised the 5 percent continuing education portion of Ms. Yonamine's work summary pie chart.

Commissioner Amano asked if the administrative one-third (1/3) portion of Ms. Yonamine's time would eventually decrease. The EDLC responded that some of the administrative time is spent in case management meetings and developing base line processes for the office.

Commissioner Amano asked when Ms. Yonamine's administrative time could be used for investigating complaints. The EDLC responded that even after a database and processes are set up, Ms. Yonamine will continue attending case management meetings, which are lengthy. Commissioner Amano thanked the EDLC and remarked that she just wanted to get a sense of whether Ms. Yonamine's time would change going forward.

The EDLC informed the Commission that Associate Legal Counsel (ALC) Wong-Nowinski's work was very heavy in administration and referenced the ALC's work summary pie chart, as requested by the Commission. The EDLC further explained that the ALC's administrative duties increased to 60 percent over the last month due to strategic planning assignments. The administrative load would likely remain constant even after strategic planning was complete because work would shift to strategic plan program implementation. For example, the ALC will still develop and implement additional training programs and standard operating procedures while continuing to handle her case load and other administrative responsibilities. The EDLC continued that the pie chart reflected the need for another position to support the administrative function.

Commissioner Amano responded that having another administrative position ties into strategic planning so that staff can reach the goal of providing direct services more effectively. The EDLC responded that staff is strained by handling case work, legal work, and administrative duties. Administration decreases the amount of time spent on the agency's core functions and duties need to be prioritized.

Commissioner Adler commented that the strategic planning permitted interaction group (PIG) identified several areas that needed administrative rules, revised ordinances, standard office procedures, and training and education. The EDLC responded that some of the U.H. externs' work would eventually be used for administrative rulemaking. Commissioner Adler thanked the externs.

## 2. Statistics – None

The EDLC informed the Commission that statistics would be updated pending closure of the 4<sup>th</sup> quarter of the fiscal year on June 30th.

## 3. Budget

- a. FY2017 Operating Budget – None
- b. FY2018 Operating Budget Request – City Council 3<sup>rd</sup> reading, June 7, 2017

The EDLC reported that the budget had its 3<sup>rd</sup> Reading before Council at the beginning of the month, and that the budget had passed. Commissioner Amano congratulated the EDLC.

## 4. Education and Outreach

- a. Ethics Training Program – Update

The Honolulu Authority for Rapid Transportation (HART) Board requested ethics training. Staff will provide them with training using the private web-based software application called Mindflash. Mindflash was also used to train the Department of Community Services Joint Selection Committee last month. The EDLC stated that staff was developing training and follow-up procedures.

The EDLC stated that in 2017 staff hoped to launch training to more agencies, but the in-house web-based application program for city agencies is still being developed by the Department of Information Technology (DIT). The EDLC recently had a short email discussion with the Managing Director who expressed a desire to launch online ethics training. She explained, however, that more development time was needed. Also, Staff intends for Cabinet to review both employee and board and commission online training so they know what their employees and board and commission members have learned.

Chair Marks asked the EDLC on the status of DIT developing the ethics training program, since DIT wanted the EC to use an in-house training application to avoid

licensing fees for vendor software. The EDLC provided background on the evolution of the ethics training application. She explained that staff obtained approvals to use Mindflash last year for all-employee training, but the approval was rescinded because DIT wanted to develop the same program in-house to avoid annual application license fees. Staff sent DIT ethics training program content, which DIT imported into its in-house application. In the meantime, Staff received comments from various agencies and revised training content with DIT.

Commissioner Amano asked if there would be any copyright issues, and the EDLC responded that there would be none because video clips were used for training purposes only.

The EDLC further informed the Commission that the launch date has been pushed back several times. The most recent delay was caused by further adjustment of slide and video content. The EDLC also mentioned that Commissioner Kanda had some input as well.

Commissioner Kanda stated that she would volunteer to rewrite the entire training program in order to make it more understandable for laypeople. Commissioner Kanda stated that she believed English may be a second language for many city employees and the language in the program seemed too legal and difficult to understand. She had to re-read the training content and concluded that it could be revised. She further stated that the examples should be more real-life and common sense, rather than high-level kinds of examples that very few people would use. She suggested using basic right and wrong examples. Commissioner Suemori interjected that it should be kept plain and simple, and Commissioner Kanda agreed. Commissioner Kanda also stated that it shouldn't sound like we were trying to trick people, and that she preferred that we introduce clear and common sense examples. Commissioner Adler added that he knew of a few common examples.

The ALC asked which training program was being referenced. Commissioner Kanda responded that both the all-employee training and board and commission training were hard to understand. The ALC asked if the *Parks & Recreation* video clips were difficult to understand. Commissioner Kanda responded that there should be more Hawai'i examples.

The ALC responded that she already had to completely redo the slide show, narration, and video edits, and that DIT was importing the revised material into the program. Chair Marks asked how difficult would it be to import a new program. The ALC responded that it is difficult since they have to change the type of file from Power Point into a comparable software application file. The prior version had been converted by the DIT director.

The ALC continued that if the Commission plans on rewriting both of the training programs, the training launch date will be pushed back possibly six (6) months. Commissioner Kanda suggested that the Commission could implement the current version of the training programs and later tweak it with her suggestions, and Commissioner Suemori agreed. The ALC responded that she and Ms. Bigornia had been working on the training programs and software for over a year. Commissioner Kanda responded that since the training is consistently being updated, her suggestions could be used for the next ethics training program.

Chair Marks asked whether DIT could actually create the software program in-house as they had stated last fall. The ALC responded in the affirmative. The ALC explained that she was working closely with the DIT software programmer and he created not just the user interface, but also the management and administrative part of the program to enable Staff to distribute the program, track progress and completion, and create reports, statistics and reminders. The ALC continued that DIT also developed a different delivery program using a scan tron form for blue-collar City employees who do not have access to desktop computers. Program planning and development took a lot of time. She further stated that DIT has done an excellent job in working with Staff and that she is very appreciative of its work.

The EDLC added that Staff needs the training data analytics to track ethics training delivered to 10,000 City employees. She continued that Staff would eventually like to develop a compendium of ethics training topics with more street-level discussion, which could be included in a second round of training. The EDLC reiterated that DIT was very helpful and worked well with Staff.

The EDLC informed the Commission that there is another City system that tracks employee training called Meridian, but Staff was informed that our ethics training program could not be added to that system. Thus, DIT built a separate system to track the ethics training program.

Chair Marks summarized that the Commission's plan is to implement the ethics training programs that have already been developed; then work on improving the training; and later create other modules of ethics training; the EDLC agreed.

- b. Newsletter – *THE COMPASS: Navigating Ethics for the City & County of Honolulu* (released May 2017)

The EDLC stated that a newsletter was sent to the Commission and City employees via each City department director. The newsletter listed topics within the Commission's jurisdiction and referenced topics handled by other departments or agencies outside of the Commission's jurisdiction. The EDLC stated that Staff plans to publish newsletters on a quarterly basis.

Commissioner Amano asked if Staff received any feedback; the EDLC responded in the negative. All the Commissioners commented that they were pleased with the newsletter and thanked the ALC.

5. 2016 General Election Charter Amendment Question No. 2 – Bill 057 (17), Relating to Ethics Commission Staff (introduced June 7, 2017; Executive Management and Legal Affairs (EMLA) Committee, June 27, 2017)

The EDLC reminded the Commission that Charter Amendment No. 2 was passed during the November election and Bill 57 repeals the language that is now duplicative of that amendment. Bill 57 will be reviewed by the EMLA Committee on June 27, 2017.

The EDLC asked for the Commission's review of the draft testimony contained in their additional distribution packet; she also requested that a Commissioner attend the EMLA Committee to testify on behalf of the Commission.

Chair Marks responded that she could sign the testimony but could not attend the EMLA hearing due to a scheduling conflict. Chair Marks asked the Vice Chair if he was available and he responded that he would attend the City Council meeting to represent the Commission.

**Chair Marks asked the Commission if they had any comments regarding the testimony and since there were none, asked for a motion to approve the draft testimony for Bill 57 (2017). It was moved by Commissioner Amano, seconded by Commissioner Suemori, and unanimously carried to approve the draft testimony for Bill 57 (2017).**

6. Audit – None

7. Legislation

- a. State Ethics Bills (enrolled to Governor)
  - i. HB508 HD1 SD1 CD1, Relating to Ethics (Report Title: government; ethics; fine increases; settlement agreement)
  - ii. HB511 HD1 SD1 CD1, Relating to Lobbyists (Report Title: State Ethics Commission; lobbyist law; lobbying; enforcement)
  - iii. HB852 HD2 SD1 CD1, Relating to Ethics (Report Title: State Ethics Commission; financial disclosure statements; notice; administrative fine)
- b. Sunshine Law – HB165 HD1 SD2 CD1, Relating to Public Meetings (Report Title: sunshine law; public agency meetings and records) (enrolled to Governor)
- c. Uniform Information Practices Act (UIPA) – SB572 SD1 HD1 CD1, Relating to Information Practices (Report Title: Office of Information Practices; freedom of information; disclosure rules) (enrolled to Governor)
- d. City Council
  - i. Bill 050 (17), Relating to City Boards and Commissions
  - ii. Bill 057 (17), Relating to Ethics Commission Staff (see Item II.B.5.)

The EDLC summarized legislative bills of interest and explained that the Governor may sign the three (3) ethics-related bills on June 22. The EDLC further stated that the remaining bills were enrolled to the Governor and were awaiting his signature. She also clarified that City Council Bill 50 (17), relating to City Boards and Commissions and Bill 57 (17), relating to the Ethics Commission Staff, would both be heard at the EMLA Committee on June 27.

8. Education Opportunities

- a. Society of Corporate Compliance and Ethics, 16<sup>th</sup> Annual Compliance & Ethics Institute, October 15-18, 2017, Caesars Palace, Las Vegas, NV

The EDLC stated that the agenda for the Society of Corporate Compliance and Ethics (SCCE) conference was provided for their review. The EDLC stated that she, Chair Marks, and Commissioner Amano may attend the conference. If so, the October 18<sup>th</sup> EC meeting must be rescheduled. Commissioner Amano informed the Commission that she and Chair Marks would attend the conference at their own expense since it was not budgeted.

- b. Council on Government Ethics Laws (COGEL), Annual Conference, December 3-6, 2017, Sheraton Centre Toronto

The EDLC informed the Commission that no one attended the last annual conference; the ALC commented that the last COGEL conference anyone from the office attended was in 2011. Commissioner Suemori asked if there were differences with conferences being held in Canada or the United States and Commissioner Amano asked whether it was helpful. The ALC responded that there were people from all over the country including Canada at the COGEL conference and confirmed it was helpful to learn what the other government agencies are doing. The EDLC and ALC explained that members of the State Ethics Commission, Campaign Spending Commission, and Office of Information Practices usually attend the COGEL conferences. The ALC commented that the SCCE conferences were usually attended by all the major private sector businesses to train their compliance and ethics program leaders.

Commissioner Suemori asked if the EC had a budget for education. The EDLC responded that she requested money for education and travel but it was removed from the budget. However, COR received a budget for education and travel. The EDLC stated that she will renew her request for education and travel budget for the next fiscal year, and will be speaking with the budget director. Commissioner Suemori asked how many roundtrips the EDLC requested for the budget. The EDLC responded that she requested two (2) roundtrips, for one Commissioner and one staff member, which was a minimal cost but it was still removed from the Commission's budget. The EDLC mentioned the possibility of obtaining a video of the conference for staff to watch.

The EDLC referenced webinars from the Columbia Law School's Center for Advancement of Public Integrity (CAPI), which she visited recently in New York. It now records and posts its luncheon training sessions online. Commissioners can go to CAPI's website, sign-in as a member, and access recorded training. The EDLC commented that CAPI offers a lot of continuing legal education (CLE) credit for New York State attorneys. The EDLC hasn't watched any training sessions yet, but informed the Commission about an upcoming CAPI two-part series on ethics issues relating to the Trump presidency.

Commissioners discussed whether the EDLC and ALC can receive continuing legal education (CLE) credit for some of the trainings. Both Commissioner Suemori and Chair Marks agreed that the EDLC and ALC should receive credit. Chair Marks also stated that there are specific CLE requirements in ethics; the EDLC responded that ethics training is difficult to find. Chair Marks also stated that it is good to learn whatever best practices that are offered from other municipalities or counties.

Commissioner Suemori asked if it was the Corporation Counsel's decision to cut the budget for education, and the EDLC responded that it was an administration executive budget decision.

The EDLC also stated that there is a municipal attorneys' conference that COR is attending on Maui from August 23 – 25, 2017. She mentioned that she would be making a courtesy call to the budget director to ask if she and the ALC could also attend. The EDLC stated that it was very difficult to get the specific kind of training that was directly on point with the work of the office, and she will be making a continuous request for money in the budget for education and travel. Chair Marks remarked that annual education training and travel money should be in the budget permanently.

C. For Discussion: Rule-Making and Mayor's Directives, Memoranda, and Department Policies and Circulars, Item V., Administrative Directives Manual Policy Guidance

The EDLC informed the Commission that COR received the EC's request for legal services and that COR's memo was pending review. This discussion will be carried over to the next EC meeting.

**\*\*\*AGENDA ITEMS TAKEN OUT OF ORDER\*\*\***

**At 12:32 p.m. Chair Marks requested a motion to exit open session to go into executive session. It was moved by Commissioner Kanda, seconded by Commissioner Suemori and unanimously carried to approve a motion to exit open session to go into executive session.**

**Commissioner Amano moved to exit executive session and return to open session. The motion was seconded by Commissioner Suemori and unanimously carried.**

I. Executive Session (The following agenda items will be reviewed in executive session pursuant to HRS Section 92-5(a)(4), to consult with the Commission's attorney on questions and issues pertaining to the Commission's powers, duties, privileges, immunities and liabilities; and HRS Section 92-5(a)(8), to deliberate or make a decision upon a matter that requires consideration of information that must be kept confidential pursuant to state or federal law or court order.)

A. For Discussion and Action: Request for Review of Legal Counsel's Preliminary Determination Regarding Alleged City Officer Misuse of City Resources to Provide Lunch for Individuals in Violation of Revised Charter of Honolulu Sec. 11-104 (Ethics Commission Rules of Procedure Section 5.5(2))

The EDLC announced that at the request of the complainant, this matter will be deferred until the next EC meeting on July 19, 2017.

- B. For Discussion: Kealoha vs. Totto, Civil No. 16-1-1166 GWBC in the Circuit Court of the First Circuit, State of Hawai‘i, and Civil No. 1:16-CV-16-00682 JMS-KSC in the United States District Court for the District of Hawai‘i

(HRS Section 92-5(a)(4))

Chair Marks reported that the Commission met with counsel.

- C. Independent Ethics Investigator Retained Due to Conflict of Interest – None

**\*\*\*AGENDA ITEMS RETURNED TO ORDER\*\*\***

II. New Business

- D. For Discussion and Action: Evaluate the Work Performance and Set the Salary of the Executive Director and Legal Counsel Pursuant to RCH Section 11-107, as amended by 2016 General Election Charter Amendment Question No. 2

- E. For Discussion and Action: Set the Salary of the Associate Legal Counsel Pursuant to RCH Section 11-107, as amended by 2016 General Election Charter Amendment Question No. 2

Chair Marks reported that the Commission met in executive session to discuss work performance and salaries and that the Commission moved and approved a 10 percent increase for the present fiscal year for the EDLC and ALC and for each subsequent fiscal year until the EDLC’s salary is comparable to the First Deputy Corporation Counsel’s salary.

Commissioner Adler commented that it’s a new era for the Commission and complimented the staff and the dedicated Commissioners. He also announced that they would need to advocate parity for staff positions with counterparts in COR and elsewhere. He also stated that the agency is underfunded, considering the major workload. Chair Marks agreed and stated that the legal positions were not comparable to COR deputies and that the situation needed to be rectified.

- IV. For Discussion: Strategic Planning – Permitted Interaction Group Report of May 25, 2017 Meeting

Chair Marks directed the Commission to the draft strategic plan created by the permitted interaction group (PIG) that consisted of herself and Commissioners Adler and Amano, the EDLC and ALC. She explained that they looked at best practices and what was needed to overcome challenges in the next five (5) to ten (10) years. The PIG tasked Staff to look at best practices from municipalities with similar employee populations to learn how they might reorganize themselves to do their work effectively. They learned that other agencies are very different. Some used another agency to investigate and prosecute, others had their own hearings officers. Chair Marks stated that the PIG tasked Staff with a lot of administrative work to support the strategic planning which added to Staff’s everyday work and caseload requirements.

Chair Marks also stated that the Commission needs to understand and be aware that some staff cannot work beyond their 40-hour work week. Chair Marks also stated that she appreciated all the work that Staff had done.

Chair Marks asked Commissioner Adler if he had anything else to add and he thanked and commended Staff. Commissioner Adler informed the Commission that there were three (3) critical priority objectives: implementing and streamlining education and outreach; reviewing and updating key ordinances, rules, and standards and operating procedures in several areas; and strengthening the internal capabilities and procedures of the Commission. He stated that this would take time and they have to prioritize.

Commissioner Adler asked if Commissioner Amano had anything to add. Commissioner Amano asked if Vice Chair Lilly or the other Commissioners had any comments. Commissioners Suemori and Kanda remarked that they were still reviewing the draft.

The ALC stated that the law school externs are already working on Priority Objective 1, Item Nos. 5, 6 and 7, Gifts, Fair and Equal Treatment and Conflict of Interest Disclosures, by briefing and indexing advisory opinions for ease of use and future rulemaking. Commissioner Amano thanked the ALC.

Vice Chair Lilly referenced section IV of the draft strategic plan and explained that he believed that another key value of the Commission is instilling confidence in the integrity of city government employees that they will adhere to the highest standards of ethical conduct. Commissioners Amano and Adler both responded that this key value should be added in the next draft plan.

Vice Chair Lilly asked if the list of objectives were prioritized, and Commissioners Amano and Adler clarified that they were co-equal. Commissioner Amano stated that the draft plan was collectively brainstormed and that the PIG was completely open to suggestions, changes and discussion of the plan by the Commission.

Vice Chair Lilly stated that he needed to spend a little more time reviewing the draft and that within Objective 2, he wanted to add, "special training in ethics for elected officials," and Chair Marks agreed. Vice Chair Lilly explained that he believes that it's important to add since he did not know when the elected officials were last trained. Also, he explained that when he recently spoke to each Councilmember during his reappointment confirmation, he got a sense that they wanted more one-on-one training. He made a commitment that this training would be one of his priorities and that Staff and the ALC would be developing special training for them, since their ethical issues were unique. Commissioner Adler stated that he would include the special training for Councilmembers in the next draft. Chair Marks thanked Vice Chair Lilly for his input. Commissioner Amano commented that it took the PIG 10-12 hours of meetings to come up with their draft plan and reiterated that they wanted all Commissioners' input.

Commissioner Kanda asked when the PIG wanted feedback and Commissioner Amano responded that feedback would be due by the next EC meeting, since it would need to be

discussed in a general meeting. Commissioner Adler stated that they would need to produce another draft to incorporate the feedback.

Chair Marks referenced her earlier announcement of receiving written testimony from Natalie Iwasa regarding this agenda item. She announced that the written testimony was

provided to each Commissioner and reiterated that it is incorporated as part of the Commission's records. Chair Marks asked if anyone present wanted to testify about anything on the agenda and, in particular, the draft strategic plan. No one requested to testify.

Commissioner Amano asked when they should address Ms. Iwasa's comments and if it would be at the next EC meeting or PIG meeting. The EDLC responded that it would need to be addressed at a full commission meeting.

Chair Marks remarked that strategic planning was still a work in progress and a continuous effort and that they have tasked Staff with a tremendous amount of work to support the strategic plan.

Commissioner Amano suggested that everyone fully review the draft and provide comments for discussion by the next EC meeting in July. The PIG may have to go back to work and reorganize the plan. Commissioner Adler also added that they would need to take up Ms. Iwasa's comments at the next EC meeting.

## V. Adjournment

**Chair Marks asked for a motion to adjourn. It was moved by Commissioner Adler, seconded by Commissioner Suemori and unanimously carried to approve a motion to adjourn.**

The meeting concluded at 1:50 p.m.