



GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS  
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July 15, 2024

Senator Diane T. Capehart  
Chairperson on Rules & Judiciary  
35<sup>th</sup> Legislature of the Virgin Islands  
3022 Estate Golden Rock  
Christiansted, St. Croix  
Virgin Islands 00820

Dear Senator Capehart:

Thank you for the invitation to testify on Bill Nos. 35-0227 and 35-0228 on July 18, 2024. I understand the importance of the proposed legislation. However, due to a previous commitment, I am unable to attend this session. Please accept my apologies.

I have attached written testimony making comments on the proposed bills.

Sincerely,

Delia M. Thomas, CFE  
VI Inspector General

**Testimony on Bill 35-0227 and 35-0228**  
**July, 18, 2024**

Good Morning, Senator Diane Capehart, Chairperson of the Committee on Rules & Judiciary, other committee members, and senators of the 35<sup>th</sup> Legislature.

I am Delia Thomas, Virgin Islands Inspector General, and I would like to offer written testimony on Bill Nos. 35-0227 and 35-0228. The potential impact of these bills on our community is significant. First, I would like to compliment the bill's sponsors' efforts to advance legislation on Ethics and Conflict of Interest Laws and to hold persons accountable for violations.

After reviewing Bill No. 35-0227 amending Title 3, Chapter 37, and Bill No. 35-0228 amending Title 3, Chapter 8, and 37 of the Virgin Islands Code, I believe the proposed changes to the law are more under the purview of the Department of Justice.

However, I would like to offer comments on two sections of the proposed legislation. First, Bill No. 35-0228 proposed adding to Title 3, Chapter 37, Section 1109 (c), which speaks to public officials completing a training course on the Ethics and Conflicts of Interest laws. The proposed legislation states that the training requirement does not apply to a public official who has completed a training course provided by the Commission on Ethics and Conflicts of Interest while serving in another public official position. It is unclear within what period of time the public official had to complete the training to be exempt. I believe that reoccurring training should be established to account for any policy changes over time, ensuring that no more than three years should lapse without a public official receiving the 2-hour training.

Also, Section 1109 (k) proposes making statements and reports available for public inspection and copying during regular office hours. I am not in agreement with public access to the reports and statements. These reports should remain available only for investigative purposes to the Commission and any other law enforcement agency with legitimate reasons for having this

information. This will prevent the contents of the report and statements from being exposed to persons with no legitimate reason for having this information.

Thank you for allowing the Office of the Virgin Islands Inspector General to comment on the proposed legislation. We will continue to support legislation that strengthens public officials' accountability and, thus, our government. This concludes my comments on the proposed bills.