

**DISCLOSURE BY ELECTED PUBLIC EMPLOYEE
OF TRAVEL EXPENSES SERVING A LEGITIMATE PUBLIC PURPOSE
AS REQUIRED BY 930 CMR 5.08(2)(d)2.**

RECEIVED

	ELECTED PUBLIC EMPLOYEE INFORMATION
Name of elected public employee:	Ryan J. Witkos
Title/ Position	Town Clerk
Agency/ Department	Town of Hardwick
Agency address:	307 Main St. P.O. Box 575 Gilbertville, MA 01031-0575
Office phone:	413-477-6700
Office e-mail:	clerk@hardwick-ma.gov
Write an X to confirm each statement.	I am filing this disclosure because: ☒ I am going to engage in an activity that serves a legitimate public purpose, i.e., it is intended to promote the interests of the Commonwealth, a county or a municipality; and ☐ A non-public entity (but not a lobbyist) has offered to reimburse, waive or pay travel expenses and costs worth more than \$50.
	ACTIVITY THAT SERVES A LEGITIMATE PUBLIC PURPOSE
Describe the activity which is the reason for traveling.	Participate in scheduled meetings with Members of Congress and their staff to advocate for sustainable federal election funding while Congress is considering federal funding for the Help America Vote Act (HAVA) prior to the start of FY26 on October 1, 2025.
Describe your participation in the activity.	As chief election officer for Hardwick, I would attend morning and afternoon meetings with congressional offices to advocate for funding to help ensure elections are secure, reliable, and free from interference. I will be part of a group of local election officials who will be attending PEI Advocacy Day in Washington, DC for the purpose of attending meetings with senators, representatives and their staff to advocate for increasing federal election funds to support state and local election management. The subject matters directly relate to my official duties as Town Clerk with a direct impact to the Town of Hardwick.
Date, time and location of activity.	September 29th and 30th, 2025, in Washington, D.C. Monday, September 29 6:00 PM: Welcome reception Tuesday, September 30 9:00 AM: Morning meetings with congressional offices Noon: Lunch, press conference, and photos at the U.S. Capitol 2:00 PM: Afternoon meetings with congressional offices 6:00 PM: Dinner reception 1 October 2025 - Depart
Please explain how the activity will promote the interests of the Commonwealth, a county or a municipality.	Recognizing the importance and vulnerability of our nation's election systems, the Department of Homeland Security officially designated election infrastructure as critical infrastructure. Election officials at the state and local level carry out complex processes under intense scrutiny, ensuring that every eligible voter can cast their ballot and have that ballot counted as cast. Massachusetts has relied on funding through the Help America Vote Act (HAVA) to guarantee election security statewide, ensure access for every voter, and to provide for smooth operations both before and on election day, and in reporting results. The Commonwealth can disburse these HAVA funds in the form of grants to aid municipalities in conducting their elections, which are important for many communities. Easton included, in the wake of the disruptions caused by the Covid-19 pandemic. This Advocacy Day, local election officials will be asking members of Congress to appropriate \$400 million towards HAVA for FY2026, with a guarantee that two-thirds of the funds would be passed directly to municipal and county election offices. By participating in this activity, members of Congress will hear from myself, as a chief election officer, the challenges faced and the need for funding to carry out elections given the aforementioned reasons.

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TOWN CLERK
HARDWICK-MA

	TRAVEL EXPENSES
Identify the person or organization that offered to reimburse, waive or pay your travel expenses.	Project for Election Infrastructure, parent nonprofit is the Center for Technology and Civic Life (CTCL)
Address of person or organization.	Regina Logan / Organizing Manager Regina@techandciviclelife.org Center for Tech and Civic Life https://peiadvocacyday.my.canva.site/ https://modernizeourelections.org/
Provide information in as much detail as possible:	Itemization and explanation of amounts offered:
Transportation:	Airfare from Massachusetts to Washington DC. Uber/taxi from airport to hotel.
Lodging:	Overnight stay on 29-30 September 2025
Meals:	Dinner on 29 September; breakfast, lunch, dinner on 30 September 2025
Admission:	None
Other (please list):	Welcome reception and orientation evening of 29 September 2025
Total:	c. \$1,469.00
Write an X beside any relevant statement.	☒ I have attached the relevant itinerary. ☒ I have attached the relevant agenda.
For the exemption to apply, check off both statements.	Having disclosed the facts above, I determine that: ☒ Acceptance of the reimbursement, waiver or payment of travel expenses will serve a legitimate public purpose i.e., it will promote the interests of the Commonwealth, a county or a municipality; AND ☒ Such public purpose outweighs any special non-work related benefit to me or to the person providing the reimbursement, waiver or payment.
Employee signature:	
Date:	

Attach additional pages if necessary.

Elected state or county employees – file with the State Ethics Commission.

Members of the General Court – file with the House or Senate clerk or the State Ethics Commission.

Elected municipal employee – file with the City Clerk or Town Clerk.

Elected regional school committee member – file with the clerk or secretary of the committee.

Form revised February, 2012

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 TOWN CLERK
 WINDHAM, MA

**Project for Election Infrastructure
Advocacy Day 2025**

[REGISTER NOW](#)

Secure MORE MONEY for

LOCAL Election Infrastructure

When the federal budget expires on **September 30th**, we've got a brief window to represent the work you do and funding needed to to run secure, accessible elections. [Register now](#) to join us in D.C. and continue the momentum for federal investments in local election infrastructure!

As the local experts, Congress wants to hear from **you** while they consider federal funding for HAVA grants.

Where state and local regulations allow us to do so, the Project for Election Infrastructure has **funds available to pay for travel and lodging for LEOs.**

Just this year, local election officials have come together to...

- Send a [letter signed by 165+ election officials](#) to key Congressional Appropriations Committee Members.
- Submit **200+ appropriations forms** to Members of Congress.
- Publish op-eds in local media across the country from [Tennessee](#) to [Pennsylvania](#) calling for increased federal funding for election infrastructure.

The Movement

[REGISTER NOW](#)

Frequently Asked Questions (FAQ)

Q: Who is eligible to participate?

A: We welcome any local election official to participate! This includes full-time, part-time, temporary, and volunteer election workers. Former local election officials are welcome as well. We are hoping that a wide range of experience and backgrounds can attend.

Q: What will I be expected to do?

A: You'll participate in scheduled meetings with Members of Congress and their staff to advocate for sustainable federal election funding. You'll receive messaging guidance and advocacy training in advance. Your presence and voice as an election practitioner are the most important contributions—no prior advocacy experience is needed.

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TODAY
HARRISBURG PA

Q: Is this a non-partisan event?

A: Yes. The Project for Election Infrastructure is a non-partisan organization. Our advocacy focuses solely on ensuring secure, reliable, and well-funded election systems in every jurisdiction across the country.

Q: Do I have to pay for my own travel and lodging?

A: Where state and local regulations allow us to do so, the Project for Election Infrastructure has funds available to pay for travel and lodging for LEOs. Please fill out an interest form, and an organizer will follow up to discuss your eligibility for payment of your travel expenses. Regardless of whether the Project for Election Infrastructure can pay for your travel and lodging, we welcome all LEOs to participate in this day of advocacy.

Q: Will meals be provided?

A: The Project for Election Infrastructure will host dinner receptions on Monday and Tuesday evening. Breakfast and lunch will be provided during Advocacy Day. Local election officials from jurisdictions who are legally able to accept and participate in these meal opportunities may do so.

REGISTER NOW

Monday, September 29

6:00 PM: Welcome reception and what to expect

Tuesday, September 30

8:00 AM: Breakfast

9:00 AM: Morning meetings with congressional offices

12:00PM: Lunch, press conference, and photos at the U.S. Capitol

2:00PM: Afternoon meetings with congressional offices

6:00 PM: Dinner reception

Wednesday, October 1st: Attendees depart

The Project for Election Infrastructure is a nonpartisan effort led by local election officials and partners to ensure that our elections are secure, reliable, and free from interference. [Read more on our website.](#)

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2025 SEP - 8 P 4: 52
JOHN C. LUK
HARRIS, MA

Hardwick Town Clerk

From: Brian W. Riley <BRiley@k-plaw.com>
Sent: Monday, September 8, 2025 4:42 PM
To: Hardwick Town Clerk; Justine Caggiano
Cc: Nicole J. Costanzo; djenkins
Subject: FW: PEI Advocacy Day - Financial Assistance Request
Attachments: Witkos_Town of Hardwick Disclosure 930CMR5.08(2)(d)2 Advocacy Day.pdf; Election Advocacy Agenda Itinerary.pdf

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TOWN CLERK
HARDWICK, MA

Importance: High

Hello, Ryan and Justine – I have just seen the attached and the question, but I was able to review the disclosure form and state regulation. Ryan, based on that review, it is my opinion that you have filled out the correct disclosure form and that you can make the call as to this conference serving a “legitimate public purpose” (I see nothing to convince me otherwise). I expect you already looked at 930 CMR 5.08, but I have copied it below for reference. PEI does not appear to fall under the definition of “lobbyist,” as generally gifts from lobbyists are prohibited. I know you need to hear on this today – based on my review, in my opinion, you may accept these travel expenses from PEI provided you file the attached disclosure form and comply with any other applicable provisions of the regulation below. Any questions, please let me know.

Brian Riley

5.08: Gifts Worth \$50 or More and Related to Official Action or Position: Exemptions

(1) A public employee is not prohibited from accepting a gift worth \$50 or more where the gift is related to the public employee's official action or position, without violating M.G.L. c. 268A, §§ 3, 23(b)(2), and 23(b)(3), if the gift falls within one of these exemptions, and if the public employee complies with all requirements imposed by the exemption. Nothing in 930 CMR 5.08 authorizes a public employee to accept any gift by a lobbyist that is prohibited by M.G.L. c. 268B, § 6, or M.G.L. c. 3, § 43, last paragraph. Gifts from lobbyists prohibited by those statutes may be accepted only in accordance with 930 CMR 5.09.

(2) **Travel Expenses.** 930 CMR 5.08(2) relates to payment of travel and related expenses for a public employee where the purpose of the travel is to engage in an activity that serves a legitimate public purpose. Payment of such expenses by one's employing agency is not a prohibited gift and does not require an exemption. Nothing in 930 CMR 5.08 authorizes a public employee to accept any gift by a lobbyist that is prohibited by M.G.L. c. 268B, § 6, or M.G.L. c. 3, § 43, last paragraph. Gifts from lobbyists prohibited by those statutes may be accepted only in accordance with 930 CMR 5.09.

(a) **Definitions.** For purposes of 930 CMR 5.00:

1. **Travel Expenses.** Travel expenses are necessary and reasonable expenses incurred by a public employee in order to engage in an activity that serves a legitimate public purpose, including air, train, bus, and taxi fare, rental car hire, the cost of meals and lodging, and expenses related to attendance at an event including costs of registration, admission, tickets, food, refreshments, instruction, materials, and entertainment.

2. **Legitimate Public Purpose.** An activity has a “legitimate public purpose” if it is intended to promote the interests of the Commonwealth, a county, or a municipality. Examples of activities with legitimate public purposes include, but are not limited to, the following:

Example: Activities that promote tourism, economic development, charitable, public health, environmental, or educational goals;

Example: Attendance at training and educational events and conferences designed to improve the efficiencies and effectiveness of public services, or to enhance the knowledge and skills of public employees relative to their official duties;

Example: Business travel necessary to make informed purchasing decisions, selections, and inspections;

Example: A class field trip that will enable students in a government class to observe proposed legislation being debated, or that will enable students in a Spanish class to hear the language spoken by native speakers;

Example: Any purpose defined by an agency's enabling legislation;

Example: Any purpose defined as a legitimate public purpose by the agency's governing body or, absent a governing body, chief executive officer, that is in furtherance of the agency's mission.

(b) **Family Members.** 930 CMR 5.08(2) does not authorize acceptance by a public employee of reimbursement, waiver, or payment of travel expenses for a family member or friend accompanying the public employee. Others may accompany a public employee accepting reimbursement, waiver, or payment of travel expenses only at their own expense, and may share the public employee's accommodations if that does not increase the expense, or if they pay any additional cost.

(c) **Travel Expenses Paid by Domestic Public Agency.** A public employee is not prohibited from accepting reimbursement, waiver, or payment of travel expenses of substantial value, provided by any domestic public agency at the federal, state, county, municipal level, for any purpose in furtherance of the employing public agency's mission, and in accordance with the procedures of the employing agency. No disclosure is required. This exemption does not apply to payment of travel expenses by foreign governmental entities, and federally recognized tribes which is permitted, subject to compliance with 930 CMR 5.08(2)(d). Example: A District Attorney sends employees to a training conference concerning sexual offenses against children. The District Attorney's sex offense unit typically works with an employee of the state Department of Children and Families (DCF) when it prosecutes such cases. The DCF employee may accept payment of her travel expenses by the District Attorney so that she may attend the conference. No disclosure is required. Example: A law enforcement officer travels out of state to bring a fugitive back to the Commonwealth. The officer's travel expenses may be paid by a prosecutor's office. No disclosure is required.

(d) **Travel Expenses Paid by Non-public or Foreign Entity or Federally Recognized Tribe.** A public employee is not prohibited from accepting reimbursement, waiver, or payment of travel expenses of substantial value, provided by a non-public or foreign entity or federally recognized tribe, if a prior written determination is made as set forth in 930 CMR 5.08(2)(d)1. or 2. that such acceptance will serve a legitimate public purpose, and that such public purpose outweighs any special non-work related benefit to the employee, or to the person providing the reimbursement, waiver, or payment. Payment of travel expenses by domestic public agencies is permitted pursuant to 930 CMR 5.08(2)(c).

1. **Non-elected Public Employees.** A non-elected public employee is not prohibited from accepting reimbursement, waiver, or payment of travel expenses of substantial value, provided by any person other than a public agency or a lobbyist, if the public employee makes a prior written disclosure to the employee's appointing authority, and the appointing authority, or designee, determines in writing and prior to the date of any travel or attendance both that acceptance of such reimbursement, waiver, or payment of expenses will serve a legitimate public purpose, and that such public purpose outweighs any special non-work related benefit to the employee or the person providing the reimbursement, waiver, or payment. Such a disclosure must be made on a form prescribed by the Commission and as provided by 930 CMR 5.07(2).

2. **Elected Public Employees.** An elected public employee is not prohibited from accepting reimbursement, waiver, or payment of travel expenses of substantial value, provided by any person other than a public agency or a lobbyist, if the elected public employee determines in writing prior to any travel or attendance both that acceptance of such reimbursement, waiver, or payment will serve a legitimate public purpose, and that such public purpose outweighs any special non-work related benefit to the employee or to the person providing the reimbursement, waiver, or payment. Such a disclosure must be made on a form prescribed by the Commission and as provided by 930 CMR 5.07(2).

3. If the value of travel expenses accepted by a public employee exceeds what was previously disclosed by \$50 or more, the public employee shall submit a reconciliation statement within two weeks after the travel is completed, in the same manner as the original disclosure was made, on a form prescribed by the Commission.

4. In addition to the disclosure required at the time of acceptance of any such reimbursement, waiver, or payment, if a particular matter involving the giver comes before the public employee during the six months following such acceptance, the employee must make a written public disclosure pursuant to M.G.L. c. 268A, § 23(b)(3).

Brian W. Riley, Esq.

KP LAW

101 Arch Street, 12th Floor

Boston, MA 02110

617-654-1722

BRiley@k-plaw.com

www.k-plaw.com

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2025 SEP - 8 PM 4: 52
TOWN CLERK
HARDWICK, MA

This message and the documents attached to it, if any, are intended only for the use of the addressee and may contain information that is PRIVILEGED and CONFIDENTIAL and/or may contain ATTORNEY WORK PRODUCT. If you are not the intended recipient, you are hereby notified that any dissemination of this communication is strictly prohibited. If you have received this communication in error, please delete all electronic copies of this message and attachments thereto, if any, and destroy any hard copies you may have created and notify me immediately.

From: Justine Caggiano <admin@hardwick-ma.gov>

Sent: Friday, September 5, 2025 2:56 PM

To: David C. Jenkins <DJenkins@k-plaw.com>; Nicole J. Costanzo <NCostanzo@k-plaw.com>; Hardwick Town Clerk <clerk@hardwick-ma.gov>

Subject: Fw: PEI Advocacy Day - Financial Assistance Request

Good afternoon David and Nicole,

Will you please review at your earliest convenience?

Thank you so much,
Justine

Sent from my Verizon, Samsung Galaxy smartphone
Get [Outlook for Android](#)

From: Hardwick Town Clerk <clerk@hardwick-ma.gov>
Sent: Thursday, September 4, 2025 3:51:41 PM
To: Justine Caggiano <admin@hardwick-ma.gov>
Subject: FW: PEI Advocacy Day - Financial Assistance Request

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2025 SEP -8 P 4: 52

TOWN CLERK
HARDWICK, MA

Hi Justine,

This is the email. I am enclosing the forms for review if you are inclined to forward to KP for review.

Thank you,
Ryan

Ryan J. Witkos, CMMC
Hardwick Town Clerk
Justice of the Peace/Notary Public
307 Main St. - P. O. Box 575
Gilbertville, MA 01031
 (413) 477-6700 | : (413) 477-6703

When writing or responding, please remember that the Secretary of State's Office has determined that email is a public record. All e-mail communications sent or received by persons using the Town of Hardwick's network may be subject to disclosure under the Massachusetts Public Records Law G.L. Chapter 66, § 10 and the federal Freedom of Information Act.

From: Sofia Martinez <sofia@techandcivicliflife.org>
Sent: Monday, August 11, 2025 4:58 PM
To: Hardwick Town Clerk <clerk@hardwick-ma.gov>
Cc: barbaram@techandcivicliflife.org; Regina Logan <regina@techandcivicliflife.org>; tavin@techandcivicliflife.org
Subject: PEI Advocacy Day - Financial Assistance Request

Hi Ryan,

I am reaching out because you have expressed interest in receiving financial assistance for reasonable travel costs to participate in the September 30, 2025 [PEI Advocacy Day](#).

PEI is unsure if it can provide financial assistance under MGL § 268A § 23(b)(2)(i). Could you please check with your legal or ethics counsel and confirm. Please keep in mind that PEI is a c4 organization, to the extent that is helpful to your counsel's analysis.

Once you have confirmed with them, please let us know via email. If they confirm that PEI is able to provide financial assistance for reasonable travel expenses, then we can proceed with your travel booking.

Best,
Sofia

Sofia Martinez

Logistics Manager

Center for Tech and Civic Life

Website: www.techandciviclife.org

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TOWN CLERK
BARNSTABLE, MA