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In Re: Wanda R. Williams,	:	File Docket:	22-0197-C
Respondent	:	Order No.	1846
	:	Date Decided:	9/18/25
	:	Date Mailed:	9/22/25

Before: David L. Reddecliff, Vice Chair
Paul E. Parsells
Robert P. Caruso
Emilia McKee Vassallo

This is a final adjudication of the State Ethics Commission.

Procedurally, the Investigative Division of the State Ethics Commission conducted an investigation regarding possible violation(s) of the Public Official and Employee Ethics Act ("Ethics Act"), 65 Pa.C.S. § 1101 *et seq.*, by the above-named Respondent. At the commencement of its investigation, the Investigative Division served upon Respondent written notice of the specific allegations. Upon completion of its investigation, the Investigative Division issued and served upon Respondent a Findings Report identified as an "Investigative Complaint." A Stipulation of Findings and a Consent Agreement were subsequently submitted by the parties to the Commission for consideration. The Findings in this Order are derived from the parties' Stipulation of Findings. The Consent Agreement has been approved.

I. ALLEGATION:

That Wanda Williams, a public official in her capacity as Mayor of the City of Harrisburg ("City"), violated Section 1103(a) of the Ethics Act when she used the authority of her office as Mayor to instruct a subordinate employee to provide her with a City-owned dumpster, at no cost, at her residence for personal use, resulting in a pecuniary gain to herself.

II. FINDINGS:

1. Wanda Williams ("Williams") has served as Mayor of the City of Harrisburg ("City") since January 3, 2022.
2. The City is governed by a seven Member Council and a Mayor.
3. As Mayor, Williams is responsible for proposing an annual budget, signing legislation into law, appointing departmental directors and committee members, and overseeing the City's day-to-day operations.
4. The City charges a fee for use of a roll-off dumpster, which includes delivery and pickup.

- a. The City charges \$230.00 to use the roll-off dumpster for trash or refuse disposal.
 - b. The fee is payable to the City Treasurer.
 - c. City residents are required to pay the fee up front.
 - d. City residents are permitted to use the dumpster for up to ten days.
5. City Department of Public Works Sanitation Billing and Enforcement Coordinator Rosemary Nye is responsible for collecting payments for the use of City dumpsters.
 6. The City Director of Public Works, the City Deputy Director of Public Works, or the City Highway Manager is responsible for ensuring the delivery of a roll-off dumpster to a City resident once payment is made.
 7. The roll-off dumpsters are emptied at the Susquehanna Resource Management Complex ("SRMC"), 1670 South 19th Street, Harrisburg, PA.
 - a. The SRMC is owned by the Lancaster County Solid Waste Management Authority ("LCSWMA").
 - b. During the relevant times in this matter, LCSWMA imposed a fee of \$214.25 per ton of refuse dumped at the SRMC.
 8. In addition to paying a fee for the delivery and pickup of the roll-off dumpster, a City resident is responsible for paying for the dumping fee per ton imposed by LCSWMA.
 9. The City Department of Public Works uses a 2019 Mack Truck PA Tag # MG4441L to empty roll-off dumpsters at the SRMC.
 - a. The Mack Truck PA Tag # MG4441L has a LCSWMA Truck No. of 22244.
 1. The LCSWMA Truck No. is identified each time the vehicle enters and dumps waste at the SRMC, and the SRMC identifies the number of tons emptied.
 10. On May 25, 2022, Williams text messaged then City Department of Public Works Director Nate Spriggs ("Spriggs") from her personal cellular telephone number at 5:55 p.m., requesting that he "bring back" a City-owned dumpster.
 - a. Williams wrote, "Good evening Nate, can you please pick up the dumpster tomorrow morning and bring it back, I have a few more things to put in it! My residents have also utilized the dumpster! A great idea to get rid of items for them. Thank you."
 - b. Spriggs replied to Williams on May 25, 2022, at 6:08 p.m., "Yes Ma'am, will do."
 11. Williams did not request use of the dumpster for a community clean up event on her street.

- a. Williams requested the dumpster to clean out her private residence in the City for an upcoming move.
12. After receiving the text message from Williams, Spriggs instructed City Highway Manager John Watson ("Watson") to deliver a roll-off dumpster to Williams' residence in the City.
 - a. Williams was provided either a twenty-yard or a thirty-yard dumpster.
13. Watson delegated the responsibility to deliver the roll-off dumpster to City Street Maintenance employee David Jordan ("Jordan").
 - a. Spriggs and Watson were onsite for the delivery of the dumpster to ensure the dumpster was placed directly in front of, or as close as possible to, Williams' residence.
14. Between May 25, 2022, and June 3, 2022, Jordan and/or City Department of Works Tradesman Dennis Shemory ("Shemory") picked up the roll-off dumpster from Williams' residence and emptied it at the SRMC at least three times.
 - a. The dumpster was full each time it was picked up to be dumped.
15. On June 3, 2022, Williams text messaged Spriggs again to request that he bring the dumpster back to her residence.
 - a. Williams wrote, "Good evening Nate, sorry I missed calling you this afternoon. Please know that I will be putting Tom Marshall in the job listed in your budget as a Lot Moderator. If you have any questions, please give me a call. Also, can you please bring the dumpster back this will be the last time. Thank you!"
16. After receiving the text message from Williams, Spriggs instructed Watson to deliver the dumpster to Williams' address on or around June 3, 2022.
17. The following day, June 4, 2022, Williams texted Spriggs again regarding picking up the dumpster from her address.
 - a. Williams wrote, "Wednesday is street cleaning starting at 12, that would be a good time to return the dumpster."
 1. Williams referenced Wednesday June 8, 2022, in her text to Spriggs, five days after she made the request to Spriggs to deliver the dumpster to Williams' address.
18. Jordan and Shemory delivered, removed, and emptied the dumpster using the City-owned 2019 Mack Truck PA Tag# MG4441L and LCSWMA Truck No. 22244.
 - a. Jordan and Shemory emptied the dumpster that was provided to Williams at least three times between May 25, 2022, and June 2, 2022.
19. Dump slips and transactional data for LCSWMA Truck No. 22244 confirmed that three trips to the SRMC were made between May 25, 2022, and June 2, 2022.

20. The chart below details transactional data for LCSWMA Truck No. 22244 between May 25, 2022, and June 2, 2022.

Customer	Material	Date	Truck	Tons	Disposal Amount	Truck License	Truck Make	Truck Year
City of Harrisburg	H01 - Refuse	05/26/22	22244	2.70	\$578.48	MG4441L	MACK	2019
City of Harrisburg	H01 - Refuse	05/31/22	22244	2.33	\$499.20	MG4441L	MACK	2019
City of Harrisburg	H01 - Refuse	06/02/22	22244	1.93	\$413.50	MG4441L	MACK	2019
				Total	\$1,491.18			

21. There are no records of Williams paying a \$230.00 fee to the City for her use of the dumpster.
22. There are no records of Williams paying the City dumping fees for three trips to the SRMC between May 25, 2022, and June 2, 2022.

III. DISCUSSION:

As Mayor of the City of Harrisburg ("City"), Pennsylvania, since January 3, 2022, Wanda Williams ("Williams") has been a public official subject to the provisions of the Public Official and Employee Ethics Act ("Ethics Act"), 65 Pa.C.S. § 1101 *et seq.*

The relevant allegation in this matter is that Williams violated Section 1103(a) of the Ethics Act when she used the authority of her office as Mayor to instruct a subordinate employee to provide her with a City-owned dumpster, at no cost, at her residence for personal use, resulting in a pecuniary gain to herself.

Pursuant to Section 1103(a) of the Ethics Act, a public official/public employee is prohibited from engaging in conduct that constitutes a conflict of interest:

§ 1103. Restricted activities

(a) **Conflict of interest.**—No public official or public employee shall engage in conduct that constitutes a conflict of interest.

65 Pa.C.S. § 1103(a).

The following terms relevant to Section 1103(a) are defined in the Ethics Act as follows:

§ 1102. Definitions

"Conflict" or "conflict of interest." Use by a public official or public employee of the authority of his office or employment or any confidential information received through his

holding public office or employment for the private pecuniary benefit of himself, a member of his immediate family or a business with which he or a member of his immediate family is associated. The term does not include an action having a de minimis economic impact or which affects to the same degree a class consisting of the general public or a subclass consisting of an industry, occupation or other group which includes the public official or public employee, a member of his immediate family or a business with which he or a member of his immediate family is associated.

“Authority of office or employment.” The actual power provided by law, the exercise of which is necessary to the performance of duties and responsibilities unique to a particular public office or position of public employment.

65 Pa.C.S. § 1102.

Subject to the statutory exclusions to the Ethics Act’s definition of the term “conflict” or “conflict of interest,” 65 Pa.C.S. § 1102, pursuant to Section 1103(a) of the Ethics Act, a public official/public employee is prohibited from using the authority of public office/employment or confidential information received by holding such a public position for the private pecuniary benefit of the public official/public employee himself, any member of his immediate family, or a business with which he or a member of his immediate family is associated.

As noted above, the parties have submitted a Consent Agreement and a Stipulation of Findings. The Findings of this Commission set forth above are derived from the parties’ Stipulation of Findings. We shall now summarize the relevant facts in this matter.

The City is governed by a seven-Member Council and a Mayor. As Mayor, Williams is responsible for proposing an annual budget, signing legislation into law, appointing departmental directors and committee members, and overseeing the City’s day-to-day operations.

The City permits its residents to use a roll-off dumpster for trash or refuse disposal for up to ten days for a fee of \$230. The fee includes delivery and pickup of the roll-off dumpster. City residents are required to pay the fee up front. The City Department of Public Works Sanitation Billing and Enforcement Coordinator is responsible for collecting the fee. The City Director of Public Works, the City Deputy Director of Public Works, or the City Highway Manager is responsible for ensuring the delivery of a roll-off dumpster to a City resident once the fee is paid.

The City’s roll-off dumpsters are emptied at the Susquehanna Resource Management Complex, which is owned by the Lancaster County Solid Waste Management Authority. During the time period relevant to this matter, in addition to paying a \$230 fee for the delivery and pickup of a roll-off dumpster, a City resident was responsible for paying a fee of \$214.25 per ton of refuse dumped at the Susquehanna Resource Management Complex. The number of tons of refuse dumped from a roll-off dumpster was determined by the Susquehanna Resource Management Complex.

On May 25, 2022, Williams used her personal cellphone to send a text message to then City Department of Public Works Director Nate Spriggs ("Spriggs") that stated, "Good evening Nate, can you please pick up the dumpster tomorrow morning and bring it back, I have a few more things to put in it! My residents have also utilized the dumpster! A great idea to get rid of items for them. Thank you." Spriggs replied to Williams that same day with a text that stated, "Yes Ma'am, will do." Williams did not request use of the roll-off dumpster for a community clean up event on her street but rather requested it to clean out her residence in the City for an upcoming move.

At Spriggs instruction, a roll-off dumpster was delivered to Williams' residence in the City. Spriggs and the City Highway Manager were onsite for the delivery of the roll-off dumpster to ensure that it was placed directly in front of, or as close as possible to, Williams' residence.

Between May 25, 2022, and June 3, 2022, City employees picked up the roll-off dumpster at Williams' residence and emptied it at the Susquehanna Resource Management Complex at least three times. The roll-off dumpster was full each time it was picked up to be dumped. Based upon the tonnage of the refuse dumped at the Susquehanna Resource Management Complex, Williams was responsible for paying dumping fees totaling \$1,491.18 for the refuse dumped. There are no records of Williams paying a \$230 fee to the City or dumping fees totaling \$1,491.18 in connection with her use of the roll-off dumpster between May 25, 2022, and June 3, 2022.

Having highlighted the Stipulated Findings and issues before us, we shall now apply the Ethics Act to determine the proper disposition of this case.

The parties' Consent Agreement sets forth a proposed resolution of the allegation as follows:

3. The Investigative Division will recommend the following in relation to the above allegation:
 - a. For purposes of a resolution given the terms of this settlement, Williams agrees that if this matter went to a hearing, the Investigative Division could meet the requisite evidentiary standard and convince a fact finder that a violation of Section 1103(a) of the Public Official and Employee Ethics Act, 65 Pa.C.S. § 1103(a), occurred when she instructed City employees to provide her with a City-owned dumpster for personal use at her residence, resulting in a private pecuniary benefit.

. . . .
4. Williams agrees to make payment in the amount of \$912.70, representing the cost of the use of the dumpster two times, in settlement of this matter payable to the City of Harrisburg and forwarded to the Pennsylvania State Ethics Commission, within thirty (30) days of the issuance of the final adjudication in this matter.

5. Williams agrees to not accept any reimbursement, compensation, or other payment from the City of Harrisburg, representing a full or partial reimbursement of the amount paid in settlement of this matter.
6. The Investigative Division will recommend that the State Ethics Commission take no further action in this matter and make no recommendations to any law enforcement or other authority to take action in this matter. Such, however, does not prohibit the Commission from initiating appropriate enforcement actions in the event of Williams' failure to comply with this agreement or the Commission's order or cooperating with any other authority who may so choose to review this matter further.
 - a. Williams has been advised that as a matter of course, all orders from the Commission are provided to the Attorney General, albeit without any specific recommendations pursuant to Paragraph 6 above.
 - b. Williams has been advised that all orders become public records and may be acted upon by law enforcement as they deem appropriate.
 - c. The non-referral language contained in this paragraph is considered an essential part of the negotiated Consent Agreement.

Consent Agreement, at 1-2.

We find the Consent Agreement to be an appropriate resolution of this case.

It is clear that but for being the City Mayor, Williams would not have been in a position to text City Department of Public Works Director Spriggs and request that he have a roll-off dumpster delivered to her residence in the City for the private purpose of cleaning out her residence for an upcoming move. At least three times between May 25, 2022, and June 3, 2022, City employees picked up the roll-off dumpster at Williams' residence and emptied it at the Susquehanna Resource Management Complex. Williams realized a private pecuniary benefit as a result of her use of the authority of her office as City Mayor when she did not pay a \$230 fee to the City for the use of the roll-off dumpster or \$1,491.18 in dumping fees for the refuse dumped at the Susquehanna Resource Management Complex between May 25, 2022, and June 3, 2022.

Williams agrees that if this matter went to a hearing, the Investigative Division could meet the requisite evidentiary standard and convince a fact finder that a violation of Section 1103(a) of the Ethics Act, 65 Pa.C.S. § 1103(a), occurred when Williams instructed City employees to provide her with a City-owned dumpster for personal use at her residence, resulting in a private pecuniary benefit.

As part of the Consent Agreement, Williams has agreed to make payment in the amount of \$912.70 payable to the City of Harrisburg and forwarded to this Commission within thirty (30)

days of the issuance of the final adjudication in this matter. Williams has further agreed to not accept any reimbursement, compensation or other payment from the City representing a full or partial reimbursement of the amount paid in settlement of this matter.

We determine that the Consent Agreement submitted by the parties sets forth a proper disposition of this case, based upon our review as reflected in the above analysis and the totality of the facts and circumstances.

IV. CONCLUSIONS OF LAW:

1. As Mayor of the City of Harrisburg ("City"), Pennsylvania, since January 3, 2022, Wanda Williams ("Williams") has been a public official subject to the provisions of the Public Official and Employee Ethics Act ("Ethics Act"), 65 Pa.C.S. § 1101 et seq.
2. For purposes of resolution given the terms of the parties' settlement, Williams agrees that if this matter went to a hearing, the Investigative Division could meet the requisite evidentiary standard and convince a fact finder that a violation of Section 1103(a) of the Ethics Act, 65 Pa.C.S. § 1103(a), occurred when Williams instructed City employees to provide her with a City-owned dumpster for personal use at her residence, resulting in a private pecuniary benefit.

In Re: Wanda R. Williams,
Respondent

: File Docket: 22-0197-C
: Date Decided: 9/18/25
: Date Mailed: 9/22/25

ORDER NO. 1846

1. For purposes of resolution given the terms of the parties' settlement, Wanda Williams ("Williams") agrees that if this matter went to a hearing, the Investigative Division could meet the requisite evidentiary standard and convince a fact finder that a violation of Section 1103(a) of the Public Official and Employee Ethics Act, 65 Pa.C.S. § 1103(a), occurred when Williams, in her capacity as Mayor of the City of Harrisburg ("City"), Pennsylvania, instructed City employees to provide her with a City-owned dumpster for personal use at her residence, resulting in a private pecuniary benefit.
2. Per the Consent Agreement of the parties, Williams is directed to make payment in the amount of \$912.70 payable to the City of Harrisburg and forwarded to the Pennsylvania State Ethics Commission by no later than the thirtieth (30th) day after the mailing date of this Order.
3. Williams is directed to not accept any reimbursement, compensation or other payment from the City representing a full or partial reimbursement of the amount paid in settlement of this matter.
4. Compliance with paragraphs 2 and 3 of this Order will result in the closing of this case with no further action by this Commission.
 - a. Non-compliance will result in the institution of an order enforcement action.

BY THE COMMISSION,



David L. Reddecliff, Vice Chair