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October 1, 2025

## **ADVISORY OPINION NO. 2025-04**

Micah Williamson  
Rehabilitation Specialist  
Alabama Department of Rehabilitation Services

### Public Employee / Revolving Door

A former public employee may accept employment with a business that provides services to their former public employer when they did not personally participate in the direct audit, regulation, or investigation of that business.

Dear Mr. Williamson:

The Alabama Ethics Commission is in receipt of your request for an Advisory Opinion of this Commission, and this opinion is issued pursuant to that request.

### **FACTS**

Mr. Williamson was employed with the Alabama Department of Rehabilitation Services (ADRS) as a Rehabilitation Specialist and retired on June 1, 2025. Darden, a Community Rehabilitation Program that partners with the Alabama Department of Rehabilitation Services, is seeking to hire Mr. Williamson as its Executive Director after reviewing several applications and conducting interviews with potential replacements. Darden receives fees for referral services it provides to ADRS. These fees are based upon rates set by the State and are not negotiated between Darden and ADRS. Mr. Williamson's interactions with Darden while working at ADRS have consisted of providing technical assistance and clarification to Darden employees when providing training for ADRS. Mr. Williamson also assisted Darden employees in the implementation and ongoing operation of Project Search at the VA home in St. Clair County. Mr. Williamson did not have control over Darden's activities and was not responsible for reviewing Darden's services to ensure that they were adequate and fulfilling their obligations to ADRS. Local vocational

rehabilitation staff were responsible for making such determinations. Mr. Williamson's involvement was primarily to facilitate communication between local vocational rehabilitation staff and community rehabilitation providers, such as Darden.

### **QUESTION PRESENTED**

May a former public employee accept employment with a business that provides services to the former public employee's previous public employer?

### **ANALYSIS**

The "Revolving Door" provisions of the Ethics Act prohibit former public employees from engaging in certain activities for a period of two years after they leave their public position.

(c) No public employee shall serve for a fee as a lobbyist or otherwise represent clients, including his or her employer before the board, agency, commission, or department, of which he or she is a former employee or worked pursuant to an arrangement such as a consulting agreement, agency transfer, loan, or similar agreement for a period of two years after he or she leaves such employment or working arrangement. For the purposes of this subsection, such prohibition shall not include a former employee of the Alabama judiciary who as an attorney represents a client in a legal, non-lobbying capacity.<sup>1</sup>

(f) No public official or public employee who personally participates in the direct regulation, audit, or investigation of a private business, corporation, partnership, or individual shall within two years of his or her departure from such employment solicit or accept employment with such private business, corporation, partnership, or individual.<sup>2</sup>

Based on the facts presented, Mr. Williamson has not personally participated in the direct regulation, audit, or investigation of Darden. Therefore, the Ethics Act does not prohibit him from accepting employment with Darden provided he did not use his public position to obtain the opportunity with Darden and did not solicit or receive anything, including the promise of future employment, for the purpose of corruptly influencing his official action.

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<sup>1</sup> Ala. Code § 36-25-13(c).

<sup>2</sup> Ala. Code § 36-25-13(f).

However, the “Revolving Door” provisions of the Ethics Act prohibit him from representing Darden before ADRS until two years after he leaves his public position.

### **CONCLUSION**

A former public employee may accept employment with a business that provides services to their former public employer when they did not personally participate in the direct audit, regulation, or investigation of that business.

### **AUTHORITY**

By 3/0 vote of the Alabama Ethics Commission on October 1, 2025.

  
Chair  
Alabama Ethics Commission