

MARYLAND STATE ETHICS COMMISSION

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33RD ANNUAL REPORT

JANUARY 1, 2011 THROUGH
DECEMBER 31, 2011

GENERAL STATUTORY IMPLEMENTATION

OVERVIEW

In calendar year 2011, the Commission welcomed new Commission member, Andrea Leahy-Fuchek. Also in calendar year 2011, the Commission said farewell to Robert Hahn, who retired after providing 28 dedicated years of service to the State Ethics Commission and the State, the last 4 as Executive Director. The Commission hired Michael W. Lord to replace Mr. Hahn.

During Calendar Year 2011, the Commission met 7 times in regularly scheduled sessions and on 5 occasions in special sessions to interview candidates for the Executive Director position and to discuss advice of counsel on several enforcement matters. During its 7 regular meetings, the Commission considered issues related to all areas of its statutory mandate: financial disclosure, conflict of interest, lobbyist disclosure and conduct restrictions, local government ethics laws, school board ethics regulations, advisory opinions, enforcement matters, employee training, lobbyist training and public information activities.

The State Ethics Commission, as directed in State Government Article §15-205, administers the provisions of the Public Ethics Law; prescribes and provides forms for each document required by the Public Ethics Law; retains as a public record each document filed with the Commission for at least four years after receipt; periodically reviews the adequacy of public ethics laws; reviews financial disclosure statements and lobbyist activity reports filed in accordance with the Public Ethics Law and notifies officials and employees of any omissions or deficiencies; and publishes information that explains the provisions of the Law.

ADVICE ACTIVITIES

The State Ethics Commission is responsible for interpreting the Public Ethics Law. Sections 15-301 through 15-303 of the Public Ethics Law authorize the State Ethics Commission to issue formal advisory opinions in response to requests from officials, employees, lobbyists, and others who are subject to the Public Ethics Law. Formal opinions generally follow an appearance before the Commission by the requestor, are published in the Maryland Register, and are accessible electronically through the Division of State Documents in COMAR Title 19A. The Commission's regulations, COMAR 19A.01.02.05, also authorize the staff and the Commission to provide informal advice. The Commission and its staff provide informal advice in many forms, including letters, emails, and phone calls.

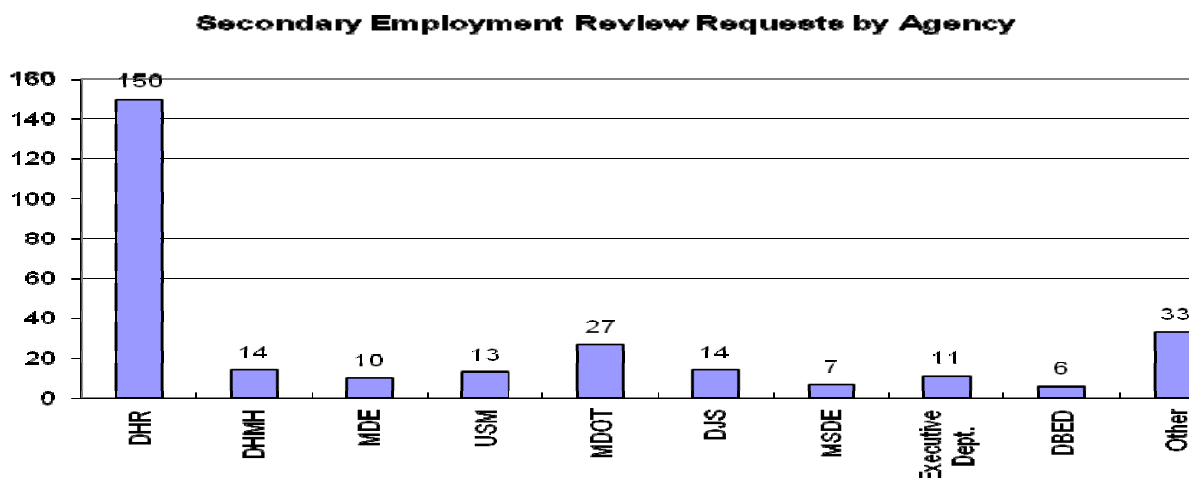
During its thirty-three years of existence, the Commission has issued 499 formal opinions. These opinions not only advise the public of the Commission's interpretation of the Public Ethics Law, but also offer guidance to the Commission and its staff in providing informal advice. In light of this large body of interpretive decisions, in recent years, the Commission and its staff primarily have provided advice informally. This process allows the Commission and its staff to provide advice in a much more timely manner, which has been important in light of the steady increase in advice requests.

The Commission's informal docket, initiated in 2002, logs requests for informal advice from the staff or Commission. The docket captures more complex matters (requiring research, consultation with other

staff members, etc.) which come to the staff's attention by way of telephone calls, email or walk in requests for advice. The Commission and its staff provided informal advice in the following subject areas during calendar years 2009 through 2011:

SUBJECT MATTER OF THE ADVICE	2011	2010	2009
Lobbying Registration, Reporting and Conduct	2	10	6
Secondary Employment Advice	285	288	215
Participation Advice	18	13	13
Procurement Restrictions	6	6	10
Post-Employment Advice	37	26	12
Gift Questions	46	25	45
Other	49	42	31
Total	443	410	332

The number of informal matters continued to increase in 2011. This increase may be attributed to an increase in the number of employees who received ethics training in 2011, as well as Commission staff's continued outreach to State agencies, employees, and public officials. The staff has worked hard to encourage employees and officials to take a proactive approach to dealing with ethics matters, preferring to deal with issues before they become enforcement matters. The vast majority of the matters addressed dealt with State employees seeking outside or secondary employment. The chart below shows the distribution of secondary employment advice requests by agency:



The 33 “other agency” secondary employment requests came from 23 different State agencies.

The informal docket does not include routine advice on matters that the Commission’s Executive Director, General Counsel, Assistant General Counsel, and Staff Counsel are able to immediately resolve through telephone calls, emails, and in-person discussions on a daily basis. It also does not include the Commission staff assisting individuals with electronic filing or training or with other general inquiries related to the Commission and access to public information.

**UNIVERSITY OF MARYLAND PUBLIC-PRIVATE PARTNERSHIP
EXEMPTIONS**

In 1990, the General Assembly enacted legislation allowing the University System of Maryland (USM) to grant to university faculty certain exemptions from the conflict of interest provisions of the Public Ethics Law for “sponsored research and development” activities. Sponsored research and development was defined in the law as an “agreement to engage in basic or applied research or development at a public senior higher education institution, and includes transferring university-owned technology or providing services by a faculty member to entities engaged in sponsored research or development.” Faculty members were not fully exempted from all Public Ethics Law requirements, and public disclosure of the interest or secondary employment was required. The institution granting the exemption was required to maintain the exemption as a public record and to file a copy with the State Ethics Commission.

In 1996, the General Assembly enacted the Public-Private Partnership Act which is codified in §15-523. This law expands the exemptions beyond faculty to include vice-presidents and presidents of institutions as well as the chancellor and vice-chancellors of the USM. The Act also broadens the exemption from the conflict of interest provisions to include USM officials, faculty members, and employees. The USM Board of Regents and the USM institutions adopted procedures pursuant to §15-523 to implement the conflict of interest exemptions. The USM Board of Regents and seven of the affiliated institutions adopted policies, and the Commission’s authority is limited to approval of the policy’s conformity as to the requirements of §15-523.

The Law requires each governing board to report quarterly to the Governor, the Legislative Policy Committee of the General Assembly and the State Ethics Commission the number of exemptions approved. Records filed by the institutions with the Commission reflect a total of 286 faculty exemptions granted by the university presidents between 1996 and 2010, including exemptions at the University of Baltimore (UMB), the University of Maryland at Baltimore County (UMBC), the University of Maryland Biotechnology Institute (UMBI), the University of Maryland Center for Environmental Science (UMCES), and the University of Maryland College Park (UMCP). During calendar year 2011, USM institutions reported an additional 27 individual faculty members exemptions to the Commission. The exemptions were from the following institutions:

INSTITUTION	Number of Exemptions
University of Maryland College Park	19
University of Maryland Baltimore	8
TOTAL FACULTY EXEMPTIONS	27

FINANCIAL DISCLOSURE

The financial disclosure program continued to identify individual employees and officials required to file, provide technical assistance to filers, and monitor compliance with the Law. In accord with Public Ethics Law § 15-103, the Commission reviewed a significant number of requests by various agencies to add or delete positions from the financial disclosure filing list, along with an extensive review of some outdated listings. The net result was an increase in the number of filers from approximately 14,177 in 2010 to 14,483 in 2011.

Pursuant to Public Ethics Law §§ 15-103 and 15-209, the Commission made decisions regarding the status of newly created boards and commissions as “executive units” for purposes of financial disclosure filing requirements. The Commission also considered and acted upon requests by a number of boards and commissions for exemption from the requirement to file financial disclosure statements. In recent years, the Commission has seen a substantial increase in the number of boards, commissions, task forces, and technical advisory groups created by the General Assembly.

Individuals who are public officials only as the result of their participation on boards or commissions are required to file a limited financial disclosure statement (Form #2). Legislators are required to file a more extensive disclosure statement (Form #19). The Commission staff conducts compliance reviews of financial disclosure statements and notifies filers of identifiable errors or omissions, and it pursues enforcement actions against those who fail to file. During 2011, the Commission staff reviewed more than 4,200 financial disclosure statements, and began implementing procedures to substantially increase that number in 2012.

In 2005, the Commission implemented an electronic financial disclosure filing system while continuing to provide the option of filing on paper. Each year more and more State employees, officials and board and commission members have filed their financial disclosure statements electronically. During calendar year 2011 more than 14,000 forms and amendments were filed electronically. Of the total number of filers, approximately 93% filed electronically. The electronic administrative tool permits the staff to review electronically submitted statements, compare them to previously electronically filed statements, send email notification to the filer of any omission or question raised by the statement and maintain a copy of that notification in the filer’s electronic record. The emails become attached to the electronic file, and a record is therefore compiled of statements, inquiries and responses. The filer may also electronically file an amendment if required. Communication with filers, for the most part, was through email, which also saved the Commission substantial supply and postage costs. Full compliance with electronic filing will allow the Commission to review the statements more efficiently, notify filers of problems earlier than in prior years, and be more timely in the enforcement process. Full compliance with electronic filing will also reduce the Commission filing space requirements and provide a safer, more secure and more efficient way of collecting, reviewing, and maintaining financial disclosure records.

LOBBYIST DISCLOSURE AND REGULATION

In 2006, the Commission implemented a process for regulated lobbyists to file required reports electronically. Through the Commission’s website, <http://ethics.gov.state.md.us>, the public is able to search lobbying registrations, event reports and activity reports.

The lobbying year runs from November 1st to October 31st of the following year. The Public Ethics Law requires a regulated lobbyist to register separately for each entity that engages the regulated lobbyist for lobbying purposes. During the lobbying year ending October 31, 2011, 2,758 lobbying registrations were filed with the Commission. With those registrations, 699 lobbyists registered on behalf of 1,269 employers. This represents an increase of 92 registrations from the 2,666 filed by October 31, 2010. The following table summarizes lobbying expenditures for the last three lobbying years:

EXPENDITURES BY LOBBYISTS			
Type of Expenditure	10/31/2011	10/31/10	10/31/09
	\$	\$	\$
B-1: Meals and beverages for officials or employees or their immediate families	9,780	5,490	9,066
B-2: Special events, including parties, dinners, athletic events, entertainment, and other functions to which all members of the General Assembly, either house thereof, or any standing committee thereof were invited.	1,384,169	1,342,398	1,031,169
B-3: Food, lodging, and scheduled entertainment of officials and employees and spouses for a meeting given in return for participation in a panel or speaking engagement at the meeting	17,507	12,511	10,428
B-4: Food and beverages at approved legislative organizational meetings	6,594	253	2,100
B-5: Tickets or free admission to attend charitable, cultural or political events where all members of a legislative unit are invited.	2,764	1,692	1,222
B-6: Gifts to or for officials or employees or their immediate families (not included on B-1 through B-5)	3,292	3,220	3,068
SUBTOTAL OF ITEMS B 1 THROUGH B 6	1,424,106	1,365,564	1,057,053
B-7: Total compensation paid to registrant (not including sums reported in any other section)	38,726,848	36,133,033	36,754,434
B-8: Salaries, compensation and reimbursed expenses for staff of the registrant	1,456,401	829,471	996,064
B-9: Office expenses not reported in B-5 or B-6	739,867	746,247	670,545

EXPENDITURES BY LOBBYISTS			
Type of Expenditure	10/31/2011	10/31/10	10/31/09
	\$	\$	\$
B-10: Cost of professional and technical research and assistance not reported in items B-5 or B-6	533,547	554,359	391,621
B-11: Cost of publications which expressly encourage persons to communicate with officials or employees	1,117,838	424,620	851,893
B-12: Fees and expenses paid to witnesses	3,434	3,590	3,765
B-13: Other expenses	797,704	761,968	738,899
TOTAL OF ITEMS B-1 THROUGH B-13	\$44,799,745	\$40,818,852	\$41,464,274

ENFORCEMENT ACTIVITIES

There are two different types of complaints, as that term is used in the Public Ethics Law and the Commission's regulations. The Public Ethics Law provides that any person may file a complaint with the Commission. Complaints filed with the Commission must be signed under oath and allege a violation of the Public Ethics Law by a person subject to the law. Following investigation of a complaint filed by a person as described above, or, investigation of independently obtained information, the Commission may issue a complaint alleging Public Ethics Law violations. Enforcement inquiries and reviews are conducted by the Commission's Staff Counsel, with the assistance of two paralegals and a compliance officer. In 2011, Staff Counsel was also ably assisted by four interns. The interns' assistance proved invaluable given that the number of enforcement matters increased 95% from calendar year 2010 to 2011.

The term "preliminary matters" describe those matters that have not yet reached the complaint stage. The Commission's enforcement procedures divide preliminary matters into two categories. All new matters are docketed as Preliminary Consideration Matters (A matters) and presented to the Commission for review to determine whether the matter merits staff inquiry or follow-up. Cases where the Commission determines that investigation is warranted are designated Preliminary Inquiry Matters (B matters). In 2011, the Commission opened 49 A matters, including 27 conflict of interest matters, 13 lobbyist matters and 9 financial disclosure matters. The Commission entered into 12 Late Filing Agreements with lobbyists during 2011, resulting in payments of \$5,010.00 to the State of Maryland. The Commission also entered into a Lobbyist Filing Agreement with a lobbyist who failed to file multiple gift reports. The lobbyist paid a late fee of \$2,750.00. The Commission closed 54 A matters in 2011, including 6 matters carried over from 2010 and 1 from 2009. (Note that at this preliminary stage, allegations of ethics violations against multiple parties may be grouped as a single matter; e.g. late filed lobbyist reports.)

The Commission opened 11 Preliminary Inquiry Matters (B matters) in 2011. All of the B Matters related to conflicts of interest allegations. In 2011, the Commission also closed 9 B Matters, including 3 matters carried over from 2010. The Commission issued a reprimand to a University of Maryland, Eastern Shore employee, through a Pre-Complaint Disposition Agreement, who violated participation restrictions by becoming involved in matter in which a qualifying relative had an interest. As part of the Agreement, the employee agreed to re-pay \$2,870.00 in grant money to the University. The Commission also issued a reprimand, through a Pre-Complaint Disposition Agreement, to a former employee of the Department of Environment for violating the secondary employment restrictions of the Public Ethics Law by having a financial interest in an entity that had contracted with her former agency. As part of the Agreement, the former employee paid a fee of \$500.00 in lieu of a fine.

In calendar year 2011, the Commission issued 187 complaints, including 74 financial disclosure matters, 5 conflict of interest matters and 112 lobbying matters. As noted above, in some circumstances, a single preliminary matter can yield multiple complaints. The Commission closed 168 complaints in 2011, including 7 matters from 2010.

All enforcement payments collected through Late Filing Agreements were deposited in the State's general fund and cannot be used by the Commission. The Commission collected a total of \$18,160.00 in enforcement payments in 2011.

LOCAL GOVERNMENT ETHICS LAWS

As originally drafted, the Public Ethics Law required Maryland counties and cities to enact local laws similar to the State's Public Ethics Law. In 1983, the General Assembly amended the Law to require local school boards either to adopt ethics regulations similar to the State Law or to be covered by county ethics laws. In 2010, the General Assembly enacted legislation (Chapter 277 of 2010) requiring local governments to adopt conflict of interest restrictions and financial disclosure requirements for elected local officials and candidates that were at least as stringent as the requirements for public officials in the Public Ethics Law. That legislation also requires local boards of education to adopt conflict of interest standards and financial disclosure requirements at least as stringent as the provisions for State officials in the Public Ethics Law for members of and candidates for election to the board of education. The law requires each local ethics commission or appropriate entity to certify to the State Ethics Commission that the county or municipal corporation is in compliance with the requirements of the law on or before October 1 of each year.

In response to this legislation, in 2011, the Commission amended its local government and board of education regulations. The Commission's Executive Director, General Counsel and Assistant General Counsel have worked with local governments and boards of education, as well as the Maryland Association of Counties, the Maryland Municipal League, and the Maryland Association of Boards of Education in implementing Chapter 277, as well as in educating local governments and boards of education on the new requirements in the Public Ethics Law.

During 2011, the Commission's Executive Director, General Counsel, and Assistant General Counsel participated in numerous phone discussions with county and local ethics officials, as well as their trade associations regarding questions relating to conflicts of interests, financial disclosure and lobbying and the implementation of Chapter 277 of 2010. The Commission received 136 written requests for advice from

local governments and boards of education. The Commission staff continued its review of the ethics ordinances and policies of local governments and boards of education for compliance with the Public Ethics Law and the Commission's regulations. In 2011, seven counties and two municipalities certified their compliance with the requirements of Chapter 277. In addition, the Commission approved draft ordinances from three counties and five municipalities. Once these approved draft policies are enacted, the counties or municipalities should certify compliance as discussed above. The Commission approved draft ethics policies from eight boards of education. In cases involving boards of education, Chapter 277 of 2010 requires a board of education to submit adopted regulations and amendments to adopt regulations to the State Ethics Commission for review and approval or disapproval. In addition, Commission staff is actively working with the remaining local governments and boards of education to ensure their drafts meet the requirements of the Public Ethics Law prior to presenting the drafts to the Commission.

The Public Ethics Law and the Commission's regulations authorize the Commission to exempt municipalities from the requirements to adopt ethics laws based on a number of factors, including size, population, government function, and budget. In 2011, the Commission began to review the exemption status of municipalities following the 2010 Census to determine whether the current exemptions are still appropriate. The Commission reviewed ten exemption requests, denied three requests, granted five exemption requests, and exempted two jurisdictions from the requirement to adopt lobbying provisions.

Finally, the Commission also received and reviewed four reports from Montgomery County and one report from Prince George's County regarding the special land use ethics disclosure reports required in certain jurisdictions (See §15-829 through §15-841).

EDUCATIONAL AND INFORMATIONAL ACTIVITIES

The Commission staff has been active in providing formal training to State employees, lobbyists and local jurisdictions. The training has involved advising and assisting employees, officials, candidates and lobbyists on completion of forms, and providing training related to the conflict of interest provisions of the Public Ethics Law. The Commission staff has assisted local government and school board officials in drafting their ethics laws and regulations. The staff has also provided technical advice to local government ethics commissions.

Legislation passed in 1999 requires new financial disclosure filers to receive 2 hours of Ethics Law training (§15-205(d)). The Commission began implementation of this mandate in calendar year 2000 and implemented online training in March of 2010. A total of 2240 public officials and state employees took the conflicts of interest training online during the remainder of calendar year 2010 and 1947 took the online training in calendar year 2011. The electronic training allows officials, employees and lobbyists to take the training at their offices and saves on expenditures related to travel, parking, and meals.

The staff conducted 6 general ethics training programs for agencies, boards and commissions, attended by 170 State employees and public officials, focusing on conflicts of interest and the electronic filing process for financial disclosure statements. The Commission staff also conducted 25 training sessions addressing conflicts of interest and procurement issues attended by an additional 1,756 State employees, public officials, members of public and special interest groups. The total number of individuals who attended general ethics and conflicts of interest training was 1,926.

In accordance with § 15-205(e) of the Public Ethics Law, which requires the State Ethics Commission to provide a training course for regulated lobbyists and prospective regulated lobbyists at least twice each year, the Commission staff conducted 5 lobbying training programs, attended by 34 regulated lobbyists. In addition, following the implementation of electronic training in March of 2010, a total of 184 regulated lobbyists took the mandated training online during the remainder of calendar year 2010 and 196 during calendar year 2011. The lobbying programs focused on electronic filing and the general lobbying conduct prohibitions in the Law, and reporting requirements.

The State Ethics Commission has become increasingly reliant on its website. The Commission's home page allows users to access the Commission's Annual Report, special explanatory memoranda, and other information. The Commission's electronic filing for lobbyists and financial disclosure filers may be accessed from the website, and all Commission forms may be downloaded from the home page. Electronic training for State employees, officials and lobbyists may be accessed from the Commission's website.

2011 LEGISLATION REPORT

The State Ethics Commission did not propose any departmental legislation for the 2011 Session of the General Assembly. However, the General Assembly enacted four bills that impacted the Public Ethics Law. House Bill 267 (Chapter 327 of the Acts of 2011) makes the following individuals subject to the Baltimore City ethics laws, rather than the Public Ethics Law: city employees and officials of the Baltimore City Health Department, the Baltimore City Police Commissioner, civilian employees and police officers of the Baltimore City Police Department, and the members of the Baltimore City Civilian Review Board. House Bill 505 (Chapter 126 of the Acts of 2011) provides that commissioners and employees of the St. Mary's County Metropolitan Commission are local officials subject to the St. Mary's County ethics laws. Senate Bill 509 (Chapter 72 of the Acts of 2011) requires the Prince George's County ethics laws to include certain restrictions related to conflicts of interest and lobbying and to include certain requirements for the county board of ethics and its executive director. Senate Bill 902 (Chapter 91 of the Acts of 2011) modifies provisions of the Public Ethics Law dealing with political contributions and disclosure requirements to the Prince George's County Executive or member of the County Council.

LEGISLATIVE RECOMMENDATIONS

PROPOSED CHANGES TO CONFLICT OF INTEREST PROVISIONS

The Commission has reviewed the conflict of interest provisions of the Public Ethics Law and suggests that the General Assembly consider the following issues:

- Like legislators, legislative staff should be prohibited from lobbying for one legislative session after leaving their State employment.
- The law prohibiting misuse of confidential information should be extended to include the use of confidential information acquired during State service by former officials and employees.

- The provisions relating to honoraria should be amended to clearly identify the types of honoraria that may be accepted, as well as the circumstances under which honoraria may be accepted.

PROPOSED CHANGES TO LOBBYING PROVISIONS

The Commission supports modifying the lobbying provisions of the Public Ethics Law in the following manner:

- Lobbyists may file their activity reports, file other lobbying reports, and initiate their lobbyist registrations with the Commission electronically. However, the Law requires that registrations include written authorization by the lobbying employer before the registration can be accepted. As a result, while a lobbyist can initially submit the data electronically, a lobbyist cannot complete the registration electronically, but must submit a signed, paper form before the registration process is considered complete. The Commission recommends modifying this requirement to allow a lobbyist to complete a registration electronically, which would then permit the Commission to offer lobbyists the convenience of paying the registration fee electronically as well. The Commission proposes enhancements to the existing electronic lobbying system to more clearly identify the information required to be reported and to create a more seamless and efficient system. To pay for these enhancements, the Commission recommends increasing the Lobbyist Registration Fee, which is used to defray the costs of administering the Commission's lobbying program.
- Section 15-708 requires lobbyists to report the total cost of a meal or reception to which all members of a legislative unit are invited. The current requirement may inadvertently inflate the actual amount spent on lobbying legislators when both legislators and non-legislators are invited. The Commission recommends that the General Assembly amend this provision by limiting the reporting requirement to the costs associated with the legislative invitees only.
- Section 15-705 requires regulated lobbyists to file a separate report disclosing the name of any State official of the Executive Branch or member of the immediate family of a State official of the Executive Branch who has benefited from gifts of meals or beverages from the regulated lobbyist. A lobbyist must file this report accounting for all expenditures on a meal or beverage for an official of the Executive Branch or a member of the official's immediate family. This reporting requirement is difficult to administer and is not consistent with other gift reporting requirements, which general require such a report only when the amount spent is \$20 or greater or \$100 cumulatively from one donor. The Commission recommends that the General Assembly amend this provision to require a report only when the amount spent is \$20 or greater or \$100 cumulatively from one donor.

PROPOSED CHANGES TO FINANCIAL DISCLOSURE PROVISIONS

During the coming calendar year, the Commission will continue to focus its attention on several of the financial disclosure provisions of the Public Ethics Law. The Commission recommends the General

Assembly consider the following amendments to the financial disclosure provisions of the Public Ethics Law:

- The General Assembly should consider eliminating the requirement to report interests in mutual funds publicly-traded on a national scale. The holder of a mutual fund has no control over the trading of the individual holdings of the mutual fund, and, therefore, it is improbable that a public employee or official could effectuate any change in value of the mutual fund by activities as a State employee or official. Legislation was introduced in the 2012 legislative session addressing this issue.
- The Public Ethics Law does not establish the financial disclosure requirements for judges and judicial appointees; instead, the Court of Appeals must adopt rules regarding financial disclosure. Judges and judicial appointees file their statements with the Court of Appeals or its designee, which then forwards the statements to the Commission. Because the Commission does not have jurisdiction over judges and judicial appointees, the Commission recommends eliminating the requirement to forward the statements to the Commission.
- In the 1999 Session of the General Assembly, the Harford County Liquor Board and its employees were placed under the authority of the State Ethics Commission. However, the employees of the Board, regardless of salary or duties, were excluded from financial disclosure requirements. This general exclusion should be withdrawn to make the disclosure requirements for these employees the same as for other employees subject to the Public Ethics Law.
- Judicial candidates should be required to file financial disclosure in each year of their candidacy in the same way as other candidates for State office.

PROPOSED CHANGE TO ENFORCEMENT PROVISIONS

The Commission and its staff continually review the Public Ethics Law in order to determine if the administration and enforcement are consistent with the intent of the law and the mission of the Commission.

- The Commission proposes that the Legislature authorize the Commission to assess civil penalties in conflict of interest, failure to file financial disclosure statements, and other violations by State employees and public officials. Currently, the Commission may request a court to assess fines of \$5,000 per violation. Having the authority to assess civil penalties would provide a formal alternative to expensive and extended court proceedings and would give the Commission equal authority in setting sanctions on conflict of interest and financial disclosure issues as it presently has with regard to lobbying violations. All penalties assessed by the court or by the Commission are sent to the General Fund.
- The Commission's current authority to assess fees for late financial disclosure statements and lobbying registrations and reports should be increased from a maximum of \$250 per late report to \$500 per late report.

**PROPOSED CHANGES TO ADMINISTRATIVE PROVISIONS OF THE LAW –
CLARIFICATION OF GENERAL COUNSEL’S ROLE IN REGULATIONS**

- The General Counsel is the legal advisor to the State Ethics Commission and prepares all legal documents required by the Commission. The General Counsel is also defined as “unit counsel” in the Administrative Procedures Act (APA) (Section 10-107, Md. Code Ann., State Gov’t Title 10 (Supp. 2011)) and has responsibility to certify the Commission’s proposed regulations as to legality. Section 10-113 of the APA requires that the Attorney General certify that changes to regulations previously published in the Maryland Register are not substantive and that the proposed text does not differ substantively from the text previously published. Despite the fact that the General Counsel is identified as the Commission’s unit counsel, this certification requires action by the Attorney General and not the “unit counsel” or General Counsel to the State Ethics Commission. The Commission recommends that the General Assembly amend the APA to allow the Commission’s “unit counsel” to certify that changes to proposed regulations are non-substantive. Legislation introduced in the 2012 legislative session would address this issue.

APPENDIX A

EMPLOYERS SPENDING **\$50,000.00** OR MORE - ALL REGISTRANTS ALL TYPES OF EXPENSES

November 1, 2010 - October 31, 2011

	TOTAL AMOUNT	EMPLOYER
1	\$1,048,959.59	Maryland State Education Association
2	\$619,045.85	Maryland Retailers Association
3	\$559,429.64	Maryland Hospital Association
4	\$431,162.87	Verizon Maryland Inc.
5	\$393,182.82	Constellation Energy Group
6	\$387,138.49	Maryland Association of Realtors, Inc.
7	\$380,862.90	Human Rights Campaign
8	\$376,338.77	Maryland Bankers Association
9	\$363,621.75	Maryland Jockey Club, The
10	\$362,917.00	Johns Hopkins Institutions
11	\$327,946.50	Montgomery County Chamber of Commerce
12	\$325,681.35	Health Facilities Association of Maryland (HFAM)
13	\$321,519.64	Pepco Holdings, Inc.
14	\$304,316.87	MedChi, The Maryland State Medical Society
15	\$303,999.95	CareFirst BlueCross BlueShield
16	\$299,087.48	Maryland State Builders Association
17	\$249,000.00	Comcast Cable Communications
18	\$244,417.11	Ocean Downs Racetrack
19	\$240,765.25	Altria Client Services Inc. and its Affiliates - Philip Morris USA Inc., John Middleton Co. and U.S. Smokeless Tobacco Company, LLC
20	\$240,636.22	EDF Inc.
21	\$233,322.25	Children's National Medical Center
22	\$233,000.00	MedStar Health
23	\$230,392.00	Maryland Independent College and University Association
24	\$227,868.70	AFSCME Maryland
25	\$226,036.30	Adventist HealthCare, Inc
26	\$221,569.94	United Healthcare Services, Inc.

27	\$216,689.78	Exelon Corporation
28	\$216,000.00	Washington Building and Construction Trades Council
29	\$199,287.72	PPE Casino Resorts Maryland, LLC
30	\$199,256.37	Norfolk Southern Corporation
31	\$192,320.52	ACS State and Local Solutions, Inc.
32	\$188,378.99	Medical Mutual Liability Insurance Society of Maryland
33	\$180,821.76	AMERIGROUP Corporation
34	\$179,348.00	Mirant Mid-Atlantic, LLC
35	\$171,705.50	League of Life & Health Insurers of Maryland, Inc.
36	\$171,211.37	Maryland Automobile Dealers Association
37	\$165,149.67	National Organization for Marriage
38	\$163,313.80	International Business Machines Corporation ("IBM")
39	\$163,231.68	Maryland Association for Justice
40	\$163,012.96	Associated Builders & Contractors
41	\$159,397.00	Maryland State Bar Association, Inc.
42	\$159,259.08	Pharmaceutical Research & Manufacturers of America
43	\$155,099.00	Joseph Smith & Sons, Inc.
44	\$152,500.00	First Energy Service Company
45	\$152,000.00	Penn National Gaming, Inc.
46	\$151,663.67	GenOn Energy
47	\$145,326.00	American Petroleum Institute
48	\$143,608.98	Direct Energy
49	\$143,247.55	Motorola, Inc.
50	\$138,000.00	Quality Image Access Maryland Coalition
51	\$136,534.30	Maryland Catholic Conference
52	\$136,255.50	American Heart Association
53	\$135,776.83	Maryland Tort Reform Coalition
54	\$132,801.17	Scientific Games International
55	\$131,612.08	Atlantic Recycling Group, LLC
56	\$129,582.89	Chesapeake Bay Foundation
57	\$126,570.43	Maryland Farm Bureau, Inc.
58	\$122,806.59	State Farm Mutual Automobile Insurance Company

59	\$121,240.64	Schaller Anderson
60	\$120,700.00	Johnson Controls, Inc.
61	\$120,257.45	Maryland Chamber of Commerce
62	\$120,200.00	Prince George's County
63	\$119,858.98	Association of Maryland Pilots
64	\$118,929.74	Aetna, Inc.
65	\$118,626.90	Washington Gas
66	\$118,163.21	Lifebridge Health
67	\$117,940.55	Maryland Association of Boards of Education
68	\$116,620.17	Epic Pharmacies
69	\$116,458.20	Greater Baltimore Committee
70	\$114,479.07	Property Casualty Insurers Association of America
71	\$114,140.27	Apartment & Office Building Association of Metropolitan Washington
72	\$114,106.25	National Children's Museum
73	\$113,281.00	Veolia Transportation
74	\$112,890.87	Licensed Beverage Distributors of Maryland, Inc.
75	\$112,500.00	Dimensions Healthcare System
76	\$110,881.75	Lockheed Martin Corporation
77	\$109,855.00	Tech Council of Maryland/MdBio
78	\$108,500.00	Accenture LLP
79	\$108,000.00	National Federation of Independent Business
80	\$107,000.00	CSX Transportation, Inc.
81	\$106,410.66	SEIU MD/DC State Council
82	\$106,100.00	MI Development (Maryland), Inc.
83	\$106,000.00	Manufacturers' Alliance of Maryland
84	\$105,832.00	Wireless Generation
85	\$105,300.00	Maryland State Dental Association
86	\$105,235.98	Mid-Atlantic LifeSpan
87	\$105,071.75	FirstEnergy Corp.
88	\$104,000.00	Chesapeake Racing, LLC
89	\$104,000.00	Law Office of Peter G. Angelos
90	\$103,000.00	RAI Services Company

91	\$102,300.00	Home Builders Association of Maryland
92	\$102,224.12	Wal-Mart Stores, Inc.
93	\$101,741.00	Merck, Sharp & Dohme Corp.
94	\$99,376.82	Ports America, Inc.
95	\$99,000.00	Mid-Atlantic Petroleum Distributors Association
96	\$97,607.05	General Motors Company
97	\$97,049.51	MedImmune, LLC
98	\$97,000.00	Chesapeake Amusements, Inc.
99	\$94,682.00	Southern Maryland Electric Cooperative, Inc.
100	\$94,481.65	Corizon Health
101	\$93,980.00	Restaurant Association of Maryland, Inc.
102	\$93,399.20	Public Justice Center, Inc.
103	\$92,708.72	FedEx Corporation
104	\$92,700.00	Balfour Beatty Construction
105	\$92,000.00	City of Bowie
106	\$91,909.09	Baltimore Jewish Council
107	\$91,228.00	Maryland Insurance Council, The
108	\$90,175.79	ESP, Inc.
109	\$90,147.28	Daily Record, The
110	\$90,000.00	Catalyst Rx, Inc.
111	\$90,000.00	Noresco, LLC
112	\$90,000.00	Owens Illinois, Inc.
113	\$89,228.09	Maryland Radiological Society
114	\$89,000.00	Civista Medical Center
115	\$88,962.63	Dominion Resources Services, Inc.
116	\$87,694.00	Beltway Fine Wine & Spirits and Corridor Fine Wines
117	\$86,907.00	Progressive Maryland
118	\$86,500.00	Maryland Classified Employees Association
119	\$86,226.00	National Aquarium in Baltimore, Inc.
120	\$84,762.27	1199 SEIU
121	\$83,903.99	Pfizer Inc.
122	\$81,658.65	Maryland Transportation Builders & Materials Association (MTBMA)

123	\$81,642.97	Allstate Insurance Company
124	\$80,400.00	Rels Valuation
125	\$79,421.03	ACLU of Maryland
126	\$79,006.03	Chief Oil & Gas, LLC
127	\$78,769.00	Old Mutual Financial Network
128	\$78,700.00	Rite Aid Corporation
129	\$78,666.00	Alcoa Eastalco Works
130	\$78,300.00	Maryland/D.C./Delaware Broadcasters
131	\$77,769.00	Holy Cross Hospital of Silver Spring, Inc.
132	\$77,500.00	Association of Forest Industries
133	\$77,390.00	Prince George's County Association of Realtors
134	\$77,000.00	Northeast Maglev, LLC
135	\$76,100.00	Microsoft Corporation
136	\$75,775.21	Maryland Wineries Association
137	\$75,600.00	Agency Insurance Company of Maryland
138	\$75,120.15	Envista Corporation
139	\$75,000.00	Darden Restaurants (GMRI, Inc.)
140	\$75,000.00	HMS Host Corporation
141	\$75,000.00	Maryland Automobile Insurance Fund
142	\$75,000.00	NaphCare, Inc.
143	\$74,747.92	American Infrastructure
144	\$74,245.42	Greater Capital Area Association of Realtors
145	\$73,670.00	Doctors Community Hospital
146	\$72,993.06	Diamond Game Enterprises
147	\$72,600.00	Apollo Group/University of Phoenix
148	\$72,532.75	L-1 Secure Credentialing, Inc.
149	\$72,500.00	Automated Health Care Solutions
150	\$72,500.00	Northrop Grumman Corporation
151	\$72,000.00	Competitive Power Ventures, Inc.
152	\$72,000.00	ValueOptions
153	\$72,000.00	Wiley Publishing
154	\$71,757.42	Harford County Government

155	\$71,643.22	ARINC, Inc.
156	\$71,533.87	Maryland Zoo in Baltimore, The
157	\$71,382.16	AAA Mid-Atlantic, Inc.
158	\$71,373.00	Maryland Citizen's Health Initiative Education Fund, Inc.
159	\$71,125.73	Paragon Project Resources, Inc.
160	\$71,040.71	T-Mobile USA, Inc.
161	\$70,571.70	Washington Area NEW Automobile Dealers Association (WANADA)
162	\$70,500.00	Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc.
163	\$70,462.51	Bank of America, N.A.
164	\$70,436.87	Concentra Medical Centers
165	\$70,152.79	Cash America
166	\$70,100.00	Chesapeake Urology Associates, P.A.
167	\$70,000.00	American Chemistry Council
168	\$70,000.00	Maryland Chapter of National Association of Industrial & Office Properties
169	\$70,000.00	Prince George's County Council
170	\$69,934.05	Sherwin-Williams Company, The
171	\$69,650.00	Correct RX Pharmacy Services, Inc.
172	\$69,492.23	Columbia Association, Inc.
173	\$68,619.24	Enterprise Holdings, Inc.
174	\$68,039.79	AFSCME, AFL-CIO
175	\$67,804.00	Woda Group, LLC, The
176	\$66,865.67	Keolis America
177	\$66,000.00	CBN Secure Technologies, Inc.
178	\$66,000.00	CSC
179	\$66,000.00	Maryland Industrial Technology Alliance
180	\$65,310.35	Coventry Health Care, Inc
181	\$65,201.62	MD/DE/DC Beverage Association
182	\$64,953.62	Baltimore Metal Recycling Association, Inc.
183	\$64,218.04	Columbia Gas of Maryland
184	\$63,926.29	Retail Energy Supply Association
185	\$63,793.94	Equality Maryland

186	\$63,163.00	Covanta Energy Corporation
187	\$63,160.25	Alliance of Automobile Manufacturers
188	\$63,109.99	Glaxo Smith Kline
189	\$62,081.38	Autism Speaks
190	\$61,800.00	Maryland Clean Energy Center
191	\$61,621.25	USAA
192	\$61,497.00	Novartis Pharmaceutical Corporation
193	\$61,159.20	Abbott Laboratories
194	\$60,832.11	GTECH
195	\$60,710.36	Teachers Insurance and Annuity Association/College Retirement Equities Fund
196	\$60,603.90	Manufacturers and Traders Trust Company As Trustee for Bondholders of the Rocky Gap Resort
197	\$60,147.72	Parsons Transportation Group, Inc.
198	\$60,100.00	Dominion Voting Systems, Inc.
199	\$60,081.26	VALIC
200	\$60,000.00	AFT Maryland
201	\$60,000.00	Citizens for Fire Safety
202	\$60,000.00	Citizens for Fire Safety Institute
203	\$60,000.00	CVS/Caremark
204	\$60,000.00	Faison
205	\$60,000.00	HMR of Maryland, LLC
206	\$60,000.00	Kaplan Higher Education
207	\$60,000.00	Marylanders for Public Research Universities, Inc.
208	\$60,000.00	Maximus
209	\$60,000.00	Peoples Community Health Centers, Inc.
210	\$60,000.00	Policy Studies, Inc.
211	\$60,000.00	Sprint Nextel
212	\$60,000.00	St. Joseph Medical Center
213	\$60,000.00	Taser International, Inc.
214	\$59,918.80	Maryland Society of Anesthesiologists
215	\$59,639.06	Maryland Society of Accountants, Inc.
216	\$59,161.85	Grant Capital Management, Inc.

217	\$58,085.72	American Cancer Society
218	\$57,500.00	AMERIGROUP Maryland, Inc.
219	\$57,217.42	Williams Companies, Inc., The
220	\$57,207.90	One Call Concepts, Inc.
221	\$57,206.76	Maryland Manufactured Housing Coalition
222	\$57,203.59	Citigroup Management Corporation
223	\$57,041.21	Legal Aid Bureau, Inc.
224	\$56,721.82	Maryland Horse Breeders Association
225	\$56,273.00	Maryland Community Health System, LLP
226	\$56,000.00	Cigar Association of America, Inc.
227	\$55,825.30	Maryland State Licensed Beverage Association
228	\$55,530.18	Maryland Optometric Association
229	\$55,420.00	Environment Maryland
230	\$55,403.05	AT&T
231	\$55,373.20	Maryland Association of Certified Public Accountants
232	\$55,333.56	Waste Management of Maryland
233	\$55,178.43	Chesapeake BaySavers, Inc.
234	\$55,002.00	Bombardier Mass Transit Corporation
235	\$55,000.00	Maryland State Fair and Agricultural Society, Inc.
236	\$54,901.40	Maryland Works, Inc.
237	\$54,568.10	NRG Energy, Inc.
238	\$54,190.00	Consumer Data Industry Association
239	\$54,166.67	Prince George's County Public Schools
240	\$54,000.00	Enterprise Solutions Realized, Inc.
241	\$54,000.00	Multi-State Associates, Inc. on behalf of Wexford Sources, Inc.
242	\$54,000.00	Synergics Wind Energy
243	\$53,921.23	Presbyterian Home of Maryland, Inc./dba The Villiage at Carsins Run
244	\$53,794.91	Industrial Pharmacy Management, LLC (IPM)
245	\$53,572.50	Express Scripts, Inc.
246	\$53,505.08	City of Rockville
247	\$53,019.37	Medco Health Solutions, Inc.

248	\$52,892.95	Chimes, The
249	\$52,851.61	Maryland Patient Care and Access Coalition
250	\$52,500.00	KSM LLC/Anne Arundel Medical Center
251	\$52,500.00	Maryland Hotel & Lodging Association
252	\$52,352.99	Nationwide Insurance Company
253	\$52,231.53	CASA De Maryland
254	\$52,000.00	Corridor Fine Wine
255	\$52,000.00	P3 Group, The
256	\$51,979.00	Maryland Association of Community Services for Persons with Developmental Disabilities, Inc.
257	\$51,767.80	Delmarva Poultry Industry
258	\$51,660.00	Wine Institute
259	\$51,000.00	T. Rowe Price Group, Inc.
260	\$50,993.52	American Community Properties Trust
261	\$50,937.00	American College of Cardiology, Maryland Chapter
262	\$50,621.58	Alkermes, Inc.
263	\$50,600.00	DAT, Inc.
264	\$50,500.00	State Center, LLC c/o PS Partners
265	\$50,483.26	Kennedy Krieger Institute, The
266	\$50,430.34	Marylanders for Restorative Justice, Inc.
267	\$50,200.00	Toy Industry Association, Inc.
268	\$50,120.39	Kaiser Permanente Insurance Company
269	\$50,000.26	CWA
270	\$50,000.00	7-11, Inc.
271	\$50,000.00	Barclays Capital Inc.
272	\$50,000.00	Fibrowatt LLC/Fibro Shore LLC
273	\$50,000.00	IBCS Group, Inc., The
274	\$50,000.00	Maryland Association of Chain Drug Stores
275	\$50,000.00	Maryland Association of Industrial & Office Properties
276	\$50,000.00	Maryland Thoroughbred Horsemen's Assoc.
277	\$50,000.00	Stevenson University
278	\$50,000.00	TBC, Inc.

APPENDIX B

LOBBYISTS RECEIVING \$50,000.00 OR MORE IN COMPENSATION ONE OR MORE EMPLOYERS

November 1, 2010 - October 31, 2011

	TOTAL AMOUNT	LOBBYIST
1	\$1,232,000.00	Evans, Gerard E.
2	\$1,217,793.18	Perry, Timothy A.
3	\$1,215,161.23	Rozner, Joel D.
4	\$1,156,368.59	Shaivitz, Robin F.
5	\$1,107,144.00	Proctor, Jr., Gregory S.
6	\$1,059,766.70	Stierhoff, John R.
7	\$1,050,234.26	Johansen, Michael V.
8	\$1,016,250.00	Manis, Nicholas G.
9	\$863,193.00	Enten, D. Robert
10	\$857,000.00	Harris Jones, Lisa
11	\$613,091.25	Bereano, Bruce C.
12	\$549,351.47	Popham, Bryson F.
13	\$535,500.00	Malone, Sean R.
14	\$516,420.00	Pitcher, J. William
15	\$501,587.83	Kasemeyer, Pamela M.
16	\$494,000.00	Rasmussen, Dennis F.
17	\$463,667.63	Greenfield, Aaron J.
18	\$461,208.81	Tiburzi, Paul A.
19	\$457,563.50	Powers, Hannah J.
20	\$447,654.46	Wise, J. Steven
21	\$445,208.27	Bagwell, Ashlie
22	\$442,039.00	Sidh, Sushant
23	\$431,150.01	Battle, J. Kenneth
24	\$425,588.00	Aery, Shaila R.
25	\$419,733.09	Carroll, Jr., David H.
26	\$416,042.30	Bellamy, Lorenzo M.
27	\$411,762.50	Harting, Marta D.
28	\$411,248.50	Miedusiewski, American Joe

29	\$407,622.09	Johnson, Robert G.
30	\$407,100.00	Boston, III, Frank D.
31	\$355,000.00	Mitchell, Van T.
32	\$352,634.71	Lanier, Ivan V.
33	\$345,175.64	Doherty, Jr., Daniel T.
34	\$334,746.00	Kress, William Allen
35	\$329,840.62	White, Josh
36	\$301,750.00	Genn, Gil
37	\$297,279.01	Levitan, Laurence
38	\$295,985.51	Collins, Carville B.
39	\$295,335.00	Hoffman, Barbara A.
40	\$286,455.50	Robinson, Kimberly Y.
41	\$276,753.42	Bryant, Eric L.
42	\$261,528.31	Lucchi, Leonard L.
43	\$257,090.17	Brocato, Barbara M.
44	\$256,224.94	Jones, Gary R.
45	\$252,700.00	DiPietro, Christopher V.
46	\$244,190.00	Valentino-Benitez, Ellen
47	\$227,000.00	Burner, Gene L.
48	\$225,841.50	McCoy, Dennis C.
49	\$216,000.00	Coles, Mark Anthony
50	\$213,240.83	Taylor, Jr., Casper R.
51	\$210,000.00	Looney, Sean M.
52	\$203,200.00	Canning, Michael F.
53	\$203,050.00	Miles, William R.
54	\$197,666.90	Chason, Todd R.
55	\$196,520.21	Alexander, Gary R.
56	\$192,540.00	Riddick, Major F.
57	\$190,000.00	Hill, Denise O.
58	\$182,167.92	Andryszak, John A.
59	\$171,234.12	Schwartz, III, Joseph A.
60	\$170,747.89	Roddy, Patrick H.

61	\$167,850.00	Schrader, Sandra
62	\$165,000.00	Gally, Eric
63	\$164,450.00	O'Keefe, Kevin
64	\$163,993.00	Elliott, Robyn S.
65	\$160,000.00	Townsend, Pegeen
66	\$156,375.00	Zellmer, Jeffrie
67	\$155,000.00	Loughran, Kathleen G.
68	\$140,250.00	Murphy, Kathleen M.
69	\$122,878.66	Wilkins, Barbara J.
70	\$122,000.00	Maloney, Kathleen M.
71	\$120,821.04	Ciekot, Ann T.
72	\$117,000.00	Gisriel, Michael U.
73	\$113,417.14	Douglas, Michele
74	\$112,830.00	Lininger, Brett Stewart
75	\$112,500.00	Almalel, Suzanne C.
76	\$110,637.00	Montgomery III, Richard A.
77	\$110,500.00	Cobbs, Drew P.
78	\$107,500.00	DeMattos, Jr., Joseph
79	\$107,415.00	Weisel, Meredith R.
80	\$107,388.84	Wood, Paul G.
81	\$104,000.00	Rivkin, Deborah R.
82	\$103,203.25	Powell, Michael C.
83	\$102,834.00	Appel, Erin
84	\$102,000.00	Farasy, Thomas Morgan
85	\$101,500.00	Opara, Clay C.
86	\$100,975.96	Hoover, Lesa N.
87	\$100,494.00	Esty, Susan
88	\$98,797.40	Neil, John B.
89	\$94,500.00	Woolums, John R.
90	\$92,234.41	Rifkin, Alan M.
91	\$91,072.00	Lewis, Thomas
92	\$90,000.00	Overton, Valerie Shearer

93	\$87,250.00	Manis, George N.
94	\$85,498.00	Thompson, Melvin R.
95	\$85,000.00	Donoho, Patrick
96	\$85,000.00	Zinsmeister, Robert M.
97	\$82,649.05	Maloney, Amy Ellen
98	\$80,000.00	Boschert , David G.
99	\$80,000.00	Jones, Tim T.
100	\$80,000.00	Nathanson, Martha D.
101	\$74,960.00	Castelli, William A.
102	\$74,496.00	Zuhowski, Susan
103	\$72,500.00	Tosi III, Byron Geoffrey
104	\$71,786.64	Fowlkes, Lyle
105	\$71,774.00	Bjarekull, Tina M.
106	\$71,000.00	Cavanagh, Terrence James
107	\$70,500.00	Carter, W. Minor
108	\$70,000.00	Ballentine, Jr. , Thomas M.
109	\$70,000.00	Jepson, Robert
110	\$70,000.00	Kelly, Clare Marie
111	\$70,000.00	Robbins, Mike
112	\$67,000.00	Muir, Charles Scott
113	\$65,000.00	Horrigan, F. Peter
114	\$64,882.00	McDonald, Tom
115	\$63,100.00	Neily Mutch, Alice J.
116	\$63,000.00	Matricciani, Denise M.
117	\$62,941.00	Connelly, Valerie T.
118	\$61,715.00	Brown, Tamera Anita
119	\$61,000.00	Kitzmilller, John P.
120	\$60,958.00	Schreiber, Bret Allan
121	\$60,508.58	Mickens, Randal L.
122	\$60,172.00	Frye, Neely T.
123	\$60,000.00	Davey, John P.
124	\$60,000.00	Fedder, Michaeline R.

125	\$59,024.92	Johnson, Sean
126	\$58,530.00	Maxwell, Amy
127	\$56,755.92	Lehman, Miriam
128	\$55,095.00	O'Brien, Susan Marie
129	\$54,931.21	Mitchell, Susan
130	\$52,509.46	Feinroth, Mark
131	\$52,500.00	Witten , Jennifer M.
132	\$50,485.79	Rankin, Sr., Robert
133	\$50,280.64	Groves, Jason L.
134	\$50,000.00	La Valle, Traci
135	\$50,000.00	Miller, Beverly L.
136	\$50,000.00	Wyatt, Joseph R.

APPENDIX C

EXPENDITURES ON SPECIAL EVENTS

November 1, 2010 - October 31, 2011

Group Invited	Number of Times Invited	Total
Allegany County Delegation	1	\$330.00
Anne Arundel County Delegation	5	\$9,053.59
Baltimore City Delegation	9	\$92,608.78
Baltimore County Delegation	8	\$16,480.82
Carroll County Delegation	3	\$4,870.55
Cecil County Delegation	1	\$500.00
Frederick County Delegation	1	\$1,000.00
General Assembly	96	\$677,241.07
Harford County Delegation	4	\$4,826.65
House Appropriations Committee	9	\$14,494.83
House Economic Matters Committee	22	\$48,464.03
House Environmental Matters Committee	11	\$25,173.98
House Health and Governmental Operations Committee	17	\$43,457.78
House Judiciary Committee	11	\$19,610.89
House of Delegates	4	\$4,670.97
House Rules and Executive Nominations Committee	0	\$0.00
House Ways and Means Committee	11	\$20,395.11
Howard County Delegation	5	\$14,358.30
Lower Eastern Shore Delegation	7	\$13,834.86
Montgomery County Delegation	18	\$319,449.77
Prince George 's County Delegation	9	\$30,140.47
Senate	7	\$12,783.77
Senate Budget and Taxation Committee	18	\$24,800.25
Senate Education Health and Environmental Affairs Committee	20	\$24,695.23
Senate Executive Nominations Committee	0	\$0.00
Senate Finance Committee	35	\$53,199.82
Senate Judicial Proceedings Committee	9	\$12,142.71

Southern Maryland Delegation	4	\$7,539.05
Upper Eastern Shore Delegation	5	\$10,866.64
Western Maryland Delegation	6	\$13,953.66

TOTAL: \$1,520,943.59

(NOTE: Where more than one committee was invited to the same event there may be a proportionate allocation for the purposes of this report. Allegany, Cecil and Frederick County Delegations are not designated units but were added in error by the lobbyist.)

APPENDIX D

LOBBYING FIRMS REPORTING COMPENSATION OF \$1,000,000.00 OR MORE

November 1, 2010 - October 31, 2011

	Name of Firm	Amount of Compensation Reported
1	Rifkin, Livingston, Levitan & Silver, LLC	\$3,433,250.84
2	Alexander & Cleaver, P.A.	\$3,417,380.37
3	Gordon, Feinblatt, Rothman, Hoffberger & Hollander, LLC	\$2,385,406.33
4	Manis Canning & Associates	\$1,661,700.00
5	Venable, LLP	\$1,471,529.20
6	Harris Jones & Malone, LLC	\$1,410,000.00
7	Capitol Strategies, LLC	\$1,372,228.18
8	Gerald Evans	\$1,257,000.00
9	G.S. Proctor & Associates, Inc.	\$1,116,144.00

APPENDIX E

STATE ETHICS COMMISSION MEMBERS – 1979 TO PRESENT

* Herbert J. Belgrad	1979 to 1986
William B. Calvert	1979 to 1980
Jervis S. Finney	1979 to 1983
Reverend John Wesley Holland	1979 to 1987
* Barbara M. Steckel	1979 to 1990
Betty B. Nelson	1981 to 1988
* Thomas D. Washburne	1984 to 1986
* M. Peter Moser	1987 to 1989
* William J. Evans	1987 to 1993
Reverend C. Anthony Muse	1988 to 1990
Robert C. Rice, PhD	1989 to 1993
* Mark C. Medairy, Jr.	1990 to 1999
Mary M. Thompson	1990 to 1994
Shirley P. Hill	1992 to 1994
* Michael L. May	1993 to 2003
Robert J. Romadka	1994 to 1997
April E. Sepulveda	1994 to 2003
* Charles O. Monk, II	1995 to 2003
* Dorothy R. Fait	1999 to 2005
D. Bruce Poole	2000 to 2004
* Julian L. Lapidés	2002 to present
Ava S. Feiner, Ph.D.	2003 to 2005
* Robert F. Scholz	2003 to present
Daryl D. Jones	2005 to 2006
Janet E. McHugh	2005 to 2011
Paul M. Vettori	2006 to present
H. Richard Duden, III	2006 to 2008
Jacob Yosef Miliman	2008 to present
Andrea Leahy-Fuckeck	2011 to present

**Person served as Chairman during some part
of his/her term on the Commission.*