

MARYLAND STATE ETHICS COMMISSION

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34TH ANNUAL REPORT

JANUARY 1, 2012 THROUGH
DECEMBER 31, 2012

GENERAL STATUTORY IMPLEMENTATION

OVERVIEW

In calendar year 2012, the Commission welcomed new Commission member, Robert G. Blue. Also in calendar year 2012, the Commission said farewell to Commissioner Robert F. Scholz, who completed 9 years of dedicated service to the Commission and the State. During Calendar Year 2012, the Commission met 6 times in regularly scheduled sessions and on 1 occasion in special session to discuss a time sensitive advice matter. During its 6 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

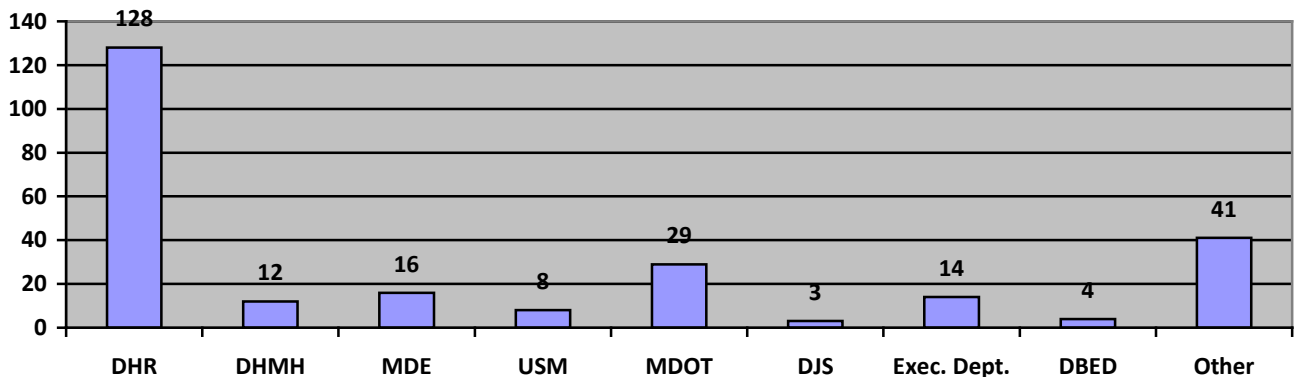
The State Ethics Commission is responsible for interpreting the Public Ethics Law. Sections 15-301 through 15-303 of the Public Ethics Law authorize the State Ethics Commission to issue formal advisory opinions in response to requests from officials, employees, lobbyists, and others who are subject to 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 in 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-four years of existence, the Commission has issued 500 formal opinions, including 1 formal opinion in 2012. These opinions not only advise the public of the Commission's interpretation of the Public Ethics Law, but also guide 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 deliver more timely advice, 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 submitted to 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 letters, 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 2010 through 2012:

SUBJECT MATTER OF THE ADVICE	2012	2011	2010
Lobbying Registration, Reporting and Conduct	8	2	10
Secondary Employment Advice	255	285	288
Participation Advice	31	18	13
Procurement Restrictions	3	6	6
Post-Employment Advice	69	37	26
Gift Questions	60	46	25
Other	44	49	42
Total	470	443	410

The number of informal matters increased in 2012, continuing a recent upward trend. These numbers are likely attributable to the increase in the number of employees who received ethics training in recent years, 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 41 "other agency" secondary employment requests came from 20 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 other general inquiries concerning the Public Ethics Law 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 with 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 313 faculty exemptions granted by the university presidents between 1996 and 2011, 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 2012, USM institutions reported an additional 38 individual faculty member exemptions to the Commission. The exemptions were from the following institutions:

INSTITUTION	Number of Exemptions
University of Maryland College Park	30
University of Maryland Baltimore	8
TOTAL FACULTY EXEMPTIONS	38

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 to/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 14,483 in 2011 to 14,554 in 2012.

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.

The basic financial disclosure statement filed by most individuals who are determined to be public officials is referred to as Form #1. 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 2012, the Commission staff reviewed more than 11,800 financial disclosure statements, largely due to the hiring of a contractual Special Assistant.

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 file their financial disclosure statements electronically. Of the total number of filers during calendar year 2012, approximately 95% filed electronically. The electronic administrative tool permits the staff to quickly review electronically submitted statements, compare them to previously electronically filed statements, notify filers by email of any omissions or questions raised by the statements and maintain copies of those notifications in the filers’ electronic records. The emails become attached to the electronic files, and a record is therefore compiled of statements, inquiries and responses. Filers may also electronically file amendments 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’s 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, 2012, 2,943 lobbying registrations were filed with the Commission. Those registrations were submitted by 723 lobbyists on behalf of 1,307 employers. This represents an increase of 185 registrations from the 2,758 filed by October 31, 2011. The following table summarizes lobbying expenditures for the last three lobbying years:

EXPENDITURES BY LOBBYISTS			
Type of Expenditure	10/31/2012	10/31/2011	10/31/2010
	\$	\$	\$
B-1: Meals and beverages for officials or employees or their immediate families	5,183	9,780	5,490
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.	2,039,495	1,384,169	1,342,398
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	12,038	17,507	12,511
B-4: Food and beverages at approved legislative organizational meetings	6,535	6,594	253
B-5: Tickets or free admission to attend charitable, cultural or political events where all members of a legislative unit are invited.	4,125	2,764	1,692
B-6: Gifts to or for officials or employees or their immediate families (not included on B-1 through B-5)	8,580	3,292	3,220
SUBTOTAL OF ITEMS B-1 THROUGH B-6	2,075,956	1,424,106	1,365,564
B-7: Total compensation paid to registrant (not including sums reported in any other section)	42,122,015	38,726,848	36,133,033
B-8: Salaries, compensation and reimbursed expenses for staff of the registrant	1,830,483	1,456,401	829,471

EXPENDITURES BY LOBBYISTS			
Type of Expenditure	10/31/2012	10/31/2011	10/31/2010
	\$	\$	\$
B-9: Office expenses not reported in B-7 or B-8	853,530	739,867	746,247
B-10: Cost of professional and technical research and assistance not reported in items B-7 or B-8	626,758	533,547	554,359
B-11: Cost of publications which expressly encourage persons to communicate with officials or employees	5,634,077	1,117,838	424,620
B-12: Fees and expenses paid to witnesses	7,804	3,434	3,590
B-13: Other expenses	1,103,383	797,704	761,968
TOTAL OF ITEMS B-1 THROUGH B-13	\$54,254,006	\$44,799,745	\$40,818,852

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. In addition, following investigation of independently obtained information, the Commission may issue a complaint alleging Public Ethics Law violations on its own motion. Enforcement inquiries and reviews are conducted by the Commission's Staff Counsel, with the assistance of two paralegals and a compliance officer. In 2012, Staff Counsel was also assisted by 3 interns.

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 2012, the Commission opened 44 A matters, including 24 conflict of interest matters, 10 lobbyist matters, 8 financial disclosure matters and 1 local government matter. The Commission issued a reprimand to a State Highway Administration employee, through a Pre-Complaint Disposition Agreement, who violated participation restrictions by becoming involved in matters in which a qualifying relative had an employment interest. As part of the Agreement, the employee paid a fine of \$1000.00.

The Commission also entered into 34 Late Filing Agreements with lobbyists during 2012, resulting in payments of \$5,210.00 to the State of Maryland. The Commission issued a reprimand to a lobbyist, through a Pre-Complaint Disposition Agreement, who knowingly made false material statements of fact to employees of the Department of Legislative Services in violation of lobbying provisions. The lobbyist agreed to pay \$500.00 as a settlement in lieu of a potential fine of up to \$5,000. The Commission closed 44 A matters in 2012, including 3 matters carried over from 2011. (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 3 Preliminary Inquiry Matters (B matters) in 2012, including 2 conflict of interest matters and 1 lobbying matter. In 2012, the Commission also closed 3 B Matters, including 2 matters carried over from 2011.

In calendar year 2012, the Commission issued 38 complaints, including complaints in 33 financial disclosure matters and 5 lobbying matters. The Commission closed 51 complaints in 2012, including 23 matters from 2011, 1 matter from 2010 and 1 matter from 2009. During 2012, 3 hearings were held, in which all 3 resulted in findings of violation, for failure to file financial disclosure statements. The Commission issued a reprimand to a legislator, through a Stipulation of Settlement Agreement, for violations of the financial disclosure provisions of the Public Ethics Law. The legislator paid a fine of \$10,000.00.

All enforcement payments were deposited in the State's general fund and cannot be used by the Commission. The Commission collected a total of \$17,420.00 in enforcement payments in 2012.

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 2012, 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 representative associations regarding questions relating to conflicts of interests, financial disclosure and lobbying and the implementation of Chapter 277 of 2010. The Commission received 116 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 addition, the Commission approved draft ordinances from eight counties and forty-four municipalities. Once these approved draft policies are enacted, the counties or municipalities should certify compliance as discussed above. The Commission has approved ethics policies from all twenty-four 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 adopted regulations to the State Ethics Commission for review and approval or disapproval, but no annual certification is required. The Commission staff is actively working with the remaining local governments 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 a municipality from the requirement to adopt an ethics law, or to modify the provisions applicable to a municipality, if the Commission determines an exemption or modification to be warranted based upon the size of the municipality. In considering whether the size of a municipality justifies an exemption or modification, the Commission looks at a number of factors, including population, number of public employees, type and number of government functions performed by the municipality, and the size of the municipal budget. In 2012, the Commission continued its decennial review of the exemption status of municipalities following the 2010 census to determine whether previously granted exemptions are still appropriate. The Commission reviewed seventy-five exemption requests. Of those seventy-five requests, the Commission denied two, granted fifty-eight full exemptions and exempted fifteen jurisdictions from the requirement to adopt lobbying provisions. In 2012, the Commission did not grant any substantive modifications to either the conflict of interest or financial disclosure provisions for any local government. The Commission did approve a few modifications related to the timing of financial disclosure statement filings for candidates for local elected office.

Finally, the Commission also received and reviewed two reports from Montgomery County and three reports 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.

The Public Ethics Law requires new financial disclosure filers to receive 2 hours of Ethics Law training (§15-205(d)). The Commission implemented online training in order to facilitate the training process in

March of 2010. A total of 964 public officials and state employees took the conflicts of interest training online during calendar year 2012. The electronic training allows officials, employees and lobbyists (see lobbyist training, below) to take the training at their offices, at a time convenient for them, and saves on expenditures related to staff travel, parking, and meals. The electronic training, which was created, and is maintained, by a contractor, will require periodic expenditures for updating and refreshing.

In addition to the basic training provided to new financial disclosure filers, the staff regularly responds to requests from various State entities for general ethics training and other, specifically focused training. The staff conducted 7 general ethics training programs for agencies, boards and commissions, attended by 168 State employees and public officials, addressing conflicts of interest and the electronic filing process for financial disclosure statements. The Commission staff also conducted 21 training sessions addressing conflicts of interest and procurement issues attended by an additional 794 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 962.

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 37 regulated lobbyists. In addition, a total of 287 regulated lobbyists took the mandated training online (which was introduced in 2010) during the calendar year 2012. The lobbying programs focused on electronic filing and the general lobbying conduct prohibitions in the Law, and reporting requirements.

In addition to requiring the State Ethics Commission to provide training for regulated lobbyists, the Law requires regulated lobbyists to attend a training course at least once in any 2-year period during which a lobbyist has registered with the Ethics Commission. Currently, however, the Law does not authorize the Ethics Commission to enforce this requirement. This report does include an entry in the Legislative Recommendations section to amend the Law to provide the Commission with the ability to enforce the training requirement for regulated lobbyists.

The State Ethics Commission has become increasingly reliant on its website. In 2012 the Commission's website, through dedicated efforts of staff member Jennifer Whitehead, underwent a major makeover with the objective of increasing its usefulness to State employees, lobbyists and members of the general public. The Commission's home page allows users to access the Commission's Annual Reports, 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 also be accessed from the Commission's website.

2012 LEGISLATION REPORT

The State Ethics Commission proposed three departmental bills for the 2012 Session of the General Assembly. Of those, two were submitted to the General Assembly, one of which was enacted. Senate Bill 147 (Chapter 185 of the Acts of 2012) makes a technical change to the Administrative Procedure Act that expands the category of officials, to include the Commission's General Counsel, who can certify that changes made to the text of a proposed regulation are non-substantive, thereby allowing the regulation to be adopted.

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 by current officials and employees should be extended to include the misuse 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 a modest increase to the Lobbyist Registration Fee, which is used to defray the costs of administering the Commission's lobbying program.
- As discussed in the Educational and Informational Activities section of this report, while the Public Ethics Law requires lobbyists to attend a training course at least once in any 2-year period during which a lobbyist has registered with the Ethics Commission, there is no authority for the Commission to enforce this requirement. The Commission recommends that the

General Assembly amend the Law to provide such authority, which can be accomplished simply by moving the training requirement to Subtitle 7 from its current location in Subtitle 2, as the Commission does have authority to enforce violations of Subtitle 7.

- 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 generally require a recipient to report gifts only when the value 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 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.

PROPOSED CHANGES 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 CHANGE TO LOCAL GOVERNMENT PROVISIONS

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

- As discussed in the Local Government Ethics Laws section of this report, since 2010 the Commission has been actively engaged with counties, municipalities and boards of education in advising them of the requirements of Chapter 277 of 2010, evaluating and acting upon their exemption requests (municipalities only), and reviewing, recommending and approving changes to their laws. In cases where counties or municipalities do not comply with their obligations under the Public Ethics Law to enact ethics laws that meet the requirements of the Law, the Ethics Commission currently has a single enforcement option – to petition a circuit court with venue over the proceeding for appropriate relief to compel compliance (Section 15-808). This option can be time consuming and costly (both in dollars and manpower) for the Ethics Commission and those local governments affected. There is no enforcement provision with respect to boards of education. The Commission proposes an amendment to this section authorizing the Commission to take an intermediate step of issuing a public order directing a county, municipality or board of education to comply with the Law and expanding the existing authority to petition a circuit court for relief to include boards of education.

APPENDIX A

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

November 1, 2011 - October 31, 2012

	TOTAL AMOUNT	EMPLOYER
1	\$2,000,000.00	Buildings Trades for National Harbor, Inc.
2	\$913,006.08	Penn National Gaming, Inc.
3	\$755,675.00	Taxpayers Protection Alliance, The
4	\$716,121.35	Maryland Workers for National Harbor, Inc.
5	\$693,310.91	Maryland Association of Realtors, Inc.
6	\$568,959.05	PPE Casino Resorts Maryland, LLC
7	\$564,477.14	Maryland State Education Association
8	\$553,568.21	Maryland Hospital Association
9	\$503,322.25	Verizon Maryland, Inc.
10	\$494,099.86	Human Rights Campaign
11	\$432,013.87	Baltimore Jewish Council
12	\$382,745.11	Exelon Corporation
13	\$360,507.00	Johns Hopkins Institutions
14	\$358,867.40	Maryland Retailers Association
15	\$358,682.57	Maryland Bankers Association
16	\$351,325.81	Maryland State Builders Association
17	\$346,938.56	National Gay and Lesbian Task Force Action Fund, Inc.
18	\$333,706.00	CareFirst BlueCross BlueShield
19	\$328,178.07	CBAC Gaming, LLC
20	\$306,497.00	MedChi, The Maryland State Medical Society
21	\$301,192.65	Comcast
22	\$295,829.50	Maryland Jockey Club, The
23	\$292,023.49	Health Facilities Association of Maryland (HFAM)
24	\$283,917.00	Prince George's Contractors and Business Association
25	\$279,954.75	National Association of REALTORS
26	\$275,565.00	Pepco Holdings, Inc.
27	\$269,046.09	Casino at Ocean Downs

28	\$268,484.83	Altria Client Services Inc. and its Affiliates - Philip Morris USA Inc., John Middleton Co. and U.S. Smokeless Tobacco Company, LLC
29	\$261,788.00	MedStar Health
30	\$252,917.84	AMERIGROUP
31	\$252,313.70	AFSCME Maryland
32	\$236,801.00	Maryland Independent College and University Association
33	\$236,501.00	CSX Transportation, Inc.
34	\$235,350.00	Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc.
35	\$231,383.00	First Energy Service Company
36	\$227,858.13	Adventist HealthCare, Inc.
37	\$223,939.40	Washington Gas
38	\$215,189.33	Baltimore Gas and Electric Company
39	\$207,973.81	Children's National Medical Center
40	\$204,585.00	American Petroleum Institute
41	\$200,195.70	Maryland Chapter of National Association of Industrial & Office Properties
42	\$193,421.40	Maryland Transportation Builders & Materials Association (MTBMA)
43	\$193,260.00	Maryland Zoo in Baltimore, The
44	\$192,901.42	Montgomery County Chamber of Commerce
45	\$191,000.00	Transformations, LLC
46	\$182,941.93	Xerox Business Services, LLC and its Affiliates
47	\$182,000.00	Wal-Mart Stores, Inc.
48	\$175,352.70	Maryland Catholic Conference, LLC.
49	\$174,480.00	Maryland State Bar Association, Inc.
50	\$174,049.43	Maryland Automobile Dealers Association
51	\$173,836.42	Medical Mutual Liability Insurance Society of Maryland
52	\$170,998.52	GenOn Energy
53	\$166,284.18	United Healthcare Services, Inc.
54	\$163,102.56	Maryland Association for Justice
55	\$161,000.00	Law Offices of Peter Angelos
56	\$159,000.00	GenOn Mid-Atlantic, Inc.

57	\$156,919.65	League of Life & Health Insurers of Maryland, Inc.
58	\$155,455.32	Associated Builders & Contractors
59	\$150,643.73	EDF Inc.
60	\$149,093.00	Veolia Transportation
61	\$148,870.00	Joseph Smith & Sons, Inc.
62	\$148,797.55	Preston Scheffenacker Properties
63	\$147,700.00	Greater Washington Board of Trade, The
64	\$146,944.70	Lifebridge Health, Inc.
65	\$146,418.00	MGM Resorts International Operations, Inc.
66	\$144,292.21	Chesapeake Bay Foundation
67	\$142,966.09	Maryland Tort Reform Coalition
68	\$142,923.55	International Business Machines Corporation ("IBM")
69	\$142,482.73	Maryland Chamber of Commerce
70	\$140,840.00	Planned Parenthood of Maryland
71	\$130,723.38	Southern Maryland Electric Cooperative, Inc.
72	\$128,952.00	Maryland Association of Industrial & Office Properties
73	\$128,917.46	Scientific Games International
74	\$128,561.00	Chesapeake Climate Action Network
75	\$123,544.39	Maryland Association of Boards of Education
76	\$122,486.30	Atlantic Recycling Group, LLC
77	\$120,899.50	Aetna, Inc.
78	\$120,356.72	Apartment & Office Building Association of Metropolitan Washington
79	\$120,083.73	Bricklayers & Allied Craftworkers Local 1 MD, VA & DC
80	\$120,000.00	Schaller Anderson
81	\$119,351.79	Direct Energy
82	\$119,065.00	Norfolk Southern Corporation
83	\$117,585.77	EPIC Pharmacies
84	\$117,288.00	Lockheed Martin Corporation
85	\$117,080.05	Association of Maryland Pilots
86	\$116,367.64	Peterson Companies, The
87	\$116,346.65	State Farm Mutual Automobile Insurance Company
88	\$115,575.00	Quality Image Access Maryland Coalition

89	\$114,723.96	Maryland Farm Bureau, Inc.
90	\$113,900.33	Maryland State Dental Association
91	\$113,333.30	Princeton Public Affairs Group, Inc.
92	\$112,610.50	National Children's Museum
93	\$112,000.00	TSG Developments (Maryland), LLC
94	\$111,042.20	Harford County Government
95	\$110,000.00	Washington DC Building & Construction Trades Council
96	\$109,927.00	Tech Council of Maryland/MdBio
97	\$109,874.61	Columbia Association, Inc.
98	\$109,000.00	Mid-Atlantic Petroleum Distributors Association
99	\$108,737.87	Atlantic Wind Connection/Atlantic Grid Operations ALLC
100	\$107,956.25	Cloverleaf Standardbred Owners Association
101	\$107,896.34	Accenture, LLP
102	\$106,882.50	Mid-Atlantic LifeSpan
103	\$105,042.69	Marylanders for Restorative Justice, Inc.
104	\$105,000.00	Johnson Controls, Inc.
105	\$104,008.51	NiSource Gas Transmission and Storage
106	\$103,850.00	Fidelity and Guaranty Life (f.k.a. Old Mutual Financial Network)
107	\$103,476.78	1199 SEIU
108	\$103,000.00	RAI Services Company
109	\$101,463.01	American Federation of Teachers - Maryland
110	\$101,456.66	Dominion Resources Services, Inc.
111	\$101,189.68	FedEx Corporation
112	\$101,005.79	Covanta Energy Corporation
113	\$100,705.81	Ports America, Inc.
114	\$100,357.30	Express Scripts, Inc.
115	\$100,000.00	K. Hovanian Homes, LLC
116	\$100,000.00	Keolis America Inc.
117	\$99,238.31	Property Casualty Insurers Association of America
118	\$98,196.48	Concentra Medical Centers
119	\$98,000.00	National Federation of Independent Business
120	\$97,191.81	ESG - Energy Systems Group

121	\$97,000.00	Manufacturers Alliance of Maryland
122	\$96,353.98	MD/DE/DC Beverage Association
123	\$95,483.99	Allstate Insurance Company
124	\$95,480.11	Pfizer Inc.
125	\$93,725.53	Paragon Project Resources, Inc.
126	\$93,703.00	ACLU of Maryland
127	\$93,593.62	Waste Management of Maryland
128	\$92,700.00	Balfour Beatty Construction
129	\$92,700.00	Owens Illinois, Inc.
130	\$92,393.00	USAA
131	\$91,964.84	Public Justice Center, Inc.
132	\$91,020.00	Maryland Cigar Direct Ship Coalition
133	\$90,896.81	ESP, Inc.
134	\$90,663.67	Pharmaceutical Research & Manufacturers of America
135	\$90,428.64	Maryland Insurance Council, The
136	\$90,200.00	Kaplan Higher Education
137	\$90,100.00	Bank of America, N.A.
138	\$90,000.00	Noresco, LLC
139	\$90,000.00	Prince George's County Council
140	\$89,905.01	Mid-Atlantic Health Care
141	\$89,796.81	Cable Telecommunications Association of MD, DE & DC
142	\$89,513.27	General Motors LLC
143	\$88,797.94	Sherwin-Williams Company, The
144	\$87,008.38	National Aquarium in Baltimore, Inc.
145	\$86,821.96	Licensed Beverage Distributors of Maryland, Inc.
146	\$86,642.79	Silver Diner, Inc.
147	\$86,100.00	Microsoft Corporation
148	\$85,061.50	Maryland Radiological Society
149	\$84,095.77	American Heart Association
150	\$84,000.00	Competitive Power Ventures, Inc.
151	\$83,229.01	Lois Wheaton, LLC
152	\$82,668.37	Curam Software, Inc.

153	\$82,620.00	Diamond Game Enterprises
154	\$82,416.00	Agency Insurance Company of Maryland
155	\$82,335.26	Prince George's County Association of Realtors
156	\$82,040.95	Motorola Solutions
157	\$81,005.00	Northrop Grumman Corporation
158	\$79,805.00	Maryland School for the Blind, The
159	\$78,700.00	Rite Aid Corporation
160	\$78,682.60	SEIU MD/DC State Council
161	\$78,593.93	Jack Neil & Associates, LLC
162	\$78,000.00	Charles County Commissioners
163	\$78,000.00	Owings Mills Mall, LLC
164	\$77,158.23	Evitts Resort, LLC
165	\$77,001.00	CSC
166	\$77,000.00	Commerce Energy
167	\$76,900.03	ARINC, Inc.
168	\$76,330.00	Woda Group, LLC., The
169	\$75,363.00	Environment Maryland
170	\$75,210.42	Greater Capital Area Association of Realtors
171	\$75,176.28	Doctors Community Hospital
172	\$75,000.00	Catalyst Rx, Inc.
173	\$75,000.00	Holy Cross Hospital of Silver Spring, Inc.
174	\$75,000.00	IBCS Group, Inc., The
175	\$74,999.96	CWA
176	\$73,553.10	Maryland Family Network
177	\$73,100.00	Merck, Sharp & Dohme Corp.
178	\$72,881.23	50Can.org
179	\$72,871.87	MedImmune, LLC
180	\$72,663.01	Apollo Group/University of Phoenix
181	\$72,500.00	Association of Forest Industries
182	\$72,500.00	Automated Health Care Solutions
183	\$72,500.00	CVS/Caremark
184	\$72,100.00	Alcoa Eastalco Works

185	\$72,000.00	Lorillard Tobacco Company
186	\$72,000.00	ValueOptions
187	\$72,000.00	Washington Suburban Sanitary Commission
188	\$71,984.00	Abbott Laboratories
189	\$71,931.00	Imagine Schools
190	\$71,900.00	Oracle America, Inc.
191	\$71,666.52	Maryland Self-Insurers' and Employers' Compensation Association
192	\$71,427.01	Washington Area NEW Automobile Dealers Association (WANADA)
193	\$71,363.84	Maryland Works, Inc.
194	\$71,250.00	Regina Hopper - anga
195	\$71,000.00	Chesapeake Amusements, Inc.
196	\$71,000.00	Civista Medical Center
197	\$70,831.98	Anheuser-Busch Companies
198	\$70,807.16	Catholic Charities
199	\$70,000.00	Deloitte Consulting, LLP
200	\$69,330.00	Maryland/D.C./Delaware Broadcasters
201	\$69,017.18	T-Mobile USA, Inc.
202	\$69,017.00	Enerplus Resources
203	\$68,715.34	Enterprise RAC Company of Baltimore, LLC
204	\$68,500.00	Maryland Hotel & Lodging Association
205	\$67,755.00	Maryland Association of Community Services for Persons with Developmental Disabilities, Inc.
206	\$67,320.00	CBN Secure Technologies, Inc.
207	\$67,061.08	Washington Gas Energy Services, Inc.
208	\$66,896.81	DentaQuest
209	\$66,727.87	Glaxo Smith Kline
210	\$66,342.67	Retail Energy Supply Association
211	\$66,167.67	Coventry Health Care, Inc.
212	\$66,100.00	Wheelabrator Technologies, Inc.
213	\$66,000.00	Coalition To End Childhood Lead Poisoning, Inc.
214	\$66,000.00	Maryland Industrial Technology Alliance
215	\$65,470.56	Maryland Wineries Association

216	\$65,401.00	American Association of Professional Landmen
217	\$65,000.00	Fraternal Order of Police, Lodge #89
218	\$65,000.00	Sprint Nextel
219	\$64,694.70	Restaurant Association of Maryland, Inc.
220	\$64,632.50	Excelsior College
221	\$64,095.00	Maryland Association of Municipal Wastewater Agencies, Inc.
222	\$63,911.81	Maryland State Licensed Beverage Association
223	\$62,868.35	Alkermes, Inc.
224	\$62,801.00	Maryland Citizen's Health Initiative Education Fund, Inc.
225	\$62,679.56	Total Wine and More
226	\$62,500.00	Darden Restaurants (GMRI, Inc.)
227	\$62,500.00	Judicially Certified Class of 57,048 Maryland Consumers in the case of Petry, et al v. Prosperity Mortgage Co., Wells Fargo Bank, et al,...
228	\$60,600.00	NIC USA, Inc.
229	\$60,100.00	Cash America
230	\$60,000.00	AT&T
231	\$60,000.00	Citizens for Fire Safety
232	\$60,000.00	Citizens for Fire Safety Institute
233	\$60,000.00	Civista Health, Inc.
234	\$60,000.00	FIS Group
235	\$60,000.00	Maryland Thoroughbred Horsemen's Assoc.
236	\$60,000.00	Marylanders for Public Research Universities, Inc.
237	\$60,000.00	Policy Studies, Inc.
238	\$60,000.00	Prince George's Racing Ventures, LLC.
239	\$60,000.00	Southern Power Company
240	\$60,000.00	TNEM, LLC
241	\$59,797.19	Chesapeake BaySavers, Inc.
242	\$58,896.81	VALIC
243	\$58,710.00	Wiley Publishing
244	\$58,600.00	Prince George's County Public Schools
245	\$58,260.20	State Privacy and Security Coalition, Inc.
246	\$58,240.00	IWP

247	\$57,394.60	Maryland Society of Anesthesiologists
248	\$57,344.31	Columbia Gas of Maryland
249	\$57,000.00	KSM LLC
250	\$57,000.00	St. Joseph Medical Center Foundation
251	\$56,404.41	Discovery Communications, Inc.
252	\$56,006.25	Jai Medical Systems
253	\$56,000.00	Cigar Association of America, Inc.
254	\$55,853.08	Maryland Association of Certified Public Accountants
255	\$55,777.00	Greater Baltimore Committee
256	\$55,394.89	Daily Record, The
257	\$55,000.00	Maximus
258	\$55,000.00	SMARTBUS LIVE
259	\$54,597.17	Maryland Consumer Rights Coalition, Inc.
260	\$54,366.36	Maryland Horse Breeders Association
261	\$54,046.00	AAA Mid-Atlantic, Inc.
262	\$54,000.00	Maryland Multi-Family Housing Association
263	\$54,000.00	Optimal Solutions Integrations, Inc.
264	\$54,000.00	St. Charles Companies
265	\$53,848.00	Maryland Community Health System, LLP
266	\$53,754.20	AARP Maryland
267	\$53,696.20	Maryland Optometric Association
268	\$53,577.13	One Call Concepts, Inc.
269	\$53,500.00	Maryland Automobile Insurance Fund
270	\$53,500.00	Reckitt Benckiser Pharmaceuticals, Inc.
271	\$53,466.62	Kennedy Krieger Institute, The
272	\$53,000.00	Envista Corporation
273	\$52,899.96	Insurance Agents & Brokers of Maryland, Inc. (IA&B)
274	\$52,870.39	Corizon Health
275	\$52,661.85	AFSCME, AFL-CIO
276	\$52,250.32	Nationwide Insurance Company
277	\$52,245.80	Patapsco Bingo
278	\$52,201.76	Chimes, The

279	\$51,923.00	Maryland Broadband Cooperative, Inc.
280	\$51,751.81	State Farm Mutual Automobile Insurance Co.
281	\$51,651.00	Maryland Association of Nonprofit Organizations
282	\$51,250.00	American Chemistry Council
283	\$51,000.00	T. Rowe Price Group, Inc.
284	\$50,997.50	Atlantic Wind Connection
285	\$50,700.00	CCI Entertainment, LLC
286	\$50,670.00	Consumer Data Industry Association
287	\$50,600.00	Manufacturers and Traders Trust Company As Trustee for Bondholders of the Rocky Gap Resort
288	\$50,474.19	Genesis HealthCare Corporation
289	\$50,470.00	Food & Friends
290	\$50,460.00	Bombardier Mass Transit Corporation
291	\$50,214.86	mLotto, Inc.
292	\$50,213.00	Heritage Rx also known as Heritage Financial Consultants, LLC
293	\$50,200.00	Saul E. Kerpelman & Associates, P.A.
294	\$50,106.21	Maryland Association of Mortgage Professionals
295	\$50,060.00	Motion Picture Association of America, Inc.
296	\$50,050.00	Delmarva Poultry Industry
297	\$50,000.00	7-11, Inc.
298	\$50,000.00	Elevator Industry Work Preservation Fund
299	\$50,000.00	Manor Care Health Services
300	\$50,000.00	Maryland Association of Chain Drug Stores
301	\$50,000.00	P3 Group, The
302	\$50,000.00	Stevenson University

APPENDIX B

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

November 1, 2011 - October 31, 2012

	TOTAL AMOUNT	LOBBYIST
1	\$1,305,414.88	Perry, Timothy A.
2	\$1,286,411.42	Rozner, Joel D.
3	\$1,248,041.00	Proctor, Jr., Gregory S.
4	\$1,196,100.38	Shaivitz, Robin F.
5	\$1,141,000.00	Evans, Gerard
6	\$1,099,155.67	Johansen, Michael V.
7	\$1,055,148.94	Stierhoff, John R.
8	\$1,048,960.00	Manis, Nicholas G.
9	\$942,695.00	Harris Jones, Lisa
10	\$930,169.00	Enten, D. Robert
11	\$790,740.35	Bereano, Bruce C.
12	\$685,417.00	Harting, Marta
13	\$659,750.00	Malone, Sean R.
14	\$625,033.30	Boston, III, Frank D.
15	\$618,283.90	Popham, Bryson F.
16	\$554,750.00	Mitchell, Van T.
17	\$521,441.60	Tiburzi, Paul A.
18	\$504,994.12	Kasemeyer, Pamela M.
19	\$491,957.56	Wise, J. Steven
20	\$474,924.19	Powers, Hannah J.
21	\$471,854.27	Bagwell, Ashlie
22	\$466,420.00	Pitcher, J. William
23	\$456,844.00	Johnson, Robert G.
24	\$456,844.00	Sidh, Sushant
25	\$454,795.40	Rasmussen, Dennis F.
26	\$444,844.00	Carroll, Jr., David H.
27	\$440,474.81	Lanier, Ivan V.
28	\$427,615.29	Bellamy, Lorenzo M.

29	\$425,577.18	Greenfield, Aaron J.
30	\$419,687.50	Hoffman, Barbara A.
31	\$399,353.50	White, Josh
32	\$375,951.50	Aery, Shaila R.
33	\$375,792.77	Collins, Carville B.
34	\$354,810.61	Jacobson, Jonas A.
35	\$343,157.84	Bryant, Eric L.
36	\$337,750.00	Riddick, Major F.
37	\$337,605.44	Doherty, Jr., Daniel T.
38	\$315,919.65	Robinson, Kimberly Y.
39	\$313,670.09	Battle, J. Kenneth
40	\$279,840.00	DiPietro, Christopher V.
41	\$275,869.11	Levitan, Laurence
42	\$270,792.50	Miedusiewski, American Joe
43	\$264,000.00	Kress, William Allen
44	\$261,983.46	Lucchi, Leonard L.
45	\$260,380.00	Valentino-Benitez, Ellen
46	\$260,180.73	Chason, Todd R.
47	\$260,000.00	Looney, Sean M.
48	\$255,000.00	Genn, Gil
49	\$244,904.12	Andryszak, John A.
50	\$221,504.00	McCoy, Dennis C.
51	\$218,750.00	Burner, Gene L.
52	\$213,025.17	Brocato, Barbara M.
53	\$212,765.00	Liningier, Brett Stewart
54	\$202,250.00	Favazza, John F.
55	\$201,500.00	Hill, Denise O.
56	\$196,726.00	Elliott, Robyn S.
57	\$195,200.00	Canning, Michael F.
58	\$190,946.62	Roddy, Patrick H.
59	\$190,381.72	Schwartz, III, Joseph A.
60	\$186,931.00	O'Keefe, Kevin

61	\$175,200.00	Schrader, Sandra
62	\$172,833.25	Jones, Gary R.
63	\$170,100.00	Carter, W. Minor
64	\$165,550.00	Miles, William R.
65	\$160,000.00	Townsend, Pegeen A.
66	\$155,829.32	Ciekot, Ann T.
67	\$154,097.98	Douglas, Michele
68	\$153,000.00	Gally, Eric
69	\$145,200.00	Gisriel, Michael U.
70	\$144,500.00	Farasy, Thomas Morgan
71	\$141,043.75	Murphy, Kathleen M.
72	\$141,000.00	Loughran, Kathleen G.
73	\$140,963.96	Taylor, Jr., Casper R.
74	\$135,086.00	Cobbs, Drew P.
75	\$124,999.96	Alexander, Gary R.
76	\$122,002.00	Maloney, Kathleen M.
77	\$121,790.00	Montgomery III, Richard A.
78	\$115,000.00	Hutchins, Diane
79	\$114,347.00	DeMattos, Jr., Joseph
80	\$111,759.99	Neil, John B.
81	\$110,000.00	Coles, Mark Anthony
82	\$109,962.98	Neily Mutch, Alice J.
83	\$108,810.00	Weisel, Meredith R.
84	\$104,510.12	Hoover, Lesa N.
85	\$104,392.00	Quinn, Brian M.
86	\$104,000.00	Rivkin, Deborah R.
87	\$103,190.00	Rasenberger, Ann Louise
88	\$99,436.77	Wilkins, Barbara J.
89	\$97,000.00	Woolums, John R.
90	\$95,000.00	Hendricks, Joel D.
91	\$93,500.00	Zellmer, Jeffrie
92	\$92,500.00	Appel, Erin

93	\$90,000.00	Overton, Valerie Shearer
94	\$89,683.00	Locklair, Cailey
95	\$88,493.00	Murray, Patrick H.
96	\$87,400.00	McDonald, Tom
97	\$85,000.00	Donoho, Patrick
98	\$82,666.66	Opara, Clay C.
99	\$82,556.15	Castelli, William A.
100	\$81,000.00	Nathanson, Martha D.
101	\$81,000.00	Rohling, Martin Guy
102	\$80,000.00	Jones, Tim T.
103	\$78,952.00	Ballentine, Jr. , Thomas M.
104	\$78,010.00	Bjarekull, Tina M.
105	\$77,000.00	Shepter, Brian
106	\$75,000.00	Horrigan, F. Peter
107	\$73,000.00	Fowlkes, Lyle
108	\$72,418.00	Abramson, Arthur C.
109	\$72,083.00	Schreiber, Bret Allan
110	\$70,000.00	Crumbliss, John
111	\$70,000.00	Reel, David
112	\$70,000.00	Robbins, Mike
113	\$69,750.00	Manis, George N.
114	\$67,970.00	Esty, Susan
115	\$66,668.36	Maloney, Amy Ellen
116	\$65,000.00	Jepson, Robert
117	\$64,095.00	Pomeroy, Christopher D.
118	\$63,200.00	Kitzmiller, John P.
119	\$63,000.00	Matricciani, Denise M.
120	\$62,644.00	Johnson, Sean
121	\$61,140.00	Tompkins, Daniel Paul
122	\$60,827.34	Adams, Jr. , Earl
123	\$60,266.47	Buckner, Todd
124	\$60,000.00	Rogers, Kelley

125	\$59,508.70	Powell, Michael C.
126	\$59,470.68	Meyer, Isaac
127	\$58,094.00	Corwin, Marjorie A.
128	\$57,656.23	Lehman, Miriam
129	\$56,000.00	Thompson, Melvin R.
130	\$55,125.00	Schiavone, Patricia
131	\$54,405.47	Bishop, Tabb J.
132	\$54,285.00	Carey, Eleanor M.
133	\$53,920.00	Worcester, Julia P.
134	\$53,788.00	Purnell, I. Vanessa
135	\$53,754.20	Bresnahan, Tamela Elizabeth
136	\$53,634.98	Blank, Avery
137	\$52,375.00	Witten , Jennifer M.
138	\$52,134.22	Feinroth, Mark
139	\$52,000.00	Kuiper, Laurie
140	\$51,923.00	Patton, Tyler C.
141	\$51,035.46	Mickens, Randal L.
142	\$50,884.08	Mitchell, Susan
143	\$50,859.00	Connelly, Valerie T.
144	\$50,602.00	McCann, Nicole
145	\$50,145.23	Richardson, Jr., Lawrence Anthony
146	\$50,000.00	La Valle, Traci
147	\$50,000.00	Miller, Beverly L.
148	\$50,000.00	Zinsmeister, Robert M.

APPENDIX C

EXPENDITURES ON SPECIAL EVENTS November 1, 2011 - October 31, 2012

Group Invited	Number of Times Invited	Total
Anne Arundel County Delegation	9	\$12,051.55
Baltimore City Delegation	8	\$5,654.84
Baltimore County Delegation	9	\$6,895.39
Carroll County Delegation	4	\$4,234.76
General Assembly	101	\$1,262,050.17
Harford County Delegation	6	\$9,746.57
House Appropriations Committee	10	\$16,280.08
House Economic Matters Committee	20	\$50,373.84
House Environmental Matters Committee	12	\$20,943.74
House Health and Governmental Operations Committee	22	\$31,319.49
House Judiciary Committee	8	\$17,884.64
House of Delegates	4	\$7,055.52
House Rules and Executive Nominations Committee	0	\$0.00
House Ways and Means Committee	9	\$19,290.65
Howard County Delegation	6	\$4,279.63
Lower Eastern Shore Delegation	7	\$15,521.80
Montgomery County Delegation	19	\$218,368.45
Prince George 's County Delegation	13	\$33,033.02
Senate	5	\$7,979.25
Senate Budget and Taxation Committee	17	\$21,351.06
Senate Education Health & Environmental Affairs	19	\$21,789.70
Senate Executive Nominations Committee	0	\$0.00
Senate Finance Committee	31	\$75,205.84
Senate Judicial Proceedings Committee	6	\$11,416.57
Southern Maryland Delegation	6	\$5,845.13
Upper Eastern Shore Delegation	6	\$14,577.65
Western Maryland Delegation	6	\$8,901.71
TOTAL:		\$1,902,051.07

(NOTE: Where more than one committee was invited to the same event there may be a proportionate allocation for the purposes of this report.)

APPENDIX D

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

November 1, 2011 - October 31, 2012

	Name of Firm	Amount of Compensation Reported
1	Rifkin, Livingston, Levitan & Silver, LLC	\$3,616,265.66
2	Alexander & Cleaver, P.A.	\$3,326,722.82
3	Gordon, Feinblatt, Rothman, Hoffberger & Hollander, LLC.	\$2,968,177.92
4	Manis Canning & Associates	\$2,070,910.00
5	Venable, LLP	\$1,844,957.94
6	Harris Jones & Malone, LLC	\$1,695,445.00
7	Capitol Strategies, LLC	\$1,451,032.00
8	G.S. Proctor & Associates, Inc.	\$1,248,041.00
9	Gerard E. Evans, Ltd.	\$1,141,000.00
10	The Artemis Group, LLC	\$1,025,964.00

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. Lapides	2002 to present
Ava S. Feiner, Ph.D.	2003 to 2005
* Robert F. Scholz	2003 to 2012
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
Robert G. Blue	2012 to present

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