EXECUTIVE DEPARTMENT STATE OF MARYLAND



LAWRENCE J. HOGAN, JR. GOVERNOR

**COMMISSION MEMBERS:**PAUL M. VETTORI, *Chairman*ROBERT G. BLUE
RACHEL T. MCGUCKIAN

JACOB YOSEF MILIMAN

# STATE ETHICS COMMISSION

45 CALVERT STREET, 3<sup>RD</sup> FLOOR ANNAPOLIS, MARYLAND 21401 410-260-7770 / 1-877-669-6085 FAX: 410-260-7746 http://ethics.maryland.gov MICHAEL W. LORD
Executive Director
JENNIFER K. ALLGAIR
General Counsel
WILLIAM J. COLQUHOUN
Staff Counsel
KATHERINE P. THOMPSON
Assistant General Counsel

# THIRTY-SIXTH ANNUAL REPORT

**JANUARY 1, 2014 – DECEMBER 31, 2014** 

# GENERAL STATUTORY IMPLEMENTATION

#### **OVERVIEW**

In calendar year 2014, the Commission said farewell to long-time Commissioner Julian L. Lapides, and welcomed new Commissioner Rachel T. McGuckian. Martin G. Madden also joined the Commission in 2014 but departed upon being tapped to join the transition team of newly-elected Governor Lawrence J. Hogan, Jr. The Commission met 6 times in regularly scheduled sessions and held 3 phone conferences. During its 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 General Provisions Article §5-205, 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

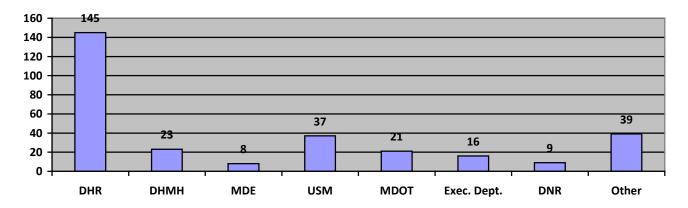
The State Ethics Commission is responsible for interpreting the Public Ethics Law. Sections 5-301 through 5-303 of the Public Ethics Law authorize the State Ethics Commission to issue formal advisory opinions in response to requests from officials, employees, lobbyists, and others who are subject to 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-six years of existence, the Commission has issued 500 formal opinions. 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. There were no formal opinions issued in 2014.

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 2012 through 2014:

SUBJECT MATTER OF THE ADVICE	2014	2013	2012
Lobbying Registration, Reporting and Conduct	9	9	8
Secondary Employment Advice	298	287	255
Participation Advice	37	40	31
Procurement Restrictions	9	3	3
Post-Employment Advice	34	44	69
Gift Questions	39	32	60
Other	41	26	44
Total	467	441	470

The number of informal matters addressed in 2014, while lower than 2012 (which was the highest number ever experienced by the Commission), was significantly higher than the 2013 number. The 2013 and 2014 numbers are still well above the numbers experienced in previous years. The Commission staff has worked hard to encourage employees and officials to take a proactive approach to dealing with ethics matters, preferring to address issues before they become enforcement matters. As the above-table indicates, a 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 39 "other agency" secondary employment requests came from 21 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 §5-525. The Act broadened the exemption from the conflict of interest provisions which now applies to officials, employees, vice-presidents and presidents as well as the chancellors and vice-chancellors of public senior higher education institutions. The USM Board of Regents and the USM institutions adopted procedures pursuant to §5-525 to implement the conflict of interest exemptions, and the Commission's authority is limited to approval of the policies' conformity with the requirements of §5-525.

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 384 faculty exemptions granted by the university presidents between 1996 and 2013, 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 2014, USM institutions reported an additional 34 individual faculty member exemptions to the Commission. The exemptions were from the following institutions:

INSTITUTION	Number of Exemptions
University of Maryland College Park	20
University of Maryland Baltimore	14
TOTAL FACULTY EXEMPTIONS	34

#### 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 § 5-103, the Commission reviewed a significant number of requests by various agencies to add or delete positions to/from the financial disclosure filing list, and conducted an extensive review of some outdated listings. The net result was a slight decrease in the number of filers from approximately 14,693 in 2013 to 14,385 in 2014, attributable to a significant effort by the staff to update the Commission's financial disclosure database by identifying board and commission members who had previously terminated their service and whose status had not been reported to the Commission.

Pursuant to Public Ethics Law §§ 5-103 and 5-209, 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 exemptions from the requirement to file financial disclosure statements. The Commission continues to see 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 2014, the Commission staff reviewed nearly 16,000 financial disclosure statements.

In 2014 the Commission continued to experience an increase in the number of employees, officials and board and commission members who elected to voluntarily file their financial disclosure statements electronically. Of the total number of filers during calendar year 2014, approximately 98% filed electronically. The electronic administrative tool permits the staff to quickly review electronically submitted statements, compare them to previously filed electronic 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, is through email, which also saves the Commission substantial supply and postage costs.

The electronic filing process received a big boost when the General Assembly passed a bill requested by the Commission to make electronic filing mandatory, which took effect October 1, 2014. The new law directs the Commission to develop procedures to grant exemptions to the electronic filing requirements, and accordingly the Commission has adopted regulations providing for exemptions in limited circumstances.

#### LOBBYIST DISCLOSURE AND REGULATION

The lobbying year runs from November 1<sup>st</sup> to October 31<sup>st</sup> 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, 2014, 3,110 lobbying registrations were filed with the Commission. Those registrations were submitted by 643 lobbyists on behalf of 1,382 employers. This represents a decrease of 11 registrations from the 3,121 filed by October 31, 2013.

The General Assembly enacted legislation at the request of the Commission, which took effect on October 1, 2014, eliminating the requirement for the employer to sign the registration form authorizing the lobbyist to act on the employer's behalf. The practical effect of this change in the Law is that the registration process has been streamlined, permitting the Commission to offer lobbyists the option of paying the registration fee electronically and completing the process on-line, eliminating the requirement for the lobbyist to submit a paper form (signed by the employer) and a check to cover the registration fee.

The following table summarizes lobbying expenditures for the last three lobbying years:

EXPENDITURES REPORT	ED BY LOBI	BYISTS	
Type of Expenditure	10/31/2014	10/31/2013	10/31/2012
Type of Expenditure	\$	\$	\$
B-1: Meals and beverages for officials or employees or their immediate families	3,054	8,889	5,183
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.	1,895,841	1,974,087	2,039,495
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	9,220	15,637	12,038
B-4: Food and beverages at approved legislative organizational meetings	3,031	3,353	6,535
B-5: Tickets or free admission to attend charitable, cultural or political events where all members of a legislative unit are invited.	23,966	3,005	4,125
B-6: Gifts to or for officials or employees or their immediate families (not included on B-1 through B-5)	7,660	7,380	8,580

EXPENDITURES REPORTED BY LOBBYISTS			
Type of Expenditure	10/31/2014	10/31/2013	10/31/2012
SUBTOTAL OF ITEMS B-1 THROUGH B-6	\$1,942,772	\$2,012,351	\$2,075,956
B-7: Total compensation paid to registrant (not including sums reported in any other section)	43,962,103	42,664,486	42,122,015
B-8: Salaries, compensation and reimbursed expenses for staff of the registrant	1,248,197	1,085,338	1,830,483
B-9: Office expenses not reported in B-7 or B-8	723,277	855,170	853,530
B-10: Cost of professional and technical research and assistance not reported in items B-7 or B-8	585,490	527,271	626,758
B-11: Cost of publications which expressly encourage persons to communicate with officials or employees	281,212	515,652	5,634,077
B-12: Fees and expenses paid to witnesses	49,302	4,856	7,804
B-13: Other expenses	578,961	838,059	1,103,383
TOTAL OF ITEMS B-1 THROUGH B-13	\$49,371,313	\$48,503,183	\$54,254,006

#### **ENFORCEMENT ACTIVITIES**

There are two 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 on its own motion 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 2014, Staff Counsel was also assisted by an intern.

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 2014, the Commission opened 45 A matters (Preliminary Consideration), including 25 conflict of interest matters, 14 lobbyist matters, 5 financial disclosure matters and 1 training matter. The Commission issued a reprimand to a Register of Wills, through a Pre-Complaint Disposition Agreement, who violated participation restrictions by becoming involved in matters in which a qualifying relative had an interest.

The Commission also entered into 16 Late Filing Agreements with lobbyists during 2014, resulting in payments of \$3,880.00 to the State of Maryland. These payments include \$750.00 from a lobbyist who failed to register during the 2011-2012 lobbying year, and \$250.00 from a lobbyist whose failure to register was discovered after comparing the list of identification badges issued to lobbyists by the Department of General Services Police with the Commission's lobbying registrations. The Commission closed 31 A matters in 2014, including 2 matters carried over from 2013. (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 12 B matters (Preliminary Inquiry Matters) in 2014, including 9 conflict of interest matters, 1 financial disclosure matter, and 2 lobbying matters. The Commission issued a reprimand to a Clerk of the Circuit Court, through a Pre-Complaint Disposition Agreement, who violated participation restrictions by becoming involved in matters in which she and a qualifying relative had an interest. As part of the Agreement, the employee agreed to pay \$5,000.00 by no later than June 30, 2015. In 2014, the Commission closed 10 B Matters, including 2 matters carried over from 2013.

In calendar year 2014, the Commission issued 49 complaints, including complaints in 46 financial disclosure matters, 2 conflict of interest matters and 1 training matter. The Commission issued a reprimand to a Board of Elections employee, through a Stipulation of Settlement Agreement, who violated participation restrictions by becoming involved in matters in which several qualifying relatives had interests. Also during 2014, the Commission issued a reprimand to a Department of Assessments and Taxation employee, through a Stipulation of Settlement Agreement, who violated the prestige provisions by improperly using his State email account. The Commission closed 48 complaints in 2014, including 15 matters from 2013, and 4 matters from 2012.

All enforcement payments were deposited in the State's general fund and cannot be used by the Commission. The Commission assessed a total of \$8,880.00 in enforcement payments in 2014.

#### 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 are at least as stringent as the requirements for officials in Subtitles 5 and 6 of the Public Ethics Law. That legislation imposes similar requirements on local boards of education with respect to conflict of interest standards and financial disclosure requirements for members of and candidates for election to boards 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 (there is no certification requirement for boards of education) is in compliance with the requirements of the law on or before October 1 of each year.

In response to the 2010 legislation 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 of 2010, as well as in educating local governments and boards of education on the new requirements in the Public Ethics Law.

During 2014, the Commission's Executive Director, General Counsel, and Assistant General Counsel continued to participate in numerous phone discussions with county and local ethics officials, as well as their representative associations regarding questions relating to conflicts of interest, financial disclosure and lobbying and the implementation of Chapter 277 of 2010. The Commission received thirty-six new 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. The Commission staff continued to work with several jurisdictions that previously submitted draft laws in 2013, but had not yet received Commission approval. In 2014, the Commission approved draft ordinances from three counties and eleven municipalities. Once these approved draft policies are enacted, the counties or municipalities must 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. Commission regulations (19A.04.03.03) require the Commission to review the status of all municipal exemptions and modifications at the end of each decennial census to determine if those that were previously granted are still appropriate. This process was completed for the 2010 census at the end of 2013 and the beginning of 2014.

The Commission reviewed forty exemption requests in 2013. Of those forty requests, the Commission granted seventeen full exemptions and exempted twenty-one jurisdictions from the requirement to adopt lobbying provisions. One jurisdiction requested not to be exempt from the requirement to adopt conflict of interest, financial disclosure and lobbying provisions in its local ethics law and the Commission granted

that request. In 2014 the Commission reviewed one exemption request and granted a full exemption. In 2014, 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 limited number of modifications related to the timing of financial disclosure statement filings for candidates for elected local office.

Finally, the Commission also received and reviewed four reports from Montgomery County and two reports from Prince George's County regarding the special land use ethics disclosure reports required in certain jurisdictions (See §5-833 through §5-845).

#### 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 and provided technical advice to local government ethics commissions.

In March of 2010, the Commission implemented online training for conflicts of interest and lobbying. The electronic training allows public officials and lobbyists to satisfy the training requirements of the Public Ethics Law in 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.

The Public Ethics Law requires new financial disclosure filers (i.e. public officials) to receive 2 hours of Ethics Law training (§5-205(d)). A total of 1,183 public officials and state employees took the conflicts of interest training online during calendar year 2014.

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 8 general ethics training programs for agencies, boards and commissions, attended by 217 State employees and public officials, addressing conflicts of interest and the financial disclosure requirements. The Commission staff also conducted 19 training sessions addressing conflict of interest and procurement issues attended by an additional 850 State employees, public officials, members of the public and special interest groups. The total number of individuals who attended general ethics and conflict of interest training was 1,067.

In accordance with § 5-205(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 3 lobbying training programs attended by 21 regulated lobbyists. In addition, a total of 308 regulated lobbyists took the mandated training online during calendar year 2014. The lobbying training focuses on electronic filing, the general lobbying conduct prohibitions in the Law, and reporting requirements.

The 2014 Legislative Session resulted in two significant changes to the training requirements for lobbyists. First, the Law was changed to make it clear that a lobbyist must attend training within six months of initially registering as a lobbyist (or if the initial registration is for a period of less than six months, prior to any subsequent registration) and thereafter within two years of the date of the previously-completed training course.

Second, the Law was changed to authorize the Commission to enforce violations of the training requirements. Prior to October 1, 2014, the training requirements for lobbyists were addressed in Subtitle 2 of the Public Ethics Law. The Public Ethics Law authorizes the Commission to take enforcement action for violations of Subtitle 7 (which covers lobbying matters), but not for violations of Subtitle 2. As a consequence, the Commission had no authority to take action against lobbyists who chose not to comply with the training requirements. The General Assembly rectified this situation by enacting legislation during the 2014 Legislative Session which moved the lobbyist training requirements from Subtitle 2 to Subtitle 7.

The State Ethics Commission has become increasingly reliant on its website. 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.

# 2014 LEGISLATION REPORT & RECOMMENDATONS

The State Ethics Commission proposed five departmental bills for the 2014 Session of the General Assembly. Each of those bills was submitted to the General Assembly and subsequently enacted. The bills include:

- Senate Bill 90 (Chapter 19 of the Acts of 2014) eliminates the requirement for the employer to sign the registration form authorizing the lobbyist to act on the employer's behalf;
- Senate Bill 91 (Chapter 20 of the Acts of 2014) authorizes the State Ethics Commission to issue a public notice that a local government or school board has failed to make a good faith effort to comply with the requirements of the Public Ethics Law;
- Senate Bill 92 (Chapter 21 of the Acts of 2014) clarifies the training requirements for regulated lobbyists and authorizes the State Ethics Commission to take enforcement action when lobbyists fail to comply with those requirements;
- Senate Bill 109 (Chapter 32 of the Acts of 2014) makes mandatory the electronic filing of financial disclosure statements subject to exceptions determined by the State Ethics Commission;
- Senate Bill 129 (Chapter 37 of the Acts of 2014) increases the fees paid by public officials for late-filed financial disclosure statements and by lobbyists for late filed reports.

#### 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:

- 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 meals or beverages 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 requires the Court of Appeals to 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 Law currently authorizes the Commission to impose a fine not exceeding \$5,000 for each violation of the Public Ethics Law by a regulated lobbyist. However, with respect to State employees and public officials, the Commission must request a court to assess fines of \$5,000 per violation. Providing the Commission with authority to assess civil penalties against State employees and public officials 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.

# **APPENDIX A**

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

November 1, 2013 - October 31, 2014

TOTAL AMOUNT	EMPLOYER
\$97,700.00	1199 SEIU
\$54,966.94	AAA Mid-Atlantic, Inc.
\$60,000.00	AARP
\$68,325.00	AbbVie Inc.
\$80,519.88	ACLU of Maryland
\$153,909.54	Adventist HealthCare, Inc.
\$52,898.79	Advocates For Children and Youth, Inc.
\$55,451.00	AES Warrior Run
\$61,600.00	Aetna, Inc.
\$70,400.00	Aetna Life Insurance Company, Inc.
\$60,800.02	AFSCME Council 67, AFL-CIO
\$185,078.00	AFSCME Maryland
\$84,800.00	Agency Insurance Company of Maryland
\$94,095.00	Alcoa Primary Metals
\$82,566.63	Alkermes, Inc.
\$74,726.13	Alliance of Automobile Manufacturers
\$84,774.65	Allstate Insurance Company
\$220,902.70	Altria Client Services Inc. and its Affiliates - Philip Morris USA Inc., John Middleton Co., U.S. Smokeless Tobacco Company, LLC and Nu Mark LLC
\$60,000.00	Amazon
\$82,858.57	American Cancer Society Cancer Action Network
\$120,000.00	American Chemistry Council
\$53,399.99	American Express Company
\$60,000.00	American Federation of Teachers - Maryland
\$54,833.58	American Forest & Paper Association, Inc.
\$82,860.00	American Heart Association
\$58,000.00	American International Group, Inc.

\$336,407.67	American Petroleum Institute
\$170,000.00	American Sugar Refining, Inc.
\$51,500.00	American Traffic Solutions, Inc.
\$94,000.00	America's Natural Gas Alliance
\$287,963.62	Amerigroup Maryland, Inc.
\$84,999.86	Anheuser-Busch Companies
\$80,693.55	Apartment & Office Building Association of Metropolitan Washington
\$58,000.00	Apex Clean Energy Management, LLC
\$72,412.06	Apollo Group/University of Phoenix
\$75,000.00	ARINC, Inc.
\$123,286.00	Associated Builders & Contractors
\$101,480.00	Association of Maryland Pilots
\$90,000.00	AT&T
\$190,300.00	Atlantic Recycling Group, LLC
\$115,400.00	Automated Health Care Solutions
\$50,000.00	Baltimore Child Abuse Center
\$287,741.50	Baltimore Gas and Electric Company
\$271,417.68	Baltimore Jewish Council
\$50,000.00	Baltimore Orioles, Inc.
\$65,976.94	Bank of America Corporation
\$75,230.42	Cable Telecommunications Association of MD, DE & DC
\$64,000.00	Canton Railroad Company
\$455,047.39	CareFirst BlueCross BlueShield
\$60,000.00	Cash America
\$64,986.06	Catholic Charities
\$678,606.54	CBAC Gaming, LLC
\$54,280.00	Cerner Corporation
\$65,491.50	CGI Technologies and Solutions Inc.
\$84,000.00	Charles County Commissioners
\$60,000.00	Chesapeake Amusements, Inc.
\$75,626.07	Chesapeake Bay Foundation
\$176,285.00	Chesapeake Climate Action Network

\$82,000.00	Chesapeake Urology Associates, P.A.
\$60,618.20	Children's National Medical Center
\$53,044.08	Chimes, The
\$57,000.00	Cigar Association of America, Inc.
\$60,000.00	Civista Health, Inc./Charles Regional Medical Center Foundation
\$89,000.00	Clark Construction
\$57,656.16	Columbia Association, Inc.
\$53,503.57	Columbia Gas of Maryland
\$189,379.18	Columbia Gas Transmission, LLC
\$439,224.57	Comcast
\$87,000.00	Commerce Energy
\$90,690.00	Committee for Montgomery
\$84,000.00	Competitive Power Ventures, Inc.
\$90,062.24	Concentra Medical Centers
\$122,013.33	Corvex Management LP
\$52,967.57	Costco Wholesale
\$95,338.96	Covanta Energy Corporation
\$60,500.99	CSC
\$200,000.00	CSX Transportation, Inc.
\$73,414.00	CVS Health
\$56,185.32	Daily Record, The
\$51,100.00	DaVita, Inc.
\$50,000.00	Daycon
\$63,000.00	Decker's Salvage
\$72,399.98	Delta Dental of Pennsylvania
\$96,000.00	Dental Group Practice Association
\$65,067.16	DentaQuest
\$64,750.00	Diamond Game Enterprises
\$154,352.99	Direct Energy
\$75,600.00	Doctor's Community Hospital
\$193,960.00	Dominion Resources Services, Inc.
\$117,266.00	ecoATM

\$62,477.85	Election Systems & Software
\$50,000.00	Elevator Industry Work Preservation Fund
\$63,155.28	EnerNOC, Inc.
\$77,376.87	Engagepoint
\$67,680.29	Enterprise RAC Company of Baltimore, LLC
\$90,015.42	Envirotest Systems Holdings Corp
\$122,948.00	EPIC Pharmacies
\$52,500.00	Ernst & Young
\$72,000.00	ESG - Energy Systems Group
\$68,297.00	Evitts Resort, LLC
\$312,436.19	Exelon Corporation
\$81,791.33	Express Scripts Holding Co.
\$60,227.54	Facebook
\$90,000.00	Faison & Associates, LLC
\$92,542.83	FedEx Corporation
\$69,564.00	Fidelity & Guaranty Life Insurance Co.
\$240,807.49	FirstEnergy Corp.
\$115,095.63	Food Research and Action Center dba Maryland Hunger Solutions
\$154,794.10	GAF Materials Corporation
\$67,500.00	Gaming and Leisure Properties, Inc.
\$60,399.98	Gannett Fleming
\$96,322.83	Gaudenzia, Inc.
\$112,162.14	General Motors LLC
\$55,513.30	Generic Pharmaceutical Association
\$66,834.58	Glaxo Smith Kline
\$50,000.00	Greater Baltimore Board of Realtors, Inc.
\$65,419.00	Greater Baltimore Committee
\$51,496.00	Greater Baltimore Medical Center
\$118,965.89	Greater Capital Area Association of Realtors
\$60,000.00	Greenberg Gibbons
\$72,550.00	GTECH Corporation
\$60,800.00	Hart InterCivic, Inc.

\$257,330.87	Health Facilities Association of Maryland (HFAM)
\$53,200.00	Hilex Poly Company LLC
\$50,000.00	Holcim (US) Inc.
\$75,000.00	Holy Cross Health, Inc.
\$70,000.00	Innocence Project
\$53,899.96	Insurance Agents & Brokers of Maryland, Inc. (IA&B)
\$50,004.00	International Business Machines Corporation ("IBM")
\$51,064.98	International Council of Shopping Centers
\$60,000.00	IWP (Injured Workers Pharmacy)
\$58,372.95	Jack Neil & Associates, LLC
\$59,004.00	Jai Medical Systems
\$352,379.00	Johns Hopkins Institutions
\$60,000.00	Johnson Controls, Inc.
\$120,000.00	Joseph Smith & Sons, Inc.
\$181,300.00	Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc.
\$60,000.00	Kaplan Higher Education
\$56,883.26	Kennedy Krieger Institute, The
\$108,000.00	Keolis America, Inc.
\$59,767.88	Kiewit Infrastructure Company
\$180,000.00	Law Offices of Peter Angelos
\$160,000.00	League of Life & Health Insurers of Maryland, Inc.
\$50,000.00	Lennar Ventures, LLC
\$59,999.99	Lexington Law
\$95,093.21	Licensed Beverage Distributors of Maryland, Inc.
\$162,133.99	Lifebridge Health, Inc.
\$116,379.92	Lockheed Martin Corporation
\$63,000.00	Lorillard, Inc.
\$78,000.00	LSN Government Affairs
\$74,160.00	M&R Strategic Solutions
\$77,000.00	Manufacturers Alliance of Maryland
\$175,853.00	Maryland Association for Justice
\$138,216.10	Maryland Association of Boards of Education

\$57,055.74	Maryland Association of Certified Public Accountants
\$60,000.00	Maryland Association of Chain Drug Stores
\$100,422.25	Maryland Association of Community Colleges
\$53,456.00	Maryland Association of Community Services (MACS)
\$373,132.98	Maryland Association of Realtors, Inc.
\$58,079.00	Maryland Association of Resources for Families & Youth
\$182,638.61	Maryland Automobile Dealers Association
\$67,075.27	Maryland Automobile Insurance Fund
\$408,416.52	Maryland Bankers Association
\$354,029.53	Maryland Catholic Conference, LLC.
\$106,694.55	Maryland Chamber of Commerce
\$85,100.00	Maryland Cigar Direct Ship Coalition
\$118,027.00	Maryland Citizens Health Initiative, Inc.
\$167,739.94	Maryland Farm Bureau, Inc.
\$105,000.00	Maryland Horse Breeders Association
\$662,234.63	Maryland Hospital Association
\$59,000.00	Maryland Hotel & Lodging Association
+ ,	mar frame fraction at Eduging Association
\$214,621.50	Maryland Independent College and University Association
\$214,621.50	Maryland Independent College and University Association
\$214,621.50 \$55,000.00	Maryland Independent College and University Association  Maryland Industrial Technology Alliance
\$214,621.50 \$55,000.00 \$88,832.93	Maryland Independent College and University Association Maryland Industrial Technology Alliance Maryland Insurance Council, The
\$214,621.50 \$55,000.00 \$88,832.93 \$60,400.00	Maryland Independent College and University Association Maryland Industrial Technology Alliance Maryland Insurance Council, The Maryland Interactive, LLC
\$214,621.50 \$55,000.00 \$88,832.93 \$60,400.00 \$218,131.74	Maryland Independent College and University Association Maryland Industrial Technology Alliance Maryland Insurance Council, The Maryland Interactive, LLC Maryland Jockey Club (Pimlico and Laurel Park)
\$214,621.50 \$55,000.00 \$88,832.93 \$60,400.00 \$218,131.74 \$133,750.00	Maryland Independent College and University Association Maryland Industrial Technology Alliance Maryland Insurance Council, The Maryland Interactive, LLC Maryland Jockey Club (Pimlico and Laurel Park) Maryland Multi-Housing Association
\$214,621.50 \$55,000.00 \$88,832.93 \$60,400.00 \$218,131.74 \$133,750.00 \$66,728.88	Maryland Independent College and University Association Maryland Industrial Technology Alliance Maryland Insurance Council, The Maryland Interactive, LLC Maryland Jockey Club (Pimlico and Laurel Park) Maryland Multi-Housing Association Maryland Optometric Association
\$214,621.50 \$55,000.00 \$88,832.93 \$60,400.00 \$218,131.74 \$133,750.00 \$66,728.88 \$120,314.99	Maryland Independent College and University Association Maryland Industrial Technology Alliance Maryland Insurance Council, The Maryland Interactive, LLC Maryland Jockey Club (Pimlico and Laurel Park) Maryland Multi-Housing Association Maryland Optometric Association Maryland Physicians Care MCO
\$214,621.50 \$55,000.00 \$88,832.93 \$60,400.00 \$218,131.74 \$133,750.00 \$66,728.88 \$120,314.99 \$77,803.35	Maryland Independent College and University Association Maryland Industrial Technology Alliance Maryland Insurance Council, The Maryland Interactive, LLC Maryland Jockey Club (Pimlico and Laurel Park) Maryland Multi-Housing Association Maryland Optometric Association Maryland Physicians Care MCO Maryland Radiological Society
\$214,621.50 \$55,000.00 \$88,832.93 \$60,400.00 \$218,131.74 \$133,750.00 \$66,728.88 \$120,314.99 \$77,803.35 \$556,871.90	Maryland Independent College and University Association Maryland Industrial Technology Alliance Maryland Insurance Council, The Maryland Interactive, LLC Maryland Jockey Club (Pimlico and Laurel Park) Maryland Multi-Housing Association Maryland Optometric Association Maryland Physicians Care MCO Maryland Radiological Society Maryland Retailers Association
\$214,621.50 \$55,000.00 \$88,832.93 \$60,400.00 \$218,131.74 \$133,750.00 \$66,728.88 \$120,314.99 \$77,803.35 \$556,871.90 \$74,160.00	Maryland Independent College and University Association Maryland Industrial Technology Alliance Maryland Insurance Council, The Maryland Interactive, LLC Maryland Jockey Club (Pimlico and Laurel Park) Maryland Multi-Housing Association Maryland Optometric Association Maryland Physicians Care MCO Maryland Radiological Society Maryland Retailers Association Maryland School for the Blind, The
\$214,621.50 \$55,000.00 \$88,832.93 \$60,400.00 \$218,131.74 \$133,750.00 \$66,728.88 \$120,314.99 \$77,803.35 \$556,871.90 \$74,160.00 \$192,496.00	Maryland Independent College and University Association Maryland Industrial Technology Alliance Maryland Insurance Council, The Maryland Interactive, LLC Maryland Jockey Club (Pimlico and Laurel Park) Maryland Multi-Housing Association Maryland Optometric Association Maryland Physicians Care MCO Maryland Radiological Society Maryland Retailers Association Maryland School for the Blind, The Maryland State Bar Association, Inc.

\$94,470.47	Maryland State Licensed Beverage Association
\$100,001.00	Maryland Thoroughbred Horsemen's Assoc.
\$174,794.92	Maryland Tort Reform Coalition
\$75,000.00	Maryland Transit Connectors
\$107,899.50	Maryland Transportation Builders & Materials Association (MTBMA)
\$65,504.56	Maryland Wineries Association
\$65,667.91	Maryland Works, Inc.
\$131,949.52	Maryland Zoo in Baltimore, The
\$74,846.00	Maryland/D.C./Delaware Broadcasters
\$68,313.53	Maximus
\$51,050.00	McAfee
\$101,999.96	MCAMD, LLC
\$120,495.01	MD/DE/DC Beverage Association
\$331,513.04	MedChi, The Maryland State Medical Society
\$200,080.53	Medical Mutual Liability Insurance Society of Maryland (Medical Mutual)
\$84,000.00	MedImmune, LLC
\$331,315.67	MedStar Health
\$112,156.50	Merck Sharp & Dohme Corp.
\$161,236.41	MGM Resorts International
\$100,000.00	Microsoft Corporation
\$149,195.73	Mid-Atlantic Health Care
\$68,789.83	Mid-Atlantic LifeSpan
\$168,500.00	Mid-Atlantic Petroleum Distributors Association
\$75,000.00	Milestone Communications Management III, Inc.
\$92,700.00	Molina Healthcare, Inc.
\$471,126.30	Montgomery County Chamber of Commerce
\$53,000.00	Motion Picture Association of America, Inc.
\$78,215.36	Motorola Solutions
\$60,680.00	Mylan, Inc.
\$123,951.05	National Aquarium in Baltimore, Inc.
\$180,490.14	National Association of Industrial And Office Properties-Maryland
\$50,000.00	National Funeral Directors Association

\$72,180.08	National Shooting Sports Foundation, Inc.	
\$116,707.28	Nationwide Insurance Company	
\$74,782.82	NMS Healthcare of Hyattsville, LLC	
\$78,600.00	Norfolk Southern Corporation	
\$72,000.00	Noridian Administrative Services	
\$54,160.96	Northeast Maglev, LLC., The	
\$137,200.00	Northrop Grumman Corporation	
\$132,860.00	NRG Energy, Inc.	
\$303,598.00	Ocean Enterprise 589, LLC	
\$87,972.50	Old Dominion Electric Cooperative	
\$55,974.68	One Call Concepts, Inc.	
\$104,100.00	Oracle America, Inc.	
\$54,000.00	Orrick, Herrington & Sutcliffe LLP	
\$92,700.00	Owens-Illinois, Inc.	
\$96,758.00	Paragon Project Resources, Inc.	
\$55,000.00	Parcel D2, LLC	
\$55,200.00	Parsons Transportation Group, Inc.	
\$60,760.09	Patapsco Bingo	
\$319,347.55	Pepco Holdings, Inc.	
\$60,000.00	Peterson Companies, The	
\$60,827.22	Pfizer Inc.	
\$84,339.09	Pharmaceutical Research & Manufacturers of America	
\$90,000.00	Ports America Chesapeake	
\$107,500.00	PPE Casino Resorts Maryland, LLC	
\$54,410.73	PPL Services Corporation	
\$51,000.00	Preston Scheffenacker Properties	
\$62,000.00	Prince George's County Council	
\$50,000.00	Prince George's County Executive	
\$66,666.60	Princeton Public Affairs Group, Inc.	
\$97,800.36	Property Casualty Insurers Association of America	
\$62,197.14	Public Justice Center, Inc.	
\$75,994.90	Purple Plus Alliance	

\$97,000.00	RAI Services Company
\$53,046.38	Raven Power Finance LLC
\$130,679.99	Related Fund Management LLC
\$69,666.00	Restaurant Association of Maryland, Inc.
\$64,137.34	Retail Energy Supply Association
\$78,600.00	Rite Aid Corporation
\$62,999.98	Riverside Health
\$60,500.00	Sanford Companies, Inc., The
\$60,000.00	Saul E. Kerpelman & Associates, P.A.
\$61,902.18	SCI Management
\$63,062.00	Science Applications International Corporation (SAIC)
\$89,828.24	Scientific Games International
\$177,450.00	Share our Strength
\$72,000.00	Skanska
\$131,767.14	Southern Maryland Electric Cooperative, Inc.
\$52,400.00	Spectra Energy
\$68,400.00	Sprint Corporation
\$60,000.00	St. Charles Companies
\$145,739.97	State Farm Mutual Automobile Insurance Company
\$60,000.00	Stevenson University
\$51,000.00	T. Rowe Price Group, Inc.
\$121,071.00	Tech Council of Maryland/MdBio
\$70,000.00	T-Mobile USA, Inc.
\$60,000.00	TNEM, LLC
\$50,000.00	Tobacco Free Kids Action Fund
\$60,163.90	Total Wine & More
\$191,753.00	Transdev North America, Inc.
\$82,500.00	Travel Tech: The Travel Technology Association
\$60,000.00	Tremco Incorporated, Building and Roofing Maintenance Division
\$67,500.00	TruAcuity, Inc.
\$96,000.00	TSG Developments (Maryland) LLC
\$142,423.43	Uber Technologies, Inc.

\$56,100.00	UNITE HERE
\$125,741.88	United Healthcare Services, Inc.
\$60,000.00	University of Maryland Charles Regional Medical Center
\$78,478.00	USAA
\$54,798.65	VALIC
\$60,000.00	ValueOptions
\$70,200.00	Ventower Industries, LLC
\$259,265.04	Verizon Communications
\$190,588.35	Verizon Maryland Inc.
\$60,031.71	Walden University/Laureate Education, Inc.
\$162,000.00	Wal-Mart Stores, Inc.
\$55,601.00	Walton Development and Management
\$86,000.00	War Horse
\$70,665.00	Washington Area NEW Automobile Dealers Association (WANADA)
\$253,515.90	Washington Gas
\$117,000.00	Washington Suburban Sanitary Commission
\$78,827.54	Waste Management of Maryland
\$91,995.00	Wegmans Food Markets, Inc.
\$64,635.85	Wexford Health Sources, Inc.
\$60,223.34	Whalen Properties
\$76,600.00	Wheelabrator Technologies, Inc.
\$63,350.00	Woda Group, LLC., The
\$137,630.00	Working Families Organization
\$173,050.00	Xerox Business Services, LLC and its Affiliates

# **APPENDIX B**

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

November 1, 2013 - October 31, 2014

TOTAL	LOBBYIST
\$98,439.00	Abramson, Arthur
\$104,255.95	Adams, Jr., Earl
\$271,533.00	Aery, Shaila
\$87,772.39	Alexander, Gary
\$242,097.96	Andryszak, John
\$74,500.00	Appel, Erin
\$242,833.00	Bagwell, Ashlie
\$122,391.00	Ballentine, Jr , Thomas
\$546,383.74	Bellamy, Lorenzo
\$62,386.29	Bennett, Tyler
\$811,848.50	Bereano, Bruce
\$69,166.93	Bishop, Tabb
\$60,794.00	Bjarekull, Tina
\$70,000.00	Bonic, Andrew
\$824,766.60	Boston, III, Frank
\$255,000.00	Brocato, Barbara
\$74,156.50	Brown, Tamera
\$289,413.93	Bryant, Eric
\$487,875.00	Bryce, Joseph
\$181,600.00	Burner, Gene
\$157,950.00	Canning, Michael
\$83,500.00	Carrington, J. Darrell
\$564,411.88	Carroll, Jr., David
\$93,300.00	Carter, W. Minor
\$81,918.00	Castelli, William
\$168,947.38	Chason, Todd
\$141,100.92	Ciekot, Ann
\$135,777.00	Cobbs, Drew

\$77,397.05	Cole Jr., David
\$316,110.00	Collins, Carville
\$74,250.00	Cutler, Otis
\$103,706.00	DeMattos, Jr., Joseph
\$245,803.00	DiPietro, Christopher
\$307,526.95	Doherty, Jr., Daniel
\$90,000.00	Donoho, Patrick
\$140,629.12	Douglas, Michele
\$55,391.62	Douglas, Robert
\$64,951.90	Elfreth, Sarah
\$174,783.00	Elliott, Robyn
\$816,586.00	Enten, D. Robert
\$55,675.00	Esty, Susan
\$1,157,000.00	Evans, Gerard
\$52,000.00	Evans, Hayley
\$50,000.00	Favazza, Erin
\$446,625.00	Favazza, John
\$58,797.13	Feinroth, Mark
\$120,805.41	Fowlkes, Lyle
\$212,500.00	Gally, Eric
\$390,938.50	Garagiola, Robert
\$53,000.00	Garner, Julie
\$326,300.00	Genn, Gil
\$85,000.00	Gisriel, Michael
\$50,000.00	Goodfriend, David
\$237,750.00	Greenfield, Aaron
\$937,850.00	Harris Jones, Lisa
\$509,274.58	Harting, Marta
\$57,500.00	Hendricks, Joel
\$238,000.00	Hill, Denise
\$458,499.00	Hoffman, Barbara
\$79,500.00	Horrigan, F. Peter

\$115,000.00	Hutchins, Diane
\$527,308.00	Jacobson, Jonas
\$1,133,729.73	Johansen, Michael
\$556,812.22	Johnson, Robert
\$77,922.00	Johnson, Sean
\$225,000.00	Jones, Gary
\$616,285.11	Kasemeyer, Pamela
\$65,000.00	Kauffman, Danna
\$66,000.00	Kitzmiller, John
\$480,913.50	Kress, William
\$115,487.88	Kristiansen, Lars
\$104,000.00	Kuiper, Laurie
\$50,000.00	La Valle, Traci
\$423,974.99	Lanier, Ivan
\$62,071.60	Lehman, Miriam
\$172,290.41	Levitan, Laurence
\$195,426.50	Lininger, Brett
\$78,321.00	Locklair, Cailey
\$400,000.00	Looney, Sean
\$165,000.00	Loughran, Kathleen
\$226,269.50	Lucchi, Leonard
\$727,000.00	Malone, Sean
\$130,763.00	Maloney, Kathleen
\$1,015,500.00	Manis, Nicholas
\$59,000.00	McCann, Nicole
\$147,450.00	McCloskey, Molly
\$125,300.00	McCoy, Dennis
\$66,457.00	McDonald, Tom
\$112,000.00	McDonough, Caitlin
\$58,472.00	Mickens, Randal
\$325,990.00	Miedusiewski, American Joe
\$54,886.09	Mitchell, Susan

\$563,100.00	Mitchell, Van
\$134,053.00	Montgomery III, Richard
\$75,300.00	Moss, Carolyn
\$169,003.88	Murphy, Kathleen
\$84,040.00	Murray, Patrick
\$90,000.00	Nathanson, Martha
\$139,850.00	Neil, John
\$144,992.00	Neily Mutch, Alice
\$187,600.00	O'Keeffe, Kevin
\$67,500.00	Opara, Clay
\$112,600.00	Ortiz, Jeanette
\$90,000.00	Overton, Valerie
\$1,868,482.85	Perry, Timothy
\$114,532.73	Pica, Jr., John
\$315,100.00	Pitcher, J. William
\$643,016.47	Popham, Bryson
\$76,784.00	Powell, Michael
\$76,784.00 \$604,543.21	Powell, Michael Powers Garagiola, Hannah
\$604,543.21	Powers Garagiola, Hannah
\$604,543.21 \$1,135,358.00	Powers Garagiola, Hannah Proctor, Jr., Gregory
\$604,543.21 \$1,135,358.00 \$197,716.00	Powers Garagiola, Hannah Proctor, Jr., Gregory Quinn, Brian
\$604,543.21 \$1,135,358.00 \$197,716.00 \$77,397.05	Powers Garagiola, Hannah Proctor, Jr., Gregory Quinn, Brian Radz, Eric
\$604,543.21 \$1,135,358.00 \$197,716.00 \$77,397.05 \$50,000.00	Powers Garagiola, Hannah Proctor, Jr., Gregory Quinn, Brian Radz, Eric Ranier, Edward
\$604,543.21 \$1,135,358.00 \$197,716.00 \$77,397.05 \$50,000.00 \$58,758.00	Powers Garagiola, Hannah Proctor, Jr., Gregory Quinn, Brian Radz, Eric Ranier, Edward Rankin, Sr., Robert
\$604,543.21 \$1,135,358.00 \$197,716.00 \$77,397.05 \$50,000.00 \$58,758.00 \$536,900.00	Powers Garagiola, Hannah Proctor, Jr., Gregory Quinn, Brian Radz, Eric Ranier, Edward Rankin, Sr., Robert Rasmussen, Dennis
\$604,543.21 \$1,135,358.00 \$197,716.00 \$77,397.05 \$50,000.00 \$58,758.00 \$536,900.00 \$276,280.00	Powers Garagiola, Hannah Proctor, Jr., Gregory Quinn, Brian Radz, Eric Ranier, Edward Rankin, Sr., Robert Rasmussen, Dennis Riddick, Major
\$604,543.21 \$1,135,358.00 \$197,716.00 \$77,397.05 \$50,000.00 \$58,758.00 \$536,900.00 \$276,280.00 \$104,000.00	Powers Garagiola, Hannah Proctor, Jr., Gregory Quinn, Brian Radz, Eric Ranier, Edward Rankin, Sr., Robert Rasmussen, Dennis Riddick, Major Rivkin, Deborah
\$604,543.21 \$1,135,358.00 \$197,716.00 \$77,397.05 \$50,000.00 \$58,758.00 \$536,900.00 \$276,280.00 \$104,000.00 \$70,000.00	Powers Garagiola, Hannah Proctor, Jr., Gregory Quinn, Brian Radz, Eric Ranier, Edward Rankin, Sr., Robert Rasmussen, Dennis Riddick, Major Rivkin, Deborah Robbins, Mike
\$604,543.21 \$1,135,358.00 \$197,716.00 \$77,397.05 \$50,000.00 \$58,758.00 \$536,900.00 \$276,280.00 \$104,000.00 \$70,000.00 \$323,400.00	Powers Garagiola, Hannah Proctor, Jr., Gregory Quinn, Brian Radz, Eric Ranier, Edward Rankin, Sr., Robert Rasmussen, Dennis Riddick, Major Rivkin, Deborah Robbins, Mike Robinson, Kimberly
\$604,543.21 \$1,135,358.00 \$197,716.00 \$77,397.05 \$50,000.00 \$58,758.00 \$536,900.00 \$276,280.00 \$104,000.00 \$70,000.00 \$323,400.00 \$194,737.38	Powers Garagiola, Hannah Proctor, Jr., Gregory Quinn, Brian Radz, Eric Ranier, Edward Rankin, Sr., Robert Rasmussen, Dennis Riddick, Major Rivkin, Deborah Robbins, Mike Robinson, Kimberly Roddy, Patrick

\$52,708.00	Sanchez, Delora
\$74,686.00	Schreiber, Bret
\$79,955.47	Schwartz, III, Joseph
\$1,142,601.19	Shaivitz, Robin
\$564,411.55	Sidh, Sushant
\$72,000.00	Siebert, Deborah
\$60,000.00	Stallings, Nicole
\$1,053,525.00	Stierhoff, John
\$62,625.05	Taylor, Jr., Casper
\$62,189.00	Thompson, Melvin
\$462,036.41	Tiburzi, Paul
\$74,870.00	Tompkins, Daniel
\$160,000.00	Townsend, Pegeen
\$212,750.00	Valentino-Benitez, Ellen
\$104,706.18	Watson, Jr., Kerry
\$83,750.00	Weber, Joy
\$112,905.00	Weisel, Meredith
\$457,799.92	White, Josh
\$72,000.00	Wilbon, Brian
\$108,269.30	Wilson, Michael
\$78,260.00	Wineholt, Ronald
\$644,711.88	Wise, J. Steven
\$99,500.00	Woolums, John
\$120,400.00	Worcester, Julia
\$210,400.00	Zellmer, Jeffrie

### **APPENDIX C**

# EXPENDITURES ON SPECIAL EVENTS November 1, 2013 - October 31, 2014

Group Invited	Times Invited	Total
Anne Arundel County Delegation	3	\$6,184.73
Baltimore City Delegation	7	\$21,914.78
Baltimore County Delegation	7	\$6,245.57
Carroll County Delegation	3	\$4,707.59
General Assembly	103	\$1,057,080.24
Harford County Delegation	3	\$3,140.28
House Appropriations Committee	9	\$13,047.44
House Economic Matters Committee	19	\$38,061.19
House Environmental Matters Committee	9	\$15,234.27
House Health and Governmental Operations Committee	17	\$26,321.71
House Judiciary Committee	8	\$17,051.30
House of Delegates	3	\$6,165.57
House Rules and Executive Nominations Committee	0	\$0.00
House Ways and Means Committee	6	\$11,819.61
Howard County Delegation	3	\$3,391.68
Lower Eastern Shore Delegation	5	\$13,212.38
Montgomery County Delegation	16	\$501,689.49
Prince George 's County Delegation	4	\$13,849.51
Senate	8	\$26,694.50
Senate Budget and Taxation Committee	17	\$23,106.49
Senate Education Health and Environmental Affairs Committee	e 13	\$13,713.63
Senate Executive Nominations Committee	0	\$0.00
Senate Finance Committee	33	\$48,541.46
Senate Judicial Proceedings Committee	7	\$12,725.68
Southern Maryland Delegation	3	\$3,390.63
Upper Eastern Shore Delegation	5	\$13,212.38
Western Maryland Delegation	6	\$11,112.96

TOTAL: \$1,911,615.08

(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, 2013 - October 31, 2014

Name of Firm	Compensation Reported
Alexander & Cleaver, P.A.	\$3,154,005.62
Capitol Strategies, LLC	\$1,772,635.65
G.S. Proctor & Associates, Inc.	\$1,236,358.00
Gerard E. Evans, Ltd.	\$1,209,000.00
Harris Jones & Malone, LLC	\$2,048,183.00
Manis Canning & Associates	\$2,682,800.00
Perry, White, Ross & Jacobson	\$2,778,942.76
Rifkin, Weiner, Livingston, Levitan & Silver, LLC	\$3,271,660.56
Schwartz, Metz & Wise, P.A.	\$1,405,952.46
Venable, LLP	\$1,760,515.58

### **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 2014
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-Fucheck	2011 to 2013
Robert G. Blue	2012 to present
Martin G. Madden	2014 to 2014
Rachel T. McGuckian	2014 to present

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