

In the Matter of

1199 SEIU United Health Care
Workers East – MD/DC Division,

Respondent

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Before the

State Ethics Commission

Complaint No. C-12-06

ORDER

At its meeting on September 21, 2006, the State Ethics Commission reviewed the above captioned complaint to determine whether further proceedings were necessary. The State Ethics Commission determined that Respondent has settled the matter complained of herein by submission of the required Lobbying Activity Report and execution of a Stipulation of Settlement, attached hereto and made a part hereof. Pursuant to paragraph 7 of the Stipulation, it is therefore

ORDERED, that Respondent is reprimanded, and this Order be placed in the Commission's public order files.

STATE ETHICS COMMISSION

SIGNATURE APPEARS ON
ORIGINAL AGREEMENT

Date: 9/26/06

By

Julian L. Lapidus, Chair

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of September, 2006, a copy of the foregoing Order in State Ethics Commission proceeding C-12-06, was forwarded via regular mail, postage prepaid, to the Respondent, 1199 SEIU United Health Care Workers East Maryland/ District of Columbia Division, at its last know address of c/o Quincey Gamble, 611 North Eutaw Street, Baltimore, Maryland 21201, and was hand delivered to Staff Counsel to the State Ethics Commission, 45 Calvert Street, 3rd Floor, Annapolis, Maryland 21401.

SIGNATURE APPEARS ON
ORIGINAL AGREEMENT

Robert A. Hahn, General Counsel

IN THE MATTER OF:

QUINCEY GAMBLE,
Respondent

* **BEFORE THE**
*
* **STATE ETHICS**
*
* **COMMISSION**
*
* **Complaint C-12-06**

STIPULATION OF SETTLEMENT AGREEMENT

This Agreement was made on this 21st day of September 2006, between Quincey Gamble, Respondent and Suzanne S. Fox, Executive Director of the State Ethics Commission, acting on behalf of Staff Counsel.

STIPULATIONS

The State Ethics Commission ("Commission") is an executive agency of the State of Maryland established for the purpose of enforcing the Maryland Public Ethics Law (Title 15, State Government Article, Annotated Code of Maryland, hereinafter the Ethics Law);

The Respondent is an individual whose lobbying activities on behalf of SEIU United Health Care Workers East – MD/DC Division ("the employer") during the period of November 1, 2005 through April 30, 2006, required registration as a lobbyist with the State Ethics Commission;

The Respondent registered on January 3, 2006 as a lobbyist with the Commission for the period of December 20, 2005 through October 31, 2006, as required by the State Government Article, Section 15-703(d)(1) of the Ethics Law on behalf of the employer;

The Respondent was required to submit a Lobbying Activity Report by May 31, 2006 for the period December 20, 2005 through April 30, 2006, as required by the State Government Article, Section 15-704(a)(i) of the Ethics Law and failed to submit the required report;

On August 15, 2006, the Commission issued a complaint against the Respondent alleging the failure to file a Lobbying Activity Report for the period of December 20, 2005 through April 30, 2006;

The Respondent submitted the delinquent Lobbying Activity Report for the period December 20, 2005, through April 30, 2006 on September 14, 2006 and

The Respondent is voluntarily entering into this Stipulation of Settlement Agreement to admit his failure to timely file the Lobbying Activity Report for the period December 20, 2005, through April 30, 2006, with the Commission and to pay a sum of money in lieu of potential late filing fees pursuant to State Government Article, Section 14-405 of the Public Ethics Law;

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STATE ETHICS COMMISSION

IN CONSIDERATION of the September 14, 2006 submission of the required Lobbying Activity Report by the Respondent, and the stipulations recited above, the Respondent and the Executive director on behalf of Staff Counsel agree as follows:

1. Respondent admits that he did not timely file his Lobbying Activity Report on behalf of the employer for the period December 20, 2005, through April 30, 2006 as required by State Government Article, Section 15-704(a)(ii) of the Ethics Law;
2. Respondent subsequently filed the required Lobbying Activity Report with the Commission on Sept 14, 2006 (a copy of which has been attached hereto and made a part hereof);
3. Respondent understands that failure to comply with the lobbying disclosure provisions of the Public Ethics Law can subject him to a formal complaint by the Commission and upon a finding of a violation the possibility of late fees, civil fines, reprimand or a suspension of his ability to lobby for compensation;
4. Based on the facts stated in this Stipulation of Settlement, the Respondent agrees to pay as settlement of the complaint, the amount of two hundred fifty dollars (\$250.00) in lieu of potential late fees and other fines for the admitted late filing of the Lobbying Activity Report.
5. Respondent waives a formal hearing on this matter and agrees that acceptance of the Stipulation of Settlement by the Commission would constitute, based on his admission of violations of the Public Ethics Law, a final action and finding of violation by the Commission, and, pursuant to § 15-407 of the Public Ethics Law, this Agreement and materials relating to this matter are not subject to the confidentiality provisions of the Public Ethics Law and will be public information unless otherwise protected;
6. Executive Director on behalf of Staff Counsel will, upon execution of this Agreement by the Respondent, recommend that the Commission suspend further complaint proceedings against the Respondent and recommend further that the Commission issue a Final Order in accordance with the terms of this Agreement;
7. Respondent accepts that the Commission, pursuant to Section 15-405(c)(2) of the Ethics Law, will issue a reprimand to him effective the date of the Final Order. The reprimand, this agreement, including any documents incorporated herein, and the Final Order will be transmitted to his employer;
8. Respondent and the Executive Director on behalf of Staff Counsel have entered into this Agreement for the sole purpose of resolving the late submission of the Lobbying Activity Report, for the payment in lieu of late fees, and to resolve the complaint now pending, and for no other purpose.

IN WITNESS WHEREFORE, Quincey Gamble, Respondent and Suzanne S. Fox, Executive Director acting on behalf of Staff Counsel for the State Ethics Commission, have signed below.

SIGNATURE APPEARS ON ORIGINAL AGREEMENT

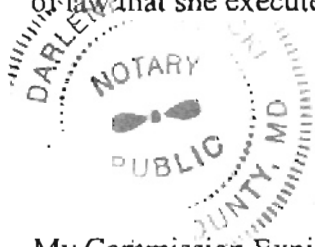
Suzanne S. Fox, Executive Director
On behalf of Staff Counsel
State Ethics Commission
45 Calvert Street, Third Floor
Annapolis, Maryland 21401
(410) 260-7770

SIGNATURE APPEARS ON ORIGINAL AGREEMENT

Quincey Gamble
Lobbyist for:
SEIU United Health Care Workers
East - MD/DC Division

State of Maryland, Harford NM
County of: Baltimore City, to wit:

Before me, the undersigned, a Notary Public in and for the State and County aforesaid, personally appeared Suzanne S. Fox, Executive Director of the State Ethics Commission, who made oath on this 12 NM day of September, 2006 in due form of law that she executed this agreement for the purpose set forth herein.



SIGNATURE APPEARS ON ORIGINAL AGREEMENT NM

Notary Public

My Commission Expires: Nov 11 2006 NM

State of Maryland
County of Baltimore City to wit:

Before me, the undersigned, a Notary Public in and for the State and County aforesaid, personally appeared Quincey Gamble, who made oath on this 12 the day of September, 2006 in due form of law that matters and facts hereinabove set forth are true to the best of his knowledge, information and belief, and are his voluntary act and that he executed this document for t

SIGNATURE APPEARS ON ORIGINAL AGREEMENT

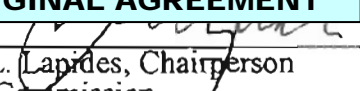
Notary Public

My Commission Expires Nov 11 2006 NM

My Commission expires: _____

Accepted by the Commission

SIGNATURE APPEARS ON
ORIGINAL AGREEMENT


Julian L. Lapidus, Chairperson
for the Commission

Date: 9/21 _____, 2006

MARYLAND STATE ETHICS COMMISSION

45 Calvert Street, 3rd Floor
Annapolis, MD 21401
410-260-7770
Toll Free 1-877-669-6085

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GENERAL LOBBYING ACTIVITY REPORT (Form #4)

Read instructions carefully before completing this form. If you had reportable expenses or compensation during the reporting period, complete Parts A, B, C, D, E, F and G of the Activity Report. If you had no reportable compensation or expenses during the reporting period, but were registered to engage in lobbying, check here _____ and complete Parts A, E, F and G. If additional forms are required for this employer, those forms should be attached to and made part of this filing.

Period covered by this report: November 1, 2005 through April 30, 2006
May 1, 20____ through October 31, 20____

A. Identification of Regulated Lobbyist (Registrant and Employer)

A-1. Identifying information (complete all blanks, compare to registration form, and explain any differences)

- a) Name Quincey Gamble, 1199 SEIU United Healthcare Workers East
- b) Permanent Address (Include firm name if applicable) 611 North Eutan Street, Baltimore, MD 21201
- c) Business Telephone (410) 332-1149
- d) Occupation or Type of Business Union

A-2. Identification of others required to register:

- a) Was any other person required to register as a lobbyist on behalf of the person or organization identified in section A-1? Yes ___ No X
- b) If the answer to a) is "Yes," identify each such person below and give their name and address:

A-3. Identification of employer (complete only if registrant acts on behalf of another):

- a) Identify all persons or organizations who compensate the registrant for activities requiring this registration:
Name 1199 SEIU United Healthcare Workers East
Permanent Address 611 North Eutan Street, Baltimore MD 21201

Business Telephone (410) 332-1149
Nature of Business Union
- b) Identify any other person who the registrant represents regarding the matters covered by this registration (if none, put in none) _____

A-4. Primary purpose of organization:

Is the employer, or registrant organization if there was not an employer, organized and operated for the primary purpose of attempting to influence any legislative or executive action? Yes ___ No X
(if "Yes," the Report of Contributors Form No. 12 must also be completed.)

A-5. Registration Information:

- a) State the period (include both beginning and ending month, day and year) for which this registration is effective: January 10, 2005 to December 31, 2005
- b) Identify the matters (including formal designation if known) on which the registrant acted or employed someone to act during the registration period covered by this report HB 1127, SB 230, HB 1318, HB 1322, SB 832, HB 58

A-6. Does the employer listed in A-3 claim to be exempt from lobbyist registration and reporting because all expenditures requiring registration are reported by the registrant, another registrant, or by the registrant with other registrants? Yes ___ No ___ If the exemption claimed differs from the registration form, please explain in writing.

B. Compensation and Expenses

B-1. Meals and beverages for officials or employees or their immediate families. B-1 \$ 0
 B-2. Special events, including dinners and receptions, entertainment, and other functions to which all members of the General Assembly, either house thereof, all members of any standing committee or all members of a formally recognized (for ethics disclosure purposes) county or regional delegation have received written invitations. List date, location, group of invitees who benefited and total expenses for each event. (Not required for meals and receptions listed completely and accurately on the 14-Day Report, Form 13F, but check below.)
 ___ Event(s) Fully Reported on 14-Day Report(s)

Total B-2 Expenses \$ 0

B-3. Expenses for food, lodging, or scheduled entertainment of officials and employees for a meeting which are given in return for participation in a panel or speaking engagement at the meeting. List date, location, and total expense for each meeting. If the total amount in expenses on any one official or employee is \$200 or more for any meeting, also include the person's name and the amount expended for the person at the meeting.

Total B-3 Expenses \$ 0

B-4. Expenses for food and beverages received by member of General Assembly or members at approved legislative organization meeting. List location, name of legislative organization, date and total expense for each meeting.

Total B-4 Expenses \$ 0

B-5. Expenses for a ticket or free admission to members of the General Assembly to attend charitable, cultural or political events where all members of legislative unit are invited by the event holder. List event, location, date, legislative unit and total expenses for each event.

Total B-5 Expenses \$ 0

B-6. Gifts to or for officials or employees or their immediate families (not including sums reported in B-1, B-2, B-3, B-4 and B-5). B-6 \$ 0

Subtotal of Items B-1 through B-6 - \$ _____

B-7. Total compensation paid to registrant (not including sums reported in any other section of Part B). Check here if the amount has been prorated because the registrant is compensated for services in addition to lobbying activities. B-7 \$ 0

B-8. Salaries, compensation and reimbursed expenses for staff of the registrant. B-8 \$ 5000.00

B-9. Office Expenses not reported in B-7 and B-8. B-9 \$ 0

B-10. Cost of professional and technical research and assistance not reported in B-7 and B-8. B-10 \$ 0

B-11. Publications and expenses which expressly encourage persons to communicate with officials or employees. B-11 \$ _____

B-12. Names of witnesses and the fees and expenses paid to each: Frank Powers & Associates B-12 \$ 5464.67

B-13. Other expenses B-13 \$ _____

TOTAL \$ 10,464.67

- C. Gifts or participation in gifts with a cumulative value of \$75 or more. (Forms 13C and 13D, Section 15-704(c)) (Check One) Yes, Attached No Report Required
- D. Gifts or participation in gifts of meals and beverages to elected Executive officials. (Forms 13A and 13B, Section 15-705) (Check One) Yes, Attached No Report Required
- E. Business transactions with officials. (Form 21, Section 15-706) (Check One) Yes, Attached No Report Required
- F. Political contributions required to be disclosed. (Form 22, Section 15-707) (Check One) Yes, Attached No Report Required

G. Signature and Oath
 I hereby make oath or affirm under the penalties of perjury that the foregoing information and attachments thereto, are complete, true and correct to the best of my knowledge, information and belief.

(SEAL)

Signature of Person Filing: _____

Date: _____

Sworn to before me this _____ day of _____, 2006.

Signature of Notary Public: _____

Printed/typed Name of Notary Public: Nichelle McEart

My Commission Expires: 11/25/07

SIGNATURE APPEARS ON ORIGINAL AGREEMENT

SIGNATURE APPEARS ON ORIGINAL AGREEMENT