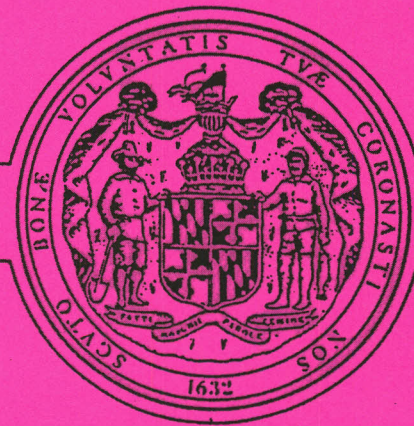


State Ethics Commission

ANNUAL REPORT 2015



EXECUTIVE DEPARTMENT
STATE OF MARYLAND



LARRY HOGAN
GOVERNOR

COMMISSION MEMBERS:
PAUL M. VETTORI, *Chairman*
KIM L. COBLE
JANET E. McHUGH
JACOB YOSEF MILIMAN
THOMAS B. SMYTH, MD.

STATE ETHICS COMMISSION

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MICHAEL W. LORD
Executive Director
JENNIFER K. ALLGAIR
General Counsel
WILLIAM J. COLQUHOUN
Staff Counsel
KATHERINE P. THOMPSON
Assistant General Counsel

THIRTY-SEVENTH ANNUAL REPORT

JANUARY 1, 2015 – DECEMBER 31, 2015

APRIL 18, 2016

GENERAL STATUTORY IMPLEMENTATION

OVERVIEW

In calendar year 2015, the Commission said farewell to Commissioners Robert G. Blue and Rachel T. McGuckian and welcomed back Janet E. McHugh and new Commissioners Kim L. Coble and Thomas B. Smyth, M.D. The Commission met 6 times in regularly scheduled sessions and held 2 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; creates 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 identified omissions or deficiencies; and publishes information that explains the provisions of the Law.

ADVICE ACTIVITIES

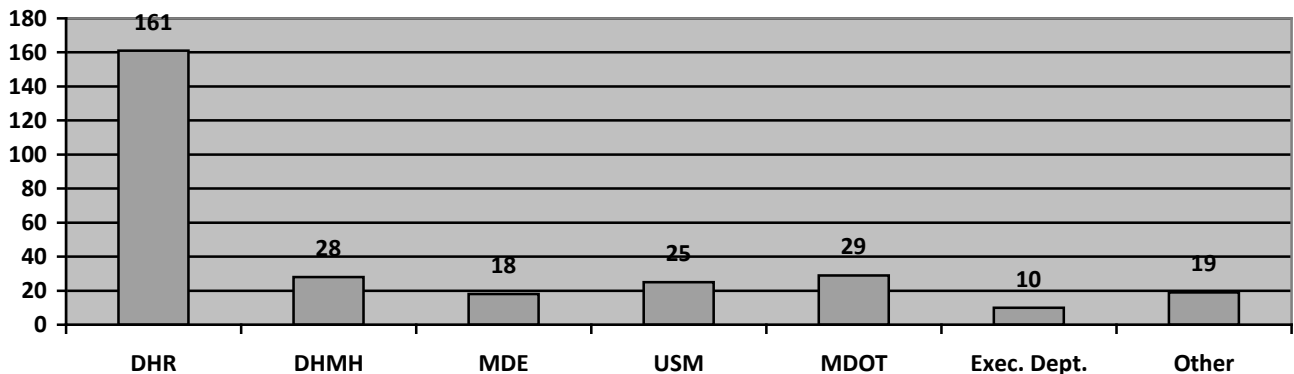
The State Ethics Commission is responsible for interpreting the Public Ethics Law. Sections 5-301 through 5-303 of the Public Ethics Law authorize the State Ethics Commission to issue formal advisory opinions in response to requests from officials, employees, lobbyists, and others who are subject to 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. Section 5-301 of the Public Ethics Law and 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-seven 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 2015, continuing a trend that has seen no formal opinions issued since 2012.

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 2013 through 2015:

SUBJECT MATTER OF THE ADVICE	2015	2014	2013
Lobbying Registration, Reporting and Conduct	6	9	9
Secondary Employment Advice	290	298	287
Participation Advice	29	37	40
Procurement Restrictions	4	9	3
Post-Employment Advice	53	34	44
Gift Questions	58	39	32
Other (Financial Interest, Prestige and Freedom of Information)	53	41	26
Total	503	467	441

The number of informal matters addressed in 2015, while lower than 2012 (which was the highest number ever experienced by the Commission), was higher than the 2014 number. The 2014 and 2015 numbers continue to be 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, the largest number of 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 19 “other agency” secondary employment requests came from 12 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 exemption for financial 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 extended the exemption from certain conflict of interest provisions (which was available to officials, employees, vice-presidents and presidents) to 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 418 faculty exemptions granted by the university presidents between 1996 and 2014, 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 2015, USM institutions reported an additional 70 individual faculty member exemptions to the Commission. This number represents a significant increase from the 34 reported in 2014, and is attributable in part to the participation of UMUC, which adopted a policy and procedures approved by the Commission in 2015. The 2015 exemptions were from the following institutions:

INSTITUTION	Number of Exemptions
University of Maryland Baltimore	27
University of Maryland Baltimore County	2
University of Maryland Center for Environmental Studies	3
University of Maryland College Park	22
University of Maryland University College	16
TOTAL FACULTY EXEMPTIONS	70

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. The net result was an increase in the number of filers from approximately 14,385 in 2014 to 15,566 in 2015.

Pursuant to Public Ethics Law §§ 5-103 and 5-209, the Commission made decisions regarding whether or not newly created boards and commissions met the Ethics Law's definition of "executive unit". These determinations are significant because members of executive units are subject to the Public Ethics Law, including both the conflict of interest and 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 2015, the Commission staff reviewed over 14,000 financial disclosure statements.

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.

LOBBYIST DISCLOSURE AND REGULATION

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, 2015, 3,352 lobbying registrations were filed with the Commission. Those registrations were submitted by 694 lobbyists on behalf of 1,462 employers. This represents an increase of 242 registrations from the 3,110 filed by October 31, 2014.

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

EXPENDITURES REPORTED BY LOBBYISTS			
Type of Expenditure	10/31/2015	10/31/2014	10/31/2013
	\$	\$	\$
B-1: Meals and beverages for officials or employees or their immediate families	20,510	3,054	8,889
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.	2,271,694	1,895,841	1,974,087
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	33,291	9,220	15,637
B-4: Food and beverages at approved legislative organizational meetings	1,186	3,031	3,353
B-5: Tickets or free admission to attend charitable, cultural or political events where all members of a legislative unit are invited.	3,195	23,966	3,005
B-6: Gifts to or for officials or employees or their immediate families (not included on B-1 through B-5)	9,517	7,660	7,380
SUBTOTAL OF ITEMS B-1 THROUGH B-6	\$2,339,393	\$1,942,772	\$2,012,351
B-7: Total compensation paid to registrant (not including sums reported in any other section)	46,412,896	43,962,103	42,664,486

EXPENDITURES REPORTED BY LOBBYISTS			
Type of Expenditure	10/31/2015	10/31/2014	10/31/2013
	\$	\$	\$
B-8: Salaries, compensation and reimbursed expenses for staff of the registrant	917,107	1,248,197	1,085,338
B-9: Office expenses not reported in B-7 or B-8	828,163	723,277	855,170
B-10: Cost of professional and technical research and assistance not reported in items B-7 or B-8	257,342	585,490	527,271
B-11: Cost of publications which expressly encourage persons to communicate with officials or employees	460,118	281,212	515,652
B-12: Fees and expenses paid to witnesses	1,775	49,302	4,856
B-13: Other expenses	538,436	578,961	838,059
TOTAL OF ITEMS B-1 THROUGH B-13	\$51,755,230	\$49,371,313	\$48,503,183

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 2015, Staff Counsel was also assisted by 2 interns.

The term "preliminary matters" describes 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 2015, the Commission opened 31 A matters (Preliminary Consideration), including 15 conflict of interest matters, 4 lobbyist matters, 7 financial disclosure matters and 5 training matters.

The Commission entered into 8 Late Filing Agreements with lobbyists during 2015, resulting in payments of \$1,740 in penalties to the State of Maryland. The Commission issued a reprimand, through a Pre-Complaint Disposition Agreement, to a Lobbyist who transmitted political contributions to candidates for the General Assembly. The Commission closed 31 A matters in 2015, including 3 matters carried over from 2014. (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 B matters (Preliminary Inquiry Matters) in 2015. All three involved conflicts of interest. In 2015, the Commission also closed 8 B Matters, including 6 matters carried over from 2014.

In calendar year 2015, the Commission issued 75 complaints, including complaints in 60 financial disclosure matters, 3 conflict of interest matters, 11 training matters and 1 lobbying matter. The Commission issued a reprimand, through a Stipulation of Settlement Agreement, to an employee of the Department of Natural Resources Police who violated the prestige provisions by using his State-issued cellphone and email address for campaign purposes. As part of the Agreement, the employee paid a \$1,000 penalty. The Commission also entered into Stipulation of Settlement Agreements with four members of the General Assembly for failure to timely file their 2014 Financial Disclosure Statements. As part of each Agreement the Commission issued reprimands and each legislator paid a \$250 penalty. The Commission closed 78 complaints in 2015, including 16 matters from 2014.

All enforcement payments were deposited in the State's general fund and cannot be used by the Commission. The Commission assessed a total of \$3,740 in enforcement penalties in 2015.

In 2015, the Commission also authorized the Staff Counsel to conduct a Lobbyist Activity Report Audit during the 2016 calendar year. The Public Ethics Law requires that lobbyists report compensation and other expenditures by filing Activity Reports. Gen'l. Prov. § 5-705. The Commission is required to review each report filed with it in accordance with the lobbying provisions of the Public Ethics Law. Gen'l. Prov. § 5-205(a)(5)(i). Lobbyists must retain each "...account, bill, receipt, book, paper, or other document[s] necessary to substantiate..." their Activity Reports and affiliated reports for 3 years after the reports are filed. Gen'l. Prov. § 5-409(a-b). Each lobbyist, with reasonable notice from the Commission, shall make those documents available to the Commission for inspection. Gen'l. Prov. § 5-409(c). This last section provides the Commission with the authority to audit Activity Reports and other associated reports by inspecting supporting documentation. Lobbyists will be advised that the audits will be occurring and of the documentation they will be required to provide if they are selected for an audit. After Activity Reports for the period of November 1, 2015 to April 30, 2016 are filed, the Commission will randomly select 20 Lobbyists and meet with them to review the documentation which supports their reports. Staff Counsel will then ask the Lobbyists to provide any necessary amendments. Lobbyists who fail to respond to the audit will be subject to enforcement action.

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 2015, 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 twenty-five 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 2014, but had not yet received Commission approval. In 2015, the Commission approved draft ordinances or revisions to previously approved local ethics ordinances from six counties and five 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 issued four Public Notices for noncompliance with the requirements of Subtitle 8 of the Public Ethics Law to local jurisdictions in 2015. Public Notices are posted on the Commission's website at <http://ethics.maryland.gov/local-government-public-notice/> and set forth the issues for each

jurisdiction related to noncompliance with the State requirements. Public Notices were issued for Carroll County, the Town of Hampstead, the Town of Mount Airy and the City of Westminster.

Finally, the Commission also received and reviewed four 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 §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.

The Public Ethics Law requires new financial disclosure filers (i.e. public officials) to receive 2 hours of Ethics Law training (§ 5-205(d)) within 6 months of becoming filers. A total of 1,323 public officials and state employees took the conflicts of interest training online during calendar year 2015.

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 131 State employees and public officials, addressing conflicts of interest and the financial disclosure requirements. The Commission staff also conducted 14 training sessions addressing conflict of interest and procurement issues attended by an additional 942 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 1073.

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 33 regulated lobbyists. In addition, a total of 315 regulated lobbyists took the mandated training online during calendar year 2015. The lobbying training focuses on electronic filing, the general lobbying conduct prohibitions in the Law, and reporting requirements.

The State Ethics Commission has become increasingly reliant on its website. The Commission's home page allows users to access the Commission's Annual 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.

2015 LEGISLATION REPORT & RECOMMENDATIONS

The State Ethics Commission proposed one departmental bill for the 2015 Session of the General Assembly. The bill was submitted to the General Assembly and subsequently enacted. The bill, Senate Bill 343 (Chapter 160 of the Acts of 2015), expressly provides authority for advisory bodies to issue informal advice, a practice utilized by the State Ethics Commission pursuant to its regulations for more than 20 years.

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 5-709 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 5-704 permits a regulated lobbyist to file a registration form with the Commission electronically, but does not mandate electronic filing. The Commission also provides an electronic filing system which permits, but does not mandate, the filing of lobbyist activity reports pursuant to § 5-705. Electronic filing of registration forms and activity reports is quick, easy, avoids delays in the registration and reporting processes, and eliminates the requirement

for a Commission staff member to manually input the information into the Commission's database (which is necessary when reports are filed on paper so the information is available for viewing in the public records portion of the Commission's website). Data entry by Commission staff adds an extra layer to the process which also increases the possibility of error. The Commission recommends legislation to require electronic filing of registration forms and activity reports, as was enacted in 2014 in the case of financial disclosure reports, applicable to all new lobbyists while grandfathering those who currently register and file reports using paper documents.

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:

- 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 \$100,000.00 OR MORE - ALL REGISTRANTS ALL TYPES OF EXPENSES

November 1, 2014 - October 31, 2015

TOTAL AMOUNT	EMPLOYER
\$214,223.60	Adventist HealthCare, Inc.
\$169,526.52	AFSCME Maryland
\$120,311.68	Alkermes, Inc.
\$263,373.33	Altria Client Services LLC and its Affiliates - Philip Morris USA Inc., John Middleton Co., U.S. Smokeless Tobacco Company, LLC and Nu Mark LLC
\$100,990.58	American Cancer Society Cancer Action Network
\$207,317.65	American Petroleum Institute
\$286,013.34	Anthem, Inc. and Its Affiliates including Amerigroup Maryland
\$137,686.51	Associated Builders & Contractors
\$210,000.00	Atlantic Recycling Group, LLC
\$110,400.00	Automated Health Care Solutions
\$313,956.25	Baltimore Gas and Electric Company
\$131,404.92	Baltimore Jewish Council
\$557,511.00	CareFirst BlueCross BlueShield
\$261,961.26	CBAC Gaming, LLC
\$100,076.54	Children's National Medical Center
\$151,002.88	Columbia Gas Transmission, LLC
\$440,001.00	Comcast
\$135,000.00	CSC
\$142,400.55	CSX Transportation, Inc.
\$126,935.56	Do No Harm
\$129,430.46	Dominion Resources Services, Inc.
\$131,821.51	EPIC Pharmacies
\$571,368.59	Exelon Corporation
\$123,265.44	Expedia, Inc.

\$258,673.74	FirstEnergy Corp.
\$102,200.00	Frederick County Chamber of Commerce
\$128,158.73	General Motors LLC
\$119,410.80	Greater Capital Area Association of Realtors
\$286,097.38	Health Facilities Association of Maryland (HFAM)
\$104,000.00	International Code Council
\$360,741.00	Johns Hopkins Institutions
\$168,800.00	Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc.
\$250,000.00	Law Offices of Peter Angelos
\$160,000.00	League of Life & Health Insurers of Maryland, Inc.
\$200,733.55	Lifebridge Health, Inc.
\$113,279.92	Lockheed Martin Corporation
\$193,181.01	Maryland Association for Justice
\$137,513.93	Maryland Association of Boards of Education
\$127,391.76	Maryland Association of Community Colleges
\$317,909.61	Maryland Association of Realtors, Inc.
\$204,752.69	Maryland Automobile Dealers Association
\$424,582.50	Maryland Bankers Association
\$443,586.00	Maryland Building Industry Association
\$150,639.80	Maryland Care Inc. dba Maryland Physicians Care
\$200,703.43	Maryland Catholic Conference, LLC.
\$252,294.88	Maryland Chamber of Commerce
\$197,522.39	Maryland Farm Bureau, Inc.
\$547,736.48	Maryland Hospital Association
\$194,958.00	Maryland Independent College and University Association
\$400,688.55	Maryland Jockey Club (Pimlico and Laurel Park)
\$129,006.84	Maryland Retailers Association
\$212,818.94	Maryland State Bar Association, Inc.
\$121,390.56	Maryland State Dental Association
\$507,261.82	Maryland State Education Association
\$109,566.79	Maryland State Licensed Beverage Association

\$100,524.63	Maryland Thoroughbred Horsemen's Assoc.
\$167,810.12	Maryland Tort Reform Coalition
\$126,579.08	Maryland Zoo in Baltimore, The
\$100,518.33	MarylandCan.org
\$100,000.00	MCAMD, LLC
\$122,437.79	MD/DE/DC Beverage Association
\$328,212.76	MedChi, The Maryland State Medical Society
\$206,472.42	Medical Mutual Liability Insurance Society of Maryland (Medical Mutual)
\$363,169.87	MedStar Health
\$104,653.45	Merck Sharp & Dohme Corp.
\$187,495.88	MGM Resorts International
\$151,610.28	Mid-Atlantic Health Care
\$143,153.10	Mid-Atlantic Petroleum Distributors Association
\$255,929.00	Montgomery County Chamber of Commerce
\$139,935.56	National Aquarium in Baltimore, Inc.
\$180,924.14	National Association of Industrial And Office Properties- Maryland
\$147,079.27	Norfolk Southern Corporation
\$137,800.00	Northrop Grumman Corporation
\$161,850.00	NRG Energy, Inc.
\$306,575.00	Ocean Enterprise 589, LLC
\$126,599.40	Peak Harvest Health, LLC
\$376,858.79	Pepco Holdings, Inc.
\$127,059.25	Pharmaceutical Research & Manufacturers of America
\$104,553.01	PPE Casino Resorts Maryland, LLC
\$102,000.00	Preston Scheffenacker Properties
\$108,000.00	Quality Imaging Access Coalition of Maryland
\$106,583.33	Queen Anne's County Commissioners
\$104,000.00	RAI Services Company
\$132,116.01	State Farm Mutual Automobile Insurance Company

\$120,908.00	Tech Council of Maryland/MdBio
\$149,971.00	Transdev North America, Inc.
\$187,370.71	Uber Technologies, Inc.
\$120,619.02	United HealthCare Services, Inc.
\$150,000.00	University of Maryland Charles Regional Medical Center
\$283,735.39	Verizon Communications
\$173,004.04	Verizon Maryland Inc.
\$120,000.00	Wal-Mart Stores, Inc.
\$251,356.57	Washington Gas
\$104,757.63	Woda Group, LLC., The
\$209,471.00	Xerox Business Services, LLC and its Affiliates

APPENDIX B

LOBBYISTS RECEIVING **\$100,000.00** OR MORE IN COMPENSATION ONE OR MORE EMPLOYERS

November 1, 2014 - October 31, 2015

TOTAL	LOBBYIST
\$119,089.11	Adams, Jr., Earl
\$166,350.00	Aery, Shaila
\$210,258.33	Andryszak, John
\$237,000.00	Bagwell, Ashlie
\$104,496.00	Ballentine, Jr., Thomas
\$494,256.30	Bellamy, Lorenzo
\$896,450.00	Bereano, Bruce
\$688,088.22	Boston, III, Frank
\$338,750.00	Brocato, Barbara
\$196,586.26	Bryant, Eric
\$825,583.00	Bryce, Joseph
\$160,000.00	Burner, Gene
\$157,200.00	Canning, Michael
\$159,000.00	Carrington, J. Darrell
\$568,790.69	Carroll, Jr., David
\$162,500.00	Carter, W. Minor
\$181,953.52	Chason, Todd
\$142,017.00	Ciekot, Ann
\$136,100.00	Cobbs, Drew
\$287,695.50	Collins, Carville
\$102,462.00	DeMattos, Jr., Joseph
\$294,803.00	DiPietro, Christopher
\$240,858.65	Doherty, Jr., Daniel
\$140,069.08	Douglas, Michele
\$181,811.00	Elliott, Robyn
\$750,328.00	Enten, D. Robert
\$1,825,900.00	Evans, Gerard

\$564,099.00	Favazza, John
\$238,750.00	Gally, Eric
\$1,695,331.86	Garagiola, Robert
\$191,500.00	Genn, Gil
\$153,500.00	Greenfield, Aaron
\$899,350.00	Harris Jones, Lisa
\$592,828.82	Harting, Marta
\$238,000.00	Hill, Denise
\$310,314.00	Hoffman, Barbara
\$115,000.00	Hutchins, Diane
\$606,600.00	Jacobson, Jonas
\$1,254,708.10	Johansen, Michael
\$555,095.36	Johnson, Robert
\$561,583.33	Jones, Gary
\$628,623.22	Kasemeyer, Pamela
\$209,084.22	Kauffman, Danna
\$334,696.00	Kress, William
\$105,800.00	Kuiper, Laurie
\$110,102.00	Lanier, Ivan
\$238,730.14	Liningier, Brett
\$400,000.00	Looney, Sean
\$165,000.00	Loughran, Kathleen
\$224,324.55	Lucchi, Leonard
\$629,500.00	Malone, Sean
\$168,122.00	Maloney, Kathleen
\$1,200,833.00	Manis, Nicholas
\$230,000.00	Massoni, Greg
\$135,000.00	McDonough, Caitlin
\$353,297.86	Miedusiewski, American Joe
\$148,830.00	Montgomery III, Richard
\$180,612.89	Murphy, Kathleen

\$113,750.00	Neil, John
\$123,700.00	Neily Mutch, Alice
\$124,900.00	O'Keeffe, Kevin
\$494,000.00	Ortiz, Jeanette
\$2,205,476.67	Perry, Timothy
\$246,830.00	Pica, Jr., John
\$330,350.00	Pitcher, J. William
\$694,481.58	Popham, Bryson
\$525,167.50	Powers Garagiola, Hannah
\$1,178,013.00	Proctor, Jr., Gregory
\$264,250.00	Quinn, Brian
\$767,000.00	Rasmussen, Dennis
\$288,750.00	Riddick, Major
\$104,400.00	Rivkin, Deborah
\$330,833.30	Robinson, Kimberly
\$187,942.88	Roddy, Patrick
\$369,500.00	Ross, Justin
\$1,364,009.24	Rozner, Joel
\$162,200.00	Schiavone, Patricia
\$578,243.69	Sidh, Sushant
\$1,015,787.50	Stierhoff, John
\$404,801.09	Tiburzi, Paul
\$160,000.00	Townsend, Pegeen
\$293,250.00	Valentino-Benitez, Ellen
\$103,820.86	Watson, Jr., Kerry
\$147,485.54	Weber, Joy
\$117,000.00	Weisel, Meredith
\$493,000.00	White, Josh
\$673,856.00	Wise, J. Steven
\$102,500.00	Woolums, John
\$195,982.00	Worcester, Julia

APPENDIX C

EXPENDITURES ON SPECIAL EVENTS *November 1, 2014 - October 31, 2015*

Group Invited	Times Invited	Total
Anne Arundel County Delegation	7	\$12,206.65
Baltimore City Delegation	10	\$13,716.71
Baltimore County Delegation	8	\$13,078.04
Carroll County Delegation	4	\$4,993.60
General Assembly	131	\$1,519,392.89
Harford County Delegation	6	\$4,314.12
House Appropriations Committee	10	\$15,780.99
House Economic Matters Committee	19	\$48,072.27
House Environment & Transportation Committee	10	\$10,961.89
*House Environmental Matters Committee	5	\$6,333.16
House Health & Governmental Operations Committee	22	\$42,641.54
House Judiciary Committee	9	\$18,043.27
House of Delegates	7	\$23,143.67
House Rules & Executive Nominations Committee	0	\$0.00
House Ways and Means Committee	14	\$31,995.86
Howard County Delegation	2	\$3,021.29
Lower Eastern Shore Delegation	11	\$17,308.14
Montgomery County Delegation	25	\$310,791.20
Prince George 's County Delegation	10	\$23,273.77
Senate	9	\$24,032.83
Senate Budget and Taxation Committee	20	\$31,238.46
Senate Education Health and Environmental Affairs Committee	16	\$17,917.40
Senate Executive Nominations	0	\$0.00

Committee		
Senate Finance Committee	32	\$56,067.77
Senate Judicial Proceedings Committee	9	\$13,405.65
Senate Rules Committee	0	\$0.00
Southern Maryland Delegation	7	\$8,319.11
Upper Eastern Shore Delegation	8	\$14,183.94
Western Maryland Delegation	6	\$10,585.84

TOTAL: \$2,294,820.07

* In January 2015, the House Environmental Matters Committee reorganized as the House Environment and Transportation Committee.

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

APPENDIX D

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

November 1, 2014 - October 31, 2015

Name of Firm	Compensation Reported
Alexander & Cleaver, P.A.	\$3,184,191.44
Capitol Strategies, LLC	\$1,848,086.50
G.S. Proctor & Associates, Inc.	\$1,307,013.00
Gerard E. Evans, Ltd.	\$1,883,900.00
Harris Jones & Malone, LLC	\$1,992,850.00
Manis Canning & Associates	\$2,747,715.00
Perry, White, Ross & Jacobson	\$3,692,076.67
Rifkin, Weiner, Livingston, Levitan & Silver, LLC	\$3,359,718.82
Schwartz, Metz & Wise, P.A.	\$1,546,563.44
Venable, LLP	\$1,872,866.32

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, Ph.D	1989 to 1993
* Mark C. Medairy, Jr.	1990 to 1999
Mary M. Thompson	1990 to 1994
Shirley P. Hill	1992 to 1994
* Michael L. May	1993 to 2003
Robert J. Romadka	1994 to 1997
April E. Sepulveda	1994 to 2003
* Charles O. Monk, II	1995 to 2003
* Dorothy R. Fait	1999 to 2005
D. Bruce Poole	2000 to 2004
* Julian L. Lapidés	2002 to 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 & 2015- present
* Paul M. Vettori	2006 to present
H. Richard Duden, III	2006 to 2008
Jacob Yosef Miliman	2008 to present
Andrea Leahy-Fuckeck	2011 to 2013
Robert G. Blue	2012 to 2015
Martin G. Madden	2014 to 2014
Rachel T. McGuckian	2014 to 2015
Kim L. Coble	2015 to present
Thomas B. Smyth, M.D.	2015 to present

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