

WASHINGTON SUBURBAN SANITARY COMMISSION
BOARD OF ETHICS
2007 ANNUAL REPORT

Members:

Charles Kuderna, Chair

Steven Hausman

William Walton

Robert Moore, Alternate Member

WSSC'S CY 2007 Annual Ethics Report

The report covers conflicts of interest matters that were addressed by the WSSC Board of Ethics, WSSC employee financial disclosure, and lobbying registration and reporting.

The current WSSC Board of Ethics members are Charles Kuderna, Chair (Prince George's County), Steven Hausman (Montgomery County), William Walton (Prince George's County), and Robert Moore, Alternate Member (Prince George's County). The Board of Ethics convened twelve times during 2007 to consider and review requests for advisory opinions, complaints, and other matters. During the year, the Board of Ethics issued three Advisory Opinions on conflict of interest topics. Attached is a summary of each Advisory Opinion, Complaint and Waiver (Appendix A).

Additionally, the Code of Ethics requires an individual to register as a lobbyist if they are compensated to influence executive or administrative actions by WSSC. Attached is a summary of the Lobbyist Expenditures as reported on the WSSC Lobbyist Activity Report (Appendix B).

During 2007, the following actions have been taken:

- Code of Ethics Amendment
- Code of Ethics - New Hire Orientation Training
- Code of Ethics - Financial Disclosure/Conflict of Interest Training
- Proposed Ethics Training for WSSC's entire workforce
- Coordination with Ethics Steering Committee to hire an Ethics Officer
- Inclusion of financial disclosure obligation in Human Resources Employee Separation from Service Check List

To improve access to Ethics information, the Board has added more content to its web site (www.wsscwater.com/ethics/index.cfm). The web site contains the Code of Ethics, lobbyist registration information, Advisory Opinions issued, and the Board of Ethics Rules and Procedures.

The Code of Ethics requires certain employees to file annual financial disclosure forms. State law requires that the content of WSSC's financial disclosure regulations be "substantially similar" to the State. The Commission has initiated an on-line system for employees to file their financial disclosure forms.

**CY 2007
BOARD OF ETHICS
ADVISORY OPINION REQUESTS**

Advisory Opinion #	Date Received	Date of Request	Request	Disposition	Disposition Date
A-07-01	09/26/07	09/26/07	Request for clarification of the following sections of the Code: 1. 3-1(a): "a purely administrative or ministerial duty which does not affect the disposition or decision concerning that matter," 2. 3-1(a): "the employee creates the appearance that he or she has an interest in the matter"	Withdrawn – No additional information was received	12/19/07
A-07-02	10/15/07	10/11/07	Request for clarification of the following section – Section 3-3	General Counsel's Office provided assistance	10/22/07

**CY 2007
BOARD OF ETHICS
COMPLAINTS**

Complaint #	Date Received	Date of Request	Request	Disposition	Disposition Date
C-07-01	04/04/07	03/30/07	Alleging that an employee of the WSSC breached the WSSC Code of Ethics by not honoring settlement agreement	Dismissed	04/17/07
C-07-02	04/11/07	04/11/07	Alleging a violation of Section 3-5 of the WSSC Code of Ethics	Dismissed	05/10/07
C-07-03	10/15/07	10/15/07	Alleging that an employee of the WSSC was performing plumbing work on private property while off from work and on weekends	Referred to Customer Care Team	11/08/07

**CY 2007
BOARD OF ETHICS
WAIVER REQUESTS**

Waiver #	Date Received	Date of Request	Request	Disposition	Disposition Date
W-07-01	12/13/07	12/13/07	Section 3-2, Restrictions on other Employment and Financial Interest. Requestor sought waiver of § 3-2, which prohibits WSSC employees from also working for a WSSC contractor.	Granted	01/18/08

**LOBBYISTS EXPENSES FOR EACH COMPANY
AS REPORTED ON THE WSSC LOBBYIST ACTIVITY REPORT**

	<u>LOBBYISTS</u>	<u>COMPANY</u>	<u>DATE OF REGISTRATION</u>	<u>REPORTING PERIOD</u>		<u>TOTAL</u>
				1/01/07 thru 6/30/07	7/01/07 thru 12/31/07	
1	N. Greenbaum	5223 River Road Partnership	4/17/2007	\$3,325.00	\$0.00	\$3,325.00
2	N. Greenbaum	The Artery Group - West Germantown	7/30/2004	\$0.00	\$2,625.00	\$2,625.00
3	N. Greenbaum	The Artery Group - SDC Matter	11/29/2007	N/A	\$2,625.00	\$2,625.00
4	N. Greenbaum	Bethel Deliverance Outreach Ministries, Inc.	1/16/2007	\$5,949.50	\$87.50	\$6,037.00
5	N. Greenbaum	Greenhill Capital Corp	4/27/2007	\$4,550.00	\$2,450.00	\$7,000.00
6	N. Greenbaum	KB Homes - Mid Atlantic	7/27/2007	N/A	\$7,875.00	\$7,875.00
7	N. Greenbaum	Pulte Corp/PG/Charles Counties	5/31/2007	\$2,502.50	\$175.00	\$2,677.50
Total Compensation and Expenses				<u>\$13,002.00</u>	<u>\$15,837.50</u>	<u>\$28,839.50</u>

**LOBBYISTS REGISTERED WITH WSSC WHO DID NOT
FILE REPORTS IN CY 2007**

	<u>LOBBYISTS</u>	<u>COMPANY</u>	<u>DATE OF REGISTRATION</u>
1	N. Greenbaum	Arcola Investment Associates	1/30/2004
2	L. Hoover	Apartment & Office Bldg. Assoc. of Metropolitan Wash.	11/12/2003
3	N. Greenbaum	The Artery Group - Crabbs Branch Way	8/10/2006
4	K. Maloney	Atlantic Recycle Group	3/1/2007
5	k. Maloney	Calgon Carbon	9/20/2006
6	N. Greenbaum	Dumont Oaks	12/1/2006
7	N. Greenbaum	Eakin-Youngentob, Associates, Inc.	2/8/2005
8	N. Greenbaum	M-I Homes	8/29/2006
9	N. Greenbaum	Miller and Smith	11/18/2003
10	N. Greenbaum	Natelli Communities	12/2/2003
11	N. Greenbaum	Newland Communities/Terrabrook	2/9/2004
12	N. Greenbaum	Toil Brothers, Inc./Claggett	4/28/2006
13	K. Quinn	Wye River Capital, Inc.	4/24/2004