

**WASHINGTON SUBURBAN SANITARY COMMISSION**  
**BOARD OF ETHICS**  
**2012 ANNUAL REPORT**

**Members:**

**George E. Pruden, II, Chair**

**Steven J. Hausman**

**Robert J. Moore**

**R. Wayne Keeler, Alternate Member**

## Washington Suburban Sanitary Commission Calendar Year 2012 Annual Ethics Report

This report covers conflicts of interest and lobbyist activities addressed by the Washington Suburban Sanitary Commission (WSSC) Board of Ethics during calendar year 2012.

The current WSSC Board of Ethics members are Steven J. Hausman (Montgomery County), Robert J. Moore (Prince George's County), and George E. Pruden, II, (Prince George's County). During calendar year 2012, Robert J. Moore served as Chair. On January 16, 2013, the Board of Ethics unanimously voted to appoint George E. Pruden, II, as Chair, commencing February 15, 2013. The Board of Ethics convened twelve times during 2012 to consider and review requests for advisory opinions, complaints, waivers and address other ethical matters. During the year, the Board of Ethics issued five (5) Advisory Opinions on conflicts of interest topics and one (1) decision on Requests for Waivers. Attached is a summary of each Advisory Opinion, Complaint and Waiver (Appendix A).

The Board of Ethics web site <http://www.wsscwater.com/home/jsp/content/ethics-index.faces> contains the WSSC Code of Ethics, Lobbyist registration information, Advisory Forms, Opinions and Procedures.

The WSSC Code of Ethics requires an individual to register as a lobbyist if s/he communicates with a Commissioner or Employee to influence executive or administrative action by the WSSC and receives compensation or expends monies for those purposes. Attached is a summary of the Lobbyist Expenditures as reported on the WSSC Lobbyist Activity Report. (Appendix B)

The WSSC Code of Ethics also requires employees to file annual disclosure forms. All WSSC employees must complete either a financial disclosure statement or a conflict of interest statement. WSSC conducted its 2011 annual disclosure filing period, commencing April 1, 2012.

All employees must complete annual Ethics training pursuant to the WSSC Code of Ethics. In 2012, the Ethics training was provided online. Active WSSC employees completed the online Ethics training by June 30, 2012.

Finally, we present the 2012 Ethics highlights:

- Implementation of a Lobbyist Awareness Registration Campaign that involved the creation of information posters and splash screens exhibited at WSSC; development of a more user-friendly Lobbyist Registration form that can be completed online; creation of Internet and Intranet messages to communicate lobbyist registration and awareness to Employees; and informational presentation to the WSSC Board of Commissioners
- Promotion of 2012 Corporate Compliance and Ethics Week, May 6 – 12, 2012, using splash screens and email communications to promote compliance
- GM/CEO sent guidance to all Employees regarding the solicitation or acceptance of gifts

- Ethical guidance provided to WSSC Management Team regarding Employees' Attendance at Conferences
- Creation of a Board of Ethics Actions webpage indexed by Code of Ethics sections to further enhance Board of Ethics decisions and their applicability
- Creation of a confidential Ethics inquiry database

**CY 2012  
BOARD OF ETHICS  
ADVISORY OPINION REQUESTS**

<b>Advisory Opinion #</b>	<b>Date Received</b>	<b>Issue</b>	<b>Regulation Involved</b>	<b>Status/Final Determination</b>
A-12-01	03/02/12	Employee inquired as to whether he can work in the same or similar line of work as his WSSC position for a subcontractor to a WSSC contractor within the Washington Suburban Sanitary District (WSSD)	Code of Ethics § 3-2	Advisory Opinion issued on 05/10/12 and posted to the WSSC website
A-12-02	03/07/12	Manager inquired about whether a subordinate has a conflict of interest in his current WSSC position while performing similar job duties for a subcontractor	Code of Ethics § 3-2	See Advisory Opinion 12-02 issued on 05/10/12 and posted to the WSSC website
A-12-03	04/06/12	Employee inquired about participating in a joint venture with other companies, one of which is a WSSC vendor	Code of Ethics § 3-2(a)	Advisory Opinion issued on 09/05/12 and posted to the WSSC website
A-12-04	04/25/12	Former employee inquired about working for a company that is currently a subcontractor for a WSSC contractor within the WSSD	Code of Ethics § 3-3	Advisory Opinion issued on 07/16/12 and posted to the WSSC website
A-12-05	07/10/12	Employee inquired about working as a civil engineer for a local residential builder regarding one specific project that the employee worked prior to commencing WSSC employment	Code of Ethics § 3-2	Advisory Opinion issued as Waiver 12-01 on 09/05/12
A-12-06	08/09/12	Employee inquired about opening a general practice law firm that includes personal and business representation in the Washington DC metropolitan area	Code of Ethics § 3-2	<b>PENDING – The Board has requested additional information from the Requestor</b>

**CY 2012  
BOARD OF ETHICS  
COMPLAINT REQUESTS**

<b>Complaint #</b>	<b>Date Received</b>	<b>Request</b>	<b>Regulation Involved</b>	<b>Status/Final Determination</b>
C-12-01	01/17/12	Non-compliance for final financial disclosure statement submission	Code of Ethics § 5-2(c)	<b>DISMISSED</b>
C-12-02	02/02/12	Ex-Employee alleged WSSC personnel violated the intent of the Code of Ethics, the policy supporting the Ethics Program and misused the prestige of their offices	Code of Ethics §§ 1-2 and 3-4(a)	<b>DISMISSED</b>
C-12-03	03/15/12	Non-compliance for final financial disclosure statement submission	Code of Ethics § 5-2(c)	<b>DISMISSED</b>
C-12-04	08/09/12	Non-compliance of submission for final financial disclosure statement submission	Code of Ethics § 5-2(c)	<b>PENDING</b>
C-12-05	09/10/12	Employee alleging conflicts of interest by a WSSC manager regarding restrictions on participation of employees and misuse of prestige of office	Code of Ethics §§ 3-1(a)(4) and 3-4(a)	<b>PENDING</b>

**CY 2012  
BOARD OF ETHICS  
WAIVER REQUESTS**

<b>Waiver #</b>	<b>Date Received</b>	<b>Request</b>	<b>Regulation Involved</b>	<b>Status/Final Determination</b>
W-12-01	07/10/12	Employee inquired about working as a civil engineer for a local residential builder for one specific project that the employee worked prior to commencing WSSC employment	Code of Ethics Section 3-2	Waiver granted on 09/05/12 and posted to the WSSC website.

**CY 2012 - LOBBYIST EXPENSES FOR EACH COMPANY  
AS REPORTED ON THE WSSC LOBBYIST ACTIVITY REPORT**

	<b>LOBBYIST</b>	<b>COMPANY</b>	<b>DATE OF REGISTRATION</b>	<b>REPORTING PERIOD</b>		<b>Total</b>
				<b>1/1/2012 thru 06/30/12</b>	<b>7/01/12 thru 12/31/12</b>	
1	L. Hoover/R. Wineholt/W.S. Pharr	Apartment & Office Bldg. Assoc. of Metropolitan Wash.	11/12/2003	\$8,287.08	\$7,407.22	\$15,694.30
2	N. Greenbaum	Belford Towers, LLC	4/14/2013	\$0.00	\$0.00	\$0.00
3	N. Greenbaum	Federal Realty Investment Trust/Mid Pike Plaza	9/14/2011	\$3,187.50	\$1,381.25	\$4,568.75
4	N. Greenbaum	Federal Capital Partners/Woodlake	10/12/2011	\$0.00	\$0.00	\$0.00
5	N. Greenbaum	F.P. Homes, LLP	7/18/2011	\$1,912.50	\$0.00	\$1,912.50
6	N. Greenbaum	Glenstone Foundation	9/14/2011	\$0.00	\$0.00	\$0.00
7	N. Greenbaum	Harmony Place Associates, LLC	11/14/2011	\$8,713.00	\$4,037.50	\$12,750.50
8	S. Sidh/D. Carroll/R.Johnson/E.Appel	M. Luis Construction	5/13/2009	\$0.00	\$0.00	\$0.00
9	T. Stone	Montgomery Scrap Corporation	5/3/2010	\$0.00	\$0.00	\$0.00
10	N. Greenbaum	Olney Assisted Living Partners, LLC	3/14/2012	\$0.00	\$0.00	\$0.00
11	N. Greenbaum	Potomac Vista Corporation	11/18/2011	\$3,293.75	\$0.00	\$3,293.75
12	N. Greenbaum	Sun Brook Partners	7/29/2011	\$13,281.25	\$106.25	\$13,387.50
13	N. Greenbaum	Woodfield Investments	1/25/2013	<u>\$0.00</u>	<u>\$425.00</u>	\$425.00
		<b>Total Compensation and Expenses</b>		<u>\$38,675.08</u>	<u>\$13,357.22</u>	<u>\$52,032.30</u>

bcc:

Board of Ethics Members  
Associate Counsel, (H. Ashbury)  
Ethics Officer (K. Neal)