



# Board of Ethics CY 2022 Annual Report

January 1, 2022 - December 31, 2022

Submitted by  
Board of Ethics Members:  
George Pruden, II, Chair  
Steven Hausman, Member  
Jeffrey Hysen, Member  
Chandria Slaughter, Alternate Member

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Prepared by:  
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Ethics Officer

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Submitted to WSSC Water  
Commissioners on 3/31/2023



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## Washington Suburban Sanitary Commission Annual Ethics Report Calendar Year 2022

### Overview

This report covers conflicts of interest matters brought before the Washington Suburban Sanitary Commission (“WSSC Water”) Board of Ethics, financial disclosures, and addresses lobbying activities occurring during Calendar Year 2022 (“CY 2022”). It has been prepared to fulfill the requirements contained in the Maryland Public Ethics Laws, Annotated Code, General Provisions Article §§ 5-823(d) and 5-830(d) and the WSSC Water Code of Ethics Chapter 1.70.140.

The WSSC Water Board of Ethics (“Board”) consists of three regular members and one alternate member who are appointed by WSSC Water’s Commissioners. The members are non-employees who live within the WSSC Water sanitary district. The Board members as of December 31, 2022 were:

Mr. George Pruden, II (Chair),  
Dr. Steven Hausman,  
Mr. Jeffrey Hysen, and  
Ms. Chandria Slaughter (Alternate).

The Board provides non-confidential information to WSSC Water employees, contractors, ratepayers, lobbyists, and other stakeholders through WSSC Water’s public website. These pages are accessible through the “Who We Are” heading on the home page (or directly by going to <https://www.wsscwater.com/boe>). This site provides information regarding the Board members, the Board’s areas of responsibility, the Ethics Program at WSSC Water, and contact information for the Ethics Office. Visitors to the page can access various documents including WSSC Water’s Code of Regulation which contains the Code of Ethics, lobbyist registration information, and a list of entities doing business with (or regulated by) WSSC Water. The Board also publishes formal Advisory Opinions, Waiver Request decisions, and Complaint findings on the site.

The Ethics Officer is responsible for directing the day-to-day ethics program for WSSC Water. Ethics Officer Angelique Dorsey White reports functionally to the Board and administratively to WSSC Water’s General Counsel Amanda Stakem Conn. Administrative support is provided by Latonya Allen.

### **Meeting Activities**

The Board conducted twelve (12) regular meetings in 2022 to address matters within its purview including, but not limited to:

- ◆ Thirteen (13) Complaints;
- ◆ Two (2) Advisory Opinion Requests;
- ◆ One (1) Waiver Request
- ◆ Overseeing the Ethics Officer’s implementation of the process for employees to obtain approval prior to engaging in outside (i.e., secondary) employment;
- ◆ Overseeing inquiries into potential complaints to determine whether to pursue a formal complaint;
- ◆ Annual disclosure statement filings; and
- ◆ Lobbyist activities.

Appendix A summarizes the formal Complaints, Advisory Opinion Requests, and Waiver Requests considered in CY 2022.

### **Lobbyist Reports**

A person or organization lobbying WSSC Water is required to register as a lobbyist if there is (1) communication to influence and (2) lobbyist compensation or expenditures meeting or exceeding specified thresholds. (See Code Chapter 1.70.380).

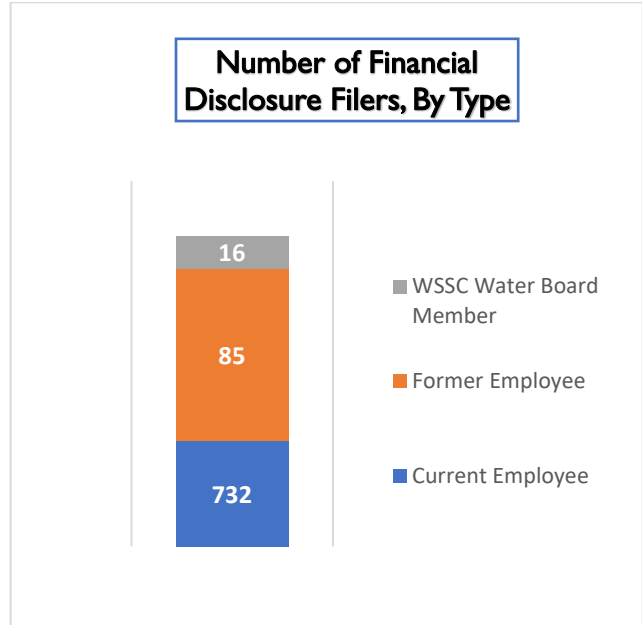
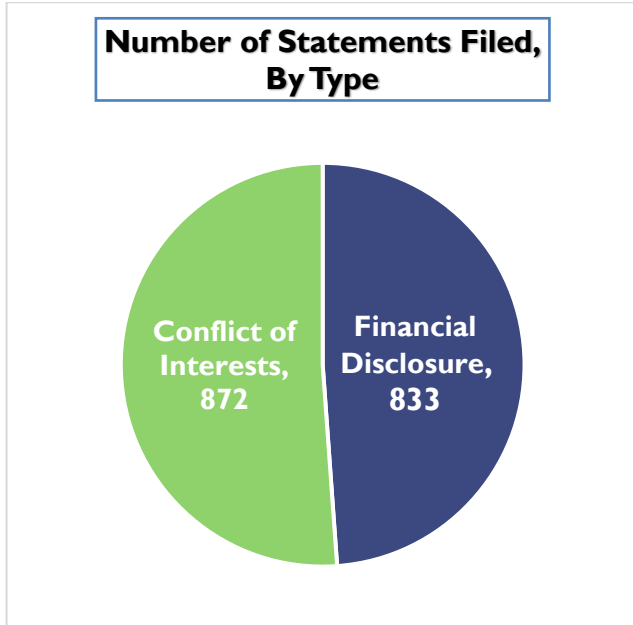
Appendix B summarizes the lobbyist expenditures reported to WSSC Water for CY 2022.

### **Financial Disclosure and Conflict of Interest Statements**

WSSC Water collects information annually from employees to enable it to identify and manage conflicts of interest.

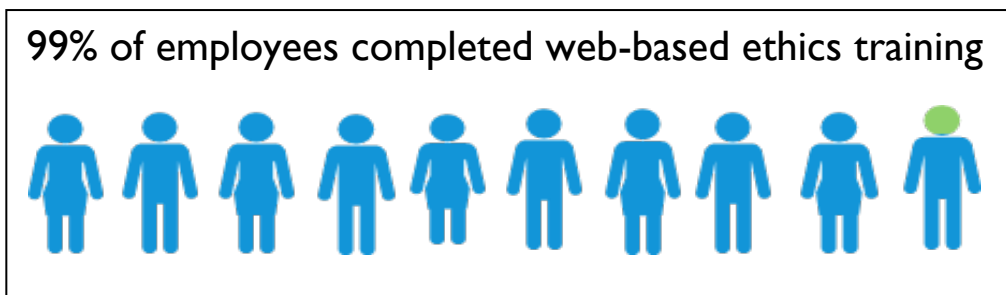
Code Ch. 1.70.330 designates who must file financial disclosure statements annually. Additionally, Code Ch. 1.70.230 states that employees who are not required to file a financial disclosure statement must annually file a conflict of interest statement. In CY 2022, the Ethics Office received a total of 1,705 annual disclosure statements from all filers.

The charts below provide additional details regarding the annual disclosure filings:



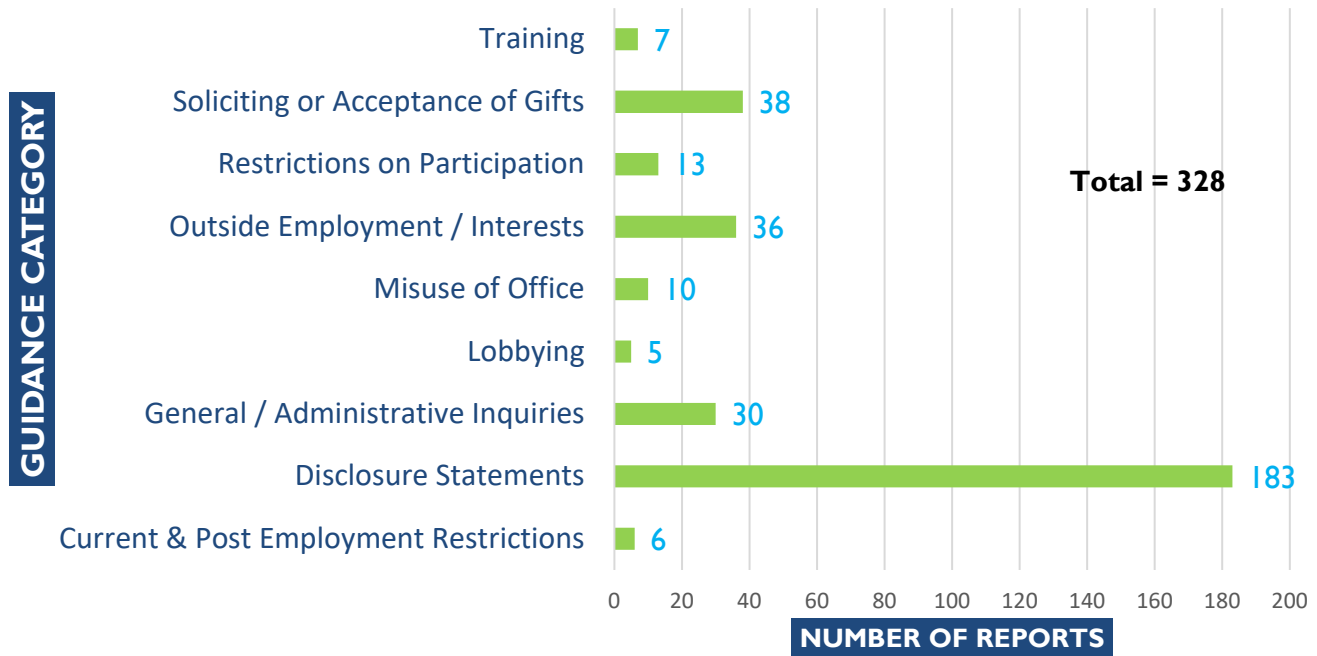
**Additional CY 2022 Ethics Program Highlights**

- ◆ The Ethics Office provides a web-based training course so that employees can complete the one hour of ethics training required annually in accordance with Code Ch. 1.70.160. In total, 1626 WSSC Water employees completed the CY 2022 web-based training.



- ◆ In conjunction with Human Resources, the Ethics Officer presented live ethics training to 170 new employees during the onboarding process.
- ◆ WSSC Water’s Ethics Office served as the primary point of contact for all ethics concerns and, under the general oversight of the Board, provided informal advice on 328 ethics inquiries. The chart below contains a breakdown of the topics covered.

## CY 2022 ETHICS OFFICE GUIDANCE CATEGORIES



# **APPENDICES**

Appendix A: Case Summaries

Appendix B: Lobbyist Expenditures

**CY 2022  
WSSC BOARD OF ETHICS MATTERS**

**COMPLAINTS**

<b>Matter No.</b>	<b>Matter Summary</b>	<b>WSSC Code of Ethics Provision(s) Referenced</b>	<b>Resolution/Status</b>
C-20-07	Two managers were alleged to have misused the contracting process to hire close associates.	1.70.020; 1.70.200	Complaint Opinion #C-20-07 issued; decision posted on the Board of Ethics website.
C-21-06	An employee was alleged to have used WSSC equipment and work time to solicit for a fundraiser that was not approved by the General Manager.	1.70.220(a)(2) and 1.70.220(b)(1)	The Board and the employee entered into a settlement agreement, a summary of which is located on the Board of Ethics website.
C-22-01	A former WSSC employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission.	1.70.340(c)	Complaint dismissed after the respondent cured the alleged violation by filing the final financial disclosure statement.
C-22-02	An employee was alleged to have misused authority over the water-shutoff process to avoid adverse action at a location in which the employee had an interest.	1.70.020; 1.70.200(a)	Complaint dismissed as moot.
C-22-03	An employee was alleged to have provided confidential solicitation information to a potential bidder prior to release of the solicitation.	1.70.260; 1.70.290	Complaint dismissed for lack of reasonable cause to believe that the respondent had violated the Code of Ethics.
C-22-04	An employee was alleged to have steered contracts to close associates.	1.70.200(a)	Complaint dismissed due to the Board's determination that the evidence did not merit further proceedings.
C-22-05	An employee was alleged to have steered contracts to close associates.	1.70.200(a)	Complaint dismissed due to the Board's determination that the evidence did not merit further proceedings.

**CY 2022  
WSSC BOARD OF ETHICS MATTERS**

**COMPLAINTS**

<b>Matter No.</b>	<b>Matter Summary</b>	<b>WSSC Code of Ethics Provision(s) Referenced</b>	<b>Resolution/Status</b>
C-22-06	An employee was alleged to have released confidential information	1.70.210	Complaint dismissed due to the Board's determination that the evidence did not merit further proceedings.
C-22-07	An employee was alleged to have released confidential information	1.70.210	Complaint dismissed due to the Board's determination that the evidence did not merit further proceedings.
C-22-09	A former WSSC employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission.	1.70.340(c)	Complaint dismissed after the respondent cured the alleged violation by filing the final financial disclosure statement.
C-22-10	A former WSSC employee was alleged to have failed to file a required final financial disclosure statement upon separation from the Commission.	1.70.340(c)	Complaint dismissed after the respondent cured the alleged violation by filing the final financial disclosure statement.
C-22-08	An employee was alleged to have been working a second job during the WSSC Water work shift	1.70.180(a)	Pending.
C-22-11	An employee was alleged to used information obtain from WSSC Water position to help a regulated plumbing company obtain private business.	1.70.200(a)	Pending.



**CY 2022**  
**WSSC BOARD OF ETHICS MATTERS**

**ADVISORY OPINION REQUESTS**

<b>Matter No.</b>	<b>Matter Summary</b>	<b>WSSC Code of Ethics Provision(s) Referenced</b>	<b>Resolution/Status</b>
A-22-01	A senior manager requested guidance on whether the Code of Ethics restricted his/her participation in various outside groups as a leader or officer	1.70.020(b); 1.70.200(a)	Advisory Opinion # A-22-01 published on the Board of Ethics website.
A-22-02	The General Manager/CEO requested guidance on whether the Code of Ethics allowed WSSC Water to officially support an outside golf fundraiser.	1.70.220(a)	Advisory Opinion # A-22-02 published on the Board of Ethics website.

**CY 2022**  
**WSSC BOARD OF ETHICS MATTERS**

**WAIVER REQUESTS**

<b>Matter No.</b>	<b>Matter Summary</b>	<b>WSSC Code of Ethics Provision(s) Referenced</b>	<b>Resolution/Status</b>
W-22-01	An employee requested a waiver to provide bookkeeping services to a WSSC Water-regulated entity as secondary employment.	1.70.180	Waiver Request # W-22-01 published on the Board of Ethics website.

## CY 2022 WSSC LOBBYIST ACTIVITY REPORT

	LOBBYIST	COMPANY	DATE OF REGISTRATION	REPORTING PERIOD		Total
				01/01/22 thru 06/30/22	07/01/22 thru 12/31/22	
1	<b>Erin Bradley</b> <i>(Terminated 08/05/22)</i>	Apartment and Office Building Association of Metropolitan Washington	2/10/2020	\$0.00	\$0.00	\$0.00
2	<b>Ryan Washington</b>	Apartment and Office Building Association of Metropolitan Washington	1/28/2022	\$0.00	\$0.00	\$0.00
3	<b>Nicola Whiteman</b> <i>(Terminated 01/31/22)</i>	Apartment and Office Building Association of Metropolitan Washington	1/21/2015	\$0.00	\$0.00	\$0.00
4	<b>Justin Ross</b> <i>(Terminated 10/28/22)</i>	CCE, Inc (Cafritz)	2/21/2020	\$6,000.00	\$6,000.00	\$12,000.00
		EYA, LLC	2/21/2020	\$0.00	\$0.00	\$0.00
5	<b>Brad Frome</b> <i>(Terminated 10/24/22)</i> <i>(Terminated 10/20/22)</i>	CCE, Inc (Cafritz)	2/21/2020	\$1,000.00	\$6,000.00	\$7,000.00
		EYA, LLC	2/21/2020	\$0.00	\$0.00	\$0.00
		Shield Investments	2/21/2020	\$0.00	\$0.00	\$0.00
		MRK Partners	11/18/2022	\$0.00	\$8,000.00	\$8,000.00
<b>Total Compensation and Expenses</b>				<b>\$7,000.00</b>	<b>\$20,000.00</b>	<b>\$27,000.00</b>

Appendix B  
CY 2022 WSSC Board of Ethics Annual Report  
Submitted on March 31, 2023