

maryland state ethics commission

27th Annual Report

**January 1, 2005 through
december 31, 2005**

General statutory implementation

Overview

The State Ethics Commission met in regular session 9 times during Calendar Year 2005 and 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 State Government Article § 15-205, must administer the provisions of the Public Ethics Law; prescribe and provide forms for each document required by the Public Ethics Law; retain as a public record each document filed with the Commission for at least four years after receipt; periodically review the adequacy of public ethics laws; review each statement and report filed in accordance with the Public Ethics Law and notify officials and employees of any omissions or deficiencies; and publish and make available to persons subject to the Public Ethics Law, and to the public, information that explains the provisions of the Law, the duties imposed by it, and the means for enforcing it.

The Commission is required to compile annually, by March 1st, a list of entities doing business with the state during the preceding calendar year and make this information available to individuals required to file annual financial disclosure statements; to provide training courses for public officials and for regulated lobbyists; and to submit to the General Assembly an annual report on its activities.

In 1999, the Legislature added § 15-602(d) to the Public Ethics Law, requiring the Commission to develop procedures under which financial disclosure statements could be filed electronically and without additional cost to the individual filing the statement. In FY 2005 the Commission received funding sufficient to proceed with this mandate, and beginning in February 2005, electronic filing was offered to all financial disclosure filers through a secure web site, <https://efds.ethics.state.md.us>. More than 6,000 of the 11,000 filers took advantage of electronic filing. The improved efficiency resulting from the electronic process permitted the Commission staff to complete the review of more than 2,600 statements by the end of May 2005, a process that took many months to accomplish in the review of paper forms. Although some filers encountered frustration with the new system, the Commission staff was able to assist all of those who called the office for help, and the comments received were overwhelmingly positive.

In 2001, the Legislature added § 15-709 to the Public Ethics Law, requiring the Commission to develop procedures under which lobbying reports could be filed electronically without additional cost to the individual

who would opt to file electronically, and to make the filed reports available for public inspection electronically. In 2005, the Commission, working with the Canton Group, LLC, a technology contractor, developed a process by which regulated lobbyists could begin the registration process and complete and submit all lobbying reports electronically and by which the public would have immediate access to electronically submitted reports. Electronic registration for lobbyists became available November 1, 2005, and electronic lobbying reporting for event reports and activity reports for the lobbying period of November 1, 2005 through April 30, 2006 was on-line before the end of calendar year 2005.

The Commission staff continued to place substantial emphasis on the training for public officials and employees and regulated lobbyists. In its Strategic Plan, the Commission asserted its commitment to education and training on its belief that increased and improved education and training will lead to an increase in advice responsibilities and a decrease in the volume of enforcement actions. Commission staff has continued to focus on providing training to smaller groups of employees at their particular agencies, which has permitted the training to address the specific ethical issues confronted by State employees and public officials in their particular service to the public. This has resulted in a marked increase in the requests for advice that come to the Commission from employees and public officials. During calendar year 2005, the Commission conducted 40 general ethics training programs for agencies, boards and commissions, attended by 1987, focusing more specifically on conflicts of interest and the electronic filing process for financial disclosure statements. In addition, the Commission staff conducted eleven conflict of interest, electronic filing and procurement training sessions attended by an additional 430 public officials, and members of public and special interest groups. The Commission staff also conducted ten lobbying training programs, attended by 213 regulated lobbyists, and one program on forms completion attended by an additional 6 lobbyists or their assistants. The lobbying programs focused on electronic filing and general lobbying prohibitions and reporting requirements.

In June 2003, the Commission conducted a complaint hearing on charges of lobbying violations by lobbyist Bruce C. Bereano. The Commission issued its decision and public order finding a violation of § 15-713(1), being engaged for lobbying purposes for contingent compensation. On December 28, 2004, the Honorable Raymond Kane of the Howard County Circuit Court, in case No. 13-C-03-057038, upheld the Commission's decision and sanction of a 10-month suspension of Mr. Bereano's lobbying registrations. Mr. Bereano's appeal of Judge Kane's decision was heard in the Court of Special Appeals on November 9, 2005. By the end of 2005, the Court of Special Appeals had not issued its decision with regard to this appeal.

On July 11, 2005, by the nomination of Speaker Michael Busch, Governor Ehrlich appointed Darryl Jones to fill the vacancy created in January 2004 by Bruce Poole's resignation from the Commission. On October 15, 2005, Ava Feiner, appointed by Governor Ehrlich in 2003, resigned from the Commission, prior to completion of her term. Janet McHugh, Esq. was appointed on October 17, 2005, to fill the remainder of Dr. Feiner's term.

The Fiscal Year 2006 budget was approved for General Funds of \$668,465 and Special Funds of \$127,582.

Advice Activities

The Maryland Public Ethics Law §§ 15-301 through 15-303 provides that the State Ethics Commission may issue formal advisory opinions in response to requests from officials, employees, lobbyists, and others who are subject to the 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 State Documents in COMAR Title 19A. The Commission regulations, COMAR 19A.01.02.05, also permit the staff and the Commission to provide informal advice. Informal advice generally result in a letter or email to the requestor referencing prior formal and

informal Commission opinions addressing similar facts and issues.

The State Ethics Commission is responsible for interpreting the Public Ethics Law. In late 1979, when the Commission was established, most advice requests resulted in published formal opinions. During its first five years of operation, the Commission issued a total of 205 formal opinions, and during the next five years, another 128 formal opinions were issued. As a result, there is a large body of published opinions available to the Commission staff providing guidance in response to advice requests. During the twenty-seven years in existence, the Commission has issued a total of 488 formal opinions. During the past five years the number of formal opinions has decreased while informal reviews and letter advice has increased. A major factor reducing the need for formal Commission opinions is the large number of existing opinions that provide guidance to the staff thus expediting the advice process.

During Calendar-Year 2005, the Commission issued two (2) formal published opinions. Both opinions addressed the application of Section 15-501 of the Ethics Law. This provision in part prohibits officials and employees from participating in State matters if a party to the matter is a business entity that employs the official's or employee's spouse, parent, child, brother or sister. Section 15-501(b) allows the Commission to grant exceptions to this requirement by advisory opinion. Opinion No. 05-01 allowed the Secretary of Transportation to participate in matters regarding two Fortune 500 companies who are vendors of the Department and who each employ one adult child of the Secretary. The children of the Secretary were employed in locations outside of Maryland and in divisions or program unrelated to the vendors' business with the Department.

Opinion No. 05-02 allowed the Director of Operations of the Maryland Port Administration to participate in matters involving an international shipping carrier that employed his older brother in a different region of the country. The brother's duties did not have any relationship to the carrier's operation in the Port of Baltimore.

The Commission's informal docket, initiated in 2002, logs requests for advice resulting in informal advice from the staff or Commission. The log may include telephone advice or responses to routine questions from individuals who either call, email or walk-into the office. The Commission and its staff provided informal advice in the following subject areas during calendar years 2002 through 2005:

Subject Matter of the Advice	Number of Requests			
	2005	2004	2003	2002
Lobbying Registration, Reporting and Conduct	9	11	18	53
Secondary Employment Advice	121	108	132	269
Participation Advice	21	17	8	3
Procurement Restrictions	15	6	7	10
Post-Employment Advice	23	13	13	6
Gift Questions	22	21	29	8
Other	40	44	35	28

Total	251	220	242	377
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The number of informal matters increased in 2005 compared to 2004. The number of informal matter had decreased each year from calendar year 2002 to 2004. The increase in 2005 is attributable to an increase in requests for secondary employment advice, for procurement ethics advice and for post-employment advice.

The 121 informal secondary employment requests considered in 2005 arose from the following Departments and agencies:

Department	Number of Requests			
	2005	2004	2003	2002
Department of Human Resources	33	40	48	219
Department of Health and Mental Hygiene	30	22	18	20
Department of Transportation	13	4	9	4
Executive Department	4	5	6	2
Department of Agriculture	1	3	5	0
University System of Maryland	5	2	5	2
Dept. of Public Safety & Correctional Services	4	3	4	2
Department of Natural Resources	6	4	3	1
Other Agencies/Departments	25	25	34	19
Totals	121	108	132	269

During calendar year 2005, the Commission's Executive Director, General Counsel, Staff Counsel, and Assistant Counsel responded to more than 1,800 phone inquiries.

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. The exemptions were 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 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. This law expanded the exemptions beyond faculty to include vice-presidents and presidents of institutions as well as the chancellor and vice-chancellors of the USM. The legislation also broadened the exemption from the conflict of interest provisions to include USM officials, faculty members, and employees. The USM Board of Regents and the USM institutions adopted procedures pursuant to § 15-523 to allow the conflict of interest exemptions. The USM Board of Regents and seven of the affiliated institutions adopted policies, and the Commission’s authority was limited to comment on the policy’s conformity to Public-Private Partnership Act. The definition of “sponsored research” was expanded to include “participation in State economic development activities.”

The records filed by the institutions with the Commission reflect a total of 104 faculty exemptions granted by the university presidents between 1996 and 2004. These included exemptions at the University of Baltimore (UMB), University of Maryland at Baltimore County (UMBC), and the University of Maryland Biotechnology Institute. During calendar year 2005, USM institutions reported to the Commission an additional 28 individual faculty members exemptions. The exemptions were from the following institutions:

Institution	Number of Exemptions
University of Maryland, Biotechnology Institute	5
University of Maryland, Baltimore County	2
University of Maryland, College Park	19
University of Maryland, Baltimore	2
TOTAL FACULTY EXEMPTIONS	28

In some instances the individual faculty member had more than one interest exempted.

financial disclosure

The financial disclosure program continued to process the identification of those required to file, to provide technical assistance to filers, and monitor compliance with the Law. In accordance with Public Ethics Law § 15-103, the Commission reviewed a large number of requests by various agencies to add or delete positions from the financial disclosure filing list, along with an extensive review of some outdated listings, the net result was a decrease in the number of filers from approximately 12,170 in 2004 to 11,783 in 2005.

In accordance with Public Ethics Law §§ 15-103 and 15-209, the Commission made decisions that were forwarded to the Department of Budget and Management for its concurrence regarding the status as “executive

units” of newly created boards and commissions and considered and acted upon requests by a number of boards and commissions for exemption from the requirement to file financial disclosure statements. In recent years, the Commission has seen a substantial increase in the number of boards, commissions, task forces, and technical advisory groups created by the General Assembly.

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 2005, the Commission staff reviewed more than 2,600 financial disclosure statements for reporting year 2004.

In 1999, the Legislature, in § 15-602(d) mandated that the Commission develop and implement a process by which filers would be able to file their financial disclosure statements electronically, at no additional cost to the filer. It was not until FY 2005 that the Commission was able to obtain funding sufficient to develop electronic filing. With the appropriated funds we were able to secure the services of the Canton Group, LLC, a technology contractor, and we were able to implement electronic filing through a secure web site, <https://efds.ethics.state.md.us>. The Commission was hopeful that 20 to 25% of the filers would opt to file electronically, and both the Commission and staff were gratified to note that more than 6,000 filers used the electronic process. Although there were a few glitches at the very beginning (the first few weeks of February), and some filers expressed some frustration with the program, the problems were easily and promptly corrected by the contractor, and the staff were able to assist all filers who contacted the Commission for help.

In order to create a user friendly and less intrusive form, the contractor used a survey process of question and answer that led the filer through each schedule of the form. Rather than exact amounts of consideration, interest rates, or values, the contract used drop-down boxes that permitted the filer to select a range of value that provided the Commission with sufficient information and satisfied the filer as being less intrusive. Because of the change to the form necessitated by the electronic program, the Commission changed the paper form to conform, in substance, to the electronic form. The Commission also began the process of drafting a regulation setting forth the new format for the financial disclosure statements.

As part of its contract with the Commission, the Canton Group, LLC, also developed an electronic administrative tool permitting the staff to review electronically submitted statements, send email notification to the filer of any omission or question raised by the statement. The emails become attached to the electronic file, and a record is therefore compiled of statements, inquiries and responses. The filer may also electronically file an amendment if required. Of special benefit is the programming that permits the filer to bring up his current form in subsequent years, make the necessary changes, and submit the new form. The filer will be able to review statements filed in prior years, and the Commission staff will be able to compare statements electronically. The review process is so efficient that one staff member was able to review more than 2,600 electronically filed forms by the end of May 2005, whereas a review of 2,600 paper forms would take several of the staff several months to complete. With full compliance with electronic filing, the Commission will be able to review the statements more efficiently, notify filers of problems earlier than in prior years, and be more efficient in the enforcement process. Full compliance with electronic filing will also reduce the Commission filing space requirements and provide a safer, more secure and more efficient way of collecting, reviewing, and maintaining financial disclosure records.

lobbyist disclosure and regulation

In 2001, the Legislature, in § 15-709 of the Public Ethics Law, mandated the Commission to develop and implement an electronic process for regulated lobbyists to file required reports at no additional cost to the individuals who file electronically. The law also mandated that lobbying reports be made available for public review electronically. In 2005, through the procurement process, the Commission was able to contract with the Canton Group, LLC, who developed the electronic financial disclosure statement filing process, to develop an electronic reporting process for lobbyists. In working with the contractor, the Commission determined that the best approach would be to enable lobbyists to at least begin the registration process electronically, which would create a data base for each lobbyist to report the required information related to his or her employers. Because of the need to have original signatures for the lobbyist and the employer, and because registration requires payment to the State of Maryland of a \$50 per registration fee, only part of the registration process could be electronic. The electronic portion of the registration process (providing the information related to the lobbyist and the employer, the focus of the lobbying, etc) became available to lobbying filers November 1, 2005. Lobbyists are also able to file event notifications (Form 13E), event reports (Form 13F) and Activity Reports (Form 4) electronically. The information provided electronically on the Activity Reports will automatically transfer appropriate information to other required forms such as Forms # 13A, B, C, and D. As lobbying activity and other reports do not become due until the close of the lobbying period, which ends on April 30, 2006, there are no figures available for this calendar year as to the filing of lobbying reports electronically.

Through the Commission's web site, <http://ethics.gov.state.md.us>, the public will be able to search through lobbyists or employers to gain access to the information that the Commission is required to collect. The administrative tool developed for Commission use, will enable the Commission to calculate totals required for annual reporting in a fraction of the time required in prior years when calculations had to be made by hand.

The lobbying year extends from November 1st to October 31st of the following year. During the lobbying year ending October 31, 2005, 2,525 lobbying registrations were filed with the Commission. This represents a decrease of 30 registrations from the 2,555 filed by October 31, 2004.

The following expenditure data summarizes lobbying expenditures for the last three lobbying years:

EXPENDITURES BY LOBBYISTS

Type of Expenditure	10/31/05 \$	10/31/04 \$	10/31/03 \$
B-1: Meals and beverages for officials or employees or their immediate families	3,202	4,493	4,178
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.	2,301,493	2,060,647	1,404,028

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	13,028	26,283	18,524
B-4: Food and beverages at approved legislative organizational meetings	26,102	16,519	15,787
B-5: Ticket or free admission to attend charitable, cultural or political events where all members of a legislative unit are invited.	4,782	4,350	4,708
B-6: Gifts to or for officials or employees or their immediate families (not included on B-1 through B-5)	24,931	16,478	41,421
SUBTOTAL OF ITEMS B 1 THROUGH B 6	\$ 2,373,538	\$ 2,128,770	\$ 1,488,646
B-7: Total compensation paid to registrant (not including sums reported in any other section)	28,957,735	32,832,105	25,367,757
B-8: Salaries, compensation and reimbursed expenses for staff of the registrant	1,112,595	980,177	889,332
B-9: Office expenses not reported in B-5 or B-6	846,022	1,146,653	841,415
B-10: Cost of professional and technical research and assistance not reported in items B-5 or B-6	497,145	334,780	635,491
B-11: Cost of publications which expressly encourage persons to communicate with officials or employees	473,243	465,458	771,743
B-12: Fees and expenses paid to witnesses	12,620	122,810	4,685
B-13: Other expenses	525,331	546,036	497,650
TOTAL OF ITEMS B-1 THROUGH B-13	\$34,798,229	\$38,556,789	\$30,496,719

(NOTE: At the time the Annual Report was compiled, some lobbyist expenditure information may have been subject to adjustment based on staff review.)

enforcement activities

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. The Commission may file a complaint on its own initiative, and, at its discretion, may proceed with preliminary inquiries of potential Public Ethics Law violations.

The Commission divides preliminary matters into two categories: Preliminary Consideration Matters (A matters) and Preliminary Inquiry Matters (B matters), the latter of which involves more extensive investigation. In 2005,

the Commission opened 66 A matters, including: 34 conflict of interest matters, 30 lobbyist matters, and 2 financial disclosure matters. The Commission entered into 15 Late Filing Agreements with lobbyists during 2005, resulting in payments of \$3625.00 to the State of Maryland. The Commission closed 67 A matters in 2005.

The Commission opened 17 Preliminary Inquiry Matters (B matters) in 2005. Fifteen (15) of the B matters involved conflict of interest issues and 2 involved lobbying issues. In 2005, the Commission closed 18 B matters, including a few pending matters from 2004, 2003 and 2002.

In calendar year 2005, the Commission issued 38 complaints: including 30 financial disclosure matters, 6 lobbying matters and 2 conflict of interest matters. The Commission closed 46 complaints in 2005, including some pending matters from 2004 and 2003. The Commission collected \$1200.00 from financial disclosure complaints stemming from late financial disclosure statement filings and \$500.00 from lobbying complaints stemming from late filings of lobbying registrations, lobbying activity reports and other required lobbying forms. The Commission collected \$5,000.00 through a Stipulation of Settlement Agreement in a conflict of interest complaint in which a former Department of Natural Resources employee participated in matters involving his spouse's business.

All enforcement payments collected through Stipulations of Settlement or Late Filing Agreements were deposited in the State's general fund and cannot be used by the Commission. The Commission collected a total of \$10,325.00 in enforcement payments in 2005.

State Ethics Commission v. Bereano was argued on November 9, 2005 in the Maryland Court of Special Appeals, and the decision is pending. The respondent appealed the Commission's June 2003 Order suspending his lobbying registrations for a period of ten months and assessing a fine of \$5,000 for a knowing and willful violation of § 15-713(a) of the Public Ethics Law. The respondent originally requested judicial review of the Commission's Order in the Circuit Court for Anne Arundel County, but the Administrative Judge of the Circuit Court for Anne Arundel County transferred the matter to the Circuit Court for Howard County. On December 28, 2004, the Circuit Court for Howard County affirmed the Commission's Order.

On June 20, 2005, lobbyist, Ira C. Cooke voluntarily agreed to a revocation of his lobbying registrations pursuant to a Stipulation of Settlement Agreement in Complaint C-3-05. The action arose from Mr. Cooke's December 2004 conviction in the State of California on three felony charges arising from his Maryland lobbying relationship with Desert Counseling Clinic.

Local government ethics laws

The Public Ethic Law requires Maryland counties and cities to enact local laws similar to the State's Public Ethics Law. In addition to the requirement that counties and cities enact ethics laws, the General Assembly amended the Law in 1983 to require local school boards either to promulgate ethics regulations similar to the State Law or to be covered by county ethics laws. As part of its responsibilities, the Commission staff reviewed proposed draft revisions to ethics laws for Frederick and Queen Anne's Counties, the City of College Park, and the Board of Education of Frederick County during 2005.

Due to the Court of Appeals opinion in *Seipp v. Baltimore City Board of Elections*, 377 Md.362, 833 A.2d 551 (2003), the Commission determined that its regulations should be amended to better define the role of the State

Ethics Commission with regard to its determination that a local jurisdiction's ethics provisions are "similar" or "substantially similar" to the Public Ethics Law. In conjunction with an advisory opinion considered late in 2005 the Commission reviewed the history of the local government program and its local government and board of education regulations (See Advisory Opinion No. 06-01). It is anticipated that amendments to the regulations will be submitted in 2006.

The Commission also received and reviewed reports from Prince George's and Montgomery Counties regarding the special land use ethics reports required in those jurisdictions (See §15-829 through §15-841).

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. The staff has also provided technical advice to local government ethics boards. Legislation passed in 1999 requires new financial disclosure filers to receive 2 hours of Ethics Law training (§15-205(d)). The Commission began implementation of this mandate in calendar year 2000. During calendar year 2005, the Commission staff conducted 40 training sessions for State employees at various locations throughout the State. The Commission provided training to a total of 1987 employees and public officials.

The Commission has placed an increasing emphasis on training smaller groups of employees and officials and has done so within the employees' agencies. In this way, those attending the training sessions participate more, and the training can be tailored to address the concerns of the various employees in the context of their work experiences. Additionally, the Commission staff has provided training to agency leadership and to various boards and commissions that support agency work. The Commission staff has received very positive response to the training, which consists of a PowerPoint presentation, interactive lecture, and supplemental documents that provide resource material. Although the training commitments have placed a significant burden on the Commission's staff, as each training session requires that at least one, and many times two, of the professional staff make the presentations, which causes a shortage of professional staff available in the office to respond to telephone and "other" inquiries in the office, the benefits of the training far outweigh the inconvenience to staff. Expanded training programs have resulted in a significant increase in the number of telephone and email requests for guidance from employees who have attended the sessions. What is significant is that the number and severity of enforcement matters has decreased due to closer contact and better communication with employees and public officials.

In accordance with § 15-205(e) of the Public Ethics Law, which mandates the Ethics Commission to provide a training course for regulated lobbyists and prospective regulated lobbyists at least twice each year, the Commission staff provided training to 213 lobbyists during calendar year 2005. A total of twelve training sessions were held on eight different days during the year.

Part of the Commission's public information activity involves distribution of lists of registered lobbyists and provision of assistance to persons inspecting various forms filed with the Commission. The Commission's staff distributes, through interagency mail, a special two-page summary of ethics requirements and other applicable memoranda to State agency managers. In order to ensure adequate public access to the Commission's

memoranda, the Commission staff posts them on our web site, <http://ethics.gov.state.md.us>, and provides them to agencies for distribution to their employees. On a limited basis, the Commission is also distributing another pamphlet covering ethics requirements for part-time members of State boards and commissions. The staff provides memoranda on lobbying laws relating to private colleges, lobbyist political activity, and a memorandum regarding adjustments to the procurement ethics provisions by request and on its web site. The Commission staff has also developed a special memorandum to advise potential new members of boards and commissions of the impact of the Ethics Law.

The Ethics Commission maintains a complete and up-to-date home page on the Internet. The home page directs users to the Annual Report, special explanatory memoranda, and a bi-monthly bulletin, downloadable forms for lobbying and State employees and Public Officials, the State vendor list, the Public Ethics Law and Formal Advisory Opinions. Another feature is an ethics question of the month, which answers hypothetical questions based on past Commission opinions. The Internet provides a cost effective mechanism for providing ethics information and training to those covered by the Ethics Law and public access to ethics information. The Commission is hopeful that it will eventually have sufficient funds to update its web software to include an interactive dialogue with users enabling it to respond to questions on-line, provide educational programming on-line, and allow users to navigate the site with more ease.

2005 legislation report

Senate Bill 150

On August 18, 2004, Commission staff sent Kenneth Masters, Chief Legislative Officer, a request to include in the Governor's Legislative Package an amendment to §15-602(d) of the Public Ethics Law that would permit the Commission to modify the format for disclosure information under § 15-607 so that we could accomplish our goal of electronic filing for financial disclosure statements. Senate Bill 150, sponsored by Chairman, Education, Health, and Environmental Affairs Committee, passed unanimously in both houses and was signed by the Governor on April 26, 2005 and enacted as chapter 127. The law adds to (d) of § 15-602 permitting the Commission to adopt regulations to modify the format for disclosure of information required under § 15-607. As of December 31, 2005, the regulations have been drafted, and they will be submitted to State Documents in 2006.

legislative recommendations

proposed changes to financial disclosure (subtitle 6) provisions

In the coming year, the Commission will continue to focus its attention on several of the financial disclosure provisions in subtitle 6 of the Public Ethics Law. Now that the State Ethics Commission has had 25 years of experience, it has had the opportunity to review the reporting requirements and recognize those areas, which appear to be the root of most conflicts, and those areas, which, since the Commission's inception, have not caused

any discernable problems. Additionally, the law in other areas has developed so there are additional retirements and deferred compensation plans that should be included in the exemption granted to 401K and 501K plans.

With electronic filing being implemented, the Commission has reviewed the filing requirements, and it has concluded that some discreet changes in requests for information would be helpful in simplifying the reporting requirements without jeopardizing the benefits of public disclosure.

- 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 other employees subject to the State Ethics Law.
- Disclosure of interests in all State deferred compensation plans should be added to the exemption now provided for those who have interests in 401 and 501 plans (§ 15- 102(t)(2)(iv)). The exemption is warranted as the State provides a discreet list of investments into which employees may invest, and there is no latitude for the employee to select investments other than those provided by the State.
- Consideration should be given to eliminating the need for reporting of investment in any mutual fund publicly traded on a national scale. The basis for the request is that the employee has no control over the trading of the individual holdings of the mutual fund, and, therefore, it is improbable that an employee could effectuate any change in value of the mutual fund by his or her official act as a State employee.
- Judicial candidates should be required to file financial disclosure in each year of their candidacy in the same way as other candidates for State office.

proposed changes to conflict of interest (subtitle 5) provisions

The Commission has also reviewed Subtitle 5, **Conflicts of Interest** and suggests Legislative consideration of the following issues:

- Specific provisions should address membership by public officials on boards or directors of private corporations having sensitive business or regulatory involvement with the State.
- The post-employment provisions (§ 15-504) should be revised to address more specifically the problems that are common to higher-level management positions.
- 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 should be extended to cover former officials and employees as to confidential information acquired during their State service.

proposed changes to local jurisdictions (subtitle 8) provisions

Subtitle 8 of the Public Ethics Law, which address local jurisdictions and boards of education, is also a priority. The Commission is looking at the following issues:

- The provisions covering school board ethics regulations need strengthening to assure that there are adequate sanctions for violations by board members, candidates for board membership and lobbyists.
- Subsequent to the issuance of *Seipp v. Baltimore City Board of Elections, et al*, 377 Md. 362, 833 A.2d 551 (2003), which interpreted sections of subtitle 8 of the Public Ethics Law and determined the degree to which local jurisdiction ethics ordinances must be similar to the Public Ethics Law, the Commission seeks to replace the language requiring that the local ordinance language be similar or substantially similar to the Public Ethics Law with language requiring that the Commission's review of local ordinances be in accordance to law.

proposed changes to lobbying (subtitle 7) provisions

The Commission also supports and would seek an amendment to the lobbying provisions of the Public Ethics Law (subtitle 7) with regard to two of the reporting requirements in the HB2 legislation of 2001:

- §15-708 should be revised in order to more correctly reflect lobbyist spending for legislative meals and receptions. As the requirement reads now, the process is cumbersome and may inadvertently inflate the actual amount spent on lobbying legislators. The provision causes significant confusion as to what costs should be reported and how the costs should be reported.
- §15-705 currently provides that regulated lobbyists must file a separate report disclosing the name of any State official of the Executive Branch or member of the immediate family of a State official of the Executive Branch who has benefited during the reporting period from gifts of meals or beverages from the regulated lobbyist, whether or not in connection with lobbying activities. The lobbyist must file this report accounting from Dollar One spent on a meal or beverage for an official of the Executive Branch or a member of the official's immediate family. This reporting requirement is difficult to administer and is not in keeping with other gift reporting requirements, which general require such a report only when the amount spent is \$20 or greater or \$100 cumulatively from one donor. This provision should be revised to require a report only when the amount spent is \$20 or greater or \$100 cumulatively from one donor.
- §15-703(e) currently sets a registration fee of \$50 per registration. The registration fee needs to be increased to \$70 per registration so that administration of the lobbying program can become more self-sustaining and less reliant on General Fund appropriations.

Proposed change to Enforcement SubTITLE 4) provisions

The Commission and 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 Commission proposes that the Legislature enable it to assess civil penalties in conflict of interest and other violations by State employees and public officials. The Commission may currently request a court of competent jurisdiction to assess fines of \$5,000 per violation, and it seeks the authority, on its own, to assess civil penalties in the amount of \$5,000 per violation. Having this authority would provide a formal alternative to expensive and extended court proceedings. This would give the Commission equal authority in setting sanctions on conflict of interest issues as it presently has with regard to lobbying violations. The Commission currently has the authority to assess civil penalties up to \$10,000 for lobbying violations. All penalties assess by the court or by the Commission go to the General Fund.

APPENDIX A

EMPLOYER SPENDING \$50,000 OR MORE - ALL REGISTRANTS ALL TYPES OF EXPENSES

November 1, 2004 • October 31, 2005

<u>\$ AMOUNT</u>	<u>EMPLOYER</u>
1. 603,950.60	Maryland Hospital Association.
2. 543,165.91	MedChi, The Maryland State Medical Society
3. 481,259.07	Medical Mutual Liability Insurance Society of Maryland
4. 443,941.64	Maryland Association of Realtors
5. 403,257.31	Verizon Maryland, Inc.
6. 370,582.56	Pepco Holdings, Inc.
7. 356,642.00	Maryland Zoo in Baltimore, The
8. 356,236.19	Johns Hopkins Institutions
9. 347,119.50	CareFirst Blue Cross Blue Shield
10. 318,309.37	Maryland Jockey Club of Baltimore City/Pimlico Race Track
11. 304,031.53	Maryland Retailers Association
12. 299,761.28	Laurel Racing Association, Inc.
13. 292,275.87	Maryland State Teachers Association

14.	264,031.30	Peterson Companies, The
15.	251,804.32	Washington Area New Automobile Dealers Association
16.	249,794.00	Gaylord Entertainment
17.	241,674.67	Maryland Bankers Association
18.	241,454.29	Maryland Trial Lawyers Association
19.	241,343.24	Ocean Downs Racetrack/Allegany Racing Association
20.	240,220.72	Adventist Healthcare, Inc.
21.	233,790.72	Mirant Mid-Atlantic, LLC
22.	222,370.52	MedStar Health
23.	220,415.80	Amerigroup Maryland, Inc.
24.	213,356.00	MAMSI/United Healthcare
25.	212,538.82	Lifebridge Health
26.	206,000.00	Prince George's County Government
27.	204,614.31	Greenbelt Metro Park, LLC
28.	195,560.68	Association of Maryland Pilots
29.	191,906.00	Maryland Thoroughbred Horsemen's Association
30.	181,239.00	Maryland Chamber of Commerce
31.	178,200.00	Law Offices of Peter G. Angelos
32.	176,662.60	Norfolk Southern Corporation
33.	175,345.15	Technology Council of Maryland
34.	166,626.00	AARP Maryland
35.	162,330.00	Comcast Cable Communications
36.	157,817.00	League of Life and Health Insurers of Maryland
37.	157,448.92	Alliance of Automobile Manufacturers
38.	155,359.03	Service Employees International Union, Maryland DC Council
39.	155,049.00	Maryland Independent College & University Association
40.	146,635.81	Children's National Medical Center
41.	144,685.00	Votehere, Inc.
42.	141,998.15	Maryland Automobile Dealers Association
43.	141,000.00	Maryland State Builders Association
44.	140,224.00	United Way of Central Maryland
45.	134,882.80	Dimensions Health Corporation

46.	134,499.88	Baltimore Jewish Council
47.	134,475.00	Lyondell Chemicals
48.	133,224.00	Maryland State Bar Association
49.	126,961.53	ACS State & Local Solutions
50.	126,427.58	Schaller Anderson of Maryland LLC
51.	124,538.92	Luk Flats, LLC
52.	123,251.85	Constellation Energy Group, Inc.
53.	120,200.00	Oberthur Gaming Technologies, Inc.
54.	120,150.00	Multimedia Games, Inc.
55.	119,761.26	State Farm Insurance Companies
56.	117,613.14	Health Facilities Association of Maryland
57.	116,074.44	Cloverleaf Standardbred Owners Association
58.	114,920.99	Restaurant Association of Maryland, Inc.
59.	108,674.03	Apartment & Office Building Assn. of Metro Washington
60.	108,416.61	MCI
61.	107,333.67	MidAtlantic Lifespan
62.	106,913.62	Property Casualty Insurers Association of America
63.	102,471.75	Scientific Games International
64.	102,447.10	American Petroleum Institute
65.	101,613.35	Equality Maryland, Inc.
66.	100,022.56	Chesapeake Bay Foundation
67.	98,282.00	Northrop Grumman Corporation
68.	97,505.37	Montgomery County Chamber of Commerce
69.	97,000.00	Greater Washington Board of Trade
70.	96,000.00	American Minority Contractors & Business Association
71.	95,669.68	Cable Telecommunications Association of MD, DE & DC
72.	94,103.13	Pharmaceutical Research & Manufacturers of America
73.	92,116.00	American Heart Association
74.	90,621.75	IGT
75.	90,200.00	OSI, Inc. (Outback Steakhouse, Inc.)
76.	90,000.00	Policy Studies, Inc.
77.	89,020.40	Maryland Association of Boards of Education

78.	88,811.39	Maryland Catholic Conference
79.	87,576.06	Maryland Community Health System, LLP
80.	86,264.00	Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc.
81.	85,649.08	Reliant Energy, Inc.
82.	85,000.00	Evercare
83.	84,050.00	Americhoice Health Services, Inc.
84.	84,000.00	Manufacturers' Alliance of Maryland
85.	81,947.00	Clark Enterprises, Inc.
86.	81,697.39	General Growth Properties, Inc.
87.	81,162.04	Maryland Farm Bureau, Inc.
88.	80,132.16	Greater Capital Area Association of Realtors
89.	80,000.00	AARP
90.	80,000.00	Lorillard Tobacco Company
91.	80,000.00	Alcoa Eastalco Works
92.	79,725.50	Suburban Hospital
93.	79,550.93	Friends of the Family, Inc.
94.	78,672.20	Prison Health Services, Inc.
95.	78,465.00	Maryland State Dental Association
96.	78,400.00	Rite Aid Corporation
97.	77,687.72	GTECH Corporation
98.	76,395.30	Maryland State and DC AFL-CIO
99.	76,274.00	Greater Washington Commercial Association of Realtors
100.	75,000.00	Prince George's County Council
101.	75,000.00	Deloitte Consulting
102.	74,737.18	Cloverleaf Enterprises, Inc.
103.	74,593.07	General Motors Corporation
104.	72,685.00	St. Agnes Healthcare
105.	72,222.06	Planned Parenthood of Metropolitan Washington
106.	72,000.00	BAA USA
107.	72,000.00	Walmart Stores, Inc.
108.	71,379.66	Correctional Medical Services
109.	71,200.00	Valley Proteins Inc.

110.	70,650.00CH2M Hill
111.	69,590.00Maryland Taxicab, Sedan & Paratransit
112.	67,878.49Maryland Horse Breeders Association
113.	67,741.36Mid-Atlantic Petroleum Distributors Association
114.	67,137.26ESP, Inc.
115.	67,100.00Microsoft Corporation
116.	66,092.09Maryland Tort Reform Coalition
117.	66,084.93NEXTEL Communications
118.	65,500.00Diebold Election Systems
119.	65,390.74UST Public Affairs, Inc.
120.	65,251.38National Federation of Independent Business
121.	65,220.48Kraft Foods North America, Inc.
122.	65,022.64Mental Health Association of Maryland
123.	64,989.20Government Affairs-Maryland
124.	64,470.93Phillip Morris, USA
125.	64,437.32CGI-AMS
126.	64,200.00Washington Metropolitan Area Transit Authority (WMATA)
127.	63,993.00Sempra Generation
128.	63,681.53Maryland Optometric Association
129.	63,397.76Nationwide Insurance Company
130.	62,883.20Cingular Wireless
131.	62,253.06St. Joseph Medical Center
132.	61,905.06Concentra Medical Centers
133.	61,825.38Variable Annuity Life Insurance Company, The (VALIC)
134.	61,661.24Chimes, The
135.	61,592.76Blind Industries & Services of Maryland
136.	61,537.78MBNA America
137.	61,189.48American Cancer Society
138.	60,715.35M-Real USA Corporation
139.	60,621.75Accenture
140.	60,537.70Maryland Citizens Health Initiative, Inc.
141.	60,456.39MV Transportation, Inc.

142.	60,277.10	GBMC Healthcare, Inc.
143.	60,250.00	Leucadia International Corporation
144.	60,246.59	R. J. Reynolds Tobacco Company
145.	60,050.00	Page & Associates
146.	60,000.00	Duke Energy North America
147.	60,000.00	National Funeral Directors Association
148.	59,800.00	Maryland Insurance Council
149.	59,669.86	Medco Health Solutions
150.	59,640.52	University of Phoenix
151.	58,933.34	Alternative Medicine Integration of Maryland LLC
152.	58,779.72	Columbia Gas of Maryland, Inc.
153.	58,483.34	Delaware North Companies
154.	57,912.00	Discovery Communications, Inc.
155.	57,000.00	American Insurance Association
156.	55,767.87	Smart & Associates, LLP
157.	55,600.00	Progressive Maryland
158.	55,500.00	Caremark
159.	55,430.32	Dominion Resources Services, Inc.
160.	55,000.00	Altria Corporate Services
161.	55,000.00	American Chemistry Council
162.	54,936.57	Maryland Association of Mortgage Brokers
163.	54,818.00	Lockheed Martin Corporation
164.	54,000.00	UFCW Local 27
165.	53,865.00	CSX Corporation
166.	53,249.73	Sunoco, Inc.
167.	53,142.64	T-Mobile USA, Inc.
168.	52,920.00	Yellow Transportation
169.	52,617.58	SCI Atlantic Region
170.	52,550.00	EPIC Pharmacies, Inc.
171.	52,469.72	U. S. Wind Force, LLC
172.	52,400.00	College of American Pathologists
173.	52,398.78	Motion Picture Association of America

174.	52,236.34	ACLU of Maryland (America Civil Liberties Union)
175.	52,224.00	Washington Gas
176.	52,200.00	Fraternal Order of Police Maryland State Lodge
177.	52,185.38	Advocates for Children & Youth, Inc.
178.	52,182.01	Dreyers Grand Ice Cream Inc. and Nestle Ice Cream Co. LLC
179.	52,050.00	Dental Network, The
180.	52,013.60	WMDA Service Station and Automotive Repair Association
181.	52,000.00	Penn National Gaming, Inc.
182.	51,539.00	MaryPirg Citizen Lobby
183.	51,492.00	AFSCME Council 92
184.	51,463.43	Abbott Laboratories
185.	51,329.60	Baltimore Building & Construction Trades Council, AFL-CIO
186.	51,206.52	Drug Policy Alliance
187.	50,851.51	AFSCME AFL-CIO
188.	50,563.77	Maryland State Licensed Beverage Association
189.	50,523.46	Organization for International Investment
190.	50,500.00	ARINC
191.	50,207.89	HSBC-GR Corp. (Formerly Household Financial Group, LTD)
192.	50,149.92	Maryland Works, Inc.
193.	50,000.00	Maryland Association of Chain Drug Stores
194.	50,000.00	MD/DC/DE Broadcasters Association, Inc.

APPENDIX B

LOBBYISTS RECEIVING \$50,000 OR MORE IN COMPENSATION ONE OR MORE EMPLOYERS

November 1, 2004 • October 31, 2005

	<u>\$ Amount</u>	
1.	1,018,784.73	Alexander, Gary R.
2.	892,584.00	Enten, D. Robert
3.	890,690.52	Rozner, Joel D.

4. 807,005.00Rifkin, Alan M.
5. 806,488.19Stierhoff, John R.
6. 709,758.33Pitcher, J. William
7. 638,514.97Johansen, Michael V.
8. 625,546.00Rasmussen, Dennis
9. 595,470.00Bereano, Bruce C.
10. 574,841.62Shaivitz, Robin F.
11. 554,564.92Cowen, Lee
12. 554,250.00Manis, Nicholas G.
13. 518,250.05Taylor, Casper
14. 464,400.00Evans Gerard E.
15. 455,726.40Burrige, Carolyn T.
16. 448,234.37Popham, Bryson F.
17. 400,354.50McCoy, Dennis C.
18. 394,000.20Schwartz, Joseph A., III
19. 363,843.00Hoffman, Barbara
20. 359,997.76Collins, Carville B.
21. 326,453.50Arrington,Michael
22. 318,924.96Lamb, Todd
23. 311,708.83Tiburzi, Paul A.
24. 289,791.68Ornstein, Chantel
25. 282,816.21Doherty, Daniel T., Jr.
26. 262,303.00Miedusiewski, American Joe
27. 231,500.00Boston, Frank
28. 226,832.80Kasemeyer, Pamela M.
29. 226,262.50Funk, David
30. 207,288.23Brocato, Barbara Marx
31. 204,000.00Genn, Gilbert J.
32. 199,375.00Levitan, Laurence
33. 197,200.00Battle, J. Kenneth Jr.
34. 189,165.00Andryszak, John A.
35. 187,817.00Rivkin, Deborah R.
36. 185,064.00Burner, Gene L.
37. 174,750.00Manis, George N.
38. 167,500.00Carter, W. Minor
39. 157,403.50Binderman,Mindy Koplan
40. 157,350.00Carroll, David H., Jr.
41. 157,350.00Johnson, Robert C.
42. 154,280.00Goldstein, Franklin
43. 152,420.00Gally, Eric
44. 152,000.00Canning, Michael F.

45.	149,451.25	Hanna, Tiffany
46.	148,000.00	Harris-Jones, Lisa M.
47.	144,685.00	Moffett, Anthony
48.	142,000.00	Proctor, Gregory S.
49.	140,664.00	Valentino-Benitez, Ellen
50.	140,000.00	Pica, John A. Jr.
51.	140,000.00	Hill, Denise
52.	139,806.49	McDonough, John P.
53.	137,800.00	Looney, Sean M.
54.	136,061.38	Iacobazzi, Catherine F.
55.	133,208.00	Harting, Marta D.
56.	128,050.00	Miles, William R.
57.	123,000.00	Albert, David G.
58.	122,000.00	DiPietro, Christopher V.
59.	121,400.00	Lanier, Ivan
60.	117,120.20	Wilkins, Barbara J.
61.	115,150.00	Sidh, Sushant
62.	115,000.00	Loughran, Kathleen
63.	113,040.00	Gisriel, Michael U.
64.	112,548.00	Weisel, Meredith R.
65.	106,300.00	Muir, Scott
66.	106,000.00	Wise, J. Steven
67.	104,894.00	Waranch, Nan Arlene
68.	102,518.50	Ciekot, Ann T.
69.	100,995.27	Wood, Paul G.
70.	100,000.00	Townsend, Pegeen
71.	98,998.00	Montgomery, Richard A., III
72.	91,000.00	Rehrmann, Eileen
73.	90,650.00	Johnson, Deron A.
74.	89,585.00	Roddy, Patrick
75.	87,330.82	Winstead, David L.
76.	86,721.60	Hoover, Lesa Noblitt
77.	86,500.00	Murphy, Don
78.	83,000.00	Jepson, Robert
79.	81,504.15	Antoun, Mary
80.	80,000.00	Matricciani, Denise M.
81.	80,000.00	McDougall, Cathy
82.	80,000.00	Nathanson, Martha Dale
83.	78,320.00	Wyatt, Joseph Richard
84.	78,200.00	Doolan, Devin John
85.	77,858.57	Murphy, Kathleen M.

86.	76,000.00	McHugh, Kathleen L.
87.	75,000.00	Lucchi, Leonard L.
88.	74,415.00	Bryant, Eric Lee
89.	72,998.00	Thompson, Melvin R.
90.	71,832.00	Kaufman, M. James
91.	71,800.00	Cohen, Harold A.
92.	71,500.00	Opara, Clay C.
93.	71,395.00	Neil, John B.
94.	71,298.00	Saquella, Thomas S.
95.	69,207.00	Levitan, Susan T.
96.	69,081.05	Zellmer, Jeffrie
97.	68,200.00	Kauffman, Danna Lubrani
98.	68,014.89	Richardson, Lawrence A., Jr.
99.	66,700.00	Larsen, Steven B.
100.	66,271.00	Doherty, Frances
101.	65,700.00	Woolums, John R.
102.	64,636.80	Powell, Michael C.
103.	64,563.85	Cobbs, Drew P.
104.	63,500.00	Neily, Alice J.
105.	62,460.00	Douglas, Robert C.
106.	60,000.00	Creighton, Nancy
107.	60,000.00	DeFrancis, Joseph A.
108.	60,000.00	Lawrence, Edgar (Larry)
109.	60,000.00	Ranier, Edward M.
110.	59,949.00	Yewell, Therese
111.	55,858.00	Bjarekull, Tina M.
112.	55,000.00	Flowers, Willie
113.	54,000.00	Counihan, Gene W.
114.	54,000.00	Dunphy, David D.
115.	54,000.00	Fedder, Michaeline R.
116.	53,933.70	Mickens, Randal L.
117.	53,793.75	Maloney, Amy E.
118.	53,550.00	Ray, Kelley
119.	52,875.00	Sammis, Elizabeth P.
120.	51,500.00	Doyle, James J., Jr.
121.	50,850.00	Conn, David
122.	50,388.16	Mitchell, Susan N.
123.	50,000.00	Pierson, Calvin M.
124.	50,000.00	Robbins, Earl H., Jr.
125.	50,000.00	Sokolowski, Paul
126.	50,000.00	Todd, Greta

APPENDIX C**EXPENDITURES ON SPECIAL EVENTS**

November 1, 2004 – October 31, 2005

Group Invited	Number of Times Invited	TOTAL
All General Assembly	102	\$1,296,617.20
Anne Arundel County Delegation	6	44,200.92
Baltimore City Delegation	6	10,104.24
Baltimore County Delegation	9	17,324.58
Carroll County Delegation	3	2,615.31
Harford County Delegation	2	888.23
Howard County Delegation	7	74,659.28
Lower Eastern Shore Delegation	6	1,426.71
Montgomery County Delegation	20	246,743.39
Prince George's County Delegation	21	209,080.15
Southern Maryland Delegation	5	43,875.86
Upper Eastern Shore Delegation	7	1,537.27
Western Maryland Delegation	4	45,213.18

HOUSE

Appropriations	11	26,482.51
Health & Government Operations	20	42,611.23
Economic Matters	19	44,433.75
Environmental Matters	14	18,482.70
Judiciary	12	27,207.19
Ways and Means	11	30,781.34

SENATE

Budget and Taxation	14	31,366.20
Education, Health & Environ. Affairs	18	19,837.50
Finance	25	36,950.05
Judicial Proceedings	12	29,053.93

TOTAL: \$2,301,492.72

(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

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LOBBYING FIRMS EARNING \$1,000,000 OR MORE

November 1, 2004 – October 31, 2005

Name of Firm

Compensation Reported

Rifkin, Livingston, Levitan & Silver, LLC	\$2,735,585.49
Alexander & Cleaver, P.A.	2,704,518.08
Funk & Bolton, P.A.	2,047,918.31
Chesapeake Government Relations	1,009,551.26