

2023
CY

Ethics Program Annual Report

January 1, 2023 - December 31, 2023
Submitted by WSSC Water's Board of Ethics





Washington Suburban Sanitary Commission Annual Ethics Program Report Calendar Year 2023 (January 1, 2023 – December 31, 2023)

Overview

This report covers conflicts of interest matters brought before the Washington Suburban Sanitary Commission (“WSSC Water”) Board of Ethics, filed financial disclosures statements, and reported lobbying activities occurring during Calendar Year 2023 (“CY 2023”). 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 Regulations Chapters 1.15.230 – 1.15.240 and 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, 2023 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 (“Code”), 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 and two (2) special meetings in 2023 to address matters within its purview including, but not limited to:

- ◆ Ten (10) Complaints;
- ◆ One (1) Advisory Opinion request;
- ◆ Two (2) Waiver Requests
- ◆ 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 2023.

Case of Note

On June 14, 2022, the Board found that Respondent Stacey Chisholm had violated Code Chapters 1.70.020(a) and 1.70.200(a) in WSSC Board Complaint # C-20-07A. The Respondent requested the Circuit Court for Prince George’s County, Maryland (Case no. CAL22-19909) review the Board’s finding pursuant to Code Chapter 1.70.100. The Circuit Court affirmed the Board’s decision and dismissed the judicial review request in an opinion and order dated December 21, 2023.

Both the Board and the Circuit Court opinions are available on the Board’s webpage at <https://www.wsscwater.com/who-we-are/board-ethics/ethics-opinions>.

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).

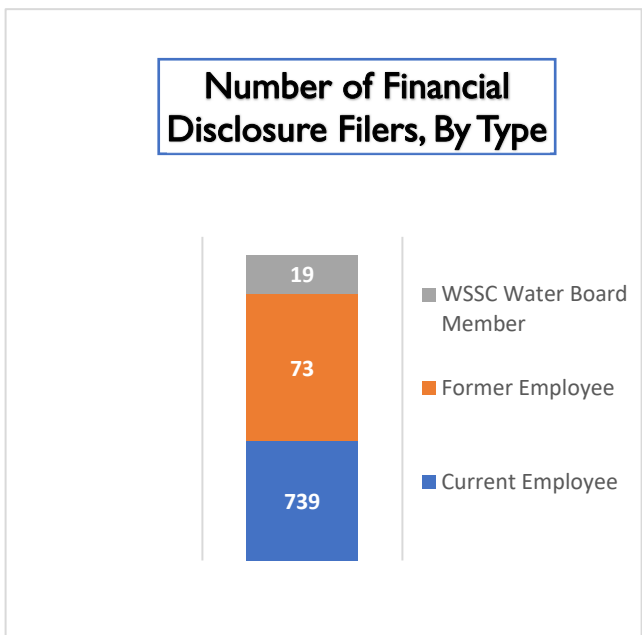
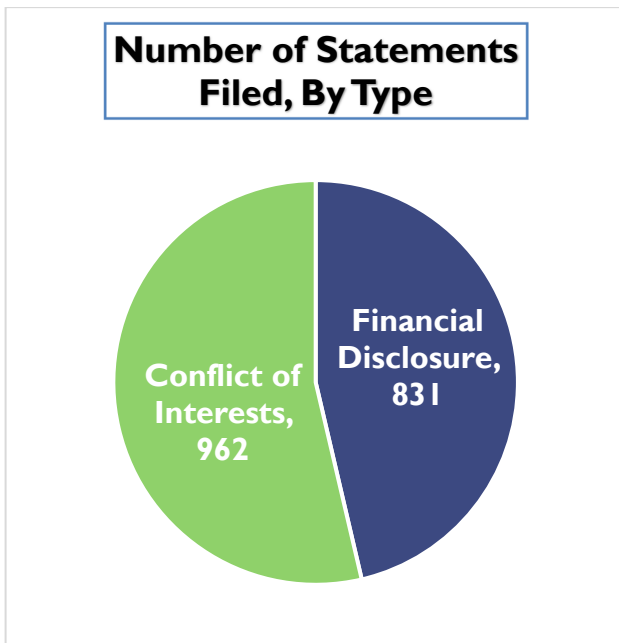
Appendix B summarizes the lobbyist expenditures reported to WSSC Water for CY 2023.

Financial Disclosure and Conflict of Interest Statements

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

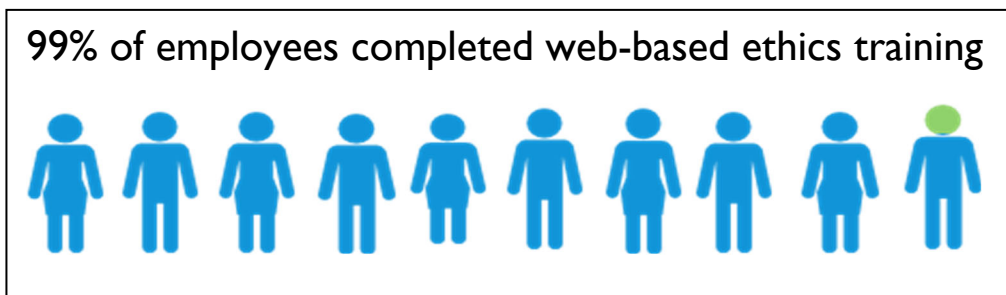
Code Ch. 1.70.330 designates who must file financial disclosure statements annually. Additionally, Code Ch. 1.70.230 states that employees who are not required to file a financial disclosure statement must annually file a conflict of interest statement. In CY 2023, the Ethics Office received a total of 1,793 annual disclosure statements from all filers.

The charts below provide detail regarding the annual disclosure filings.



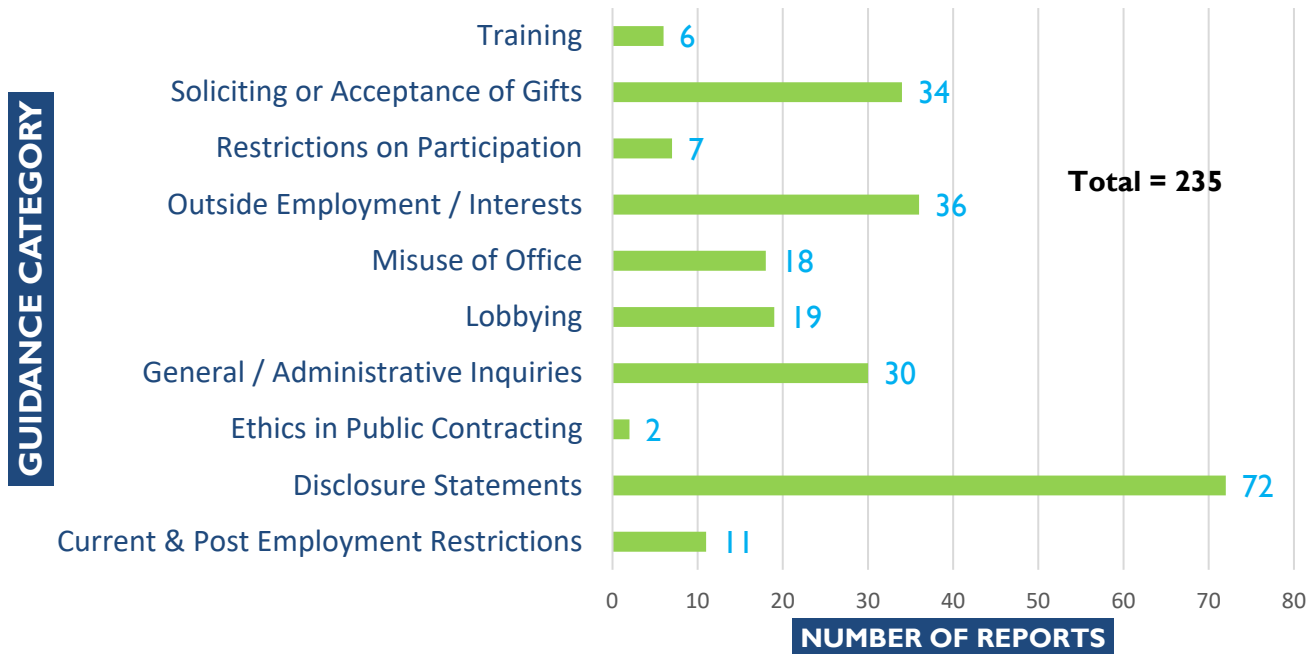
Additional CY 2023 Ethics Program Highlights

- ◆ 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, 1631 WSSC Water employees completed the CY 2023 web-based training by December 31, 2023.



- ◆ In conjunction with Human Resources, the Ethics Officer presented live ethics training to 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 235 ethics inquiries. The chart below contains a breakdown of the topics covered.

CY 2023 ETHICS OFFICE GUIDANCE CATEGORIES



APPENDICES

Appendix A: Case Summaries

Appendix B: Lobbyist Expenditures

CY 2023
WSSC BOARD OF ETHICS MATTERS

ADVISORY OPINION REQUESTS

Matter No.	Matter Summary	WSSC Code of Ethics Provision(s) Referenced	Resolution/Status
A-23-01	An employee requested that she/he not be required to provide home address on the annual financial disclosure statement due to safety reasons.	1.70.350	Board permitted the request; Advisory Opinion # A-23-01 cross published on the Board of Ethics website as Waiver Request # W-23-01.

**CY 2023
WSSC BOARD OF ETHICS MATTERS**

COMPLAINTS

Matter No.	Matter Summary	WSSC Code of Ethics Provision(s) Referenced	Resolution/Status
C-22-08	An employee was alleged to have been working a second job during their WSSC Water work shift.	1.70.180(a)	Complaint dismissed as moot.
C-22-11	An employee was alleged to have used information obtain from his/her WSSC Water position to help a regulated plumbing company obtain private business.	1.70.200(a)	Complaint dismissed due to the Board's determination that the evidence did not merit further proceedings.
C-23-01	An employee was alleged to have released confidential information.	1.70.110 and 1.70.210	Pending.
C-23-02	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-23-03	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-23-04	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-23-05	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.

CY 2023
WSSC BOARD OF ETHICS MATTERS

COMPLAINTS

Matter No.	Matter Summary	WSSC Code of Ethics Provision(s) Referenced	Resolution/Status
C-23-06	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-23-07	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-23-08	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.

CY 2023
WSSC BOARD OF ETHICS MATTERS

WAIVER REQUESTS

Matter No.	Matter Summary	WSSC Code of Ethics Provision(s) Referenced	Resolution/Status
W-23-01	An employee requested that she/he not be required to provide current home address on the annual financial disclosure statement due to safety reasons.	1.70.350	Board granted the request; Waiver Request Opinion # W-23-01 cross published as Advisory Opinion # A-23-01.
W-23-02	An employee sought a waiver of the restriction on having, through his/her spouse, a financial interest in a business regulated by WSSC.	1.70.180(b)(1)	Board granted the request with stipulations; Waiver Request Opinion # W-23-02 published on the Board of Ethics website.

CY 2023 WSSC LOBBYIST ACTIVITY REPORT

LOBBYIST	COMPANY	DATE OF REGISTRATION	REPORTING PERIOD		Total
			01/01/23 thru 06/30/23	07/01/23 thru 12/31/23	
Brian Anleu	Apartment and Office Building Association of Metropolitan Washington	01/06/23	\$0.00	\$0.00	\$0.00
Ryan Washington	Apartment and Office Building Association of Metropolitan Washington	01/31/22	\$0.00	\$0.00	\$0.00
Brad Frome	CCE, Inc (Cafritz)	02/21/20	\$15,000.00	\$15,000.00	\$30,000.00
Justin Ross	CCE, Inc (Cafritz)	02/21/20	\$15,000.00	\$15,000.00	\$30,000.00
Michael Arrington	SAC Incorporated	03/02/23	\$10,000.00	\$0.00*	\$10,000.00
Steven Silverman	Washington Property Company	11/14/23	N/A	\$0.00*	\$0.00
Total Compensation and Expenses			\$40,000.00	\$30,000.00	\$70,000.00

* Indicates no report received

Appendix B
CY 2023 WSSC Board of Ethics Annual Report
Submitted on March 29, 2024

