

CY
2024



Ethics Program Annual Report

January 1, 2024 - December 31, 2024
Submitted by
Angelique Dorsey White, Esq.
Ethics Officer

MESSAGE FROM THE ETHICS OFFICER

Angelique Dorsey White, Esq.



In conjunction with the Board of Ethics (BOE), I appreciate this opportunity to provide the Calendar Year (CY) 2024 Annual Ethics Program Report on the Ethics for the Washington Suburban Sanitary Commission. Each year, this report allows us to demonstrate how WSSC Water is putting its commitment to operating with integrity into action.

This year, the Ethics Office promoted employee, customer, and stakeholder trust in WSSC Water by providing guidance on 225 matters. The support of the Ethics Office ensured BOE meetings complied with the Open Meetings Act and that regulatory procedures were followed for the 33 matters it considered. In collaboration with the Human Resources Office, the Ethics Office fostered a culture of integrity by delivering training to 296 new and 1,719 existing employees.

It is my honor to serve the 1.9 million residents of Montgomery County and Prince George's County by helping WSSC Water achieve its Smart One Water Mission of "ensure[ing] all communities thrive by **ethically** delivering safe, reliable and sustainable water and wastewater services."

Yours in service,

A handwritten signature in blue ink that reads "Angelique Dorsey White".

Angelique Dorsey White, Esq.
Ethics Officer

Washington Suburban Sanitary Commission Annual Ethics Report Calendar Year 2024

Overview

This report covers conflicts of interest matters, filed financial disclosures statements, and reported lobbying activities occurring during Calendar Year 2024 (“CY 2024”) at Washington Suburban Sanitary Commission (“WSSC Water”). 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 1.70.140.

Board of Ethics

The WSSC Water Commissioners have appointed an independent Board of Ethics to assist the agency in maintaining the highest professional and ethical standards. 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 not employees, but are customers who live within the WSSC Water sanitary district. The Board members, with their county of residence, as of December 31, 2024, were:

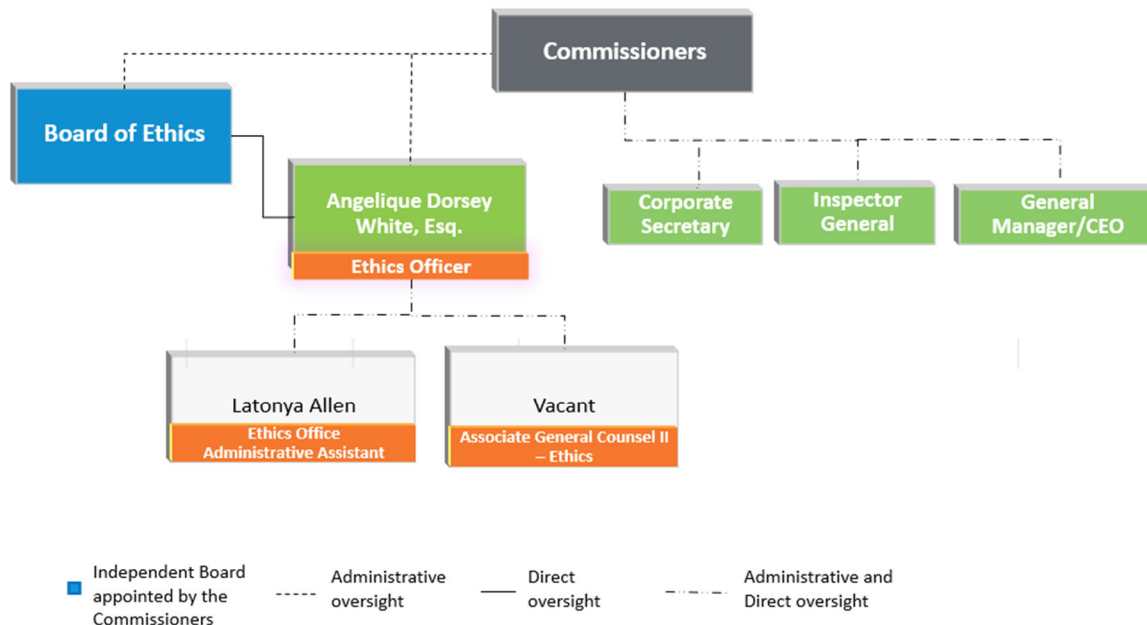
Mr. George Pruden, II – Chair (Prince George’s County),
Dr. Steven Hausman (Montgomery County),
Mr. Jeffrey Hysen (Montgomery County), and
Ms. Chandria Slaughter – Alternate (Prince George’s County).

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 and 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 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 website.

Ethics Office and Chief Ethics Officer

Effective September 2, 2024, the Commissioners reorganized the Ethics Office as an independent department of WSSC Water. With this action, the Ethics Officer became an administrative report to the Commissioners, while remaining a direct report of the Board of Ethics. This places the ethics program within the governance function and outside of the operations, as evidenced by the following organizational chart.

WSSC WATER'S ETHICS OFFICE ORGANIZATIONAL CHART



The Commissioners have delegated to Ethics Officer Angelique Dorsey White, Esq. the responsibility for directing the day-to-day ethics program for WSSC Water. This includes promoting ethical standards, ethics-related training, ethics program compliance, responding to potential ethical violations, and preparation of this report. Additionally, an Associate General Counsel II position has been created specifically for the Ethics Office. This new position will focus on investigations and program compliance. Administrative support is provided by Latonya Allen.

Board of Ethics Meeting Activities

The Board conducted twelve (12) regular meetings in 2024 to address matters within its purview including, but not limited to,:

- ◆ Nine (9) Complaints;
- ◆ One (1) Advisory Opinion Request;
- ◆ Two (2) Waiver Requests;
- ◆ Considered twenty-one (21) potential, or informal, complaints to determine whether to pursue a formal complaint;
- ◆ Collaborated with the Office of Inspector General to resolve three (3) Fraud, Waste, and Abuse Hotline cases (OIG #294, #329, and #330);
- ◆ Annual disclosure statement filings; and
- ◆ Lobbyists activities.

Appendix A summarizes the formal Complaints, Advisory Opinion Requests, and Waiver Requests considered in CY 2024.

Lobbyists 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).

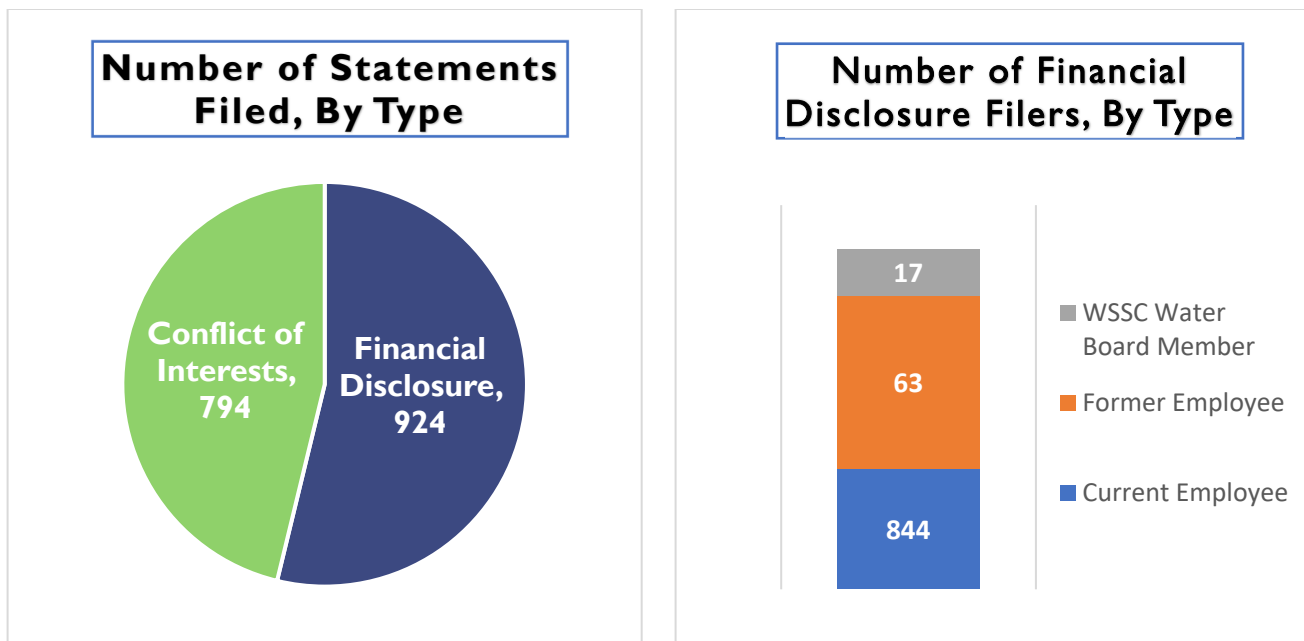
Appendix B summarizes the lobbyist expenditures reported to WSSC Water for CY 2024.

Financial Disclosure and Conflict of Interest Statements

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

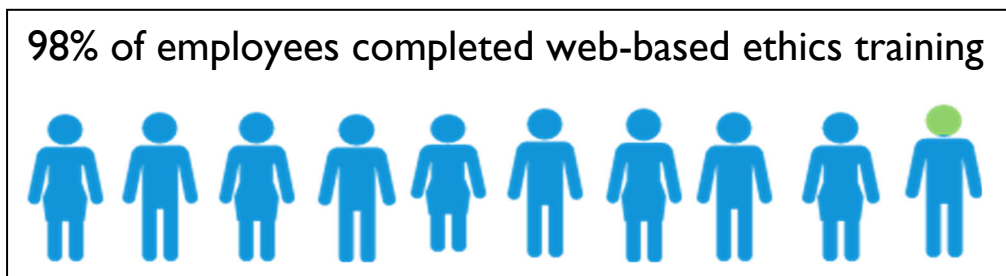
Code Ch. 1.70.330 designates who must file financial disclosure statements annually. Additionally, Code Ch. 1.70.230 states that employees who are not required to file a financial disclosure statement must annually file a conflict of interest statement. In CY 2024, the Ethics Office received a total of 1,718 annual disclosure statements from all filers.

The charts below provide detail regarding the annual disclosure filings.



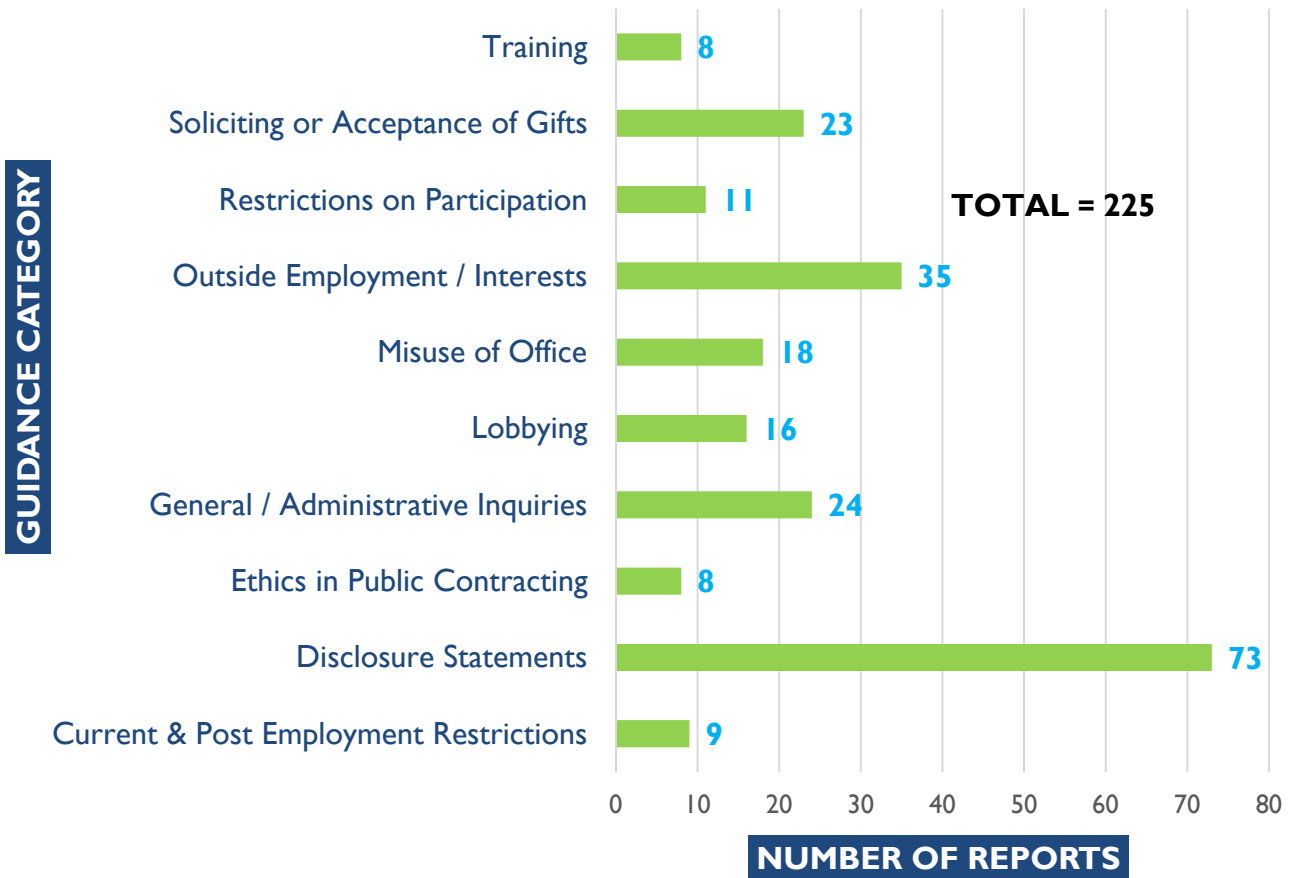
Additional CY 2024 Ethics Program Highlights

- ♦ The Ethics Officer presented quarterly Ethics Spotlight Reports on various ethics topics during the monthly public Commission meetings.
- ♦ 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, 1,719 WSSC Water employees completed the CY 2024 web-based training by December 31, 2024.



- ♦ In conjunction with Human Resources, the Ethics Officer presented twenty-six (26) live ethics training sessions to a total of 296 people during the onboarding process (239 new employees and 57 student interns).
- ♦ The Ethics Office, serving as the primary point of contact for all ethics concerns, provided informal advice on 225 ethics inquiries. The chart on the next page contains a breakdown of the topics covered.

CY 2024 ETHICS OFFICE GUIDANCE CATEGORIES



APPENDICES

Appendix A: Case Summaries

Appendix B: Lobbyists Expenditures

CY 2024
WSSC BOARD OF ETHICS MATTERS

ADVISORY OPINION REQUESTS

| Matter No. | Matter Summary | WSSC Code of Ethics Provision(s) Referenced | Resolution/Status |
|-------------------|---|--|--|
| A-24-01 | Procurement requested guidance for determining when work provided by a contractor on one phase of a project is is deemed to have assisted in drafting the bid specifications for a subsequent phase of the project, thereby precluding the contractor from bidding on that phase. | 1.70.270 | Board provided guidance; Advisory Opinion # A-24-01 published on the Board of Ethics website. |
| A-24-02 | Employee requested a waiver to provide plumbing services within the WSSC Sanitary District; after denial, published as an Advisory Opinion. | 1.70.180(b) | Board denied the request; Advisory Opinion # A-24-02 cross published on the Board of Ethics website as Waiver Request # W-24-02. |

CY 2024
WSSC BOARD OF ETHICS MATTERS

COMPLAINTS

| Matter No. | Matter Summary | WSSC Code of Ethics Provision(s) Referenced | Resolution/Status |
|-------------------|--|--|---|
| C-23-01 | A WSSC employee was alleged to have released confidential information. | 1.70.110 and 1.70.210 | Violation found; Complaint # C-23-01 published on the Board of Ethics website. |
| C-24-01 | A lobbyist was alleged to have failed to submit the required Lobbyist Activity Report for the July - December 2023 reporting period. | 1.70.420(a)(2) | Complaint dismissed after the respondent cured the alleged violation by filing the Lobbyist Activity Report. |
| C-24-02 | A lobbyist was alleged to have failed to submit the required Lobbyist Activity Report for the July - December 2023 reporting period. | 1.70.420(a)(2) | Complaint dismissed after the respondent cured the alleged violation by filing the Lobbyist Activity Report. |
| C-24-03 | 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-24-04 | 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-24-05 | 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. |
| C-24-06 | A WSSC employee was alleged to have provided contact information for a customer with a leak to an associate offering plumbing services. | 1.70.200(a) and (c) and 1.70.210 | Complaint dismissed after investigation due to the Board's determination that the evidence did not merit further proceedings. |

CY 2024
WSSC BOARD OF ETHICS MATTERS

COMPLAINTS

| Matter No. | Matter Summary | WSSC Code of Ethics Provision(s) Referenced | Resolution/Status |
|-------------------|---|--|---|
| C-24-07 | A WSSC employee was alleged to have used his/her position to influence WSSC decisions to benefit a former employer | 1.70.020 and 1.70.200(a) | Complaint dismissed after investigation due to the Board's determination that the evidence did not merit further proceedings. |
| C-24-08 | A WSSC employee was alleged to have provided contact information for a customer with a leak to an associate offering plumbing services. | 1.70.200(a) and (c) and 1.70.210 | Pending. |

CY 2024
WSSC BOARD OF ETHICS MATTERS

WAIVER REQUESTS

| Matter No. | Matter Summary | WSSC Code of Ethics Provision(s) Referenced | Resolution/Status |
|-------------------|---|--|--|
| W-24-01 | An employee requested a waiver to own and operate a restaurant, an entity regulated by WSSC, within the WSSC Sanitary District. | 1.70.180(b) | Board granted the request with stipulations; Waiver Request Opinion # W-24-01 published on the Board of Ethics website. |
| W-24-02 | Employee requested a waiver to provide plumbing services within the WSSC Sanitary District; after denial, published as an Advisory Opinion. | 1.70.180(b) | Board denied the request; Waiver Request # W-24-02 cross published on the Board of Ethics website as Advisory Opinion # A-24-02. |

CY 2024 WSSC LOBBYIST ACTIVITY REPORT

| LOBBYIST | COMPANY | DATE OF REGISTRATION | REPORTING PERIOD | | | TOTAL |
|---------------------------------|---|-------------------------|------------------------------|------------------------------|------------------------------|-------------|
| | | | 01/01/24 thru 06/30/24 | 07/01/24 thru 12/31/24 | 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 |
| Hugo Cantu [#] | Apartment and Office Building Association of Metropolitan Washington | 08/06/24 | \$0.00 | \$0.00 | | \$0.00 |
| Brad Frome | Calvin Cafritz Enterprises (Riverdale Park Station) | 02/21/20 | \$10,000.00 | \$22,500.00 | | \$32,500.00 |
| Justin Ross | Calvin Cafritz Enterprises (Riverdale Park Station) | 02/21/20 | \$10,000.00 | \$22,500.00 | | \$32,500.00 |
| Janelle Bruce [^] | Omega Supply Services, Inc | 05/23/24 | \$770.00 | \$2,835.00 | | \$3,605.00 |
| Steven Silverman [%] | Washington Property Company | 11/14/23 | \$1,000.00 | \$0.00 | | \$1,000.00 |
| Michael Arrington ⁺ | SAC Incorporated | 03/07/23 | \$0.00 | \$0.00 | \$15,000.00 | \$15,000.00 |
| Total Compensation and Expenses | | | \$21,770.00 | \$47,835.00 | \$15,000.00 | \$84,605.00 |

^{*} Termed 08/08/24

[#] Registered after Jan-Jun reporting period

[^] Termed 01/29/25

⁺ Submitted Jul-Dec 2023 in 2024; Ethics Office notified of term 05/02/24

[%] Termed 01/23/25

CONTACT US

Additional public information on the Ethics Office and the Board of Ethics is available on the WSSC Water website. We encourage anyone to contact the Ethics Office for guidance on the Code of Ethics or to report suspected ethics violations.

Website: <https://www.wsscwater.com/ethics>

Email: EthicsQuestions@wsscwater.com

FWA Hotline: 1-877-WSSC-FWA (1-877-977-2392)

FWA Online: www.reportlineweb.com/wssc

Mailing Address:
14501 Sweitzer Lane
Attn: Ethics Office
Laurel, MD 20707

