

**BEFORE THE  
WASHINGTON SUBURBAN SANITARY COMMISSION  
BOARD OF ETHICS**

COMPLAINT NO: 17-02

**SUMMARY OF SETTLEMENT AGREEMENT**

The WSSC Board of Ethics (the “Board”) received a complaint that a WSSC employee working as a claims agent (the “Employee”) solicited and received gifts and kickbacks from a WSSC contractor (the “Contractor”).

The Employee reviewed requests for payment made by the Contractor and managed the work of the Contractor.

An investigation conducted by counsel for the Board revealed:

- a. The Employee had the Contractor perform work on Employee’s home.
- b. The Employee did not promptly pay the Contractor for work performed on Employee’s home.
- c. The Employee failed to request and to obtain a waiver from the WSSC Board of Ethics before hiring Contractor to work on Employee’s home.
- d. The Employee failed to disclose that she had retained the services of Contractor on Employee’s annual financial disclosure statement.
- e. The Employee failed to disclose that she owed money to Contractor on her annual financial disclosure statement.

The Board found that Employee violated Section 3-1 of the WSSC Code of Ethics for hiring Contractor to work on her home because she was one of the WSSC employees responsible for managing the work performed by Contractor for WSSC. A WSSC employee may not have a direct

business relationship with someone who has contracted with WSSC and whose services for WSSC are managed in part by such employee.

The Board found that Employee violated Section 5-1 of the WSSC Code of Ethics for failing to disclose on her financial disclosure statement that she owed money to a WSSC Contractor who was managed in part by the Employee.

WSSC and the Employee agreed to a suspension without pay and to the inclusion, in her personnel file, of written documentation of her admitted violations of Sections 3-1 and 5-1 of the WSSC Code of Ethics.

The Employee agreed not to contract with or to retain the services of any contractor engaged in business with WSSC without first obtaining, in advance, the express written consent of her supervisor and the WSSC Ethics Office after first explaining to her supervisor and the WSSC Ethics Officer why she believes that hiring such a contractor will not violate Section 3-1 of the Code of Ethics, as may be from time to time amended.

At its January 11, 2018 meeting, the foregoing Summary of Settlement Agreement in the above-captioned Complaint for posting on the WSSC Board of Ethics internet page was approved by the Board by a vote of 3-0.