

GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ETHICS AND GOVERNMENT ACCOUNTABILITY



February 11, 2019

Honorable Charles Allen
Committee on the Judiciary and Public Safety
Council of the District of Columbia
1350 Pennsylvania Avenue, N.W., Suite 406
Washington, D.C. 20004

**RE: Board of Ethics and Government Accountability's
2019 Responses to the Performance Oversight Questions**

Dear Councilmember Allen:

Thank you for this opportunity to provide responses to the Performance Oversight Questions contained in the Committee on the Judiciary's correspondence dated January 15, 2019. The members of the Board and I look forward to providing testimony and answering these and any other questions you might have at the Hearing scheduled on February 19, 2019. The questions and answers are set forth below:

General Questions

1. Please provide a current organizational chart for the agency, including the number of vacant, frozen, and filled positions in each division or subdivision. Include the names and titles of all senior personnel, and note the date that the information was collected on the chart.

See EXHIBIT 1 - BEGA Organizational Chart.

- a. Please provide an explanation of the roles and responsibilities of each division and subdivision.

The Board of Ethics and Government Accountability (BEGA) is responsible for overseeing the Office of Government Ethics (OGE) and the Office of Open Government (OOG).

The Office of Government Ethics administers and enforces the District of Columbia Code of Conduct. More specifically, OGE investigates alleged violations of the Code of Conduct; adjudicates violations of the Code of Conduct; provides mandatory ethics training; issues rules and regulations governing the ethical conduct of

employees and public officials; oversees lobbyist registration and activity reporting; manages and oversees the financial disclosure filing requirements for District employees and officials; drafts an annual ethics Best Practices Report and an Ethics Manual; and provides for the anonymous and confidential receipt of information related to violations of the Code of Conduct or other information with regard to the administration or enforcement of the Code.

While OGE has no formal subdivisions, the office's staffing pattern was restructured during FY18 to create three distinct investigative teams, each consisting of one attorney and one investigator, who work with one another exclusively on their assigned cases.

The Office of Open Government (OOG) is a separate office under the Board of Ethics and Government Accountability. OOG's role is to advise and educate public bodies and the public regarding the Freedom of Information Act (FOIA) in an effort to ensure compliance with the requirements of FOIA. OOG's role regarding the Open Meetings Act is to enforce the provisions of the OMA and to advise and educate public bodies regarding the OMA to ensure compliance with the OMA. Specifically, OOG provides boards and commissions with formal and informal advice on compliance with the OMA. It investigates OMA complaints, and when necessary, issued to public bodies binding opinions on compliance. The OOG issues formal and informal advice to agencies on compliance with FOIA.

There are no subdivisions under OOG.

- b. Please provide a narrative explanation of any changes to the organizational chart made during the previous year.

OGE: Changes made to the organizational chart during the previous year are as follows: Board member Shomari Wade resigned from his position effective February 8, 2019. There are currently two vacant positions on the Board. Rochelle W. Ford started as Senior Attorney Advisor on October 29, 2018. The Senior Attorney Advisor position description was revised by the Board to ensure the Senior Attorney Advisor coordinates with the Directors of OGE and OOG on their respective programs and office operations, education and training requirements, and generally supports each Director in their efforts to achieve the goals and missions of their respective offices.

Director Wolfingbarger restructured OGE's staffing pattern by creating a third Investigator position, dividing the investigative staff into three distinct teams, each consisting of one attorney and one investigator, who work with one another exclusively on their assigned cases. OGE also modified the position description for its Auditor position and upgraded the role to a CS-13 position that more accurately reflects its day-to-day duties and responsibilities.

OOG had two changes to the organizational chart. Niquelle M. Allen is the new Director of OOG and began her tenure on July 9, 2018. The position of Information Technology Specialist became vacant on December 17, 2018, and OOG is currently screening candidates to fill the vacancy.

2. Please provide a current Schedule A for the agency which identifies each position by program and activity codes, with the employee's name, title/position, salary, fringe benefits, and length of time with the agency. Please note the date that the information was collected. The Schedule A should also indicate if the position is continuing/term/temporary/contract or if it is vacant or frozen. Please separate salary and fringe and indicate whether the position must be filled to comply with federal or local law.

See EXHIBIT 2 - BEGA Schedule A.

3. Please list all employees detailed to or from your agency. For each employee identified, please provide the name of the agency the employee is detailed to or from, the reason for the detail, the date of the detail, and the employee's projected date of return.

There have been no details.

4. Please provide the Committee with:
 - a. A list of all vehicles owned, leased, or otherwise used by the agency and to whom the vehicle is assigned, as well as a description of all vehicle collisions involving the agency's vehicles in FY18 and FY19, to date;

The Agency has no leased or owned vehicles. The Agency participates in the Fleet Share program under the Department of Public Works. Since FY18 to-date, Ronald Cook, Sr., Ileana Corrales, Ashley Cooks, Asia Stewart-Mitchell, and Sonya King are authorized drivers. There have been no vehicular accidents involving BEGA's use of government vehicles.

- b. A list of travel expenses, arranged by employee for FY18 and FY19, to date, including the justification for travel.

See EXHIBIT 3 - BEGA FY18 and FY19 Travel Report.

5. For FY18 and FY19, to date, please list all intra-District transfers to or from the agency and the purpose for each transfer.

See EXHIBIT 4 – BEGA FY18 and FY19 intra-District Transfers.

6. For FY18 and FY19, to date, please identify any special purpose revenue funds maintained by, used by, or available for use by the agency. For each fund identified, provide:
 - a. The revenue source name and code;
 - **Fine Fees: Fund 0601, D.C. Official Code § 1-1162.21**
 - **Lobbyist Registration Fees: Fund 0602 D.C. Official Code § 1-1162.27**

- b. The source of funding;
 - **Fine Fees: Agency Fund, 0600**
 - **Lobbyist Registration Fees: Agency Fund, 0600**
 - c. A description of the program that generates the funds;
 - **Fine Fees: This program manages and oversees the financial disclosure filing requirements for District employees and officials. Revenue from this fund comes from fines imposed by the Board, see D.C. Official Code sec. 1-1162.10. Those funds in turn are spent on office operations including training and personnel services.**
 - **Lobbyist Registration Fees: This program oversees lobbyist registration and activity reporting. Revenue from this fund comes from lobbyist registration fees, see D.C. Official Code 1-1162.27. By statute, these funds in turn are spent on lobbyist oversight and enforcement.**
 - d. The amount of funds generated by each source or program;
 - **Fine Fees: FY18 = \$10,885; FY19 = \$3,500**
 - **Lobbyist Registration Fees: FY18 = \$109,252; FY19 = \$21,408**
 - e. Expenditures of funds, including the purpose of each expenditure;
 - **Fine Fees: FY18 = \$5,757; FY19 = \$0**
 - **Lobbyist Registration Fees: FY18 = \$21,408; FY19 = \$3,078**
 - f. The current fund balance.
 - **Fine Fees: \$65,101**
 - **Lobbyist Registration Fees: FY18 = \$148,584**
7. For FY18 and FY19, to date, please list any purchase card spending by the agency, the employee making each expenditure, and the general purpose for each expenditure.
- See EXHIBIT 5 - BEGA FY18 Purchase Card Expenditure Report.**
- See EXHIBIT 6 - BEGA FY19 Purchase Card Expenditure Report.**
8. Please list all memoranda of understanding (“MOU”) entered into by your agency during FY18 and FY19, to date, as well as any MOU currently in force. For each, indicate the date on which the MOU was entered and the termination date.
- See EXHIBIT 7 - BEGA FY18 and FY19 Memoranda of Understandings.**
9. Please summarize and provide the status of all existing capital projects and those in the financial plan, including a brief description, the amount budgeted by fiscal year, actual dollars spent, and any remaining balances (by type of funds). In addition, please provide:

- a. An update on all capital projects concluded in FY17, FY18, and FY19, to date, including the amount budgeted, actual dollars spent, any remaining balances, and whether the project had an impact on the operating budget of the agency. If so, please provide an accounting of such impact.

There are no existing capital projects, and no capital projects in the financial plan.

10. Please provide a list of all budget enhancement requests (including capital improvement needs) for FY18 and FY19, to date. For each, include a description of the need, the amount of funding requested, and whether the request was approved or denied.

OGE: A FY 2018 Capital Budget Request was submitted to the Office of Budget and Finance (OBF) for the development of a new e-Filing system for Lobbyist and Financial Disclosure Statement functions. The funds needed for the new System were provided by OBF.

OOG received an enhancement of \$43,000 for Non-Personnel Services expenditures for FY18. The request was to purchase materials to facilitate public outreach, including a high-volume printer. OOG did not submit an enhancement request for the allotment for FY 2019.

11. Please list, in chronological order, each reprogramming in FY18 and FY19, to date, that impacted the agency, including those that moved funds into the agency, out of the agency, and within the agency. For each reprogramming, list the date, amount, program and activity codes, rationale, and reprogramming number.

AGO - DC BOARD OF ETHICS AND GOVT ACCOUNTABILITY
FY 2018 & 2019 Reprogrammings

Fiscal Year	Date	To	From	Reprogrammed use of fund	Total
2018	Mar-18	NPS - Certification training & Contractual Services	PS - Regular Salary	IT Refresh	20,000.00
	Jun-18	NPS - Certification training & Contractual Services	PS - Regular Salary	IT Refresh	14,718.40
	Aug-18	NPS - Certification training & Contractual Services	PS - Regular Salary	Specialized staff training & IT Refresh	\$40,000.00
2019	NONE				

There has been no reprogramming in FY19 to date.

12. Please list each grant or sub-grant received or distributed by your agency in FY18 and FY19, to date. List the date, amount, source, purpose of the grant or sub-grant received or distributed, and amount expended.

- a. How many FTEs are dependent on grant funding at your agency? What are the terms of this funding? If it is set to expire, what plans, if any, are in place to continue funding the FTEs?

There has been no grant or sub-grant.

13. Please list each contract, procurement, and lease, entered into, extended, and option years exercised by the agency during FY18 and FY19, to date. For each contract, please provide the following information, where applicable:

- a. The name of the contracting party;
- b. The nature of the contract, including the end product or service;
- c. The dollar amount of the contract, including amount budgeted and amount spent;
- d. The term of the contract;
- e. Whether the contract was competitively bid;
- f. The name of the agency's contract monitor and the results of any monitoring activity; and
- g. The funding source.

See EXHIBIT 8 - BEGA FY18 and FY19 Procurements (Purchase Orders).

14. Please list all pending lawsuits that name the agency as a party. Identify which cases on the list are lawsuits that potentially expose the District to significant financial liability or will result in a change in agency practices, and describe the current status of the litigation. Please provide the extent of each claim, regardless of its likelihood of success. For those identified, please include an explanation about the issues involved in each case.

BEGA was involved in nine (9) lawsuits during FY18 and FY19. None of the lawsuits expose the District to significant financial liability or would result in a change in agency practices. The lawsuits pending during the time period are:

OGE: Gerren Price v. D.C. BEGA, D.C. Court of Appeals (CA No. 16-AA-1230). This case involves an appeal from a BEGA finding that Mr. Price had violated the Nepotism provisions of the DPM and CMPA. This case was submitted without argument on October 24, 2018, and we are awaiting the D.C. Court of Appeal's decision.

Wallace Mitchell vs. D.C., et al., D.C. Superior Court (2017 CA 003239). Plaintiff appealed BEGA's dismissal of ethics complaints he had filed against several District public officials. On October 31, 2017, DC Superior Court

granted the District's motion to dismiss this lawsuit. The case was dismissed with prejudice for failure to state a claim upon which relief could be granted.

Charlene Dickens v. BEGA, D.C. Court of Appeals CA No. 17-CV-1027 (DCCA). Ms. Dickens is one of 2 DDOT employees who appealed their designations as employees who are required to file a public financial disclosure statement. On August 16, 2017, the Superior Court issued an Order in which it affirmed BEGA's decision upholding the designation. Ms. Dickens appealed this decision to the Court of Appeals on September 15, 2017. Her petition was dismissed by Court of Appeals on March 2, 2018.

Edwin Edokwe vs. DC BEGA, D.C. Superior Court 2016 CA 007889 P (MPA). Mr. Edokwe, the second of the DDOT employees, appealed the Board's decision denying his appeal of his 2016 FDS designation as a public filer. This appeal was dismissed on February 9, 2018.

Rahsaan French vs. BEGA, D.C. Superior Court (2018 CA 002306 P(MPA)). Employee appealed the imposition of a \$600 ministerial fine for failure to file a financial disclosure statement. On November 16, 2018, the case was dismissed for lack of prosecution.

D.C. vs. Larry Hicks, D.C. Superior Court (2017 CA 008091). This is an enforcement (collection) action filed to reduce the Board's \$20,000 fine imposed on Mr. Hicks to judgment. On January 8, 2019, Judge Jackson issued an order granting the District's Motion for Summary Judgment in this matter requiring the respondent to pay his \$20,000 fine, or risk additional sanction from the Court.

J. Dillion vs. BEGA, OEA Matter No. J-0030-18. This is an employment matter involving a separated employee. This matter was settled on or about October 31, 2018.

OOG: Claudia Barber vs BEGA/OOG, D.C. Superior Court (C.A. 2018 CA 001060 P(MPA)). This case was filed on February 9, 2018, challenging an opinion issued by the Office of Open Government concluding that OOG had no authority to independently nullify actions taken during meetings of public bodies. This case was dismissed on May 1, 2018.

OOG vs. Michael Yates, D.C. Superior Court (2016 CA 007337 B). The OOG filed an enforcement action in October 2016 against the chairman of the Mayor's Advisory Commission on Caribbean Community Affairs (MACCCA), for failure to comply with the Open Meetings Act. Judgment was entered in this matter on March 20, 2018 requiring MACCCA to provide at least one week's notice to OOG of MACCCA meetings for any meeting occurring within twelve months of the date of the Order.

15. Please list all settlements entered into by the agency or by the District on behalf of the agency in FY18 or FY19, to date, and provide the parties' names, the amount of the settlement, and if related to litigation, the case name and a brief description of the case. If unrelated to litigation, please describe the underlying issue or reason for the settlement (e.g. administrative complaint, etc.).

OGE: Besides the Negotiated Dispositions published on our website resulting from OGE investigations, the agency entered into one settlement during the referenced time frame. Dillion vs. BEGA, OEA Matter No. J-0030-18, was an employment matter involving an employee who was separated on January 8, 2018. This matter was settled on or about October 31, 2018 for \$42,000.

OOG: None.

16. Please list the administrative complaints or grievances that the agency received in FY18 and FY19, to date, broken down by source. Please describe any changes to agency policies or procedures that have resulted from complaints or grievances received. For any complaints or grievances that were resolved in FY18 or FY19, to date, describe the resolution.

OGE: There was one grievance filed in FY18, alleging harassment involving time and leave matters. The grievance was denied. There was no appeal. The process used to respond to personnel complaints and grievances is found in Chapter 16 of the District Personnel Manual. No changes to agency policies or procedures resulted from that grievance.

OOG: None.

17. Please list and describe any complaints or allegations of sexual harassment or other forms of sexual misconduct received by the agency in FY18 and FY19, to date, whether or not those complaints or allegations were resolved.

None.

18. Please list and describe any ongoing investigations, audits, or reports on or of the agency, or any investigations, studies, audits, or reports on the agency that were completed in FY18 and FY19, to date.

A government-wide fee study initiated in FY 17 was conducted by the Mayor's Office to determine whether agency fees charged to the public were appropriate. This included an analysis of whether the Lobbyist registration fees charged by BEGA are adequate and consistent with those of other jurisdictions. We understand that the results of that study have not yet been finalized.

BEGA enlisted the assistance of the Department of General Services (DGS) during FY18 to assess the current office space needs for both OGE and OOG. Per DGS records, BEGA's two offices currently occupy a total of approximately 3,100 square feet. Unfortunately, according to the initial study completed for DGS by Savills Studley on February 1, 2018, BEGA needs between 7,000 square feet and 8,000 square feet. Because DGS previously informed us that One Judiciary Square lacks excess space to accommodate BEGA's needs, it appears the agency may need to relocate to leased property elsewhere, at an estimated cost of \$398,422.50 in FY20. However, we have asked DGS to consider placing BEGA in alternative space on the 7th floor at One Judiciary Square that is in the process of being vacated by the Office of Contracting and Procurement (OCP) that we believe may be adequate for BEGA's needs.

19. Please describe any spending pressures the agency experienced in FY18 and any anticipated spending pressures for the remainder of FY19. Include a description of the pressure and the estimated amount. If the spending pressure was in FY18, describe how it was resolved, and if the spending pressure is in FY19, describe any proposed solutions.

OGE: Almost all the computers that OGE staff members used to perform their duties at the beginning of FY18 were outdated and needed to be replaced, as were the tablets used by the Board members. The total cost to replace those computers, tablets and related hardware (e.g. scanners, monitors, etc.) was approximately \$47,515. Fortunately, due to position vacancies that lasted longer than anticipated, OGE was able to reprogram surplus PS funds during FY18 to purchase those replacements.

During FY18, OGE was still using the same outdated case management system (ProLaw) it had used since 2012. After initially conducting market research to gain insight on the price range for suitable case management options, we were concerned that it might cost as much as \$200,000.00 up front to purchase a replacement system, plus an additional \$50,000 per year thereafter in licensing fees. Facing the prospect of funding such a significant expenditure from BEGA's allocated FY18 budget created significant spending pressures on the agency. Fortunately, OGE was able to work with OCP to develop a solicitation for a new case management system that led to a contract with WingSwept, LLC on August 16, 2018 to purchase the CMTS system for only \$55,756.60. However, the annual maintenance, support and hosting fees for the system are substantially more expensive than what OGE was paying for its antiquated ProLaw System (\$2,523.39 per year) vs. CMTS annual fees at \$29,173.86 (Option Year One), \$30,182.55 (Option Year Two), \$31,241.68 (Option Year Three) and \$32,353.77 (Option Year Four), which increased costs have created spending pressure for our agency.

Lastly, as we have discussed on several instances, BEGA enlisted the assistance of the Department of General Services (DGS) during FY18 to assess the current office space needs for both OGE and OOG. Per DGS records, BEGA's two offices currently occupy a total of approximately 3,100 square feet. However, per the

initial study completed for DGS by Savills Studley on February 1, 2018, BEGA actually needs between 7,000 square feet and 8,000 square feet. Because DGS previously informed us that One Judiciary Square lacks excess space to accommodate BEGA's needs, it appears the agency may need to relocate to leased property elsewhere, at an estimated cost of \$398,422.50 in FY20. However, we have asked DGS to consider placing BEGA in alternative space on the 7th floor at One Judiciary Square that is in the process of being vacated by the Office of Contracting and Procurement (OCP) that we believe may be adequate for BEGA's needs.

20. Please provide a copy of the agency's FY18 performance plan. Please explain which performance plan objectives were completed in FY18 and whether they were completed on time and within budget. If they were not, please provide an explanation.

See EXHIBIT 9 - OGE FY18 Performance Plan.

21. Please provide a copy of your agency's FY19 performance plan as submitted to the Office of the City Administrator.

See EXHIBIT 10 - OGE and OOG FY19 Performance Plans.

22. Please describe any regulations promulgated by the agency in FY18 or FY19, to date, and the status of each.

OGE: 10/20/2017 - Notice of Proposed Rulemaking - Amend Chapter 57 require the Chairman and each member of the Council to file a public financial disclosure statement semiannually (May 15 and November 15).

2/2/2018 - Notice of Final Rulemaking- Chairman and Councilmembers Must File FDS Semiannually.

4/13/2018 - Notice of Emergency and Proposed Rulemaking - Procedural rules for informal hearings and revising the ministerial schedule of fines authorized under D.C. Official Code § 1-1162.21(a)(3).

6/29/2018 Notice of Final Rulemaking- To add new Sections 5530 and 5535 to Chapter 55 (Board of Ethics and Government Accountability Hearing Procedures) to revise schedule of ministerial fines.

OOG: The OOG has promulgated proposed regulations to implement provisions of the Board of Ethics and Government Accountability Amendment Act of 2018 (Fiscal Year 2019 Budget Support Act of 2018) on the appeal to BEGA of advisory opinions requested by public officials and employees; or by an aggrieved party when the Director of OOG issues an opinion issued *sua sponte*. There are new regulations on: (1) the use of rules of parliamentary procedure; (2) maintaining public meeting records; (3) conducting meetings by electronic means; and (4) to reflect advisory opinions that construe the

OMA issued after adoption of the current regulations. Currently, the proposed regulations are being informally reviewby the OAG.

23. Please provide a list of all studies, research papers, reports, and analyses that the agency prepared or for which it contracted in FY18 and FY19, to date. Please state the status and purpose of each. Please submit a hard copy to the Committee if the study, research paper, report, or analysis is complete.

OGE: Analysis of District government employees who were designated to file either a Public Financial Disclosure Statement (PFDS) or a Confidential Financial Disclosure Statement (CFDS) for the May 2018 FDS filing season.¹

Analysis of non-profit Lobbyist registrants to determine eligibility to pay reduced registration fee.

Desk Review Audit of Lobbyist Activity Reports filed during the January 2018 filing season for the July 1, 2017 to December 31, 2018 reporting period.

Desk Review Audit of Lobbyist Activity Reports filed during the July 2018 filing season for the January 1, 2018 to June 30, 2018 reporting period.

OOG: OOG is undertaking a comprehensive audit of the District of Columbia's website, DC.GOV, and OOG's Central Meeting Calendar to determine if District of Columbia public bodies are in compliance with D.C. Official Code § 2-536 (information which agencies must make public without submission of a Freedom of Information Act request) and D.C. Official Code §§ 2-576 and 2-578 (the Open Meeting Act requirements regarding posting of public notice and meeting records). OOG will complete the audit on or before August 1, 2019 and report the results on or before September 30, 2019.

See EXHIBIT 11 – Hard Copies of OGE and OOG Studies & Reports

¹ BEGA has provided the Committee with a digital copy of the Designated Filers report as an Excel spreadsheet, but did not attach a hard copy of said report as an Exhibit to these responses because a printed copy of that spreadsheet would exceed 2,000 pages in length.

24. Please separately list each employee whose salary was \$100,000 or more in FY18 and FY19, to date. Provide the name, position number, position title, program, activity, salary, and fringe. In addition, state the amount of any overtime or bonus pay received by each employee on the list.

Posn Nbr	Title	Name	Prgm Code	Activity	Salary	Fringe	Overtime/Bonus
FY 2018:							
00077471	Director of Government Ethics	Wolfigbarger, Brentton Wade	2010	2010	\$ 179,107.73	\$ 36,000.65	None
00077797	Director of Open Government	Allen, Niquelle M	1100	1100	\$ 168,000.00	\$ 33,768.00	None
00077482	General Counsel	Flowers, Brian K	2010	2010	\$ 160,630.87	\$ 32,286.80	None
00078130	Senior Attorney Advisor		2010	2010	\$ 155,920.00	\$ 31,339.92	None
00077645	Attorney Advisor	King, Sonya O	2010	2010	\$ 106,882.00	\$ 21,483.28	None
FY 2019:							
00077471	Director of Government Ethics	Wolfigbarger, Brentton Wade	2010	2010	\$ 182,689.88	\$ 37,634.12	None
00078130	Senior Attorney Advisor	Ford, Rochelle W	2010	2010	\$ 176,924.00	\$ 36,446.34	None
00077797	Director of Open Government	Allen, Niquelle M	1100	1100	\$ 171,360.00	\$ 35,300.16	None
00077482	General Counsel	Flowers, Brian K	2010	2010	\$ 163,843.49	\$ 33,751.76	None
00077645	Attorney Advisor	King, Sonya O	2010	2010	\$ 109,019.64	\$ 22,458.05	None

25. Please list in descending order the top 25 overtime earners in your agency in FY18 and FY19, to date, if applicable. For each, state the employee's name, position number, position title, program, activity, salary, fringe, and the aggregate amount of overtime pay earned.

FY 2018 Overtime Pay by Employee

No.	Employee Name	Title	Salary	Overtime Pay
1	Okai, Ishmael	Auditor	\$75,495.00	\$576.87
	Total			\$576.87

FY 2019 YTD Overtime Pay by Employee

No.	Employee Name	Title	Salary	Overtime Pay
1	Kittab, Waddah	IT Specialist (DataMgmt)	\$90,607.00	\$7,055.19
	Total			\$7,055.19

26. For FY18 and FY19, to date, please provide a list of employee bonuses or special pay granted that identifies the employee receiving the bonus or special pay, the amount received, and the reason for the bonus or special pay.

There have been no bonuses or special award pay in FY18 or FY19 to date.

27. Please provide each collective bargaining agreement that is currently in effect, **and differs from that submitted last year**, for agency employees. Please include the bargaining unit and the duration of each agreement. Please note if the agency is currently in bargaining and its anticipated completion.

None.

28. If there are any boards or commissions associated with your agency, please provide a chart listing the names, confirmation dates, terms, wards of residence, and attendance of each member. Include any vacancies.

<i>Board Member</i>	<i>Confirmation Date</i>	<i>Term</i>	<i>Ward</i>	<i>Member Attendance</i>
Tameka M. Collier, Chair	1-Nov-16	Ended July 1, 2018; Holdover	2	Attended all meetings
Shomari Wade, Former Member	28-Jun-16	6 Years	1	Attended all meetings; resigned effective Feb 8, 2019
Norma Hutcheson, Member	28-Jun-16	6 Years	4	Attended all meetings except Oct. 4, 2018
Darrin P. Sobin, Member	9-Jan-18	Ended July 1, 2018; Holdover	2	Attended all meetings except May 11, 2018
Carol Schwartz, Former Member	16-Dec-15	6 years	1	Attended Oct 2017 meeting; resigned effective Nov. 6, 2017
Two vacancies				

29. Please list all reports or reporting currently required of the agency in the District of Columbia Code or Municipal Regulations. Provide a description of whether the agency is in compliance with these requirements, and if not, why not (e.g. the purpose behind the requirement is moot, etc.).

- D.C. Official Code § 1-1162.19 – Advisory Opinions
- D.C. Official Code § 1-1162.20 – Quarterly Complaint Report
- D.C. Official Code § 1-1162.02(b) – Best Practices Report
- D.C. Official Code § 2-576 (3) – Notice of meetings, including agenda
- D.C. Official Code § 2-578(b)(1) – Copies of minutes

- D.C. Official Code § 1-1162.24 (c) – List of public officials who have filed a public financial disclosure statement, received an extension of the deadline for filing, or not filed
- D.C. Official Code § 1-1162.29(b)(2) – summary of registered lobbyist information by August 15th or within 10 days after registering

Agency Operations

30. Please describe any initiatives that the agency implemented in FY18 or FY19, to date, to improve the internal operations of the agency or the interaction of the agency with outside parties. Please describe the results, or expected results, of each initiative.

OGE: See BEGA FY18 and FY19 Performance Plans (Exhibits 8 and 9). Director Wolfingbarger also restructured OGE's staffing pattern by creating a third Investigator position, dividing the investigative staff into three distinct teams, each consisting of one attorney and one investigator, who work with one another exclusively on their assigned cases. OGE transformed the duties performed by its Grade 11 Program Analyst position and is working with DCHR to finalize a new Grade 12 position description that accurately describes that new role. OGE also modified the position description for its Auditor position and upgraded the role to a CS-13 position that more accurately reflects its day-to-day duties and responsibilities.

OOG: In FY18, to improve OOG's interactions with the public and District government entities, OOG initiated the process of publishing copies of all advisory opinions it has issued to date in the D.C. Register. OOG expects that the published opinions will: (1) inform more of the general public of the office's existence, resources and functions; (2) increase understanding of the OMA and FOIA; and increase compliance with the OMA and FOIA by public bodies and agencies.

31. What are the agency's top five priorities? Please explain how the agency expects to address these priorities in FY19. How did the agency address its top priorities listed for this question last year?

OGE:

1. **Securing new office space that is adequate for the agency's needs.** Some of the District's residents believe that BEGA lacks the resources needed to effectively protect the ethical integrity and transparency of the District government's operations, and some critics have asserted that "the politicians who created BEGA only wanted it to serve as 'window dressing' and never really intended for it to be effective." The size and structure of the office space sometimes appears to inhibit BEGA's ability to meet its mission most effectively. When citizens come to One Judiciary Square to interact with

BEGA, they typically don't understand that the agency is composed of two Offices with different missions, or that those Offices are located on two different floors of the building. They often have difficulty determining which "Office" has jurisdiction over their issue, and it is quickly apparent that the agency's staff members are operating from cramped work spaces which in many instances do not even measure up to the minimum space requirements established by DGS.

BEGA continues to address this priority by engaging DGS, Council, and the Office of Budget and Performance Management (OBPM) in discussions regarding our urgent need to obtain additional office space by either transitioning into a larger space at One Judiciary Square – such as part of the space on the 7th floor that OCP is in the process of vacating – or through the allocation of additional budgetary funding to allow us to lease adequate space elsewhere.

2. Improving the functionality of the BEGA's new Lobbyist Registration & Reporting (LRR) and Financial Disclosure Statement (FDS) E-Filing Systems, as well as the quality of the customer service and technical support provided to those who use those systems. In June 2017, BEGA executed an MOU with OCTO to develop new E-Filing systems with updated coding and greater cybersecurity protections for its LRR and FDS programs at the cost of \$184,326.00, including OCTO's services in coordinating with BEGA's previous IT vendor to migrate data from the old systems into the new ones. The new FDS E-Filing system was launched in May 2018, while use of the new LRR E-Filing system began with the January 2019 filing season.

While the new E-Filing systems appear to have incorporated the enhanced cybersecurity protections that were recommended in a study conducted by the Office of the Chief Financial Officer (OCFO) between November 2016 and January 2017, a sizable segment of our customers experienced technical difficulties with those two systems and expressed dissatisfaction with the technical support and customer service they received from BEGA and OCTO. We are preparing a survey to be distributed via Survey Monkey or a similar service to obtain honest, objective and anonymous input from our customers that we can incorporate in improving both our internal customer service processes as well as the overall user experience with the new systems.

To improve the new systems' functionality, BEGA plans to retain the services of a senior Application Architect or a senior Application Developer through OCTO's Pipeline contract to help implement desired system enhancements our customers have identified, and to help create detailed user manuals related to the two new systems after those development efforts are completed. We also anticipate this resource will focus on improving the system's interaction with the District's Lightweight Directory Access Protocol (LDAP), as the new FDS E-Filing system experienced significant problems

synching with the LDAP during the May 2018 FDS filing season, which unfortunately interfered with the ability of current District government employees to use their dc.gov usernames and passwords to access the new FDS system. We anticipate these development services will cost between \$17,000 and \$25,000.

To improve the responsiveness and effectiveness of our technical support and customer service efforts, we plan to augment OCTO's staff during FDS and LRR filing seasons by retaining additional experienced IT Customer Service personnel who will be available to troubleshoot and resolve issues as they arise. In addition to OCTO's staffing efforts, we plan to retain three Customer Service Specialists through the Pipeline contract to assist BEGA's customers during the next quarterly LRR filing season in April and the FDS filing season in May. Depending on the level of success achieved by those additional resources in April and May, we would continue utilizing those services during the July LRR filing season in FY19 and the October and January LRR filing season in FY20, while adjusting the staffing level as needed. We anticipate these additional IT technical support services will cost approximately \$33,000.00 in FY19.

3. Implementation of the Comprehensive Code of Conduct (CCC) legislation. This remains the agency's top legislative priority yet again this year. Once the CCC is passed by the Council and signed into law by the Mayor, BEGA will immediately begin implementation. The implementation plan will include training all ethics counselors of the government on the revisions to the ethics code, revising and republishing the Ethics Manual, and modifying BEGA's Formal Advice Opinions to ensure consistency with the new code.
4. Increasing community outreach. OGE is partnering with OOG to expand the agency's educational efforts by conducting training programs for Advisory Neighborhood Commissions (ANC) and other community groups during their regularly scheduled meetings. The purpose of these programs is to expand the public's awareness of BEGA's mission and operations, as well as the distinct role each of its two Offices plays in improving the transparency of District government and its accountability to the District's residents.
5. Increasing Financial Disclosure Statement Compliance. Since the passage of the Ethics Act that created BEGA, and BEGA's assumption of employee Financial Disclosure Statement filing responsibility from the Office of Campaign Finance, agency personnel have often expressed confusion regarding who must be designated as a filer. BEGA has made significant progress in helping agencies correctly identify and designate required filers, and we recently distributed a new Financial Disclosure Manual to agency Ethics Officers. However, the Confidential Filer compliance primarily overseen by agencies is still lacking. BEGA will continue aggressively

enlisting the assistance of agency heads, general counsel and Ethics Officers to further increase Confidential Filer compliance, including where warranted the imposition of late fees on delinquent confidential filers pursuant to a recently enacted rule which expanded BEGA's authority to impose such fees on both Public Filers and Confidential. BEGA will award certificates of excellence to agencies whose employees comply with all reporting obligations.

OOG:

1. Securing new office space that is adequate for the agency's needs. The OOG and the OGE agree that securing new office space that is adequate for the needs of both Offices is BEGA's top priority for FY19 for the reasons described above.
 2. Revise Open Meetings Act regulations. The OOG plans to issue revised regulations regarding the Open Meetings Act to clarify issues concerning the conduct of public meetings and to establish rules concerning appealing certain advisory opinions to the Board.
 3. Continued public outreach. The OOG has worked consistently to inform agencies of its trainings and resources. Now that there is a general agency awareness of the OOG and its role, the OOG is shifting its focus to conducting more community-based trainings. The OOG intends to establish firmer connections with Advisory Neighborhood Commissioners (ANCs) by attending meetings to generally inform the public about OOG, and to conduct trainings of ANCs on the requirements of FOIA.
 4. Develop and launch online training offerings for FOIA and the OMA. The OOG is fortunate to have in-house expertise that can build the online platforms for the OOG to conduct and offer the trainings to agencies and public bodies. This will be a key resource as it will make attendance by agencies and public body members easier.
 5. Work with agencies to post information about the OOG on their open government tabs. All subordinate District government agencies have "Open Government" tabs on their websites. OOG will provide a brief, general write up about the OOG and its role under the OMA and FOA, and ask that agencies include the information under the tab. This will improve the public's access to government records and meetings.
32. Please list each new program implemented by the agency during FY18 and FY19, to date. For each initiative, please provide:
- a. A description of the initiative;

- b. The funding required to implement the initiative; and
- c. Any documented results of the initiative.

OGE: See BEGA FY18 and FY19 Performance Plans (EXHIBITS 8 and 9).

OOG: None.

33. What are the top metrics regularly used by the agency to evaluate its operations? Please be specific about which data points are monitored by the agency.

OGE: We measure the number of complaints we receive; the number of investigations we initiate; the length of time it takes to resolve our investigations after initiation, the number of trainings we conduct; the number of both formal and informal requests for ethics advice we receive; and the number of required Financial Disclosure Statement filers – both Public and Confidential – who submit their FDS statements before the established deadlines of May 15 and June 1, respectively. In FY19, we have also begun to measure the number of regulatory matters we handle (e.g. Lobbyist Activity Report late filing penalties, FDS fine waiver requests, etc.) and the length of time it takes to resolve those matters after initiation.

OOG: In FY19, OOG began to track performance measures. With respect to the Open Meetings Act, OOG is tracking the following: (1) the percentage of OMA Advisory Opinions issued within 30 days of a completed investigation and (2) the percentage of public bodies that OOG notified of compliance issues within thirty days of completing an OMA compliance audit. With respect to the Freedom of Information Act, OOG is tracking the percentage of agency websites reviewed for listing mandatory FOIA information on DC.GOV and the percentage of designated FOIA Officers trained in FOIA. With respect to training in general, OOG is tracking percentage of organizational training completed within 90 days of the agency or organization making the request to OOG.

34. Please list any task forces and organizations of which the agency is a member.

OGE: BEGA is a member of the Council on Government Ethics Laws (COGEL), which is a private organization the membership of which is comprised of government entities similar to BEGA from all 50 States and the District of Columbia.

OOG: OOG Director Allen is a member of the Mayor's Open Government Advisory Group and National Association of Parliamentarians. OOG Director Allen and OOG Attorney Barton are members of the American Society of Access Professionals.

35. Please explain the impact on your agency of any legislation passed at the federal level during FY18 and FY19, to date, which significantly affected agency operations.

Not applicable.

36. Please identify all electronic databases maintained by the agency, including the following:

- a. A detailed description of the information tracked within each system; and
- b. The age of the system and any discussion of substantial upgrades that have been made or are planned to the system.

OGE: OGE oversees four electronic databases – the BEGA website, the Lobbyist Registration and Activity Report filing system, the Public Official Financial Disclosure Statement filing system, and the CMTS case management system.

The BEGA website is the central location for public information concerning BEGA/OGE. It contains all Formal Advisory Opinions issued by the Office of Government Ethics, Board decisions with respect to enforcement actions, the quarterly complaint report and announcements such as news, trainings and other events. The BEGA website also provides instructions and forms for filing ethics complaints, and, importantly, links to the Lobbyist and FDS databases. The website is also where the Ethics Manual, the Code of Conduct and the several Best Practices Reports reside.

OGE manages the Lobbyist Registration and Reporting Filing system, which allows Lobbyists to electronically register, pay their fees, and file their activity reports four times per year as required. The activity reports contain information concerning all contacts lobbyists have had with government officials and the nature of those communications. The activity reports also contain information concerning funds expended for lobbying activities and client information. As mentioned above, BEGA launched a new LRR E-Filing system for the January 2019 filing season, and one of the agency's biggest priorities is to improve the functionality of its LRR and FDS E-Filing Systems, as well as the quality of the customer service and technical support provided to those who use the systems. We are also continuing to maintain the old LRR E-Filing system database until the historical data currently stored in that system can be imported into the new system, so that the public's ability to search those historical records is not interrupted.

The Financial Disclosure Statement (FDS) E-Filing system is the repository for all Public Financial Disclosure filings by public officials (certain high-level employees as well as elected officials). As mentioned above, BEGA launched a new FDS E-Filing system for the May 2018 filing season, and one

of the agency's biggest priorities is to improve the functionality of its LRR and FDS E-Filing Systems, as well as the quality of the customer service and technical support provided to those who use the systems. We are also continuing to maintain the old FDS E-Filing system database until the historical data currently stored in that system can be imported into the new system, so that the public's ability to search those historical records is not interrupted.

Finally, BEGA also uses its web-based CMTS electronic case management system to manage and track complaints, investigations, regulatory matters and audits. The system provides file storage and sharing, configurable alerts and reminders, financial action tracking, robust reporting capabilities and an advanced audit trail of record changes. It is not accessible to the public nor are there plans to make it so. We are also continuing to maintain the old ProLaw database until the end of FY19.

OOG: The OOG maintains a central meeting calendar for all District government boards and commissions on the OOG website at www.open-dc.gov. The calendar may be utilized by public body points of contact with administrative rights to upload meeting-related information and records, such as meeting dates, agendas, audio recordings, video links, slide decks, meeting minutes, etc. The system has been maintained internally by the OOG for four years, and all administrative profiles are managed by the OOG. The content of the calendar is accessible by any member of the public with internet access.

The OOG maintains an advice management database which contains FOIA, OMA and all technical advice (pertaining to access to the central calendar and assistance with tracking requests through FOIAXpress) provided to agencies and the public. OOG has maintained the database for one year, and continues to modify and redesign the dashboard to reflect agency metrics to be accessible by the public.

The OOG maintains a case management system to track all OMA complaints and OMA complaint transactions. The database, for internal access only, is designed to manage all cases processed by OOG as part of a comprehensive management system. This case management system was launched on January 1, 2018.

37. Please provide a detailed description of any new technology acquired in FY18 and FY19, to date, including the cost, where it is used, and what it does. Please explain if there have been any issues with implementation.

OGE: As discussed above, BEGA executed an MOU in July 2017 agreeing to pay OCTO \$184,326.00 to develop a new Lobbyist Registration & Reporting (LRR) E-Filing system and a new Financial Disclosure Statement (FDS) E-

OGE: OGE received 805 requests for informal advice during FY18 and has received 351 such requests in FY19 to date. We have issued two formal advisory opinions during the referenced time frame, both of which were requested:

1. **1687-001 Meet and Greet Advisory Opinion, March 7, 2018.** District employees may host “meet and greet” events for partisan political candidates because the Local Hatch act allows employees to take an active part in political management and campaigns. In doing so, however, employees must not engage in fundraising. Fundraising is defined as knowingly soliciting, accepting, or receiving apolitical contribution from any person and includes “cost-of-attendance” or donations to events, such as meet and greets. This opinion answers the question of whether employees are permitted to host meet and greet events for District political candidates.
2. **1249-002 Outside Activity - Patronizing Colleagues with Outside Business, October 18, 2017.** District government employees must abide by certain outside employment rules when engaging in outside employment. Specifically, a District employee may not let the operation of an outside company interfere with his or her ability to perform his or her District government job or impair the efficient operation of District government. In addition, District employees may not use government property for other than authorized purposes and may not solicit business, sell products, or perform any operation related to their outside company on District government property or during their tour of duty.

OOG: OOG has issued 19 advisory opinions during FY18 and FY19 to date, of which 16 only 3 were issued *sua sponte*.

1. **OOG-0002.8.1.18_SILC_AO Compliance with Notice of Meetings and Record of Meetings Directives of the Open Meetings Act. (Statewide Independent Living Council)**

Discussion of the Notice of Meetings and Record of Meetings directives of the OMA. The OMA requires specific forms of notice to the public before public bodies may lawfully conduct meetings. The OMA also requires public bodies to publish an annual schedule of public meetings and notice of public meetings in the DC Register. The OMA requires timely publication of draft or final meeting minutes and meeting agendas.

<https://www.open-dc.gov/sites/default/files/SILC%20Advisory%20Opinion%2009052018.pdf>

2. **OOG-0005_5.11.18 Resolution of Complaint**

Complaint resolving that the CCNV shelter (Federal City Shelter) is not a public body subject to the OMA.

<https://www.open-dc.gov/documents/oog-00551118-resolution-complaint>

3. OOG-0008_6.26.18 Resolution of Complaint DCPCSB

Whether the DCPCSB's failure to provide 30-day's notice to the ANC of their intent to consider a matter involving the Statesman Public Charter violates the OMA. The allegation falls under D.C. Official Code § 1-309.10(b) a provision of The Advisory Neighborhood Councils Act of 1975 (D.C. Official Code § 1-309.01 et seq.) (ANC Act) and not the OMA.

https://www.open-dc.gov/sites/default/files/redacted%20OOG-0008_6.26.18%20Resolution%20of%20Complaint_DCPCSB.pdf

4. OOG-0006_5.24.18 Resolution of Complaint COST

Whether the OOG may: (1) initiate disciplinary action against District government employees for alleged violations of the OMA; and (2) Whether the OMA empowers the OOG to nullify action of public body allegedly taken in violation of the Act. The OMA does not empower the OOG to take either of the requested actions.

https://www.open-dc.gov/sites/default/files/%23%20OOG-0006_5.24.18%20redacted%20Resolution%20of%20Complaint_COST.doc2_.pdf

5. OOG-0004_4.20.18 Resolution of Complaint _Grubbs

Whether a local pharmacy's failure to fill a prescription unless the customer fills all their prescriptions with the pharmacy constitutes a violation of the OMA. Because Grubbs Pharmacy SE is not a public body under the OMA, the OOG does not have jurisdiction over the allegation.

https://www.open-dc.gov/sites/default/files/Redacted%20Final%20Closed%20Complaint1%20%20OOG-004_4.20.18.pdf

6. OOG-0001_1.30.18-AO_- United Medical Center Board (UMC)

UMC Board's failure to make available to the public an electronic recording of its February 21, 2017, Strategic Planning Committee meeting violated the OMA.

<https://www.open-dc.gov/documents/oog-000113018-aoumc-board-complaint-resolving-whether-umc-board's-failure-make-available>

7. OOG-0003_3.11.18 Resolution of Complaint BEGA

(1) The Board of Ethics and Government Accountability (BEGA) was authorized by the OMA (D.C. Official Code § 2-575(b)(10)), to enter the February 1, 2018, closed/executive session to discuss a personnel matter; (2) BEGA strictly adhered to the protocol for entering the closed/executive session (D.C. Official Code § 2575(c)); (3) any discussions by BEGA of the D.C. Open Government Coalition's (Coalition) recommendation during the February 1, 2018, closed/executive session were incidental to the lawful and primary purpose of discussing Director Hughes's reappointment; and (4) any discussion by BEGA during closure of the Coalition's recommendation to reappoint Director Hughes, falls within the scope of D.C. Official Code § 2-575(b)(10) as "employment" and "appointment" matters. Therefore, pursuant to 3 DCMR § 10402.2.

https://www.open-dc.gov/sites/default/files/Goode2finalredacted_0.pdf

8. OOG-0002_2.6.18 Resolution of Complaint- Commission on Selection and Tenure (COST)

The enforcement authority of the OOG extends only to violations committed by District of Columbia public bodies under the OMA. D.C. Official Code § 2-537 confers exclusive jurisdiction over local FOIA disputes to the Office of the Mayor or the D.C. Superior Court. The OMA and its regulations do not authorize the OOG to revisit or vacate the findings and conclusions of an advisory opinion or resolution of complaint. The OOG does not have the legal authority to sanction or otherwise take disciplinary actions against employees of a District agency or public body for violations of the OMA or FOIA.

https://www.open-dc.gov/sites/default/files/%23%20OOG-0002_2.6.18%20Redacted%20Resolution%20of%20Complaint_Barber.pdf

9. OOG-0014 and 0015_12.14.17_UMC Board²

The OMA permits a public body to enter a closed/executive session to deliberate and vote on a resolution, but the deliberations and vote must be in connection with one of the permissible exceptions for entering a closed/executive session.

https://www.open-dc.gov/sites/default/files/FINAL%20F.Mulhauser_OOG-0014_12.14.17_AO.pdf

10. OOG-0013_11.14.17_COST_

² This advisory opinion was the subject of two complaints. Therefore, the OOG provided two advisory opinions, one to each of the complainants.

The Office of Administrative Hearings acknowledged that a May 24, 2016 meeting did occur, but contends no formal action was taken; and that a July 8, 2016 status conference was conducted by the COST. The OOG is unable to make factual determinations regarding violations of the OMA without the requested records. The OOG does not have the authority to independently nullify actions taken during meetings of public bodies and cannot take any action regarding your request to nullify the March 3, 2016 meeting; the July 13, 2016 status hearing; and the July 13, 2016 hearing.

https://www.open-dc.gov/sites/default/files/OOG-0013_11.14.17%20Resolution%20of%20Complaint_COST%20%282%29.pdf

11. OOG-0012_10.13.17 (issued *sua sponte*)

The OMA applies to “any gathering of a quorum of the members of a public body at which the members consider conduct or advise on public business” (D.C. Official Code § 2-574(1)). The legislative history of the OMA makes abundantly clear that the Council’s intent was to exclude meetings by a subcommittee of a public body from the definition of “public body” and “meeting.” However, the OMA would apply when a subcommittee meeting is no more than an attempt to evade the OMA’s “Open meeting” provisions. In this instance the OOG did not find this to be an issue.

https://www.open-dc.gov/sites/default/files/Redacted%20Dismissal%20of%20%23OOG-0012_10.13.17_%20AO_0.pdf

12. OOG-0006_10.01.17_ - Advisory Board on Veteran’s Affairs (MOVA) (issued *sua sponte*)

MOVA’s violations of the OMA were: (1) the improper cancellation of its January 5, 2016, July 5, 2016, and August 2, 2016, meetings; (2) conducting on August 2, 2016, an electronic meeting in violation of the OMA; (3) the failure to record meetings by electronic means; and (4) the failure to timely publish draft and final meeting agendas.

https://www.open-dc.gov/sites/default/files/MOVA%20OOG-0006_10.01.17_AO_0.pdf

13. OOG--00011_10.31.17 (issued *sua sponte*) (Zoning Commission)

The OMA and its legislative history make abundantly clear that drafting and editing the contract performance report by the SEUAB falls within the within the scope of the spirit and letter of actions that constitute public business; (2) the OMA does not include within the

list of exceptions for meeting in a closed session drafting and editing a contract performance report; and (3) the regulations adopted by the SEUAB make abundantly clear that editing and drafting of the report must take place in an open meeting.

https://www.open-dc.gov/sites/default/files/SEU2%20Final%20OMA%20OOG-00011_10.31.17_AO_0.pdf

14. OOG-007_10.25.17 (On November 1, 2017, this opinion was also issued to the Zoning Commission.)

The OMA mandates that a public body first meet in an open session where it must follow the OMA protocol for entering a closed/executive session. The public body must then return to an open session to put on the record any official action that was taken during the closure if it is appropriate to do so. D.C. Official Code § 2-575(c) does not preclude a public body from holding an entire meeting in closure, only that prior to doing so the public body first meet in an open session which it resumes after meeting in closure. Plainly stated, the closed session must be part of a single meeting.

https://www.open-dc.gov/sites/default/files/BZA2%20OOG-007_10.25.17_%20AO_0.pdf

15. RE: #OOG-0010__10.3.17 Resolution of Complaint

Although the Council of the District of Columbia is a public body as defined by the OMA (D.C. Official Code § 2574(3)), and is subject to its provisions, the OMA does not afford any member of the public the right to address a public body, only to be physically present. The OOG cannot dictate how the Council receives testimony.

https://www.open-dc.gov/sites/default/files/FINAL%20CLOSED%20COMPLAINT_OOG_10.3.17_0.pdf

OOG FOIA Advisory Opinions issued by the FY2018 to date.

16. OOG-0002_8.23.18_FOIA AO

Absent statutory or regulatory authority an agency's FOIA identity-verification requirement does not have the force of law. FOIA does not support a requirement: (1) that the requester present valid identification to submit a first-party FOIA request for a 911 audio recording; and (2) to obtain the 911 audio recording for police assistance for a first-party request.

https://www.open-dc.gov/sites/default/files/Final%20B.%20cunningham.FOIA%2010%2027%2018%20%28002%29_Redacted.pdf

17. OOG-0001_1.04.18_FOIA AO

(1) Absent statutory or regulatory authority, MPD's identity-verification requirement does not have the force of law; (2) in the District of Columbia, the Duncan Ordinance controls the release of adult arrest records, but that the release of arrest records under the Duncan Ordinance is nonetheless subject to FOIA; (3) pursuant to the Duncan Ordinance a defense attorney submitting a request to obtain their client's adult arrest records who meets the requirements of 1 DCMR § 1004.1, is not legally required to provide a copy of the retainer agreement, proof of representation or a copy of the client's or attorney's identification; (4) with respect to first-party requests, the Duncan Ordinance is silent as to how the MPD is to ensure the release of adult arrest records are properly to the applicant to whom the records relate; (5) to obtain copies of adult arrest records, designees must present releases in appropriate form executed by the person to whom the records relate, however the ordinance does not specify that the designee identify themselves; and (6) it is inconsistent with FOIA, to require that individual FOIA requesters of MPD incident reports, accident reports and 911 calls (about themselves) or their attorneys attach to the request proof of the attorney or client's identity or proof of representation or a release executed by the client.

https://www.open-dc.gov/sites/default/files/redacted2%20OOG-0001_1.04.18_FOIA%20AO_Mulhauser.pdf

18. OOG-0004_12.11.18_FOIA AO Whether the PSC may withhold records requested under FOIA as exempt from disclosure, under D.C. Official Code § 2-534(e).

The requester's DC FOIA request seeks budget financial records that the Commission must make publicly available without making a written request because it falls within the provisions of D.C. Official Code § 2-536. The Commission should provide the requester with the records that must be made publicly available and does not require a FOIA request to obtain. To the extent that these records are not on the Commission's website, OOG recommends that the Commission post the records. Records that fall into the category of mandatory release includes the Commission's budget and financial information. With respect to the requested records in "Request No. 3" that may be excluded under the deliberative process privilege, the Commission must analyze all records and determine whether the records concerning billing estimates are pre-decisional and deliberative prior to excluding records from release to the requester. Similarly, the Commission's outside counsel's billing records and related records are subject to DC FOIA, but the Commission may withhold the

records under Exception 4. The following may be redacted from the Commission's outside counsel's billing records prior to release: "confidential information, including the motive of the client in seeking representation, or that reveals litigation strategy; records indicating the specific nature of the services provided, such as researching particular areas of law, may also fall within these exceptions when the disclosure would compromise legal strategy; disclosures that would reveal analytical work product or legal advice; strategies and motives in seeking representation."

Prior to releasing any records to the requester, the Commission is advised to apply the legal analysis in this advisory opinion to determine if either the attorney-client, deliberative process, or attorney work product privileges are applicable respectively to its outside counsel's billing records, budget estimates, and other records. OOG is available to assist the Commission in making such determinations.

https://www.open-dc.gov/sites/default/files/FOIA%20Advisory%20Opinion%20OOG-0004_12.11.18_FOIA%20AO.pdf

19. OOG-0003_10.31.18_FOIA AO.

What notifications, if any, does FOIA require an agency, specifically the MPD, to provide a requester when: (1) it invokes an extension to dispatch a determination to a FOIA request for body-worn camera recordings and (2) when no determination is dispatched by the agency to the requester within the applicable period.

<https://www.open-dc.gov/sites/default/files/UDODI%20Advisory%20Opinion%202%2006%202019.pdf>

39. How many ethics complaints did the agency receive in FY18 and FY19, to date? Please break down the complaints by subject matter, if possible, as well as by length to reach and outcome of any resolution.

OGE received 123 complaints during FY18. For more information, see the agency's FY18 Complaint Report at EXHIBIT 12.

OGE has received 42 complaints to date in FY19. For more information, see the Ad Hoc FY19 Complaint Report at EXHIBIT 13.

40. Did BEGA receive any complaints from the public alleging Open Meetings Act ("OMA") violations in FY18 or FY19, to date?

The OOG received fifteen (15) complaints from the public alleging violations of the OMA in FY18 and FY19 to date.

- a. Did BEGA initiate any suits in Superior Court regarding the Open Meetings Act?

On October 5, 2016, the OOG filed suit against Michael Yates, in his official capacity as Chairman of the Mayor's Advisory Commission on Caribbean Community Affairs. The matter is Civil Action No. 16-0007337.

- b. Did BEGA issue any advisory opinions on the Open Meetings Act?

The OOG has issued fifteen (15) binding OMA advisory opinions.

41. How many requests for formal and informal advice regarding compliance with the OMA did BEGA receive in FY18 and FY19, to date?

Through February 11, 2019, the OOG has provided responses to seventy-three (73) formal and informal requests for advice for compliance with the OMA.

Furthermore, OOG responded to thirty-five (35) technical requests for public body access to the Central Meetings Calendar.

42. How many requests for formal and informal advice regarding compliance with FOIA did BEGA receive in FY18 and FY19, to date?

Through February 11, 2019, the OOG has provided responses to one-hundred and twenty-one (121) formal and informal requests for advice for compliance with the FOIA.

43. How many requests for formal and informal advice regarding compliance with the Local Hatch Act did BEGA receive in FY18 and FY19, to date?

BEGA received no formal requests for advice related to the Local Hatch Act.

BEGA received 805 requests for informal advice during FY18 and an additional 351 requests for informal advice in FY19 to date; however, BEGA does not currently maintain detailed statistics regarding the subject matter of those informal advice requests, so it is uncertain how many of those requests pertained to the Local Hatch Act.

44. How many ethics trainings did BEGA conduct in FY18 and FY19, to date?

OGE conducted 101 ethics trainings in FY18, and has conducted 19 ethics trainings to date in FY19.

How many FOIA and OMA trainings?

During FY18 and through FY19 to date, the OOG has conducted 8 FOIA trainings and 16 OMA trainings.

45. Please describe any upgrades to the e-filing system that have occurred in FY18 and FY19, to date. What, if any, upgrades are outstanding?

We obtained a totally new e-filing system developed by OCTO to replace our old system. And while there are no system “upgrades” that currently remain outstanding, as described above, we plan to retain the services of a senior Application Architect or a senior Application Developer through OCTO’s Pipeline contract to help implement desired system enhancements our customers have identified, and to help create detailed user manuals related to the two new systems after those development efforts are completed. We also anticipate this resource will focus on improving the new FDS E-Filing system’s interaction with the District’s Lightweight Directory Access Protocol (LDAP), to remediate the problems that many users experienced synching with the LDAP during the May 2018 FDS filing season, which unfortunately interfered with the ability of current District government employees to use their dc.gov usernames and passwords to access the new FDS system.

We also need to complete the data migration project needed to import data from the old e-filing system into the new one.

- a. Leading up to the November 15, 2018, financial disclosure filing deadline, many filers experienced problems with the e-filing system or were unaware of the deadline. What actions has BEGA take to remedy these issues?

OCTO is reconfiguring the FDS E-Filing system to allow it to accept the November semi-annual filings by Councilmembers. The LRR E-Filing system was originally designed to allow users to submit Lobbyist Activity Reports at any time throughout the year, regardless of whether the timing coincided with one of the statutory filing seasons. BEGA incorrectly believed that the new FDS E-Filing system was similarly configured but learned in November 2018 that understanding was incorrect. Apparently, the FDS system was designed to only allow users to file one FDS report per year, viewing any other reports submitted by a user to constitute an “amendment” of the report that was submitted during the May filing seasons as opposed to a stand-alone semi-annual report. Once BEGA learned of this issue, there was not enough time for developers to reconfigure the FDS system to accept the Councilmembers’ November 2018 submissions as stand-alone semi-annual reports as required by the statute, so BEGA quickly reverted to the process established in 2017 whereby Councilmembers submitted hard copy FDS reports for their November submissions. However, BEGA anticipates that OCTO will have completed the FDS system reconfiguration in time to allow Councilmembers to submit their November 2019 FDS reports online.

We have created a new position whose sole primary responsibility is managing the FDS and Lobbyist programs. Unfortunately, delays in the hiring process prevented BEGA from filling that position before Council's semi-annual FDS filing season began in November 2018 or the January 2019 LRR filing season. The vacancy in that position contributed to the curtailed reminder notice we provided Council in advance of the filing deadline, as well as the challenges we experienced with the rollout of the new LRR E-Filing system.

- b. How can BEGA better communicate with filers about upcoming deadlines, requirements, and processes for filing in advance of deadlines?

As noted above, we have created a new position whose sole primary responsibility is managing the FDS and Lobbyist programs on a year-round basis. It is expected that this specialized position focused primarily on the details of these two programs will improve the efficiency of BEGA's communications with FDS and LRR filers. We are also working to develop better documentation related to our notification processes and procedures, and enhancing those procedures to ensure that we have sufficient bandwidth in place to ensure that our customers are properly notified well in advance of their respective filing deadlines.

- c. What other improvements can BEGA make to smooth the financial disclosure process for future deadlines?

We have developed and distributed a new Financial Disclosure Manual for agency Ethics Counselors to help them better understand the process, and hopefully improve their ability to reinforce with FDS filers the importance of filing their reports on time, and to provide filers with yet another reminder of the applicable filing deadline. We have also revised the written notices that are sent to required FDS filers where the filing deadline is prominently displayed near the top of the first page in bold and underlined.

We are also working to develop a User Manual for the new FDS E-Filing system. Like the rough draft User Manual for the new LRR E-Filing system that is described below, the FDS E-Filing System User Manual will incorporate screenshots to better educate our customers on the way the new system is designed, the steps they must follow to log in with their DC.GOV credentials (or create a new User account for required filers who are no longer employed by the District), detailed explanations regarding the questions that are being asked, and step-by-step instructions on how to complete the questionnaire and submit their disclosures. We hope to have that new User Manual completed and distributed to agency Ethics Counselors for wider distribution to all required FDS filers by April 1, 2019.

We will likely conduct a series of live training webinars on the FDS system in April and May so that required filers can get an advance look (or refresher for those who used the system last year) at the system and watch a BEGA staffer walk through the process of logging into the system, answering the questions, certifying the truth/accuracy of the answers, and submitting the final report to BEGA. We also will likely record a “dry run” of that training program and post it on our website as another educational resource for FDS filers.

Lastly, we are putting a renewed emphasis on asking agency Ethics Counselors to ensure the accuracy of the PFDS and CFDS filer spreadsheets they send us in three key ways that should make the FDS process smoother: 1) Clearly identifying those required filers who are no longer employed with the agency; 2) Working with their agency’s human resources staff to capture updated personal email information from required filers who are leaving the agency during the separation process; and 3) Ensuring that the personal email addresses for required filers who have separated from the agency are included in the filer spreadsheets.

46. How many lobbyists are currently registered with BEGA?

A total of 207 Lobbyists have filed 2019 Registration Reports in BEGA’s new LRR E-Filing system to date. A total of 122 Lobbying Clients have filed 2019 Registration reports in the new system. Additionally, 26 Lobbyists and 15 Lobbying Clients have filed 2018 Registration reports in the new system.

- a. Out of the total number of registered lobbyists, how many filed their activity reports in January 2018, July 2018, and January 2019?

January 2019 Reporting Period: To date, we have received a total of 430 Activity Reports for the most recent reporting period (July 1, 2018 to December 31, 2018), of which 255 were filed by Lobbyists and 176 were filed for Clients based on statistics generated from the new E-Filing system.

July 2018 Reporting Period: There were 580 registered Lobbyists in the old system as of July 15, 2018, of which 317 did not file an Activity Report for that reporting period (January 1, 2018 to June 30, 2018), based on statistics generated from the old E-Filing system.

January 2018 Reporting Period: There were 534 registered Lobbyists in the old system as of January 15, 2018, of which 278 did not file an Activity Report for that reporting period (July 1, 2017 to December 31, 2017), based on statistics generated from the old E-Filing system. However, we are still analyzing how many of those 278 apparent non-compliant Registrants were actually registered in our system for calendar year 2017. We want to ensure we do not target lobbyists for enforcement action – for not filing a LAR for

the July 1, 2017 to December 31, 2017 reporting period – if they were not registered with us in 2017, and thus may not have been obligated to file a LAR in January 2018.

- b. Out of those who did not file or filed untimely, what penalties did BEGA assess?

We have been working on a proposed Rulemaking to offer greater clarity regarding the procedures BEGA will follow in imposing civil penalties against Lobbying Registrants for non-compliance, as well as the factors we will take into consideration in evaluating any penalty waiver requests we receive from Registrants. We have largely deferred initiating enforcement action against Lobbyists for filing violations until that Rulemaking is published and takes effect, hopefully sometime in March 2019

- c. Of the total amount of penalties assessed, how much has been recovered? How does nonpayment affect a lobbyist's ability to lobby?

Under current law, nonpayment of the registration fee does not affect a lobbyist's ability to perform lobbying services. We recommend amending the statute to explicitly authorize BEGA to suspend non-compliant Lobbyists from performing lobbying services until they come into full compliance.

The statistics maintained by the Office of Finance and Resource Management (OFRM) does not differentiate between payments collected for FDS-related fines and payments collected for Lobbyist-related fines.

- d. How much did BEGA receive in lobbyist registration fees in FY18 and FY19, to date?

FY18: \$109,252. FY19: \$21,408 to date.

47. Please describe any upgrades to the lobbyist filing system that have occurred in FY18 and FY19, to date. What, if any, upgrades are outstanding?

We obtained a totally new e-filing system developed by OCTO to replace our old system. And while there are no system "upgrades" that currently remain outstanding, as described above, we plan to retain the services of a senior Application Architect or a senior Application Developer through OCTO's Pipeline contract to help implement desired system enhancements our customers have identified, and to help create detailed user manuals related to the two new systems after those development efforts are completed.

We also need to complete the data migration project needed to import data from the old e-filing system into the new one.

- a. Leading up to the January 15, 2019, lobbyist registrant filing deadline, many filers encountered issues with the new filing system and were unaware of the new filing requirements. How can BEGA better communicate with filers about new requirements, processes, and deadlines?

As noted above, we have created a new position whose sole primary responsibility is managing the FDS and Lobbyist programs on a year-round basis. It is expected that this specialized position focused primarily on the details of these two programs will improve the efficiency of BEGA's communications with FDS and LRR filers. We are also working to develop better documentation related to our notification processes and procedures, and enhancing those procedures to ensure that we have sufficient bandwidth in place to ensure that our customers are properly notified well in advance of their respective filing deadlines.

We are also putting the finishing touches on a detailed User Manual for the new LRR E-Filing system that should be ready for distribution later this month. The User Manual incorporates screenshots to better educate our customers on the way the new LRR E-Filing system is designed, and the steps they must follow to create new User accounts, file their Registration Reports, pay their registration fees, file their quarterly Activity Reports, etc. A very rough draft of the new User Manual is attached as EXHIBIT XXX.

48. How does BEGA intend to make the content of lobbyist activity reports more publicly accessible, particularly for lobbyists' communications with public officials and their staff on contracts, procurements, grants, and legislation?

We feel the search functionality available on the new LRR E-Filing system constitutes a significant improvement over what was available from the old system. For instance, the new option to search by communication did not exist in the old system. Additionally, members of the public can export their search results to a .CSV file that is compatible with Excel for more in-depth data analysis. Future system enhancements under consideration in this regard include expanding the fields which are searchable by the public (e.g. the particular subject matter on which different Lobbyists performed services) and perhaps adding the ability to tailor searches more narrowly from the public-facing portal (e.g. limiting search results to only Lobbyists who received compensation in excess of a particular amount) rather than having to wait to do so when working with the exported spreadsheet.

49. Has BEGA considered hiring a Chief of Staff or similar position to facilitate inter-office collaboration between OGE and OOG and enhance communication with the public and media? If not, why not?

BEGA discussed the pros and cons of potentially creating a Chief of Staff position but concluded that such a position most likely would add an unnecessary layer of

internal bureaucracy given BEGA's small size and current organizational structure. During FY18, BEGA hired two new Directors for OGE and OOG, and both the quality and frequency of collaboration between the two Offices has improved dramatically over the past year. The Board also revised the Senior Attorney Advisor position description to ensure better coordination with the Directors of OGE and OOG on their respective programs and office operations, education and training requirements, and generally supports each Director in their efforts to achieve the goals and missions of their respective offices.

In light of that improved collaboration, the primary value that a Chief of Staff could offer BEGA would be communicating with the public and government agencies on the agency's behalf, as opposed to supervising staff or making budgetary decisions. Given this assessment, BEGA believes that hiring a Public Information Officer (PIO) would better suit the agency's needs by offering the same beneficial effects on our communications with the public and media without creating an additional layer of bureaucracy. However, given BEGA's other pressing needs that require additional funding (e.g. larger office space to house both OGE and OOG, replacement of the Board's audio-video system, OOG's need for a second attorney and OGE's need for a second auditor), BEGA did not request a budget enhancement to fund a PIO position in FY20.

50. Please provide an update on BEGA's upgrade to its case management system. Has this project been completed?

As described above, OGE was able to purchase a new case management system called CMTS on August 16, 2018 for \$55,756.60. The new system was implemented in September 2018 and OGE has been using it on a regular basis since it went live on September 30, 2018. During the past four months, all historical case data and documents from OGE's legacy ProLaw system have been imported into CMTS, except for 213 so-called "events" that were created within ProLaw to note certain case developments or milestones (e.g. the issuance of an Order by the Board) that in most instances were also memorialized by digital files (e.g. PDF scans of the actual Order). We are still working to get the contents of those "events" extracted from ProLaw and imported into CMTS as files associated with their respective cases, but the overwhelming majority of those "events" are related to closed cases and have no bearing on OGE's open investigations. However, the new case management is fully operational.

51. Please describe any symposia held by the agency in FY18 and FY19, to date. What symposia, if any, does the agency plan to hold in the remainder of FY19 and in FY20?

OGE: On October 4, 2018 BEGA hosted "Ethics Day"- a half day program that consisted of eight different training programs, including political activity training, and OIG and BEGA overview, a session on social media, Office of Open Government programs on FOIA and OMA, FDS training guidance,

training on the Council's Code of Conduct, and a session on legal ethics for government attorneys that was cosponsored by the D.C. Bar Association. The following entities participated in the program: OGE, OOG, the Office of General Counsel for the Council, Office of Campaign Finance, Office of the Inspector General, and the D.C. Bar.

We plan to organize and host another Ethics Day in FY19.

OOG: As part of the BEGA Ethics Day, held on October 4, 2018, OOG Director Allen and OOG Attorney Barton held a two-hour training session entitled, "The Nuts and Bolts of the OMA and FOIA." The sessions included instruction and group exercises.

Director Allen also was a presenter at the National Association of Attorneys General Training & Research Institute (NAGTRI) Center for Ethics & Public Integrity Ethics Summit in Phoenix, Arizona from December 11-13, 2018. Director Allen spoke on the topic "Effectively Managing the FOIA Process" where she discussed best practices for responding to FOIA requests, conducting searches for records, producing records, and issuing decision letters. The audience for this symposium was government attorneys and attorneys practicing ethics and open government law. The presentation occurred at the Sandra Day O'Connor School of Law in Phoenix, Arizona.

52. In the FY19 budget, the Council provided additional funding to develop new materials for outreach to the public. How has BEGA used these funds?

As part of the BEGA Ethics Day, held on October 4, 2018, BEGA produced and widely distributed brochures detailing the mission and activities of the Office of Open Government and Office of Government Ethics. The brochures are available at BEGA's offices.

BEGA has also invested in video camera equipment through OOG. The agency intends to utilize this equipment to record the meetings it attends and permit public bodies to utilize the video camera to record its meeting upon request. OOG also purchased printers, laptops, and mobile telephones to enable OOG staff to attend public meetings and provide recording and other services.

BEGA is also planning to purchase a portable projector and screen to facilitate agency presentations as part of its outreach efforts at meetings of Advisory Neighborhood Commissions (ANCs) and other community organizations.

53. Please provide the Committee with an update on BEGA's plans for a new office space.

Because DGS previously informed us that One Judiciary Square lacks excess space to accommodate BEGA's needs, it appears our agency may need to relocate to leased property elsewhere at an estimated cost of \$398,422.50 in FY20. However, we


have asked DGS to consider placing BEGA in alternative space at One Judiciary Square on the 7th floor that is being vacated by the Office of Contracting and Procurement (OCP) that we believe may be well-suited for BEGA's needs.

After expressing our understanding there is a discrete portion of the space being vacated by OCP on the 7th floor at One Judiciary Square that may be particularly suited for BEGA's needs, the Chief Operating Officer for DGS (Yohance Fuller) has tasked the Associate Director for the Portfolio team at DGS (IK Imo) with following up on our request. But unless DGS can locate additional space for BEGA at One Judiciary Square, it is our understanding – based on prior conversations with Mr. Fuller and others at DGS – that DGS generally does not act upon an agency's request for additional office space unless and until the interested agency can identify funding that is available to pay its rent expenses for such space.

Thank you, and please let us know if you have any questions or require any additional information.

Sincerely,


Brent Wolfingbarger
Director, Office of Government Ethics
Board of Ethics and Government Accountability


Niquelle M. Allen
Director, Office of Open Government
Board of Ethics and Government Accountability

Enclosures

Board of Ethics and Government Accountability

Tameka Collier (Chairperson)
Darrin P. Sobin (Board Member)
Norma B. Hutcheson (Board Member)
2 Vacant

Brent Wolfingbarger
Director, Office of Government Ethics (OGE)
1 FTE/0 Vacant

Niquelle M. Allen
Director, Office of Open Government (OOG)
1 FTE/0 Vacant

Rochelle W. Ford
Senior Attorney Advisor
1 FTE/0 Vacant

Brian K. Flowers
General Counsel
1 FTE/0 Vacant

Investigative Team #1
2 FTE/0 Vacant

Investigative Team #2
2 FTE/0 Vacant

Investigative Team #3
2 FTE/0 Vacant

Administrative Officer
1 FTE/0 Vacant

Program Support
Assistant
1 FTE/0 Vacant

Auditor
1 FTE/1 Vacant

Compliance Specialist
1 FTE/0 Vacant

Attorney Advisor
1 FTE/0 Vacant

IT Specialist
1 FTE/1 Vacant

AGO - DC BOARD OF ETHICS AND GOVT ACCOUNTABILITY
FY2019 Position Listing Report
As of January 31, 2019

Exhibit 2

Posn Nbr	Title	Name	Hire Date	Time with Agency	Vac Stat	Prgm Code	Activity	Salary	Fringe (20.6%)	Job Status
00077471	Director of Government Ethics	Wolfigbarger,Brentton V	12/11/2017	12/11/2017	Filled	2010	2010	\$ 182,689.88	\$ 37,634.12	Reg - Full Time
00077482	General Counsel	Flowers,Brian K	3/9/2015	3/9/2015	Filled	2010	2010	\$ 163,843.49	\$ 33,751.76	Reg - Full Time
00077612	Auditor	Okai,Ishmael	6/12/2017	6/12/2017	Filled	2010	2010	\$ 77,007.00	\$ 15,863.44	Reg - Full Time
00077645	Attorney Advisor	King,Sonya O	9/19/2016	8/6/2018	Filled	2010	2010	\$ 109,019.64	\$ 22,458.05	Reg - Full Time
00077729	Program Support Assistant	Dow,Tyrell H	10/20/2015	10/20/2015	Filled	2010	2010	\$ 52,447.00	\$ 10,804.08	Reg - Full Time
00077797	Director of Open Government	Allen,Niquelle M	9/9/2002	7/9/2018	Filled	1100	1100	\$ 171,360.00	\$ 35,300.16	Term
00078130	Senior Attorney Advisor	Ford,Rochelle W	10/29/2018	10/29/2018	Filled	2010	2010	\$ 176,924.00	\$ 36,446.34	Reg - Full Time
00083174	IT Specialist (Data Mgmt)				Vacant	1100	1100	\$ 73,906.00	\$ 15,224.64	Reg - Full Time
00085318	Program Analyst	Blaine, Andria N	1/28/2019	1/28/2019	Filled	2010	2010	\$ 73,167.00	\$ 15,072.40	Reg - Full Time
00085319	Investigator	James,Ileana C.	2/4/2008	3/2/2015	Filled	2010	2010	\$ 98,794.00	\$ 20,351.56	Reg - Full Time
00086144	Attorney Advisor	Barton,Johnnie	2/8/2016	2/8/2016	Filled	1100	1100	\$ 97,831.00	\$ 20,153.19	Reg - Full Time
00087514	Attorney Advisor	Cooks,Ashley	10/5/2015	10/5/2015	Filled	2010	2010	\$ 97,831.00	\$ 20,153.19	Reg - Full Time
00087567	Administrative Officer	Peterson,Sandra D.	11/26/2007	12/16/2012	Filled	2010	2010	\$ 96,065.00	\$ 19,789.39	Reg - Full Time
00091999	Attorney Advisor	Stewart-Mitchell,Asia	12/27/2016	12/27/2016	Filled	2010	2010	\$ 95,035.00	\$ 19,577.21	Reg - Full Time
00093338	Investigator	Cook Sr.,Ronald J	2/11/2013	2/11/2013	Filled	2010	2010	\$ 85,149.00	\$ 17,540.69	Reg - Full Time
00094184	Investigator	Bradley, Ralph T	1/7/2019	1/7/2019	Filled	2010	2010	\$ 85,149.00	\$ 17,540.69	Reg - Full Time

BEGA	Travel Expenses FY 2018	EXHIBIT 3
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Employee	Justification for Travel	Travel Expenses
	Council on Governmental Ethics Laws (COGEL)	
Brian Flowers	COGEL - Conference sessions on ethics, lobbyists and Hatch Act	\$1,616.50
Janet Foster	COGEL - Conference sessions on ethics, lobbyists and Hatch Act	\$1,616.50
Traci Hughes	COGEL - Conference sessions on government transparency, open government and FOIA	\$2,383.00
Johnnie Barton	COGEL - Conference sessions on government transparency, open government and FOIA	\$2,383.00
Ashley Cooks	National Criminal Justice Training Center - Strategies for Instructional Excellence	\$651.50
Niquelle Allen	using government television and social media to engage the public in participating in governance.	\$1,277.21
Niquelle Allen	National Association of Parliamentarians - Conference provided extensive training regarding the rules of Parliamentary procedure. The training also covered the role of Parliamentary Procedure in Open Meeting Laws.	\$1,227.38
Waddah Kittab	Development Security Conference focuses on the role of cybersecurity in the development of IT operations. It checks and evaluates the security role in the application life cycle starting from operation analysis, development analysis, and the implementation using the Risk Management Model.	\$1,870.62

Travel Expenses FY 2019		
Employee	Justification for Travel	Travel Expenses
	Council on Governmental Ethics Laws (COGEL)	
Rochelle Ford	COGEL - Conference sessions on ethics, lobbyists and Hatch Act	\$421.38
Ashley Cooks	COGEL - Conference sessions on ethics, lobbyists and Hatch Act	\$900.70
Asia Stewart-Mitchell	COGEL - Conference sessions on ethics, lobbyists and Hatch Act	\$900.70
Niquelle Allen	COGEL - Conference sessions on government transparency, open government and FOIA	\$645.22
Johnnie Barton	COGEL - Conference sessions on government transparency, open government and FOIA	\$912.84

AGO - DC BOARD OF ETHICS AND GOVT ACCOUNTABILITY
FY 2018 - FY 2019 Intra-District Transfers

Exhibit 4

Fiscal Year	Seller Agency	Buyer Agency	Service Description	Fund	Service Period	Total Amount
FY 2018	OCP	BEGA	Purchase Card	0100	10/01/17 - 09/30/18	\$ 121,724.52
	OCTO	BEGA	RTS	0100	10/01/17 - 09/30/18	\$ 7,531.79
	DCHR	BEGA	Personnel and Resource Support	0100	10/01/17 - 09/30/18	\$ 10,360.00
	OCTO	BEGA	IT Assessment	0100	10/01/17 - 09/30/18	\$ 13,669.47
	OCTO	BEGA	Licenses	0100	10/01/17 - 09/30/18	\$ 3,042.86
	DPW	BEGA	Fleet Services	0100	10/01/17 - 09/30/18	\$ 2,555.28
	ODR	BEGA	Sign Language Interp	0100	10/01/17 - 09/30/18	\$ 230.00
	Total					\$ 159,113.92
FY 2019	OCTO	BEGA	IT Assessment	0100	10/01/18 - 09/30/19	\$ 22,207.86
	OCTO	BEGA	MICROS OFFICE 365	0100	10/01/18 - 09/30/19	\$ 3,349.89
	OCP	BEGA	Purchase Card	0100	10/01/17 - 09/30/18	\$ 21,514.69
	DPW	BEGA	Fleet Services	0100	10/01/18 - 09/30/19	\$ 1,120.77
	Total					\$ 48,193.21

BEGA FY 2018 Purchase Card Report

Exhibit 5

Transaction Date	Transaction Amount	Merchant Name	General Purpose of Expenditure	Cardholder Last Name
10/3/2017	\$86.50	AVNGATE*CREATIVE-TIM.C	Computer Software	Waddah
10/22/2017	(\$989.97)	BEST BUY 00002691	reimbursemnt	Waddah
10/28/2017	(\$1,029.97)	BEST BUY 00002691	reimbursemnt	Waddah
10/27/2017	\$1,050	COUNCIL ON GOVERNMENTA	Conference registration fee	Waddah
10/30/2017	\$1,050	COUNCIL ON GOVERNMENTA	Conference registration fee	Waddah
10/10/2017	\$54.55	STANDARD OFFICE SUPPLY	Office Supplies	DOW
10/3/2017	(\$790)	VARIDESK	reimbursemnt	DOW
10/31/2017	\$400	VSN*DOTGOVREGISTRATION	Domain registration renewal	Waddah
11/7/2017	\$330	INT*IN *ARMSTRONG CUST	Banner for Ethics Day.	DOW
11/16/2017	\$342.12	AIR CAN 0142185933230	Air Canada/Flight reservations	DOW
11/16/2017	\$232.73	AIR CAN 0142185952837	Air Canada/Flight reservations	DOW
11/2/2017	\$227.82	AIR CAN 01470208111492	Air Canada/Flight reservations	Waddah
11/2/2017	\$227.82	AIR CAN 01470208111503	Air Canada/Flight reservations	Waddah
11/17/2017	\$76.68	COMCAST	Cable Television	DOW
11/17/2017	\$76.68	COMCAST	Cable Television	DOW
11/17/2017	\$1,125	COUNCIL ON GOVERNMENTA	Membership Dues	DOW
11/17/2017	\$1,125	COUNCIL ON GOVERNMENTA	Membership Dues	DOW
11/20/2017	\$600	DNH*MEDIA TEMPLE INC	Renew website for OOG	Waddah
11/3/2017	\$6.57	INTERNATIONAL TRANSACTION	Internation transaction fee	Waddah
11/3/2017	\$2.20	INTERNATIONAL TRANSACTION	Internation transaction fee	Waddah
11/10/2017	\$1.82	INTERNATIONAL TRANSACTION	Internation transaction fee	DOW
11/10/2017	\$1.82	INTERNATIONAL TRANSACTION	Internation transaction fee	DOW
11/17/2017	\$2.72	INTERNATIONAL TRANSACTION	Internation transaction fee	Waddah

11/17/2017	\$2.72	INTERNATIONAL TRANSACTION	Internation transaction fee	Waddah
11/24/2017	\$8.18	INTERNATIONAL TRANSACTION	Internation transaction fee	Waddah
11/24/2017	\$8.18	INTERNATIONAL TRANSACTION	Internation transaction fee	Waddah
11/22/2017	\$50	METRO FARE AUTOLOAD	Farecard for local transportation	DOW
11/22/2017	\$50	METRO FARE AUTOLOAD	Farecard for local transportation	DOW
11/22/2017	\$50	METRO FARE AUTOLOAD	Farecard for local transportation	DOW
11/22/2017	\$50	METRO FARE AUTOLOAD	Farecard for local transportation	DOW
11/9/2017	\$32.25	NATIONAL PEN CO LLC	OGE Training Supplies	DOW
11/9/2017	\$11.70	NATIONAL PEN CO LLC	OGE Training Supplies	DOW
11/9/2017	\$178.05	NATIONAL PEN CO LLC	OGE Training Supplies	DOW
11/3/2017	\$656.81	SHERATON	Sheraton/Hotel Reservation for COGEL Conference	Waddah
11/3/2017	\$220.39	SHERATON	Sheraton/Hotel Reservation for COGEL Conference	Waddah
11/10/2017	\$182.06	SHERATON	Sheraton/Hotel Reservation for COGEL Conference	DOW
11/10/2017	\$182.06	SHERATON	Sheraton/Hotel Reservation for COGEL Conference	DOW
11/17/2017	\$271.76	SHERATON	Sheraton/Hotel Reservation for COGEL Conference	Waddah
11/17/2017	\$271.76	SHERATON	Sheraton/Hotel Reservation for COGEL Conference	Waddah
11/24/2017	\$818.14	SHERATON	Sheraton/Hotel Reservation for COGEL Conference	Waddah
11/24/2017	\$818.14	SHERATON	Sheraton/Hotel Reservation for COGEL Conference	Waddah
11/3/2017	(\$656.81)	TEMPORARY DISPUTE CREDIT	reimbursemnt	Waddah
11/3/2017	(\$220.39)	TEMPORARY DISPUTE CREDIT	reimbursemnt	Waddah
12/15/2017	\$76.70	COMCAST	Cable Television service for OGE	DOW
12/15/2017	\$76.70	COMCAST	Cable Television service for OOG	DOW
12/5/2017	\$5.47	INTERNATIONAL TRANSACTION	Internal Transaction	Waddah
12/13/2017	\$5.39	INTERNATIONAL TRANSACTION	Internal Transaction	Waddah
12/18/2017	\$75	ONE SOURCE PROCESS	Process Server for subpeona	DOW
12/18/2017	\$65	ONE SOURCE PROCESS	Process Server for subpeona	DOW
12/18/2017	\$65	ONE SOURCE PROCESS	Process Server for subpeona	DOW
12/11/2017	\$6.16	STANDARD OFFICE SUPPLY	Office Supplies	DOW

12/11/2017	\$29.99	STANDARD OFFICE SUPPLY	Office Supplies	DOW
12/29/2017	\$59.55	STANDARD OFFICE SUPPLY	Office Supplies	DOW
12/30/2017	\$400	VSN*DOTGOVREGISTRATION	Domain registration renewal	DOW
1/18/2018	\$22.99	AMAZON MKTPLACE PMTS	Headset with microphone	DOW
1/9/2018	\$78.07	COMCAST	Cable Television	DOW
1/9/2018	\$78.07	COMCAST	Cable Television	DOW
1/11/2018	(\$1,778)	DMI* DELL HLTHCR/REL	reimbursemnt	DOW
1/26/2018	\$3,248.22	DMI* DELL HLTHCR/REL	Computer equipment	Waddah
1/27/2018	\$245.70	NATIONAL PEN CO LLC	OGE Training Supplies	DOW
1/27/2018	\$354.75	NATIONAL PEN CO LLC	OGE Training Supplies	DOW
1/27/2018	\$119	NATIONAL PEN CO LLC	OGE Training Supplies	DOW
1/27/2018	\$119	NATIONAL PEN CO LLC	OGE Training Supplies	DOW
1/27/2018	\$297.50	NATIONAL PEN CO LLC	OGE Training Supplies	DOW
1/27/2018	\$119	NATIONAL PEN CO LLC	OGE Training Supplies	DOW
1/27/2018	\$184	NATIONAL PEN CO LLC	OGE Training Supplies	DOW
1/17/2018	\$249.51	STANDARD OFFICE SUPPLY	Office Supplies	DOW
1/17/2018	\$29.86	STANDARD OFFICE SUPPLY	Office Supplies	DOW
1/26/2018	\$72.13	STANDARD OFFICE SUPPLY	Office Supplies	DOW
1/8/2018	\$528	THOMSON WEST*TCD	Legal searches	DOW
1/10/2018	\$6.90	UPS*294034NDGNA	Delivery service	DOW
2/28/2018	\$47.18	AMAZON MKTPLACE PMTS	Office Supplies	Waddah
2/2/2018	\$71.33	AMAZON.COM	Office Supplies	Waddah
2/13/2018	\$78.07	COMCAST	Cable Television service for OGE	DOW
2/13/2018	\$78.07	COMCAST	Cable Television serive for OOG	DOW
2/16/2018	\$262.49	DMI* DELL HLTHCR/REL	Computer equipment	Waddah
2/12/2018	\$301	SENODA INC	Business cards for Brentton Wolfingbarger	DOW
2/21/2018	(\$877.13)	SHERATON	reimbursemnt	Waddah
2/22/2018	\$442	SQU*SQ *NORTH CAPITOL	Moving services from Surplus Property	DOW
2/14/2018	\$35.68	STANDARD OFFICE SUPPLY	Office Supplies	DOW

2/21/2018	\$74.97	STANDARD OFFICE SUPPLY	Office Supplies	DOW
2/27/2018	\$253.78	STAPLES DIRECT	Office Supplies	DOW
2/7/2018	\$1,368.40	THOMSON WEST*TCD	Legal searches	DOW
3/6/2018	\$45.99	AMAZON MKTPLACE PMTS	Office Supplies	Waddah
3/6/2018	\$61.98	AMAZON MKTPLACE PMTS	Office Supplies	Waddah
3/29/2018	\$399.96	BESTBUYCOM049	Office Supplies	Waddah
3/29/2018	\$59.90	BESTBUYCOM805537086795	Office Supplies	Waddah
3/29/2018	\$37.40	BESTBUYCOM805537094396	Office Supplies	Waddah
3/17/2018	\$78.07	COMCAST	Cable Television service for OGE	DOW
3/17/2018	\$78.07	COMCAST	Cable Television services for OOG	DOW
3/16/2018	\$445	COUNCIL ON GOVERNMENTA	Membership Dues	Waddah
3/26/2018	\$99	DC BAR	Membership Dues	Waddah
3/2/2018	\$656.81	DISPUTE REBILL	Sheraton	Waddah
3/2/2018	\$220.39	DISPUTE REBILL	Sheraton	KITTAB
3/9/2018	\$374.94	EBI*EBAGS.COM	Laptop bag	Waddah
3/22/2018	\$175	PAYPAL *IAPE		Waddah
3/16/2018	\$141.31	STANDARD OFFICE SUPPLY	Office Supplies	DOW
3/21/2018	(\$13.80)	STAPLES DIRECT	reimbursemnt	DOW
04/11/2018	150.00	SQU*SQ *A DIGITAL SOLU	OTHER SERVICES (NOT ELSEWHERE CLASSIFIED)	DOW
04/12/2018	78.07	COMCAST	Cable Television service for OOG	DOW
04/12/2018	78.07	COMCAST	Cable Television service for OOG	DOW
04/13/2018	60.00	METRO FARE AUTOLOAD	Metro farecards for staff business use	DOW
04/13/2018	60.00	METRO FARE AUTOLOAD	Metro farecards for staff business use	DOW
04/13/2018	60.00	METRO FARE AUTOLOAD	Metro farecards for staff business use	DOW
04/13/2018	60.00	METRO FARE AUTOLOAD	Metro farecards for staff business use	DOW
04/22/2018	899.91	BESTBUYDIRECT234583049	DIRECT MARKETING-COMBINATION CATALOG-RETAIL MERCH.	DOW
04/23/2018	1,316.59	STANDARD OFFICE SUPPLY	Incorrect charge. Transaction was refunded.	DOW
04/27/2018	24.60	STANDARD OFFICE SUPPLY	Office Supplies	DOW

04/30/2018	513.00	THOMSON WEST*TCD	Legal searches	DOW
04/30/2018	49.00	NW3C INC NATIONAL	Payment for Ileana Corrales to attend "Intro to Cell Phone Info" webinar.	DOW
04/30/2018	1,316.59	STANDARD OFFICE SUPPLY	Incorrect charge from vendor. BEGA has been refunded	DOW
04/30/2018	(1,316.59)	STANDARD OFFICE SUPPLY	reimbursemnt	DOW
04/30/2018	(1,316.59)	STANDARD OFFICE SUPPLY	reimbursemnt	DOW
05/10/2018	78.07	COMCAST	Cable Television service for OGE	DOW
05/10/2018	78.07	COMCAST	Cable Television service for OOG	DOW
05/10/2018	550.00	LEX*LEXIS NEXIS	Legal searches	DOW
05/11/2018	513.00	THOMSON WEST*TCD	CLEAR Legal searches	DOW
05/17/2018	39.00	AVNGATE*CREATIVE-TIM.C	Computer software	KITTAB
05/17/2018	49.00	AVNGATE*CREATIVE-TIM.C	Computer software	KITTAB
05/23/2018	339.00	NATIONAL BUSINESS INST	Purchase of "Data Analysis Toolkit for Attorneys" training webinar viewable by entire OGE staff in the BEGA boardroom, registered in the name of Denise Kiser.	DOW
05/29/2018	215.95	AMAZON MKTPLACE PMTS	Purchase of a desk chair for our Director, Brentton Wolfingbarger. Chair was not available from a CBE for less than \$241.86.	DOW
05/30/2018	68.24	STANDARD OFFICE SUPPLY	Purchase of trashcans for employees	DOW
06/05/2018	49.00	NW3C INC NATIONAL	Webinar for Brentton Wolfingbarger on "Bio Hacking".	DOW
06/06/2018	1,776.56	AMAZON.COM AMZN.COM/BI	Purchase of desk scanners for Attorneys and Investigators. Please note: taxes charged will be refunded once Amazon approves our tax	DOW
06/06/2018	133.22	ONESOURCEPROCESS	Process Server	DOW
06/08/2018	1,565.36	TOTAL OFFICE PRODUCTS	Purchase of toner for both Dell color printers in 830s.	DOW
06/11/2018	60.00	METRO FARE AUTOLOAD	Metro farecards for staff business use	DOW
06/11/2018	60.00	METRO FARE AUTOLOAD	Metro farecards for staff business use	DOW
06/11/2018	236.22	STANDARD OFFICE SUPPLY	Office Supplies	DOW
06/14/2018	513.00	THOMSON WEST*TCD	CLEAR Legal searches	DOW
06/13/2018	864.00	BIRCH GROVE SOFTWARE I	Purchase of software "ActivTrak Advanced" to improve employee productivity.	DOW
06/15/2018	78.07	COMCAST	Cable Television service for OGE	DOW
06/15/2018	78.07	COMCAST	Cable Television service for OOG	DOW
06/14/2018	550.00	LEX*LEXIS NEXIS	Legal searches	DOW

06/14/2018	600.00	FIOD-D EXT CLIENTS	Payment for Brentton Wolfingbarger to attend "Inspector General Public Corruption Investigations Training Program".	DOW
06/30/2018	4,400.00	CCL*CTR CREAT LEAD USA	Professional Management training for Director Wolfingbarger	DOW
06/28/2018	88.40	STANDARD OFFICE SUPPLY	Office Supplies	DOW
07/02/2018	194.56	DMI* DELL HLTHCR/REL	Purchase of 2 keyboards and 2 mice to replace broken ones and two power adapters for laptops.	DOW
07/09/2018	75.00	DNH*MEDIA TEMPLE INC	Domain registration renewal	KITTAB
07/14/2018	78.07	COMCAST	Cable Television service for OGE	DOW
07/14/2018	78.07	COMCAST	Cable Television service for OOG	DOW
07/13/2018	550.00	REI*PAYMENT CENTER	LexisNexis Legal search services	DOW
07/16/2018	513.00	THOMSON WEST*TCD	CLEAR Legal searches	DOW
07/18/2018	59.54	STANDARD OFFICE SUPPLY	Office Supplies	DOW
07/23/2018	215.00	GLOBAL PRINT MASTER	BUSINESS SERVICES-NOT ELSEWHERE CLASSIFIED	KITTAB
07/23/2018	170.00	GLOBAL PRINT MASTER	BUSINESS SERVICES-NOT ELSEWHERE CLASSIFIED	KITTAB
07/25/2018	1,199.99	BEST BUY 00002691	ELECTRONIC SALES	KITTAB
07/31/2018	24.60	STANDARD OFFICE SUPPLY	Purchase of 2 keyboards and 2 mice to replace broken ones and two power adapters for laptops.	DOW
08/01/2018	837.00	NATIOAL ASSOCIATION OF	ORGANIZATIONS MEMBERSHIP-NOT ELSEWHERE CLASSIFIED	KITTAB
08/01/2018	462.40	AMERICAN 00121031725673	AMERICAN AIRLINES	KITTAB
08/05/2018	147.38	AMZN MKTP US AMZN.COM/	Purchase of screen protectors and cases for new iphones for staff.	DOW
08/06/2018	(96.60)	AMAZON.COM AMZN.COM/BI	Refund from Amazon of taxes charged before tax exempt approval.	DOW
08/06/2018	(4.41)	AMZN MKTP US AMZN.COM/	Refund from Amazon of taxes charged before tax exempt approval.	DOW
08/10/2018	99.00	AMERICAN SOCIETY OF AC	ORGANIZATIONS MEMBERSHIP-NOT ELSEWHERE CLASSIFIED	KITTAB
08/10/2018	78.07	COMCAST	CABLE television services	DOW
08/10/2018	78.07	COMCAST	CABLE TELEVISION SERVICES.	DOW
8/9/2018	550.00	REI*PAYMENT CENTER	LexisNexis Legal search services	DOW
08/10/2018	513.00	THOMSON WEST*TCD	Legal search services	DOW

08/10/2018	198.00	DC BAR	ORGANIZATIONS MEMBERSHIP-NOT ELSEWHERE CLASSIFIED	DOW
08/14/2018	289.00	DC BAR	ORGANIZATIONS MEMBERSHIP-NOT ELSEWHERE CLASSIFIED	KITTAB
08/14/2018	308.57	AMZN MKTP US AMZN.COM/	BOOK STORES	DOW
08/15/2018	495.00	DEVSECCON BOSTON 2018	THEATRICAL PRODUCERS(EXCL MOTION PIX) TICKET AGENCY	KITTAB
08/15/2018	571.60	LINKEDIN-400*9972794	DIRECT MARKETING-CONTINUITY-SUBSCRIPTION MERCHANTS	DOW
08/14/2018	3,543.94	STANDARD OFFICE SUPPLY	COMMERCIAL EQUIPMENT NOT ELSEWHERE CLASSIFIED	KITTAB
08/16/2018	289.00	DC BAR	ORGANIZATIONS MEMBERSHIP-NOT ELSEWHERE CLASSIFIED	KITTAB
08/16/2018	751.77	STANDARD OFFICE SUPPLY	COMMERCIAL EQUIPMENT NOT ELSEWHERE CLASSIFIED	KITTAB
08/23/2018	213.60	DELTA 00623377173812	DELTA	KITTAB
08/24/2018	178.00	AMERICAN SOCIETY OF AC	ORGANIZATIONS MEMBERSHIP-NOT ELSEWHERE CLASSIFIED	KITTAB
08/23/2018	31.76	STANDARD OFFICE SUPPLY	COMMERCIAL EQUIPMENT NOT ELSEWHERE CLASSIFIED	KITTAB
08/29/2018	472.04	HOTELS.COM151451189251	TRAVEL AGENCIES AND TOUR OPERATORS	KITTAB
08/28/2018	99.00	DC BAR	ORGANIZATIONS MEMBERSHIP-NOT ELSEWHERE CLASSIFIED	DOW
08/28/2018	198.00	DC BAR	ORGANIZATIONS MEMBERSHIP-NOT ELSEWHERE CLASSIFIED	DOW
08/29/2018	520.96	SOUTHWES 5261482770373	SOUTHWEST AIRLINES	KITTAB
08/29/2018	559.24	LOEWS HOTELS	LOEWS HOTELS	KITTAB
08/29/2018	714.00	NATIONAL PEN CO LLC	DIRECT MARKETING-OTHER DIRECT MARKETERS-NOT ELSEW.	DOW
08/30/2018	540.00	NAP	ORGANIZATIONS POLITICAL	KITTAB
08/30/2018	1,492.00	THOMSON WEST*TCD	PROFESSIONAL SERVICES-NOT ELSEWHERE CLASSIFIED	DOW
08/30/2018	1,846.99	VISTAPR*VISTAPRINT.COM	MISCELLANEOUS PUBLISHING AND PRINTING	DOW
08/29/2018	79.02	STANDARD OFFICE SUPPLY	COMMERCIAL EQUIPMENT NOT ELSEWHERE CLASSIFIED	DOW
08/31/2018	512.97	WWW.VISTAPRINT.COM	MISCELLANEOUS PUBLISHING AND PRINTING	DOW
08/28/2018	469.99	SOFTCHOICE CORPORATION	COMPUTER SOFTWARE STORES	DOW
09/04/2018	1,299.96	BEST BUY 00010926	ELECTRONIC SALES	KITTAB
09/05/2018	299.01	BEST BUY 00002691	ELECTRONIC SALES	KITTAB
09/06/2018	156.14	COMCAST	Cable Television	DOW

09/06/2018	156.14	COMCAST	Cable Television	DOW
09/05/2018	172.12	AMZN MKTP US	BOOK STORES	DOW
09/06/2018	2,655.88	BEST BUY 00002691	ELECTRONIC SALES	KITTAB
09/06/2018	395.00	FOX VALLEY TECH PAYPAT	COLLEGES UNIV PRO SCHOOLS JUNIOR COLLEGES	DOW
09/06/2018	11.26	TN FOX VALLEY TECH PAY	COLLEGES UNIV PRO SCHOOLS JUNIOR COLLEGES	DOW
09/07/2018	550.00	REI*PAYMENT CENTER	BUSINESS SERVICES-NOT ELSEWHERE CLASSIFIED	DOW
09/07/2018	550.00	REI*PAYMENT CENTER	BUSINESS SERVICES-NOT ELSEWHERE CLASSIFIED	DOW
09/11/2018	1,369.95	LOEWS BOSTON	LOEWS HOTELS	KITTAB
09/11/2018	59.00	AICPA *AICPA	ORGANIZATIONS MEMBERSHIP-NOT ELSEWHERE CLASSIFIED	DOW
09/11/2018	513.00	THOMSON WEST*TCD	PROFESSIONAL SERVICES-NOT ELSEWHERE CLASSIFIED	DOW
09/10/2018	357.96	SOUTHWES 5261486877473	SOUTHWEST AIRLINES	DOW
09/11/2018	1,004.38	STANDARD OFFICE SUPPLY	COMMERCIAL EQUIPMENT NOT ELSEWHERE CLASSIFIED	DOW
09/14/2018	586.94	BEST BUY 00002691	ELECTRONIC SALES	KITTAB
09/17/2018	9,495.25	INT*IN *LYNNDOUGLASLLC	CONSULTING MANAGEMENT AND PUBLIC RELATIONS SVCS	DOW
09/17/2018	2,523.39	TCD*THOMSON ELITE	BUSINESS SERVICES-NOT ELSEWHERE CLASSIFIED	DOW
09/19/2018	3,941.86	DMI* DELL HLTHCR/REL	COMPUTERS COMPUTER PERIPHERAL EQUIPMENT SOFTWARE	KITTAB
09/19/2018	980.40	AMZN MKTP US*MT08Z3ZK1	BOOK STORES	DOW
09/20/2018	1,660.50	National Institute for Trial Advocacy	Registration Fee for training - Ashley Cooks	DOW
09/20/2018	1,660.50	National Institute for Trial Advocacy	Registration Fee for training - Asia Stewart-Mitchell	DOW
09/20/2018	1,660.50	National Institute for Trial Advocacy	Registration Fee for training - Sonya King	DOW
09/20/2018	405.54	COURTYARD MESQUITE	COURTYARD BY MARRIOTT	KITTAB
09/20/2018	179.99	BEST BUY 00002691	ELECTRONIC SALES	KITTAB
09/20/2018	8,999.96	AMZN MKTP US*MT88U1N42	BOOK STORES	DOW
09/20/2018	513.00	THOMSON WEST*TCD	PROFESSIONAL SERVICES-NOT ELSEWHERE CLASSIFIED	DOW

09/20/2018	395.00	VARIDESK	OFFICE AND COMMERCIAL FURNITURE	DOW
09/22/2018	(559.24)	DISPUTE CREDIT	LOEWS HOTELS	KITTAB
09/22/2018	(1,369.95)	DISPUTE CREDIT	LOEWS HOTELS	KITTAB
09/21/2018	2,388.00	INT*IN *ARCHIVESOCIAL	COMPUTERS COMPUTER PERIPHERAL EQUIPMENT SOFTWARE	KITTAB
09/22/2018	4,999.69	NBF*NATL BIZ FURNITURE	OFFICE AND COMMERCIAL FURNITURE	KITTAB
09/25/2018	3,702.86	BEST BUY 00002691	ELECTRONIC SALES	KITTAB
09/27/2018	(1,369.95)	DISPUTE CREDIT	LOEWS HOTELS	KITTAB
09/26/2018	43.57	BEST BUY 00011999	ELECTRONIC SALES	KITTAB
09/28/2018	(472.04)	DISPUTE CREDIT	TRAVEL AGENCIES AND TOUR OPERATORS	KITTAB
09/28/2018	1,369.95	DISPUTE REBILL	LOEWS HOTELS	KITTAB
09/27/2018	2,500.00	DATANET SYSTEMS CORP	COMPUTERS COMPUTER PERIPHERAL EQUIPMENT SOFTWARE	DOW
09/27/2018	1,234.95	HI TECH SOLUTION INC	COMPUTER MAIN.-REPAIR-SERVICES NOT ELSEWHERE CLASS	DOW

BEGA FY 2019 Purchase Card Report**Exhibit 6**

Transaction Date	Transaction Amount	Merchant Name	General Purpose of Expenditure	Cardholder Last Name
09/27/2018	9,500.00	CAPITOL DOCUMENT SOLUT	Purchase of copier	DOW
09/29/2018	105.74	DRI*NUANCE	Purchase of Dragon Naturally Speaking software for BW	DOW
09/28/2018	183.30	BIRCH GROVE SOFTWARE I	Purchase of ActivTrak Advanced software for BW	DOW
10/10/2018	472.04	DISPUTE REBILL	Hotel booking	KITTAB
10/10/2018	559.24	DISPUTE REBILL	Hotel booking	KITTAB
10/10/2018	1,369.95	DISPUTE REBILL	Hotel booking	KITTAB
10/18/2018	795.00	INT*IN *ARMSTRONG CUST	Purchase of 500 brochures for BEGA	DOW
10/18/2018	333.14	STANDARD OFFICE SUPPLY	General Office Supplies	DOW
10/29/2018	400.00	VSN*DOTGOVREGISTRATION	.gov domain registration services renewal	KITTAB
10/29/2018	32.52	AMZN MKTP US	General Office Supplies	DOW
10/29/2018	152.79	AMAZON.COM*M85CA90Z0 A	Purchase of HDMI cables	DOW
11/06/2018	125.00	EBI	Purchase of laptop bag for Sonya King	DOW
11/08/2018	2,600.00	COUNCIL ON GOVERNMENTA	Conference fees for Allen and Barton	KITTAB
11/09/2018	636.00	DNH	OOG webserver renewal	KITTAB
11/14/2018	271.00	AMTRAK .CO31	Amtrak: eTicket 12/09/2018 Trip - Niquelle Allen	KITTAB
11/15/2018	448.00	AMZN DIGITAL	Purchase of Adobe Acrobat for employees	DOW
11/16/2018	78.01	COMCAST	Provides cable television services.	DOW
11/16/2018	78.01	COMCAST	Provides cable television services.	DOW
11/16/2018	169.00	AMZN MKTP US	Purchase of docking station for laptop.	DOW
11/16/2018	55.99	EBI	Purchase of laptop bag for Ishmael Okai.	DOW
11/20/2018	1,648.66	AMZN MKTP US	Purchase of Dell laptop for new Investigator.	DOW
11/19/2018	117.00	SENODA INC	Purchase of business cards for Sonya King.	DOW
11/20/2018	1,400.00	COUNCIL ON GOVT ETHICS	Conference registration fee for Asia Stewart-Mitchell	DOW
11/20/2018	1,400.00	COUNCIL ON GOVT ETHICS	Conference registration fee for Rochelle Ford	DOW
11/20/2018	1,400.00	COUNCIL ON GOVT ETHICS	Conference registration for Ashley Cooks	DOW
11/20/2018	334.00	AMTRAK .CO32	Purchase of Amtrak tickets for Ford, Cooks and Stewart-Mitchell to attend COGEL	DOW

11/26/2018	404.00	THOMSON WEST	Provides updates to the D.C. Code.	DOW
11/26/2018	513.00	THOMSON WEST	Provides legal search services.	DOW
11/26/2018	257.43	REI*PAYMENT CENTER	Provides legal search services.	DOW
11/26/2018	77.90	CAPITOL DOCUMENT SOLUT	Payment for copy machine maintenance.	DOW
11/28/2018	207.98	BEST BUY 00002691	Keyboards	KITTAB
11/29/2018	308.12	STANDARD OFFICE SUPPLY	Purchase of office supplies	DOW
12/06/2018	550.92	SQU*SQ *NORTH CAPITOL	Provided delivery service from Surplus Property	DOW
12/07/2018	78.04	COMCAST	Provides cable television services to OGE.	DOW
12/07/2018	78.04	COMCAST	Provides cable television services to OOG.	DOW
12/07/2018	2,208.00	HI TECH SOLUTION INC	Purchase of three scanners and four monitors.	DOW
12/10/2018	509.68	MARRIOTT PHILAD DTOWN	Hotel stay for Johnnie Barton at COGEL	KITTAB
12/12/2018	374.22	MARRIOTT PHILAD DTOWN	Hotel stay for Niquelle Allen at COGEL	KITTAB
12/13/2018	520.20	MARRIOTT PHILAD DTOWN	Hotel reservations for Asia Stewart-Mitchell to attend COGEL	DOW
12/13/2018	447.00	MARRIOTT PHILAD DTOWN	Hotel reservations for Ashley Cooks to attend COGEL Conference in Philadelphia, PA	DOW
12/13/2018	73.20	MARRIOTT PHILAD DTOWN	Hotel reservations for Ashley Cooks' room (tax charge, hotel t	DOW
12/20/2018	31.61	STANDARD OFFICE SUPPLY	Office Supplies	DOW
01/03/2019	24.60	STANDARD OFFICE SUPPLY	Office Supplies	DOW
01/11/2019	80.08	COMCAST	Cable Television services for OGE	DOW
01/11/2019	80.08	COMCAST	Cable Television services for OOG	DOW
01/10/2019	1,140.00	REI*PAYMENT CENTER		DOW
01/11/2019	731.88	THOMSON WEST	Legal searches	DOW
01/10/2019	81.86	CAPITOL DOCUMENT SOLUT	Maintenance fees for Copier	DOW
01/16/2019	89.97	STANDARD OFFICE SUPPLY	Office Supplies	DOW
01/18/2019	57.54	AMZN MKTP US	Office Supplies	DOW
01/24/2019	55.99	AMZN MKTP US	Office Supplies	DOW
01/24/2019	184.13	STANDARD OFFICE SUPPLY	Office Supplies	DOW

AGO - DC BOARD OF ETHICS AND GOVT ACCOUNTABILITY
MOUs for FY 2018 - FY 2019

Exhibit 7

Fiscal Year	Seller Agency	Buyer Agency	Service Description	Fund	Service Period	Total Amount
FY 2018	OCP	BEGA	Purchase Card	0100	10/01/17 - 09/30/18	\$ 121,724.52
	OCTO	BEGA	RTS	0100	10/01/17 - 09/30/18	\$ 7,531.79
	DCHR	BEGA	Personnel and Resource Support	0100	10/01/17 - 09/30/18	\$ 10,360.00
	OCTO	BEGA	IT Assessment	0100	10/01/17 - 09/30/18	\$ 13,669.47
	OCTO	BEGA	Licenses	0100	10/01/17 - 09/30/18	\$ 3,042.86
	DPW	BEGA	Fleet Services	0100	10/01/17 - 09/30/18	\$ 2,555.28
	ODR	BEGA	Sign Language Interp	0100	10/01/17 - 09/30/18	\$ 230.00
	Total					\$ 159,113.92
FY 2019	OCTO	BEGA	IT Assessment	0100	10/01/18 - 09/30/19	\$ 22,207.86
	OCTO	BEGA	MICROS OFFICE 365	0100	10/01/18 - 09/30/19	\$ 3,349.89
	OCP	BEGA	Purchase Card	0100	10/01/17 - 09/30/18	\$ 21,514.69
	DPW	BEGA	Fleet Services	0100	10/01/18 - 09/30/19	\$ 1,120.77
	Total					\$ 48,193.21

D.C. Board of Ethics and Government Accountability (AGO)

Purchase Order FY 2018

EXHIBIT 8

Agy Fund	P.O. number	Vendor Name	PO Amount	Expenditure	PO BAL	Final Action
Local	PO570959	METROPOLITAN OFFICE PRODUCTS	3000	3000	0	
Local	PO570961	LEXISNEXIS RISK SOLUTIONS FL	3300	3300	0	
Local	PO577357	DELL MARKETING L.P.	412.83	412.83	0	
SPR	PO582709	DATA NET SYSTEMS CORP	11119.59	5,042.75	6,076.84	Balance Deobligated
Local	PO584010	DELL MARKETING L.P.	20605.76	20605.76	0	
SPR	PO588298	WINGSWEPT LLC	55756.6	55756.6	0	
Local	PO589620	PUBLIC PERFORMANCE MANAG.	12401.80	0	0.00	Fully Deobligated
		TOTAL	106,596.58	88,117.94		

Purchase Order FY 2019

Agy Fund	P.O. number	Vendor Name	PO Amount	Expenditure	PO BAL	Final Action
Local	PO597338	REED ELSEVIER INCORPORATED	6270.00		6270.00	
Local	PO597339	DATA NET SYSTEMS CORP	13120.80		13120.80	
SPR	PO598004	WINGSWEPT LLC	9750.00		9750.00	
		TOTAL	29140.80		29140.80	

Purchase Order Monitors: Sandra Peterson and Tyrell Dow



District of Columbia Planning Documents

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NEW DSLBD Ag...

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Agency [D.C. Board of Ethics and Government Accountability](#)

Agency Acronym BEGA

Agency Code AG0

To edit agency and POC information press your agency name (underlined and in blue above).

Agency Performance POCs

[Brent Wolfingbarger](#) [Brian \(EOM\) Flowers](#) [Sandra Peterson](#)

Agency Budget POCs

[Mohammad Awan](#) [Sandra Peterson](#)

Fiscal Year 2018

Agency's Operating Budget

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2018 Agency Accomplishments

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Accomplishment

Add Accomplishment

Accomplishments

Full Report | Grid Edit | Email | More 2 Accomplishments

What is the accomplishment that your agency wants to highlight?

For the second consecutive year, we hosted our Annual Ethics Day program for the District government, where we offered a full day of ethics training programs.

The agency regularly held joint meetings with the staff of the Office of the Inspector General (OIG), to discuss progress on shared cases and to ensure that each agency's staff members received appropriate guidance and feedback regarding case management, coordination and development.

How did this accomplishment impact residents of DC?

This helped to ensure that District employees received training required under the Ethics Act.

The District's residents benefited from having two oversight agencies with related responsibilities coordinate their operations to ensure that government resources were used efficiently by preventing duplication of investigative efforts.

How did this accomplishment impact your agency?

We tailored a slate of ethics-related training sessions for our target audience of District employees, concurrently delivering multiple sessions each hour to give employees more content choices, and we received prompt and detailed feedback from attendees to help us improve our future training offerings.

BEGA benefited from this coordination by being able to focus its limited resources on non-criminal matters that were not being investigated by the OIG, which is equipped with more investigators and resources than our agency. Adopting this "divide-and-conquer" approach has helped improve the efficiency of both agencies' operations.

2018 Objectives

Strategic Objectives

Full Report | Grid Edit | Email | More 4 Objectives

Objective Number	Strategic Objective	# of Measures	# of Operations
1	Issue Ethics advice in an expeditious and consistent fashion.	3	1
2	Conduct timely and appropriate investigations and enforcement actions.	3	1
3	Conduct mandatory training on the Code of Conduct and produce ethics training materials.	3	1
4	Create and maintain a highly efficient, transparent and responsive District government.**	0	1
TOT		9	4

[Add Strategic Objective](#)

Key Performance Indicators

Full Report Grid Edit Email More				9 Measures														
Measure	New Measure/ Benchmark Year	Directionality	FY 2014 Actual	FY 2015 Target	FY 2015 Actual	FY 2016 Target	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2018 Quarter 1	FY 2018 Quarter 2	FY 2018 Quarter 3	FY 2018 Quarter 4	FY 2018	Was 2018 KPI Met?	Please explain any barriers to meeting your FY2018 KPI Target?	Are Explanations of Barriers to Meeting KPIs Complete

Percent of formal written Advisory Opinions issued within 30 days of receipt of complete information from requester.

	Up is Better	Not available	Not available	Not Available	Not Available	100%	85%	100%	85%	Annual Measure	Annual Measure	Annual Measure	Annual Measure	100%	Met
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Percent of advice queries received that were handled as informal rather than formal advice.

Up is Better	Not available	Not available	Not Available	Not Available	Not Available	10%	97.8%	10%	100%	99.5%	100%	100%	99.9%	Met
--------------	---------------	---------------	---------------	---------------	---------------	-----	-------	-----	------	-------	------	------	-------	-----

Percent of formal written Advisory Opinions appealed to the Ethics Board.

Up is Better	Not available	Not available	100%	85%	Not Available	85%	0%	85%	No applicable incidents	No applicable incidents	No applicable incidents	No applicable incidents	No applicable incidents	Unmet	There were no appeals this year.
--------------	---------------	---------------	------	-----	---------------	-----	----	-----	-------------------------	-------------------------	-------------------------	-------------------------	-------------------------	-------	----------------------------------

Percent of investigations resolved by dismissal, negotiated disposition, or issuance of Notice of Violation within 120 days of initiation.

Up is Better	Not available	Not available	Not Available	Not Available	83.3%	80%	84.1%	80%	77.8%	83.3%	100%	75%	80.8%	Met
--------------	---------------	---------------	---------------	---------------	-------	-----	-------	-----	-------	-------	------	-----	-------	-----

Percent of enforcement actions that result in a sanction.

Up is Better	Not available	Not available	Not Available	Not Available	Not Available	85%	100%	85%	100%	100%	100%	100%	100%	Met
--------------	---------------	---------------	---------------	---------------	---------------	-----	------	-----	------	------	------	------	------	-----

Percent of
final Ethics
Board Orders
issued within
45 days of
close of
hearing
record.

Up is Better	Not available	Not available	Not Available	Not Available	100%	85%	100%	85%	100%	100%	100%	100%	100%	Met
--------------	---------------	---------------	---------------	---------------	------	-----	------	-----	------	------	------	------	------	-----

Measure	New Measure/ Benchmark Year	Directionality	FY 2014 Actual	FY 2015 Target	FY 2015 Actual	FY 2016 Target	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2018 Quarter 1	FY 2018 Quarter 2	FY 2018 Quarter 3	FY 2018 Quarter 4	FY 2018	Was 2018 KPI Met?	Please explain any barriers to meeting your FY2018 KPI Target?	Are Explanations of Barriers to Meeting KPIs Complete
Percent of evaluations completed by attendees with an overall positive rating of "3" or higher on the BEGA training evaluation form.	<input type="checkbox"/>	Up is Better	Not available	Not available	Not Available	Not Available	Not Available	80%	97.5%	80%	99%	100%	100%	91.3%	97.6%	Met		
Percent of agency trainings held within 90 days of agency making the request.	<input type="checkbox"/>	Up is Better	Not available	Not available	Not Available	Not Available	Not Available	90%	100%	90%	100%	100%	100%	100%	100%	Met		
Percent of off site agency training requests granted.	<input type="checkbox"/>	Up is Better	Not available	Not available	Not Available	Not Available	Not Available	90%	100%	90%	100%	100%	100%	100%	100%	Met		

**We've revisited a project to standardize District wide measures for the Objective "Create and maintain a highly efficient, transparent and responsive District government." New measures will be tracked in FY18 and FY19 and published starting in the FY19 Performance Plan.

2018 Operations

Operations **Full Report** | **Grid Edit** | **Email** | **More** **4 Activities**

Operations Header	Operations Title	Operations Description	Type of Operations	# of Measures	# of Strategic Initiatives
1 - Issue Ethics advice in an expeditious and consistent fashion. (1 Activity)					
BOARD OF ETHICS	Render Timely Advice. Respond to requests for informal ethics advice in a substantive and useful manner.	Work with staff to ensure that ethics guidance is provided to government employees who seek ethics guidance.	Daily Service	3	0
TOT				3	0
2 - Conduct timely and appropriate investigations and enforcement actions. (1 Activity)					
BOARD OF ETHICS	Monitor and support ongoing investigations to ensure timely completion.	Track progress throughout the year and work with staff to ensure movement.	Daily Service	11	0
TOT				11	0
3 - Conduct mandatory training on the Code of Conduct and produce ethics training materials. (1 Activity)					
BOARD OF ETHICS	Increase Training Sessions. Increase number of trainings available to District government employees.	Allocate staff time to ensure availability when requests are made from client agencies.	Daily Service	1	0
TOT				1	0
4 - Create and maintain a highly efficient, transparent and responsive District government.** (1 Activity)					
BOARD OF ETHICS	Ensure that every request for advice or information is acknowledged within 24 hours of receipt.	Work with staff to ensure that either a substantive response is provided or, where that is not possible, an acknowledgment that the request is under review.	Daily Service	1	0

2018 Workload Measures

Workload Measures - Operations	Full Report Grid Edit Email More	16 Measures																
	Measure	New Measure/ Benchmark Year	Numerator Title	Units	FY 2014	FY 2015	FY 2016	FY 2017 Actual	FY 2018 Quarter 1	FY 2018 Quarter 2	FY 2018 Quarter 3	FY 2018 Quarter 4	FY 2018					
1 - Render Timely Advice. Respond to requests for informal ethics advice in a substantive and useful manner. (3 Measures)																		
	Number of requests for informal ethics advice		Requests for informal ethics advice	Number of requests for informal ethics advice			690	700	136	210	289	170	805					
	Number of formal written advisory opinions issued pursuant to a request		Number of formal written advisory opinions issued pursuant to a request	advisory opinions			4	12	0	1	0	0	1					
	Number of formal written advisory opinions issued on the agency's own initiative		Number of formal written advisory opinions issued on the agency's own initiative	advisory opinions			2	2	0	0	0	0	0					
2 - Monitor and support ongoing investigations to ensure timely completion. (11 Measures)																		
	Number of complaints received		Complaints answered	Number of complaints received			138	183	31	26	24	42	123					
	Number of preliminary investigations opened based on tips to the hotline		Number of preliminary investigations opened based on tips to the hotline	investigations			2	0	0	0	0	0	0					
	Number of preliminary investigations dismissed		Number of preliminary investigations dismissed	investigations			34	24	8	0	2	2	12					
	Number of preliminary investigations opened based on information provided by means other than the hotline		Number of preliminary investigations opened based on information provided by means other than the hotline	investigations			85	33	3	17	13	4	37					
	Number of preliminary investigations converted to formal investigations		Number of preliminary investigations converted to formal investigations	investigations			3	1	1	2	1	1	5					
	Number of preliminary investigations resolved with a negotiated disposition		Number of preliminary investigations resolved with a negotiated disposition	investigations			12	9	3	1	0	0	4					
	Number of preliminary investigations resolved after an evidentiary hearing		Number of preliminary investigations resolved after an evidentiary hearing	investigations			0	0	0	0	0	1	1					
	Number of formal investigations initiated on intake		Number of formal investigations initiated on intake	investigations			24	14	0	3	1	5	9					
	Number of formal investigations dismissed		Number of formal investigations dismissed	investigations			17	12	2	3	1	5	11					
	Number of formal investigations resolved with a negotiated disposition		Number of formal investigations resolved with a negotiated disposition	investigations			1	3	1	0	0	0	1					
	Number of formal investigations resolved after an evidentiary hearing		Number of formal investigations resolved after an evidentiary hearing	investigations			0	1	0	0	0	0	0					
3 - Increase Training Sessions. Increase number of trainings available to District government employees. (1 Measure)																		
	Number of trainings conducted		Number of trainings conducted	trainings			121	129	23	27	28	23	101					
4 - Ensure that every request for advice or information is acknowledged within 24 hours of receipt. (1 Measure)																		
	Number of formal advisory opinions issued		Formal advisory opinions issued	Number of formal advisory opinions issued			8	9	0	1	0	0	1					

2018 Initiatives

Strategic Initiatives	Strategic Initiative Title	Strategic Initiative Description	Proposed Completion Date
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No strategic initiatives found

2018 Initiative Updates

Initiative Updates	Strategic Initiative Title	Initiative Status Update	% Complete to date	Confidence in completion by end of fiscal year (9/30)?	Status of Impact	Explanation of Impact	Supporting Data	Quarters
No initiative updates found								

Administrative Information

FY Performance Plan D.C. Board of Ethics and Government Accountability FY2018 Record ID# 430

Performance Plan ID 304

Created on Dec. 15, 2016 at 3:17 PM (EST). Last updated by [Katz, Lia \(EOM\)](#) on June 6, 2017 at 5:49 PM (EDT). Owned by [Katz, Lia \(EOM\)](#).



District of Columbia Planning Documents

My Apps

FY18 DSLBD ...

FY17 DSLBD ...

NEW DSLB...

FY18: EOM B...

OCA: District P...

DSLBD (FY15...

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STRATEGIC INITIATIVES

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Agency [D.C. Board of Ethics and Government Accountability](#)

Agency Acronym BEGA

Agency Code AGO

Return

To edit agency and POC information press your agency name (underlined and in blue above).

Agency Performance POCs

[Brent Wolfingbarger](#)[Brian \(EOM\) Flowers](#)[Sandra Peterson](#)

Agency Budget POCs

[Mohammad Awan](#)[Sandra Peterson](#)

Fiscal Year 2019

Agency's Operating Budget

[Lookup Your Agency's Operating Budget](#)

2019 Objectives

Strategic Objectives

Full Report

Grid Edit

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More

4 Objectives

Objective
Number

Strategic Objective

- 1 Issue Ethics advice in an expeditious and consistent fashion.
- 2 Conduct timely and appropriate investigations and enforcement actions.
- 3 Conduct mandatory training on the Code of Conduct and produce ethics training materials.
- 4 Create and maintain a highly efficient, transparent and responsive District government.

Add Strategic Objective

[Add Strategic Objective](#)

2019 Key Performance Indicators

Key
Performance
Indicators

Full Report

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More

9 Measures

Measure

New
Measure/
Benchmark

Directionality

FY
2014
ActualFY
2015
TargetFY
2015
ActualFY
2016
TargetFY
2016
ActualFY
2017
TargetFY
2017
ActualFY
2018
TargetFY
2018
ActualFY
2019
TargetFY
2019
Quarter

Measure	New Measure/ Benchmark Year	Directionality	FY 2014 Actual	FY 2015 Target	FY 2015 Actual	FY 2016 Target	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2018 Actual	FY 2019 Target	FY 2019 Quarter 1
Percent of formal written Advisory Opinions issued within 30 days of receipt of complete information from requester	<input type="checkbox"/>	Up is Better	Not available	Not available	Not Available	Not Available	100%	85%	100%	85%	100%	85%	Needs Data Update
Percent of advice queries received that were handled as informal rather than formal advice	<input type="checkbox"/>	Up is Better	Not available	Not available	Not Available	Not Available	Not Available	10%	97.8%	10%	99.9%	10%	Needs Data Update
Percent of formal written Advisory Opinions appealed to the Ethics Board	<input type="checkbox"/>	Up is Better	Not available	Not available	100%	85%	Not Available	85%	0%	85%	No applicable incidents	85%	Needs Data Update
2 - Conduct timely and appropriate investigations and enforcement actions. (3 Measures)													
Percent of investigations resolved by dismissal, negotiated disposition, or issuance of Notice of Violation within 120 days of initiation	<input type="checkbox"/>	Up is Better	Not available	Not available	Not Available	Not Available	83.3%	80%	84.1%	80%	80.8%	80%	Needs Data Update
Percent of enforcement actions that result in a sanction	<input type="checkbox"/>	Up is Better	Not available	Not available	Not Available	Not Available	Not Available	85%	100%	85%	100%	85%	Needs Data Update
Percent of final Ethics Board Orders issued within 45 days of close of hearing record	<input type="checkbox"/>	Up is Better	Not available	Not available	Not Available	Not Available	100%	85%	100%	85%	100%	85%	Needs Data Update

Measure	New Measure/ Benchmark Year	Directionality	FY 2014 Actual	FY 2015 Target	FY 2015 Actual	FY 2016 Target	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2018 Actual	FY 2019 Target	FY 2019 Actual	FY 2019 Quarter 1
Percent of evaluations completed by attendees with an overall positive rating of "3" or higher on the BEGA training evaluation form	<input type="checkbox"/>	Up is Better	Not available	Not available	Not Available	Not Available	Not Available	80%	97.5%	80%	97.6%	80%		Needs Data Update
Percent of agency trainings held within 90 days of agency making the request	<input type="checkbox"/>	Up is Better	Not available	Not available	Not Available	Not Available	Not Available	90%	100%	90%	100%	90%		Needs Data Update
Percent of off site agency training requests granted	<input type="checkbox"/>	Up is Better	Not available	Not available	Not Available	Not Available	Not Available	90%	100%	90%	100%	90%		Needs Data Update

2019 Operations

Operations

Full Report

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More

4 Activities

Operations Header	Operations Title	Operations Description	Type of Operations
1 - Issue Ethics advice in an expeditious and consistent fashion. (1 Activity)			
BOARD OF ETHICS	Render Timely Advice. Respond to requests for informal ethics advice in a substantive and useful manner	Work with staff to ensure that ethics guidance is provided to government employees who seek ethics guidance.	Daily Service
2 - Conduct timely and appropriate investigations and enforcement actions. (1 Activity)			
BOARD OF ETHICS	Monitor and support ongoing investigations to ensure timely completion	Track progress throughout the year and work with staff to ensure movement.	Daily Service
3 - Conduct mandatory training on the Code of Conduct and produce ethics training materials. (1 Activity)			
BOARD OF ETHICS	Increase Training Sessions. Increase number of trainings available to District government employees	Allocate staff time to ensure availability when requests are made from client agencies.	Daily Service
4 - Create and maintain a highly efficient, transparent and responsive District government. (1 Activity)			
BOARD OF ETHICS	Ensure that every request for advice or information is acknowledged within 24 hours of receipt	Work with staff to ensure that either a substantive response is provided or, where that is not possible, an acknowledgment that the request is under review.	Daily Service

Measures - Operations	Full Report	Grid Edit	Email	More	16 Measures									
	Measure				New Measure/ Benchmark Year	Numerator Title	Units	FY 2014	FY 2015	FY 2016	FY 2017 Actual	FY 2018 Actual	FY 2019 Quarter 1	
1 - Render Timely Advice. Respond to requests for informal ethics advice in a substantive and useful manner (3 Measures)														
	Number of requests for informal ethics advice				<input type="checkbox"/>	Requests for informal ethics advice	Number of requests for informal ethics advice			690	700	805	Needs Data Update	
	Number of formal written advisory opinions issued pursuant to a request				<input type="checkbox"/>	Number of formal written advisory opinions issued pursuant to a request	advisory opinions			4	12	1	Needs Data Update	
	Number of formal written advisory opinions issued on the agency's own initiative				<input type="checkbox"/>	Number of formal written advisory opinions issued on the agency's own initiative	advisory opinions			2	2	0	Needs Data Update	
2 - Monitor and support ongoing investigations to ensure timely completion (11 Measures)														
	Number of complaints received				<input type="checkbox"/>	Complaints answered	Number of complaints received			138	183	123	Needs Data Update	
	Number of preliminary investigations opened based on tips to the hotline				<input type="checkbox"/>	Number of preliminary investigations opened based on tips to hotline	investigations			2	0	0	Needs Data Update	
	Number of preliminary investigations dismissed				<input type="checkbox"/>	Number of preliminary investigations dismissed	investigations			34	24	12	Needs Data Update	
	Number of preliminary investigations opened based on information provided by means other than the hotline				<input type="checkbox"/>	Number of preliminary investigations opened based on information provided by means other than the hotline	investigations			85	33	37	Needs Data Update	
	Number of preliminary investigations converted to formal investigations				<input type="checkbox"/>	Number of preliminary investigations converted to formal investigations	investigations			3	1	5	Needs Data Update	
	Number of preliminary investigations resolved with a negotiated disposition				<input type="checkbox"/>	Number of preliminary investigations resolved with a negotiated disposition	investigations			12	9	4	Needs Data Update	
	Number of preliminary investigations resolved after an evidentiary hearing				<input type="checkbox"/>	Number of preliminary investigations resolved after an evidentiary hearing	investigations			0	0	1	Needs Data Update	
	Number of formal investigations initiated on intake				<input type="checkbox"/>	Number of formal investigations initiated on intake	investigations			24	14	9	Needs Data Update	
	Number of formal investigations dismissed				<input type="checkbox"/>	Number of formal investigations dismissed	investigations			17	12	11	Needs Data Update	
	Number of formal investigations resolved with a negotiated disposition				<input type="checkbox"/>	Number of formal investigations resolved with a negotiated disposition	investigations			1	3	1	Needs Data Update	
	Number of formal investigations resolved after an evidentiary hearing				<input type="checkbox"/>	Number of formal investigations resolved after an evidentiary hearing	investigations			0	1	0	Needs Data Update	

Measure	New Measure/ Benchmark Year	Numerator Title	Units	FY 2014	FY 2015	FY 2016	FY 2017 Actual	FY 2018 Actual	FY 2019 Quarter 1
Number of trainings conducted	<input type="checkbox"/>	Number of trainings conducted	trainings			121	129	101	Needs Data Update
4 - Ensure that every request for advice or information is acknowledged within 24 hours of receipt (1 Measure)									
Number of formal advisory opinions issued	<input type="checkbox"/>	Formal advisory opinions issued	Number of formal advisory opinions issued			8	9	1	Needs Data Update

2019 Initiatives

Strategic Initiatives	Strategic Initiative Title	Strategic Initiative Description	Proposed Completion Date	Add Initiative Update
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No strategic initiatives found

2019 Initiative Updates

Initiative Updates	Strategic Initiative Title	Initiative Status Update	% Complete to date	Confidence in completion by end of fiscal year (9/30)?	Status of Impact	Explanation of Impact	Supporting Data	FY19 Reporting Quarter
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No initiative updates found

Internal: Unfinished 2018 Initiatives

This year, the OCA is requesting updates on any unfinished initiatives from FY18. Updates will not be published, but will be used to report progress to the City Administrator and the Mayor as needed.

Strategic Initiatives	Title	Description	Complete to Date	Status Update	Explanation	Anticipated Completion Date	Add Initiative Update - Rolled Over Initiatives	Needs Initiative Update - Rolled Over Initiatives - Notification
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No strategic initiatives found

Int: Unfinished 2018 Initiative Updates

Strategic Initiative Title	Anticipated completion date	New initiative created for FY19	No Longer an Initiative	Initiative Status Update	% Complete to date	Confidence in completion by anticipated completion date?	Status of Impact	Explanation of Impact	Supporting Data	FY19 Reporting Quarter
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2019 Capital Projects

Capital projects -
performance plans links

Project Number

Project Title

Owner Agency Acronym

Implementing Agency Acronym

Milestone Description

Fiscal Year Allotment

No capital projects - performance plans links found

[Operating Budget](#)

Administrative Information

FY Performance Plan D.C. Board of Ethics and Government Accountability FY2019 Record ID# 568

Performance Plan ID 568

Created on Dec. 26, 2017 at 4:23 PM (EST). Last updated by [Katz, Lia \(EOM\)](#) on June 18, 2018 at 1:51 PM (EDT). Owned by [Katz, Lia \(EOM\)](#).

Office of Open Government FY2019



Agency Office of Open Government

Agency Code OOG

Fiscal Year 2019

Mission Ensuring that all persons are entitled to full and complete information regarding the affairs of the District government and the actions of those who represent them.

2019 Strategic Objectives

Objective Number	Strategic Objective
1	Improve the compliance of public bodies with Open Meetings Act (OMA)
2	Improving the governments compliance with the Freedom of Information Act (FOIA)
3	Conduct mandatory training on the Open Meetings Act and produce OMA and FOIA training materials on open-dc.gov

2019 Key Performance Indicators

Measure	Directionality	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	FY 2019 Target
1 - Improve the compliance of public bodies with Open Meetings Act (OMA) (2 Measures)							
Percent of formal written OMA advisory opinions issued within 30 days of a completed investigation	Up is Better	Not available	Not Available	New Measure	New Measure	New Measure	New Measure
Percent of of public bodies not in compliance with OMA that were notified of non-compliance within 30 days of completion of the audit	Up is Better	Not available	Not Available	New Measure	New Measure	New Measure	New Measure
2 - Improving the governments compliance with the Freedom of Information Act (FOIA) (2 Measures)							
Percent of agency websites reviewed for listing mandatory FOIA information available on the District's website, DC.GOV	Up is Better	Not available	Not Available	New Measure	New Measure	New Measure	New Measure
Percent of designated FOIA officers trained in FOIA	Up is Better	Not available	Not Available	New Measure	New Measure	New Measure	New Measure
3 - Conduct mandatory training on the Open Meetings Act and produce OMA and FOIA training materials on open-dc.gov (2 Measures)							
Percent of evaluations completed by attendees with an overall positive rating of "3" or higher on the BEGA/OOG evaluation form	Up is Better	Not available	Not Available	New Measure	New Measure	New Measure	New Measure
Percent of organization training completed within 90 days of the agency or organization making the request	Up is Better	Not available	Not Available	New Measure	New Measure	New Measure	New Measure

Measure	Directionality	FY 2014 Actual	FY 2015 Actual	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	FY 2019 Target
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2019 Operations

Operations Header	Operations Title	Operations Description	Type of Operations
1 - Improve the compliance of public bodies with Open Meetings Act (OMA) (3 Activities)			
OMA Compliance	Audit	Audit	Daily Service
OMA Compliance	Outreach, training, and education	Outreach, training, and education	Daily Service
OMA Compliance	Complaints	Complaints	Daily Service
2 - Improving the governments compliance with the Freedom of Information Act (FOIA) (2 Activities)			
FOIA Compliance	Training, Outreach, and Education	Training, Outreach, and Education	Daily Service
FOIA Compliance	DC.GOV Website Audit for minimum FOIA information	DC.GOV Website Audit for minimum FOIA information	Daily Service
3 - Conduct mandatory training on the Open Meetings Act and produce OMA and FOIA training materials on open-dc.gov (2 Activities)			
Training	Annual Open Meetings Act Training	Annual Open Meetings Act Training	Daily Service
Training	Annual Open Meetings Act Training OMA and FOIA Materials Available on OOG Website	OMA and FOIA Materials Available on OOG Website	Daily Service

2019 Workload Measures

Measure	New Measure/ Benchmark Year	Numerator Title	Units	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018
1 - Audit (1 Measure)								
Number of public bodies' websites reviewed for compliance with OMA as per the annual audit	✓	Number of public bodies' websites reviewed	Numerical			New Measure	New Measure	New Measure
1 - Complaints (2 Measures)								
Number of complaints received	✓	Number of complaints received	Numerical			New Measure	New Measure	New Measure

Measure	New Measure/ Benchmark Year	Numerator Title	Units	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018
Number of complaints resolved	✓	Number of complaints received	Numerical			New Measure	New Measure	New Measure
1 - Outreach, training, and education (3 Measures)								
Number of trainings hosted	✓	Number of trainings hosted	Numerical			New Measure	New Measure	New Measure
Number of public meetings attended	✓	Number of public meetings attended	Numerical			New Measure	New Measure	New Measure
Number of best practice recommendations issued for changes to legislation	✓	Number of best practice recommendations issued for changes to legislation	Numerical			New Measure	New Measure	New Measure
2 - DC.GOV Website Audit for minimum FOIA information (2 Measures)								
Number of agency websites reviewed	✓	Number of agency websites reviewed	Numerical			New Measure	New Measure	New Measure
Number of agencies notified that their websites are out of FOIA compliance within 30 days of completion of the website audit	✓	Number of agencies notified that their websites are out of FOIA compliance within 30 days of completion of the website audit	Numerical			New Measure	New Measure	New Measure
2 - Training, Outreach, and Education (2 Measures)								
Number of FOIA trainings completed by this office	✓	Number of FOIA trainings completed by this office	Numerical			New Measure	New Measure	New Measure
Number of requests for FOIA assistance processed by this office	✓	Number of requests for FOIA assistance processed by this office	Numerical			New Measure	New Measure	New Measure
3 - Annual Open Meetings Act Training (2 Measures)								
Number of Boards and Commissions Trained on the OMA	✓	Number of Boards and Commissions Trained on the OMA	Numerical			New Measure	New Measure	New Measure
Number of Core Public Documents available on open-dc.gov website	✓	Number of Core Public Documents available on open-dc.gov website	Numerical			New Measure	New Measure	New Measure
3 - Annual Open Meetings Act Training OMA and FOIA Materials Available on OOG Website (3 Measures)								
Number of training materials available via open-dc.gov	✓	Number of training materials available via open-dc.gov	Numerical			New Measure	New Measure	New Measure

Measure	New Measure/ Benchmark Year	Numerator Title	Units	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018
Number of OMA Advisory Opinions posted on open-dc.gov	✓	Number of OMA Advisory Opinions posted on open-dc.gov	Numerical			New Measure	New Measure	New Measure
Number of FOIA Advisory Opinions posted on open-dc.gov	✓	Number of FOIA Advisory Opinions posted on open-dc.gov	Numerical			New Measure	New Measure	New Measure

▼ 2019 Strategic Initiatives

Strategic Initiatives

Strategic Initiative Title	Strategic Initiative Description	Proposed Completion Date
No strategic initiatives found		

DeskReview Jan-Jun 18 (Audit Report)

A. Failure to Register/file

1. David Wilmot was hired by District of Columbia Association of Health Plans to lobby. David Wilmot Register and filed LAR but DCAHP did not register nor file LAR.
2. eSystems hired The Meyers Group to lobby. eSystems registered and filed LAR but The Meyers Group did not.
3. Georgetown Public Affairs, LLC was hired by M.C Dean to lobby. Georgetown Public Affairs, LLC registered and filed LAR but M.C. Dean neither registered nor filed LAR.
4. Global Government and Industry Partners, LLC was hired by Total Healthcare solutions to lobby but Total Healthcare solutions did not register or file the LAR
5. Bird Rides Inc. hired Max Brown to lobby on its behalf. Max Brown registered and filed LAR but Bird Rides did not.
6. WGL Holding hired Group 360 LLC to lobby on its behalf. Group 360 registered and filed LAR but WGL did not register nor file the LAR
7. IESI hired The Meyers Group to lobby. IESI registered and filed LAR but Meyers did register or file LAR
8. Jackson and Campbell was hired by DC Land Title Association to lobby. Jackson and Campbell registered and filed LAR but DC Land Title Association did register or file LAR.
9. MaryEvaCandon hired Frank D. Boston to lobby. MaryEva registered and filed LAR but Frank Boston did not.

10. MaryEvaCandon was hired by Epic Pharmacies, Inc., c/o MultiState Associates to lobby. MaryEva registered and filed LAR but Epic Pharmacies, Inc., c/o MultiState Associates did not.
11. Nelson Mullins was hire by Mobike to lobby. Nelson registered and filed LAR but Mobike did not.
12. O'Neill and Associates was hired by Waltz, Inc. to lobby. O'Neill and Associates registered and filed LAR but Waltz, Inc. did not.
13. The Bellamy Genn Group was hire by Cybersecurity Association of Maryland, Inc. to lobby. The Bellamy Genn Group registered and filed LAR but Cybersecurity did not.
14. The Bellamy Genn Group was hire by Telligen to lobby. The Bellamy Genn Group registered and filed LAR but Telligen did not.

B. Campaign Contribution Violation

No.	Registered User	Client Name	Email	Filing Period	Amount	Beneficiary	Remarks/Notes
1	Global Government and Industry Partners, LLC	Potomac Electric Power Company	Coreyg@2gip.com	Jan 1, - Jun30 2018	\$5,000.00	\$500 to Ward 4 Constituent Services Fund; \$1,500 to Mendelson for Chairman 2018; \$1,500 to Karl Racine 2018; \$1,500 to Mendelson for Chairman 2018	Phil Mendelson received \$3,000 instead of \$1,500. See DC Official code §1163.33
2	Global Government and Industry Partners, LLC	Mid City Financial Corporation	Coreyg@2gip.com	Jan 1, - Jun30 2018	\$5,200.00	\$200 to Adrian Jordan 2018; \$1,500 to Mendelson for Chairman 2018; \$1,500 to Karl Racine 2018; \$1,500 to Mendelson for Chairman 2018; \$500 Ward 4 Constituent Services.	Phil Mendelson received \$3,000 instead of \$1,500. See DC Official code §1163.33
3	Global Government and Industry Partners, LLC	Anthem, Inc. and its Affiliates (including Amerigroup)	Coreyg@2gip.com	Jan 1, - Jun30 2018	\$5,000.00	\$1500 to Mendelson for Chairman 2018; \$ 1500 to Karl Racine 2018; \$1500 to Mendelson for Chairman 2018; \$500 to Ward 4 Constituent Services.	Phil Mendelson received \$3,000 instead of \$1,500. See DC Official code §1163.33
4	UNITE HERE Local 25		sepps@local25now.org	Jan 1, - Jun30 2018	\$6,000.00	\$1500 to Phil Mendelson; \$1500 to Karl Racine; \$1500 to Kenyan McDuffie; \$1500 Muriel Bowser.	Kenyan McDuffie received \$1,500 instead of \$1,000. See DC Official code §1163.33

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ETHICS AND GOVERNMENT ACCOUNTABILITY**

Office of Government Ethics



January 2018 Lobbyist Activity Desk Review Findings

During the January 2018 filing period, **405** entities filed Lobbyist Activity Report (LAR). Below are the audit procedures that auditor used:

Audit Procedures:

- Reviewed all 405 entities / lobbyist who registered and filed LAR
- Checked if both lobbyist and entity registered and filed LAR

Below are the Desk Review findings for all the 405 records reviewed:

1. Citelum hired Carmen Group to lobby. Citelum reported \$5,000 in cumulative retainer fees for the period indicating that there was activity but Carmen Group did not register or file LAR.
2. Claudia McKoin was hired by Humanities Council DC to lobby on its behalf. Both Claudia and Humanities DC registered but no LAR was filed.
3. Frank Boston III hired Grant D Gillham to lobby. Frank Boston III registered and filed LAR. Grant did not register or file LAR
4. DC Land Title Association hired Jackson and Campbell PC to lobby on their behalf. DC Land Title Association did not register or file LAR.
5. AFLAC hired Robert M. Willis of Skadden, Arps, Slate, Meagher & Flom LLP to lobby on its behalf. Both Robert M Willis and Skadden, Arps, Slate, Meagher & Flom LLP did not register or file LAR.

The below table shows a summary of the findings:

Registered User	Client in violation	Email	Remarks/Findings
Citelum DC, LLC	Carmen Group, Inc.	ctlus-ap@citelum.com	Citelum hired Carmen grp. to lobby. Citelum reported \$5,000 in cumulative retainer fees for the period indicating that there was activity but Carmen Group did not register or file LAR.
Claudia L. McKoin	Humanities Council, DC	clim2000@comcast.net	Claudia McKoin was hired by Humanities Council DC to lobby on its behalf. Both Claudia and Humanities DC registered but no LAR was filed
Frank Boston III	Grant David Gillham Inc.	fdb3law@aol.com	Frank Boston III hired Grant D Gillham to lobby. Frank Boston III registered and filed LAR. Grant did not register or file LAR
Jackson and Campbell, P.C.	DC Land Title Association	RKaufmann@jackscamp.com	DC Land Title Association hired Jackson and Campbell PC to lobby on their behalf. DC Land Title Association did not register or file LAR
AFLAC		john.mannion@skadden.com	AFLAC hired Robert M. Willis of Skadden, Arps, Slate, Meagher & Flom LLP to lobby on its behalf. Both Robert M Willis and Skadden, Arps, Slate, Meagher & Flom LLP did not register or file LAR.

BOARD OF ETHICS AND GOVERNMENT ACCOUNTANTS

January Report 2018 - Filers Report

N/A
Yes
No

Do not delete

TESTING ATTRIBUTES

1. Did both the Lobbying entity and Lobbyist register and file LAR?
2. Does compensation reported tie to the amount reported by the other party?
3. Does the Lobbyist expenditure reported match what the Lobbying entity reported?
4. Business relationships with council members, staff, including personnel or committee staff?
5. Gifts given to council members?
6. Political Contribution given to officials?
7. Claiming Nonprofit 501(c)(3) status?

KEY

If exception is noted, details will be provided in in the form of a tickmark or in the remarks/Findings column.

Registered User Client Name
1319 South Capitol Associates LLC
AARP
ABC of Metro Washington
Accenture LLP

Ace Cash Express

Adapt Pharma, Inc. Adapt Pharma, Inc.
AFLAC

Airbnb, Inc.
Albers & Company
Albers & Company
Albers & Company
Albers & Company
Albers & Company
Alexander & Cleaver, P.A.
Greenwich Biosciences, Inc.
Benevis, LLC for Kool Smiles
Fresenius Medical Care
Eli Lilly and Company
Intuit
MD DC Credit Union Association

Alexander & Cleaver, P.A.
Alexander & Cleaver, P.A.
Alkermes, Inc.
Alliance for Construction Excellence
Allied Universal
Allstate Insurance
Altria Client Services Inc., and its Affiliates Altria Client Services, LLC
Alzheimer's Association National Capital Area Chapter
Amalgamated Transit Union International
American Association of College Registrars and Admissions Officers
American Beverage Assoc. American Beverage Association
American Civil Liberties Union of the Nation's American Civil Liberties Union of the District of Columbia
American Coatings Association
American Council of Life Insurers
American Heart Association

				Gift			Political Contribution			7	Remarks/Findings
1	2	3	4	5	Amount	Beneficiary	6	Amount	Beneficiary		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident lobbyist
Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident lobbyist
No	No	No		No	-	N/A	No	-	N/A		The lobbyist works for the company "State & Federal Communications." There is not record of any LAR or Registration
Yes	Yes	Yes		Yes	-	see amount section	Yes	4,000.00	\$500 to K. McDuffie (CM); \$2000 to M. Bowser; \$1,327.20 & \$172.80 to Karl Racine (AG)		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
No	No	No		No	-	N/A	Yes	-	N/A		AFLAC hired Robert M. Willis of Skadden, Arps, Slate, Meagher & Flom LLP to lobby on its behalf. Both Robert M Willis and Skadden, Arps, Slate, Meagher & Flom LLP did not register or file LAR.
Yes	Yes	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie 2018		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A	Yes	MD DC registered as a nonprofit under the name Mr. Kerry R. Watson Jr.
Yes	Yes	Yes		No	-	N/A	No	-	N/A	Yes	
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	No	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Yes	Yes	Yes		No	-	N/A	Yes	1,315.00	Muriel Bowser		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist

American Hotel and Lodging Association		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
American Insurance Association		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
American International Group		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
American Management Corporation	Walmart	Yes	No	No	No	-	N/A	No	-	N/A		
American Management Corporation	Enhanced Capital Partners	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
American Management Corporation	CareFirst BlueCross BlueShield	Yes	No	No	No	-	N/A	No	-	N/A		
American Management Corporation	American Beverage Association	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
American Management Corporation	Childrens National Health System	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
American Management Corporation	Property Casualty Insurers	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
American Management Corporation	AmeriHealth Caritas	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
American Petroleum Institute		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
American University		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
America's Health Insurance Plans		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Amerihealth District of Columbia		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Amgen	Amgen	Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Anheuser-Busch Companies		Yes	Yes	Yes	No	-	N/A	Yes	5,000.00	Democratic Legislative Campaign Committee		
Anthem,Ink and Affiliates (Amerigroup of the District of Columbia)		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Apartment & Office Building Assoc. of Metropolitan Washington		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Apple, Inc		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Archdiocese of Washington		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Arent Fox, LLP	Provident Resources Group, Inc.	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	\$2,000 to Bowser; \$500 Cheh 2018; \$1,500 Karl Racine 2018		
Arent Fox, LLP	Sidwell Friends School	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Arent Fox, LLP	Center for Strategic and International Studies, Inc.	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Arent Fox, LLP	Beacon Capital Partners, LLC	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Arent Fox, LLP	KIPP D.C. Public Charter Schools	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Arent Fox, LLP	Population Services International	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Arent Fox, LLP	National Academy of Sciences	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Arent Fox, LLP	American Association of College Registrars and	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Arent Fox, LLP	Resources for the Future	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Arent Fox, LLP	BREOF Holdings, LLC	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Arent Fox, LLP	DC United	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Arent Fox, LLP	Uber Technologies, Inc.	Yes	No	No	No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Arent Fox, LLP	Sunstone Hotels Investors Inc.	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Arent Fox, LLP	FWG Solutions, Inc.	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Arent Fox, LLP	Shakespeare Theater	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Arent Fox, LLP	Washington Drama Society, Inc. d/b/a Arena St	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		

Arent Fox, LLP	Eagle Academy Public Charter School
Arent Fox, LLP	Food & Friends
Arent Fox, LLP	St. John's College High School
Arent Fox, LLP	Saxon Collaborative Construction
Arent Fox, LLP	WeWork
AT&T	
Bank of America Corporation	
Beacon Capital Partners, LLC	
Branded Cities Network LLC	Branded Cities Network
BREOF Holdings LLC (f/k/a Brookfield Real Estate Opportunity Fund)	
Capital Fringe	
Capitol Outdoor Inc.	
Capitol Petroleum	Capitol Petroleum Group LLC
car2go N.A. LLC	
CarefirstBluecrossBlueshield	
Carmen Group Inc.	Crown Castle NG Atlantic LLC
Carmen Group Inc.	Branded Cities Network
Carmen Group Inc.	Douglas Development Corporation
Carpet Cushion Council	
Casey Trees	
Center for Science in the Public Interest	
Center for Strategic and International Studies, Inc.	
Children's National Medical Center	
Christian Science Committee on Publication for the District of Columbia	
Christina Figueras	Trial Lawyers Association of Metropolitan DC
Cigna Companies	
Citelum DC, LLC	
Citigroup Washington, Inc.	
Claudia L. McKoin	Humanities Council, DC
Coldchain Technology Services	
Comcast of the District	
Common CoLiving Inc	
Conduent, Inc. and its Affiliates	
Consumer Technology Association	
Corrections Corporation of America	
Covanta Energy LLC	Covanta Energy LLC
Crossfit	
Crown Castle NG Atlantic LLC	
CSX Corporation	
CVS Caremark	
David Wilmot	PhRMA

Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
Yes	Yes	Yes		No	-	N/A	Yes	2,500.00	Muriel Bowser for Mayor (\$2,000); McDuffie 2018 (\$500)		Resident Lobbyist
Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Yes	No	No		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		No Activity
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
No	No	No		No	-	N/A	No	-	N/A		Citelum hired Carmen grp. to lobby. Citelum reported \$99,900 in cumulative retainer fees for the period but Carmen Group did not register or file LAR.
Yes	Yes	Yes		No	-	N/A	Yes	2,000.00	Muriel Bowser		
No	No	No		No	-	N/A	Yes	100.00	Muriel Bowser		Claudia McKoin was hired by HumanitiesDC to lobby on it behalf. Claudia registered and filed the LAR, HumanitiesDC registered but no LAR was filed
Yes	Yes	Yes		No	-	N/A	Yes	100.00	Muriel Bowser		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		Comcast hired William Jarvis and J.R. Clark to lobby. W. Jarvis Registered and filed LAR but J.R. Clark did not register or file LAR
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Yes	Yes	Yes		No	-	N/A	No	-	N/A		No Activity
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	No	No		No	-	N/A	Yes	2,000.00	N/A		

David Wilmot	Anheuser Busch	Yes	Yes	Yes		No	-	N/A	Yes	2,000.00	Muriel Bowser		Expenditure and Compensation report does not match what PhRMA presented
David Wilmot	Hotel Association of Washington	Yes	Yes	Yes		No	-	N/A	Yes	2,000.00	Muriel Bowser		
David Wilmot	Citigroup Washington, Inc.	Yes	Yes	Yes		No	-	N/A	Yes	2,000.00	Muriel Bowser		
David Wilmot	District of Columbia Association of Health Plans	Yes	Yes	Yes		No	-	N/A	Yes				
DBA International		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
DC Association of Beverage Alcohol Wholesalers		Yes	Yes	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie		Contribution to the Ward 5 Constituent Fund
DC Chamber of Commerce		Yes	Yes	Yes		Yes	-	N/A	No	-	N/A		Resident Lobbyist
DC Fiscal Policy Institute		Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
DC Hospital Association		Yes	Yes	Yes		Yes	65.00	Vincent Gray	No	-	N/A		Meal for Keynote Speaker
DC United		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
DC Working Families Organization		Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
DC09		Yes	Yes	Yes		No	-	N/A	Yes	2,000.00	Re-Elect Muriel Bowser Our Mayor		
District Distilling Company		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
District of Columbia Athletic Trainer Association		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
District of Columbia Building Industry Association		Yes	Yes	Yes		Yes	-	N/A	No	-	N/A		
District of Columbia Insurance Federation	Insurance Industry at large	Yes	Yes	Yes		No	-	N/A	Yes	250.00	Kenyan McDuffie Ward 5		
Donald R. Dinan	District of Columbia Athletic Trainer Association	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Douglas Development Corporation		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Drug Policy Alliance		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Eagle Academy Public Charter School		Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
East Banc, Inc.		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Edgemoor Infrastructure and Real Estate		Yes	No	Yes		No	-	N/A	No	-	N/A		
Ellen Valentino-Benitez	American Petroleum Institute	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Ellen Valentino-Benitez	MD-DE-DC Beverage Assn.	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Enhanced Capitol Partners		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Entertainment Software Association		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Epic Pharmacies Inc.		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
eSystems Inc.		Yes	Yes	Yes		No	-	N/A	Yes	2,000.00	Reelect Muriel Bowser Our Mayor		
Expedia, Inc.	Expedia, Inc	Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Express Scripts Holding Co.		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Fair Fund, Inc.		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Food & Friends		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Frank Boston III	Grant David Gillham Inc.	No	No	No		No	-	N/A	No	-	N/A		
Frank Boston III	MillerCoors	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Frank Boston III	Altria Client Services LLC and its Affiliates	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Fresenius Medical Care		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
FWG Solutions		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
GCS, Inc.		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Genentech, Inc. A member of the Roche Group	Genentech, Inc., A Member of the Roche Group	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
General Motors LLC	General Motors LLC	Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
George Washington University Hospital		Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Georgetown University		Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Global Government and Industry Partners, LL	Mid City Financial Corporation	Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Global Government and Industry Partners, LL	Anthem, Inc. and Its Affiliates (Including Ameri	Yes	Yes	Yes		No	-	N/A	Yes	7,194.65	\$1500 Mendelson for Chairman; \$2000 Re-Elect Muriel Bowser Our Mayor; \$2000 Re-Elect Muriel Bowser Our Mayor; \$500 Evans Constituent Services Fund; \$500 Ward 7 Constituent Services Fund; \$500 Our Ward 5; \$194.65 Our Ward 5		
Goldblatt, Martin, Pozen LLP	Wells Fargo & Company	Yes	Yes	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie 2018		
Goldblatt, Martin, Pozen LLP	AirBnB, Inc.	Yes	Yes	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie 2018		
Goldblatt, Martin, Pozen LLP	George Washington University Hospital	Yes	Yes	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie 2018		
Goldblatt, Martin, Pozen LLP	Google, Inc. and its Affiliates	Yes	Yes	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie 2018		
Goldblatt, Martin, Pozen LLP	CSX Corporation	Yes	Yes	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie 2018		
Goldblatt, Martin, Pozen LLP	International Spy Museum	Yes	Yes	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie 2018		
Goldblatt, Martin, Pozen LLP	District of Columbia Building Industry Association	Yes	Yes	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie 2018		
Goldblatt, Martin, Pozen LLP	Mid-City Financial Corporation	Yes	No	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie 2018		
Goldblatt, Martin, Pozen LLP	Allied Universal	Yes	Yes	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie 2018		
Goldblatt, Martin, Pozen LLP	Carpet Cushion Council	Yes	Yes	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie 2018		
Goldblatt, Martin, Pozen LLP	Capital Fringe	Yes	Yes	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie 2018		
Gonzalez Saggio & Harlan LLP	Accenture LLP												

Google Inc	Google Inc. and its Affiliates	Yes	Yes	Yes	No	-	N/A	Yes	75.48	Mario Cuahutle		
Gotham Urban Ventures LLC	Edgemoor Infrastructure & Real Estate	Yes	No	Yes	No	-	N/A	No	-	N/A		
Greenberg Traurig LLP	Washington Area New Auto Dealers Association	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Greenberg Traurig LLP	Starship Technologies OU	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Greenberg Traurig LLP	The Lab School of Washington	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Greenberg Traurig LLP	Miller & Long DC	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Greenberg Traurig LLP	Unity Health Care	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Greenberg Traurig LLP	Forge Company	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Greenstein Delorme & Luchs, P.C.	Apartment and Office Building Association of M	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Greenstein Delorme & Luchs, P.C.	District Distilling Company, Inc.	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Greenwich Biosciences, Inc.		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Group 360 LLC	Mylan	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Group 360 LLC	Public Consulting Group	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Group 360 LLC	WGL Holdings	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Group 360 LLC	Corrections Corp of America/CoreCivic	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Group 360 LLC	MTM	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Group 360 LLC	Zipcar	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Group 360 LLC	Lyft	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Group 360 LLC	Consumer Technology Association	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Group 360 LLC	Entertainment Software Association	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Group 360 LLC	Medstar Health	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Group 360 LLC	Conduent Inc., and their Affiliates	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
GS Proctor and Associates Inc.	International Association of Firefighters, Local 3	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Heather Podesta + Partners, LLC	Marriott	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Hit2												
HNTB Corporation	HNTB Corporation	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Hogan Lovells	National Structured Settlements Trade Association	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Hogan Lovells	Coldchain Technology Services	Yes	Yes	Yes	No	-	N/A	Yes	100.00	Re-elect Muriel Bowser		
Holland & Knight LLP	Archdiocese of Washington	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Holland & Knight LLP	Common CoLiving	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Holland & Knight LLP	Target Corporation	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Holland & Knight LLP	Capitol Petroleum Group LLC	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Holland & Knight LLP	Vesta Corporation	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	\$2000 for Mayor Muriel Bowser; \$500 for Kenyan McDuffie; \$1327.20 for Attorney General Karl Racine; \$172.80 for Attorney General Karl Racine.		
Holland & Knight LLP	McDonald's Corp.	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Holland & Knight LLP	Portfolio Recovery Associates	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Holland & Knight LLP	NBL Associates, LP	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine		
Holland & Knight LLP	Providence Hospital	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Holland & Knight LLP	T-Mobile	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine		
Holland & Knight LLP	Stay Alfred Vacation Rentals	Yes	Yes	Yes	No	-	N/A	Yes		\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine		
Holland & Knight LLP	1319 South Capitol Associates, LLC	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Holland & Knight LLP	Power Design	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Holland & Knight LLP	Ingleside at Rock Creek	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Holland & Knight LLP	Kimberly-Clark Corp.	Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine		
Holland & Knight LLP	Jonathan Klein	Yes	Yes	Yes	No	-	N/A	No	-	N/A		

Holland & Knight LLP	Legal Zoom	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine		
Holland & Knight LLP	Ace Cash Express, Inc.	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine		
Holland & Knight LLP	CVS Health	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Holland & Knight LLP	East Banc Inc.	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Holland & Knight LLP	GCS, Inc.	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Holland & Knight LLP	Kaiser Foundation Health Plan of the Mid-Atlantic	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Holland & Knight LLP	Miller & Long - DC	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Hotel Association of Washington DC	Members of the Hotel Association of Washington DC	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
IESI MD Corporation		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Ingleside		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Institute for Justice		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
International Association of Firefighters, Local 36		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
International Spy Museum		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Intuit		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Invidior PLC		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
James Nathanson		Yes	No	Yes		Yes	-	N/A	Yes	250.00	Charles Allen		
Jackson and Campbell, P.C.		No	No	No		No	-	N/A	No	-	N/A		
JBG Companies	Not Applicable	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Jews United for Justice		Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Johnson and Johnson		Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Jonathan Klein		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Julyan&Julyan	Washington Parking Association	Yes	Yes	Yes		No	-	N/A	Yes	1,500.00	\$500 for Kenyan McDuffie; \$500 for Muriel Bowser; \$500 Muriel Bowser		
Julyan&Julyan	Terrell Place Properties LLC	Yes	Yes	Yes		No	-	N/A	Yes	1,500.00	\$500 for Kenyan McDuffie; \$500 for Muriel Bowser; \$500 Muriel Bowser		
Julyan&Julyan	Conduent Business Solutions	Yes	Yes	Yes		No	-	N/A	Yes	1,500.00	\$500 for Kenyan McDuffie; \$500 for Muriel Bowser; \$500 Muriel Bowser		
K & L Gates LLP	Association of Independent Schools of Greater Washington	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc.		Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine		
Kimberly-Clark Corporation		Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine		
KIPP DC Inc		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Kool Smiles		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Lawrence H. Mirel	State Farm Insurance	Yes	Yes	Yes		No	-	N/A	Yes	200.00	Mayor Muriel Bowser		
Leftwich LLC	American Hotel and Lodging Association	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
LegalZoom		Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine		
Lilly USA Inc.		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Lopez and Associates LLC	Will Lansing	No	No	No		No	-	N/A	Yes	801.00	\$100 Re-Elect Muriel Bowser Our Mayor; \$100 Kenyan McDuffie 2018; \$51 Dionne Ford DC; \$250 Marcus Goodwin For DC; \$300 Reid 4 Ward 1 2018.		
lyft Inc.		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Manatt,Phelps& Phillips LLP	Perseus Realty, LLC	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Manatt,Phelps& Phillips LLP	Willco Construction Co., Inc.	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Manatt,Phelps& Phillips LLP	Capitol Petroleum Group	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Manatt,Phelps& Phillips LLP	Supreme Council 33	Yes	Yes	Yes		No	-	N/A	No	-	N/A		
March of Dimes		Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Marijuana Policy Project		Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Marriott International Inc.		Yes	Yes	Yes		No	-	N/A	No	-	N/A		
MaryEvaCandon	Frank D. Boston III, Esq and Associates	Yes	Yes	Yes		No	-	N/A	No	-	N/A		

MaryEvaCandon	Epic Pharmacies c/o MultiState Associates	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
MaryEvaCandon	Altria Client Services	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
McDonalds Corp.		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
McGuire Woods LLP	Covanta Energy	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
McGuire Woods LLP	Alkermes, Inc.	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
MDDC Press Association		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
MDDC Press Association	MDDC Press Association	Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
MD-DE-DC Beverage Association		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Medical Society of DC		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
MedStar Health		Yes	Yes	Yes	No	-	N/A	Yes	2,000.00	Re-Elect Muriel Bowser Our Mayor		
Merck Sharp & Dohme Corp.	Merck Sharp & Dohme Corp.	Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Metropolitan Washington Airports Authority	Metropolitan Washington Airports Authority	Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Mid-Atlantic Lectet		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Mid-City Financial Corporation		Yes	No	Yes	No	-	N/A	No	-	N/A		
Miller & Long Construction Company		Yes	Yes	Yes	No	-	N/A	No	-	N/A		No Activity
Miller & Long-- DC		Yes	No	Yes	No	-	N/A	No	-	N/A		
Miller & Long-- DC		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
MillerCoors LLC		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Mobike		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Molina Health Care, Inc		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Monumental Sports and Entertainment		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
MTM Inc		Yes	Yes	Yes	No	-	N/A	Yes	2,000.00	Bowser for Mayor		
Mylan Inc.		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
N William Jarvis	National Community Reinvestment Coalition	Yes	Yes	Yes	No	-	N/A	Yes	2,000.00	Bowser for Mayor		
N William Jarvis	Washington Nationals Baseball Club	Yes	Yes	Yes	No	-	N/A	Yes	2,000.00	Bowser for Mayor		
N William Jarvis	DC09	Yes	Yes	Yes	No	-	N/A	Yes	2,000.00	Re-Elect Muriel Bowser Our Mayor		
N William Jarvis	Comcast of the District LLC	Yes	Yes	Yes	No	-	N/A	Yes	2,000.00	Re-Elect Muriel Bowser Our Mayor		
N William Jarvis		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
National Academy of Sciences		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
National Capitol Strategy Group	Direct Energy	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
National Community Reinvestment Coalition		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
National Restaurant Association		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
National Structured Settlements Trade Association		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Nationwide Mutual Insurance		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Natural Resources Defense Council		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
NBL Associates, LP		Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine		
Nelson Mullins Riley And Scarborough	Mobike	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Nelson Mullins Riley And Scarborough	JBG Companies	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Nelson Mullins Riley And Scarborough	SAS Institute Inc.	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Novartis Pharmaceuticals Corp.	Novartis Services, Inc.	Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Orexo US Inc.		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Otsuka America Pharmaceuticals Inc.	Otsuka America Pharmaceuticals Inc.	Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Paintcare, Inc.		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Pascal & Weiss, P.C.		Yes	Yes	Yes	No	-	N/A	Yes	500.00	Kenyan McDuffie		Contribution to Ward 5 Constituent Fund
Perseus Realty, LLC		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Pfizer Inc.	Pfizer Inc.	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Pharmaceutical Research and Manufacturers	Pharmaceutical Research and Manufacturers of America	Yes	Yes	Yes	No	-	N/A	No	-	N/A		Expenditure and Compensation report does not match what David Wilmot presented
Population Services International		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Portfolio Recovery Associates		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Potomac Electric Power Company	Potomac Electric Power Company	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Potomac Law Group, PLLC	Washington DC Economic Partnership	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Potomac Law Group, PLLC		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Power Design		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Projekt Echo OU (dba Starship Technologies)		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Property Casualty Insurers Assoc. of American (PCI)		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Providence Hospital		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Provident Group-Howard Properties LLC		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Public Citizen		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Public Consulting Group Inc.		Yes	Yes	Yes	No	-	N/A	No	-	N/A		

Pulse Advocacy LLC	AMERICA'S HEALTH INSURANCE PLANS	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Pulse Advocacy LLC	Service Contract Industry Council	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Pulse Advocacy LLC	Federal City Council	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Resources for the Future		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Robert Willis	American International Group, Inc.	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Robert Willis	Aflac	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Roetzel & Andress	DC Athletic Trainers Association	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Sanofi-Aventis	Sanofi US	Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
SAS Institute Inc.		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Save the Children Federation, Inc.	Save the Children Federation, Inc.	Yes	Yes	Yes	No	-	N/A	No	-	N/A		No activity
Saxon Collaborative Construction		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Secular Coalition for America												
SEIU Local 32BJ		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Service Contract Industry Council		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Shakespeare Theatre		Yes	Yes	Yes	Yes	-	N/A	No	-	N/A		
Sibley Memorial Hospital		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Sidwell Friends School		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
St. John's College High School		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Starship Technologies OU		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
State Farm Mutual Automobile Insurance Company		Yes	Yes	Yes	No	-	N/A	Yes	200.00	Mayor Muriel Bowser		
Stay Alfred Vacation Rentals		Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine		
Stoddard Baptist Global Care		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Sunovion Pharmaceuticals Inc.	Sunovion Pharmaceuticals Inc.	Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Sunrun Inc.		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Sunstone Hotels Investors Inc		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Supreme Council, 33		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Target Corporation	Target Corporation	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Terrell Place Property LLC		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
The College Board												
The Forge Company		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Incomplete form
The George Washington University		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
The Humane Society of the United States		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
The Lab School of Washington		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
The Meyers Group LLC	Molina	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
The Meyers Group LLC	eSystems	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
The Meyers Group LLC	Trusted Health Plan	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
The Meyers Group LLC	WB Waste	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
The Meyers Group LLC	Stoddard Baptist Home Global Care	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
The Meyers Group LLC	Aetna	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
The Nature Conservancy		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
The Washington Post		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
T-Mobile		Yes	Yes	Yes	No	-	N/A	Yes	5,000.00	\$500 Kenyan McDuffie; \$2000 Muriel Bowser; \$500 Kenyan McDuffie; \$2000 Muriel Bowser.		
Trial Lawyers Association or Metropolitan Washington, D.C.		Yes	No	Yes	No	-	N/A	No	-	N/A		
Trusted Health Plan		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Uber Technologies		Yes	No	No	No	-	N/A	No	-	N/A		
UFCW Local 400		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
UFCW Local 400		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
UNITE HERE Local 25		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Unity Health Care		Yes	Yes	Yes	No	-	N/A	No	-	N/A		
USAA		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist
Valor Development												
Venable LLP	Paintcare, Inc.	Yes	Yes	Yes	No	-	N/A	No	-	N/A		Cannot find
Venable LLP	DBA International	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Venable LLP	Capitol Outdoor, Inc. ATTN: John Polis	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Venable LLP	American Coatings Association, ATTN: Allison	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Venable LLP	Monumental Sports & Entertainment, ATTN: Ra	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Venable LLP	Metropolitan Washington Airport Authority	Yes	Yes	Yes	No	-	N/A	No	-	N/A		
Verizon Washington DC		Yes	Yes	Yes	No	-	N/A	No	-	N/A		Resident Lobbyist

Vesta Corporation

Wal-Mart Stores Inc. Wal-Mart Stores, Inc.
 Warner Session,ESQ Alliance for Construction Excellence (Contact: N
 Washington Area New Automobile Dealers Association
 Washington D.C. Assoc. of Realtors
 Washington DC Economic Partnership
 Washington Drama Society. Inc. d/b/a Arena Stage
 Washington Gas
 Washington Parking Association
 Wells Fargo & Company
 WEM Assoc. District of Columbia Insurance Federation
 WeWork
 Willco Construction Co., Inc.
 William J. Brennan Jr. Center for Justice, Inc.
 Zipcar

Yes	No	No		No	-	N/A	Yes	6,000.00	\$500 to Kenyan McDuffie; \$2000 Mayor Muriel Bowser; \$1327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine; \$2000 Mayor Muriel Bowser		
Yes	No	No		No	-	N/A	Yes	1,000.00	Karl Racine		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	Yes	500.00	Mary M. Cheh		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		Resident Lobbyist
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		
Yes	Yes	Yes		No	-	N/A	No	-	N/A		No Activity
Yes	Yes	Yes		No	-	N/A	No	-	N/A		

Non Profit

Audit & Verification

Lobbyist ID	Registered User	Client Name	Activated Date	Amount	Payment Date	501(c)(3)?	Comment
2754	Alzheimer's Association National Capital Area Chapter		12/27/16 4:29 PM	\$ 50.00	12/27/16 4:29 PM	No	This was a 501(c)(3) organization. The last form 990 they filed was for 2001. They are not in the IRS Database - signifying that their 501(c)(3) status has either reexpired or revoked for some reason.
2911	Marijuana Policy Project		1/10/17 1:56 PM	\$ 50.00	1/10/17 1:56 PM	Yes	501(c)(4) - Social Welfare Organization
2921	American Civil Liberties Union of the Nation's	American Civil Liberties Union of the	1/10/17 3:14 PM	\$ 50.00	1/10/17 3:14 PM	Yes	501(c)(4) - Social Welfare Organization
3049	Public Citizen		1/17/17 2:12 PM	\$ 50.00	1/17/17 2:12 PM	Yes	501(c)(4) - Social Welfare Organization
2906	DC Working Families Organization		1/17/17 4:29 PM	\$ 50.00	1/17/17 4:29 PM	Yes	501(c)(4) - Social Welfare Organization
3220	Secular Coalition for America		7/11/17 4:52 PM	\$ 50.00	7/11/17 4:52 PM	Yes	501(c)(4) - Social Welfare Organization
2847	UFCW Local 400		1/6/17 10:19 AM	\$ 50.00	1/6/17 10:19 AM	Yes	501(c)(5) - Labor & Agricultural Organizations
2855	UFCW Local 400		1/6/17 12:30 PM	\$ 50.00	1/6/17 12:30 PM	Yes	501(c)(5) - Labor & Agricultural Organizations
2620	National Structured Settlements Trade Association		12/8/16 1:42 PM	\$ 50.00	12/8/16 1:42 PM	Yes	501(c)(6) - Business League
2781	Entertainment Software Association		1/3/17 11:19 AM	\$ 50.00	1/3/17 11:19 AM	Yes	501(c)(6) - Business League
2827	MD-DE-DC Beverage Association		1/4/17 5:27 PM	\$ 50.00	1/4/17 5:27 PM	Yes	501(c)(6) - Business League
2812	American Beverage Assoc.	American Beverage Association	1/5/17 6:01 PM	\$ 50.00	1/5/17 6:01 PM	Yes	501(c)(6) - Business League
2828	MDDC Press Association		1/5/17 9:01 PM	\$ 50.00	1/5/17 9:01 PM	Yes	501(c)(6) - Business League
2814	American Petroleum Institute		1/6/17 9:12 AM	\$ 50.00	1/6/17 9:12 AM	Yes	501(c)(6) - Business League
2851	Medical Society of DC		1/6/17 10:53 AM	\$ 50.00	1/6/17 10:53 AM	Yes	501(c)(6) - Business League
2875	ABC of Metro Washington		1/9/17 2:14 PM	\$ 50.00	1/9/17 2:14 PM	Yes	501(c)(6) - Business League
2920	Greenstein Delorme & Luchs ,P.C.	Apartment and Office Building Association of Metropolitan Washington	1/10/17 3:09 PM	\$ 50.00	1/10/17 3:09 PM	Yes	501(c)(6) - Business League
2923	Washington Area New Automobile Dealers Association		1/10/17 4:14 PM	\$ 50.00	1/10/17 4:14 PM	Yes	501(c)(6) - Business League
2829	District of Columbia Insurance Federation	Insurance Industry at large	1/11/17 12:09 PM	\$ 50.00	1/11/17 12:09 PM	Yes	501(c)(6) - Business League
3000	District of Columbia Building Industry Association		1/12/17 3:19 PM	\$ 50.00	1/12/17 3:19 PM	Yes	501(c)(6) - Business League
3022	International Association of Firefighters, Local 36		1/16/17 7:12 PM	\$ 50.00	1/16/17 7:12 PM	Yes	501(c)(6) - Business League
3048	National Restaurant Association		1/17/17 3:02 PM	\$ 50.00	1/17/17 3:02 PM	Yes	501(c)(6) - Business League
3062	America's Health insurance Plans		1/18/17 8:03 AM	\$ 50.00	1/18/17 8:03 AM	Yes	501(c)(6) - Business League
3064	DC Chamber of Commerce		1/18/17 6:18 PM	\$ 50.00	1/18/17 6:18 PM	Yes	501(c)(6) - Business League
3065	Hotel Association of Washington DC	Members of the Hotel Association of Washington, D.C.	1/18/17 7:24 PM	\$ 50.00	1/18/17 7:24 PM	Yes	501(c)(6) - Business League
2648	American Coatings Association		2/10/17 1:50 PM	\$ 50.00	2/10/17 1:50 PM	Yes	501(c)(6) - Business League
3131	Hogan Lovells	National Structured Settlements Trade Association	5/23/17 4:54 PM	\$ 50.00	5/23/17 4:54 PM	Yes	501(c)(6) - Business League

3149	DC Association of Beverage Alcohol Wholesalers		6/29/17 10:34 AM	\$ 50.00	6/29/17 10:34 AM	Yes	501(c)(6) - Business League
3157	American Insurance Association		7/5/17 10:43 AM	\$ 50.00	7/5/17 10:43 AM	Yes	501(c)(6) - Business League
3173	MDDC Press Association	MDDC Press Association	7/7/17 2:25 PM	\$ 50.00	7/7/17 2:25 PM	Yes	501(c)(6) - Business League
3229	Jaskson and Campbell, P.C.	DC Land Title Association	8/28/17 12:36 PM	\$ 50.00	8/28/17 12:36 PM	Yes	501(c)(6) - Business League
3250	Carpet Cushion Council		9/26/17 10:46 AM	\$ 50.00	9/26/17 10:46 AM	Yes	501(c)(6) - Business League
129924	Property Casualty Insurers Association of America		1/16/2016	\$50.00	Manually Added	Yes	501(c)(6) - Business League
2784	Consumer Electronics Association		1/3/17 11:25 AM	\$ 50.00	1/3/17 11:25 AM	Yes	501(c)(6) - Business League. The last 990 they filed was 2013. Their status may have expires or revoked
3044	SEIU Local 32BJ		1/17/17 11:08 AM	\$ 50.00	1/17/17 11:08 AM	No	501(c)(9) - Voluntary employees beneficiary associations, which provide payment of life, sickness, accident or other benefits to members
2652	Roetzel & Andress	DC Athletic Trainers Association	7/11/16 2:54 PM	\$ 50.00	7/11/16 2:54 PM	No	Lobbyist for DC Athletic Trainers Association. Per IRS website, Tax Exempt status was revoked effective 4/13/2015
3009	The College Board		1/13/17 11:50 AM	\$ 50.00	1/13/17 11:50 AM	No	Not found - Guidestar, Nonprofit explorer and IRS website
3219	Mid-Atlantic Lecet		7/11/17 6:41 PM	\$ 50.00	7/11/17 6:41 PM	No	Not found - Guidestar, Nonprofit explorer and IRS website
3170	Christian Science Committee on Publication for the District of Columbia		1/9/18 11:43 AM	\$ 50.00	1/9/18 11:43 AM	No	Not found - Guidestar, Nonprofit explorer and IRS website
2619	District of Columbia Athletic Trainer Association		7/11/16 9:50 PM	\$ 50.00	7/11/16 9:50 PM	No	Per IRS website, Tax Exempt status was revoked effective 4/13/2015
3233	Supreme Council, 33		9/1/17 12:34 PM	\$ 50.00	9/1/17 12:34 PM	No	The 501(c)(3) status of this organization has been revoked by the IRS effective 5/15/2017
2715	American Heart Association		12/8/16 3:08 PM	\$ 50.00	12/8/16 3:08 PM	Yes	
2725	AARP		12/13/16 3:37 PM	\$ 50.00	12/13/16 3:37 PM	Yes	
2742	American University		12/19/16 3:04 PM	\$ 50.00	12/19/16 3:04 PM	Yes	
2780	Ingleside		1/3/17 11:17 AM	\$ 50.00	1/3/17 11:17 AM	Yes	
2788	MedStar Health		1/3/17 12:21 PM	\$ 50.00	1/3/17 12:21 PM	Yes	
2797	Pharmaceutical Research and Manufacturers of America	Pharmaceutical Research and Manufacturers of America (PhRMA)	1/3/17 1:33 PM	\$ 50.00	1/3/17 1:33 PM	Yes	
2831	Natural Resources Defense Council		1/5/17 2:38 PM	\$ 50.00	1/5/17 2:38 PM	Yes	
2854	CarefirstBluecrossBlueshield		1/6/17 11:18 AM	\$ 50.00	1/6/17 11:18 AM	Yes	
2862	Christina Figueras	Trial Lawyers Association of Metropolitan DC	1/7/17 12:44 PM	\$ 50.00	1/7/17 12:44 PM	Yes	
2775	The George Washington University		1/9/17 12:52 PM	\$ 50.00	1/9/17 12:52 PM	Yes	
2904	Center for Science in the Public Interest		1/10/17 10:38 AM	\$ 50.00	1/10/17 10:38 AM	Yes	
2909	Save the Children Federation, Inc.	Save the Children Federation, Inc.	1/10/17 12:23 PM	\$ 50.00	1/10/17 12:23 PM	Yes	
2916	Georgetown University		1/10/17 2:33 PM	\$ 50.00	1/10/17 2:33 PM	Yes	
2970	The Nature Conservancy		1/11/17 3:22 PM	\$ 50.00	1/11/17 3:22 PM	Yes	
2363	Casey Trees		1/12/17 9:58 AM	\$ 50.00	1/12/17 9:58 AM	Yes	
2998	International Spy Museum		1/12/17 3:06 PM	\$ 50.00	1/12/17 3:06 PM	Yes	
2690	Institute for Justice		1/13/17 5:03 PM	\$ 50.00	1/13/17 5:03 PM	Yes	
3042	Unity Health Care		1/17/17 10:37 AM	\$ 50.00	1/17/17 10:37 AM	Yes	

Duplicate

3043	The Lab School of Washington		1/17/17 10:45 AM	\$ 50.00	1/17/17 10:45 AM	Yes	
3066	Drug Policy Alliance		1/19/17 2:32 PM	\$ 50.00	1/19/17 2:32 PM	Yes	
3107	Claudia L. McKoin	Humanties Council, DC	3/7/17 2:39 PM	\$ 50.00	3/7/17 2:39 PM	Yes	
3116	Potomac Law Group, PLLC	Washington DC Economic Partnership	4/13/17 11:44 AM	\$ 50.00	4/13/17 11:44 AM	Yes	
3120	Potomac Law Group, PLLC		4/18/17 5:48 PM	\$ 50.00	4/18/17 5:48 PM	Yes	
3122	March of Dimes		4/27/17 1:14 PM	\$ 50.00	4/27/17 1:14 PM	Yes	
3135	Fair Fund, Inc.		6/7/17 4:20 PM	\$ 50.00	6/7/17 4:20 PM	Yes	
3152	DC Fiscal Policy Institute		6/30/17 9:38 AM	\$ 50.00	6/30/17 9:38 AM	Yes	
3178	Washington Parking Association		7/10/17 9:34 AM	\$ 50.00	7/10/17 9:34 AM	Yes	
3183	Sibley Memorial Hospital		7/10/17 11:46 AM	\$ 50.00	7/10/17 11:46 AM	Yes	
3207	Paintcare, Inc.		7/10/17 3:07 PM	\$ 50.00	7/10/17 3:07 PM	Yes	
3217	Children's National Medical Center		7/10/17 8:17 PM	\$ 50.00	7/10/17 8:17 PM	Yes	
3225	Jews United for Justice		7/25/17 1:15 PM	\$ 50.00	7/25/17 1:15 PM	Yes	
3258	The Humane Society of the United States		11/1/17 4:36 PM	\$ 50.00	11/1/17 4:36 PM	Yes	
3259	William J. Brennan Jr. Center for Justice, Inc.		11/8/17 2:38 PM	\$ 50.00	11/8/17 2:38 PM	Yes	
3261	Stoddard Baptist Global Care		11/15/17 4:20 PM	\$ 50.00	11/15/17 4:20 PM	Yes	
3278	Sidwell Friends School		11/26/17 9:43 PM	\$ 50.00	11/26/17 9:43 PM	Yes	
3284	Capital Fringe		12/5/17 2:35 PM	\$ 50.00	12/5/17 2:35 PM	Yes	
3289	National Community Reinvestment Coalition		12/8/17 12:56 PM	\$ 50.00	12/8/17 12:56 PM	Yes	
3290	N William Jarvis	National Community Reinvestment Coalition	12/8/17 3:11 PM	\$ 50.00	12/8/17 3:11 PM	Yes	
156889	WeWork	Arent Fox	1/11/2018	\$50.00	Manually Added	Yes	
156910	KIPP D.C. Public Charter Schools	Arent Fox	1/11/2018	\$50.00	Manually Added	Yes	
8000503	Kaiser Foundation Health Plan of the Mid-Atlantic States	Holland & Knight	1/24/2018	\$50.00	Manually Added	Yes	
8000465	Archdiocese of Washington	Holland & Knight	1/18/2018	\$50.00	Manually Added	Yes	

501(c)(3) - Public Charity
501(c)(4) - Social Welfare Organization
501(c)(5) - Labor & Agricultural Organizations
501(c)(6) - Business League
501(c)(9) - Voluntary employees beneficiary associations, which provide payment of life, sickness, accident or other benefits to members

Failure to Register and File

Registered User	Client in violation	Remarks/Findings
Accenture LLP	Robert Lloyd Clayton	Accenture, LLP hired Robert Lloyd Clayton. Accenture registered and filed LAR but Robert Lloyd Clayton did not register or file LAR.
Citelum DC, LLC	Carmen Group, Inc.	Citelum hired Carmen grp. to lobby. Citelum reported \$99,900 in cumulative retainer fees for the period indicating that there was activity but Carmen Group did not register or file LAR.
Claudia L. McKoin	Humanties Council, DC	Claudia McKoin was hired by Humanities Council DC to lobby on its behalf. Both Claudia and Humanities DC registered but no LAR was filed
Frank Boston III	Grant David Gillham Inc.	Frank Boston III hired Grant D Gillham to lobby. Frank Boston III registered and filed LAR. Grant did not register or file LAR
Jaskson and Campbell, P.C.	DC Land Title Association	DC Land Title Association hired Jackson and Campbell PC to lobby on their behalf. DC Land Title Association did not register or file LAR
AFLAC		AFLAC hired Robert M. Willis of Skadden, Arps, Slate, Meagher & Flom LLP to lobby on its behalf. Both Robert M Willis and Skadden, Arps, Slate, Meagher & Flom LLP did not register or file LAR.

Registered User	Client Name	1	2	3	4	5	Amount	Beneficiary	6	Amount	Beneficiary	7	Remarks/Findings
Accenture LLP		No	No	No		No	-	N/A	No	-	N/A		The lobbyist works for the company "State & Federal Communications." There is no record of any LAR or Registration
AFLAC		No	No	No		No	-	N/A	Yes	-	N/A		AFLAC hired Robert M. Willis of Skadden, Arps, Slate, Meagher & Flom LLP to lobby on its behalf. Both Robert M Willis and Skadden, Arps, Slate, Meagher & Flom LLP did not register or file LAR.
Alliance for Construction Excellence		Yes	No	Yes		No	-	N/A	No	-	N/A		
American Management	Walmart	Yes	No	No		No	-	N/A	No	-	N/A		
American Management	CareFirst BlueCross BlueShield	Yes	No	No		No	-	N/A	No	-	N/A		
America's Health insurance Plans		Yes	No	Yes		No	-	N/A	No	-	N/A		
Arent Fox, LLP	Uber Technologies, Inc.	Yes	No	No		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)		
CarefirstBluecrossBlueshield		Yes	No	No		No	-	N/A	No	-	N/A		
Citelum DC, LLC		No	No	No		No	-	N/A	No	-	N/A		Citelum hired Carmen grp. to lobby. Citelum reported \$99,900 in cumulative retainer fees for the period but Carmen Group did not register or file LAR.
Claudia L. McKoin	Humanities Council, DC	No	No	No		No	-	N/A	Yes	100.00	Muriel Bowser		Claudia McKoin was hired by HumanitiesDC to lobby on it behalf. Claudia registered and filed the LAR, HumanitiesDC registered but no LAR was filed
David Wilmot	PhRMA	Yes	No	No		No	-	N/A	Yes	2,000.00	N/A		
Edgemoor Infrastructure and Real Estate		Yes	No	Yes		No	-	N/A	No	-	N/A		
Frank Boston III	Grant David Gillham Inc.	No	No	No		No	-	N/A	No	-	N/A		
Goldblatt, Martin, Poze	Mid-City Financial Corporation	Yes	No	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie 2018		
Gotham Urban Venture	Edgemoor Infrastructure & Real Estate	Yes	No	Yes		No	-	N/A	No	-	N/A		
James Nathanson		Yes	No	Yes		Yes	-	N/A	Yes	250.00	Charles Allen		
Jaskson and Campbell, P.C.		No	No	No		No	-	N/A	No	-	N/A		
Lopez and Associates	Will Lansing	No	No	No		No	-	N/A	Yes	801.00	\$100 Re-Elect Muriel Bowser Our Mayor; \$100 Kenyan McDuffie 2018; \$51 Dionne For DC; \$250 Marcus Goodwin For DC; \$300 Reid 4 Ward 1 2018.		
Mid-City Financial Corporation		Yes	No	Yes		No	-	N/A	No	-	N/A		
Miller & Long-- DC		Yes	No	Yes		No	-	N/A	No	-	N/A		
Trial Lawyers Association or Metropolitan Washington. D.C.		Yes	No	Yes		No	-	N/A	No	-	N/A		
Uber Technologies		Yes	No	No		No	-	N/A	No	-	N/A		
Vesta Corporation		Yes	No	No		No	-	N/A	Yes	6,000.00	\$500 to Kenyan McDuffie; \$2000 Mayor Muriel Bowser; \$1327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine; \$2000 Mayor Muriel Bowser		
Wal-Mart Stores Inc.	Wal-Mart Stores, Inc.	Yes	No	No		No	-	N/A	Yes	1,000.00	Karl Racine		

Gifts to Officials

Registered User	Client Name	1	2	3	4	5	Amount	Beneficiary		6	Amount	Beneficiary	7	Remarks/Findings
Ace Cash Express		Yes	Yes	Yes		Yes	172.00	In-kind food contribution to Karl Racine		Yes	4,000.00	\$500 to K. McDuffie (CM); \$2000 to M. Bowser; \$1,327.20 & \$172.80 to Karl Racine (AG)		The In-Kind contribution to KR was correctly reported to OCF website on 12/04/2017
DC Hospital Association		Yes	Yes	Yes		Yes	65.00	Meal for Keynote speaker - Vincent Gray		No	-	N/A		Per Brian, CMs serving as Keynote Speakers are allowed to accept meals of up to \$350 under OGE rules

Political Contributions

Registered User	Client Name	1	2	3	4	5	Amount	Beneficiary	6	Amount	Beneficiary	Remarks/Findings
Ace Cash Express		Yes	Yes	Yes		Yes	-	see amount section	Yes	4,000.00	\$500 to K. McDuffie (CM); \$2000 to M. Bowser; \$1,327.20 & \$172.80 to Karl Racine (AG)	
AFLAC		No	No	No		No	-	N/A	Yes	-	N/A	AFLAC hired Robert M. Willis of Skadden, Arps, Slate, Meagher & Flom LLP to lobby on its behalf. Both Robert M Willis and Skadden, Arps, Slate, Meagher & Flom LLP did not register or file LAR.
Airbnb, Inc.	American Beverage Association	Yes	Yes	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie 2018	
American Beverage Assoc.		Yes	Yes	Yes		No	-	N/A	Yes	1,315.00	Muriel Bowser	
Anheuser-Busch Companies	Provident Resources Group, Inc.	Yes	Yes	Yes		No	-	N/A	Yes	5,000.00	Democratic Legislative Campaign Committee	
Arent Fox, LLP		Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	\$2,000 to Bouser; \$500 Cheh 2018; \$1,500 Karl Racine 2018	
Arent Fox, LLP	Sidwell Friends School	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	Center for Strategic and International Studies, Inc.	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	Beacon Capital Partners, LLC	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	KIPP D.C. Public Charter Schools	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	Population Services International	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	National Academy of Sciences	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	American Association of College Registrars and Ad	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	Resources for the Future	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	BREOF Holdings, LLC	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	DC United	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	Uber Technologies, Inc.	Yes	No	No		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	Sunstone Hotels Investors Inc.	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	FWG Solutions, Inc.	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	Shakespeare Theater	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	Washington Drama Society, Inc. d/b/a Arena Stage	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	Eagle Academy Public Charter School	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	Food & Friends	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	St. John's College High School	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	Saxon Collaborative Construction	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
Arent Fox, LLP	WeWork	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	Muriel Bowser for Mayor (\$2,000); Cheh 2018 (\$500); Karl Racine 2018 (\$1,500)	
AT&T		Yes	Yes	Yes		No	-	N/A	Yes	2,500.00	Muriel Bowser for Mayor (\$2,000); McDuffie 2018 (\$500)	Resident Lobbyist
Citigroup Washington, Inc.		Yes	Yes	Yes		No	-	N/A	Yes	2,000.00	Muriel Bowser	

Claudia L. McKoin	Humanties Council, DC		No	No	No	No	-	N/A	Yes	100.00	Muriel Bowser	Claudia McKoin was hired by HumanitiesDC to lobby on it behalf. Claudia registered and filed the LAR, HumanitiesDC registered but no LAR was filed
			Yes	Yes	Yes	No	-	N/A	Yes	100.00	Muriel Bowser	
Coldchain Technology Services			Yes	Yes	Yes	No	-	N/A	Yes	1,000.00	Mayor Muriel Bowser	
Conduent, Inc. and its Affiliates	PhRMA		Yes	No	No	No	-	N/A	Yes	2,000.00	N/A	
David Wilmot	Anheuser Busch		Yes	Yes	Yes	No	-	N/A	Yes	2,000.00	Muriel Bowser	Expenditure and Compensation report does not match what PhRMA presented
David Wilmot	Hotel Association of Washington		Yes	Yes	Yes	No	-	N/A	Yes	2,000.00	Muriel Bowser	
David Wilmot	Citigroup Washington, Inc.		Yes	Yes	Yes	No	-	N/A	Yes	2,000.00	Muriel Bowser	
DC Association of Beverage Alcohol Wholesalers			Yes	Yes	Yes	No	-	N/A	Yes	500.00	Kenyan McDuffie	Contribution to the Ward 5 Constituent Fund
DC09			Yes	Yes	Yes	No	-	N/A	Yes	2,000.00	Re-Elect Muriel Bowser Our Mayor	
District of Columbia Insurance Federatio	Insurance Industry at large		Yes	Yes	Yes	No	-	N/A	Yes	250.00	Kenyan McDuffie Ward 5	
eSystems Inc.			Yes	Yes	Yes	No	-	N/A	Yes	2,000.00	Reelect Muriel Bowser Our Mayor	
Global Government and Industry Partner	Anthem, Inc. and Its Affiliates (Including Amerigroup		Yes	Yes	Yes	No	-	N/A	Yes	7,194.65	\$1500 Mendelson for Chairman; \$2000 Re-Elect Muriel Bowser Our Mayor; \$2000 Re-Elect Muriel Bowser Our Mayor; \$500 Evans Constituent Services Fund; \$500 Ward 7 Constituent Services Fund; \$500 Our Ward 5; \$194.65 Our Ward 5	
Goldblatt, Martin, Pozen LLP	Wells Fargo & Company		Yes	Yes	Yes	No	-	N/A	Yes	500.00	Kenyan McDuffie 2018	
			Yes	Yes	Yes	No	-	N/A	Yes	500.00	Kenyan McDuffie 2018	
Goldblatt, Martin, Pozen LLP	AirBnB, Inc.		Yes	Yes	Yes	No	-	N/A	Yes	500.00	Kenyan McDuffie 2018	
Goldblatt, Martin, Pozen LLP	George Washington University Hospital		Yes	Yes	Yes	No	-	N/A	Yes	500.00	Kenyan McDuffie 2018	
Goldblatt, Martin, Pozen LLP	Google, Inc. and its Affiliates		Yes	Yes	Yes	No	-	N/A	Yes	500.00	Kenyan McDuffie 2018	
Goldblatt, Martin, Pozen LLP	CSX Corporation		Yes	Yes	Yes	No	-	N/A	Yes	500.00	Kenyan McDuffie 2018	
Goldblatt, Martin, Pozen LLP	International Spy Museum		Yes	Yes	Yes	No	-	N/A	Yes	500.00	Kenyan McDuffie 2018	
Goldblatt, Martin, Pozen LLP	District of Columbia Building Industry Association		Yes	Yes	Yes	No	-	N/A	Yes	500.00	Kenyan McDuffie 2018	
Goldblatt, Martin, Pozen LLP	Mid-City Financial Corporation		Yes	No	Yes	No	-	N/A	Yes	500.00	Kenyan McDuffie 2018	
Goldblatt, Martin, Pozen LLP	Allied Universal		Yes	Yes	Yes	No	-	N/A	Yes	500.00	Kenyan McDuffie 2018	
Goldblatt, Martin, Pozen LLP	Carpet Cushion Council		Yes	Yes	Yes	No	-	N/A	Yes	500.00	Kenyan McDuffie 2018	
Goldblatt, Martin, Pozen LLP	Capital Fringe		Yes	Yes	Yes	No	-	N/A	Yes	500.00	Kenyan McDuffie 2018	
Google Inc	Google Inc. and its Affiliates		Yes	Yes	Yes	No	-	N/A	Yes	75.48	Mario Cuahutle	
Hogan Lovells	Coldchain Technology Services		Yes	Yes	Yes	No	-	N/A	Yes	100.00	Re-elect Muriel Bowser	
Holland & Knight LLP	Vesta Corporation		Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	\$2000 for Mayor Muriel Bowser; \$500 for Kenyan McDuffie; \$1327.20 for Attorney General Karl Racine; \$172.80 for Attorney General Karl Racine.	
Holland & Knight LLP	NBL Associates, LP		Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine	
Holland & Knight LLP	T-Mobile		Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine	
Holland & Knight LLP	Stay Alfred Vacation Rentals		Yes	Yes	Yes	No	-	N/A	Yes		\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine	
Holland & Knight LLP	Kimberly-Clark Corp.		Yes	Yes	Yes	No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine	

Holland & Knight LLP	Legal Zoom	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine	
Holland & Knight LLP	Ace Cash Express, Inc.	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine	
James Nathanson Julyan&Julyan	Washington Parking Association	Yes	No	Yes		Yes	-	N/A	Yes	250.00	Charles Allen	
Julyan&Julyan	Terrell Place Properties LLC	Yes	Yes	Yes		No	-	N/A	Yes	1,500.00	\$500 for Kenyan McDuffie; \$500 for Muriel Bowser; \$500 Muriel Bowser	
Julyan&Julyan	Conduent Business Solutions	Yes	Yes	Yes		No	-	N/A	Yes	1,500.00	\$500 for Kenyan McDuffie; \$500 for Muriel Bowser; \$500 Muriel Bowser	
Kimberly-Clark Corporation		Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine	
Lawrence H. Mirel LegalZoom	State Farm Insurance	Yes	Yes	Yes		No	-	N/A	Yes	200.00	Mayor Muriel Bowser	
Lopez and Associates LLC	Will Lansing	Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine	
MedStar Health MTM Inc N William Jarvis N William Jarvis N William Jarvis N William Jarvis NBL Associates, LP	National Community Reinvestment Coalition Washington Nationals Baseball Club DC09 Comcast of the District LLC	No	No	No		No	-	N/A	Yes	801.00	\$100 Re-Elect Muriel Bowser Our Mayor; \$100 Kenyan McDuffie 2018; \$51 Dionne For DC; \$250 Marcus Goodwin For DC; \$300 Reid 4 Ward 1 2018.	
		Yes	Yes	Yes		No	-	N/A	Yes	2,000.00	Re-Elect Muriel Bowser Our Mayor	
		Yes	Yes	Yes		No	-	N/A	Yes	2,000.00	Bowser for Mayor	
		Yes	Yes	Yes		No	-	N/A	Yes	2,000.00	Bowser for Mayor	
		Yes	Yes	Yes		No	-	N/A	Yes	2,000.00	Bowser for Mayor	
		Yes	Yes	Yes		No	-	N/A	Yes	2,000.00	Re-Elect Muriel Bowser Our Mayor	
		Yes	Yes	Yes		No	-	N/A	Yes	2,000.00	Re-Elect Muriel Bowser Our Mayor	
		Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine	
Pascal & Weiss, P.C.		Yes	Yes	Yes		No	-	N/A	Yes	500.00	Kenyan McDuffie	Contribution to Ward 5 Constituent Fund
State Farm Mutual Automobile Insurance Company Stay Alfred Vacation Rentals		Yes	Yes	Yes		No	-	N/A	Yes	200.00	Mayor Muriel Bowser	
		Yes	Yes	Yes		No	-	N/A	Yes	4,000.00	\$500 Kenyan McDuffie; \$2,000 Muriel Bowser; \$1,327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine	
T-Mobile		Yes	Yes	Yes		No	-	N/A	Yes	5,000.00	\$500 Kenyan McDuffie; \$2000 Muriel Bowser; \$500 Kenyan Mc Duffie; \$2000 Muriel Bowser.	
Vesta Corporation		Yes	No	No		No	-	N/A	Yes	6,000.00	\$500 to Kenyan McDuffie; \$2000 Mayor Muriel Bowser; \$1327.20 Attorney General Karl Racine; \$172.80 Attorney General Karl Racine; \$2000 Mayor Muriel Bowser	
Wal-Mart Stores Inc.	Wal-Mart Stores, Inc.	Yes	No	No		No	-	N/A	Yes	1,000.00	Karl Racine	
Washington Area New Automobile Dealers Association		Yes	Yes	Yes		No	-	N/A	Yes	500.00	Mary M. Cheh	

FY18 Complaint Report - Board of Ethics and Government Accountability - October 1, 2017 - September 30, 2018*

Investigation #	Date Received	Source Type	Nature of Allegation(s)	Referral to Ethics Board (Y/N)	Disposition (including fines/penalties imposed by Ethics Board)	Status
1398-001 C. Snowden	9/22/2015	Hotline	Formal investigation into allegations that a supervisory employee ordered a subordinate to perform non-official duties.	Yes - presented to the Ethics Board on December 21, 2017	On October 4, 2018, the Ethics Board approved a negotiated disposition imposing a \$3,000 fine on Respondent for ordering, directing or requesting a subordinate to perform personal services unrelated to District government functions.	Closed 10/4/2018
1401-001 A. Hayes	9/23/2015	Agency	Formal Investigation involving allegations that a supervisor prepared tax returns for several subordinate employees.	Yes - presented to the Ethics Board on November 5, 2015	On September 6, 2018, the Ethics Board approved a negotiated disposition in which Respondent agreed to pay a \$2,000 fine for using government resources for other than official business.	Closed 9/6/18
1052-006 Non-public	1/11/2016	Agency	Preliminary investigation into allegations that agency employees received gifts from a prohibited source	No	On September 25, 2018, the Director of Government Ethics issued a non-public informal admonition for accepting a gift from a prohibited source.	Closed 9/25/18
1052-013 Non-public	1/11/2016	Agency	Preliminary investigation into allegations that agency employees received gifts from a prohibited source	No		Pending
1449-001 Non-public	2/8/2016	OIG	Preliminary investigation into allegations that a District employee misused a government vehicle to commit a crime	No		Stayed 3/7/16
1515-001 A. Shakeri	5/18/2016	OIG	Formal Investigation into allegations that employee did not disclose over \$170,000 in outside income on his Financial Disclosure Statement.	Yes - presented to the Ethics Board on August 4, 2016		Stayed 5/18/16
1551-001 Non-public	9/9/2016	OIG	Formal investigation from OIG Report of Investigation finding that a former Grants Management Specialist and a Contractor engaged in a scheme to defraud the D.C. government in the amount of \$52,700.	Yes - presented to the Ethics Board on October 6, 2016		Stayed 10/6/16
1414-004 Non-public	10/13/2016	Agency	Preliminary investigation into allegations that an employee solicited and accepted a gift from a prohibited source	No		Stayed 2/6/17
1025-004 Non-public	5/22/2017	Agency	Preliminary investigation into allegations that an employee had a possible conflict of interest involving a local architecture firm	No		Stayed 9/22/17
1031-008 Non-public	5/24/2017	OIG	Preliminary investigation into allegations that an employee circumvented procurement laws and regulations by providing himself and his employees travel reimbursements.	No		Stayed

Investigation #	Date Received	Source Type	Nature of Allegation(s)	Referral to Ethics Board (Y/N)	Disposition (including fines/penalties imposed by Ethics Board)	Status
1031-009 Non-public	5/31/2017	Agency	Preliminary investigation into allegations that an employee was involved in soliciting donations from private donors.	No		Pending
1031-010 Non-public	5/31/2017	Agency	Preliminary investigation into allegations that a former employee used government resources to operate a private company.	No		Pending
1031-011 Non-public	5/31/2017	Agency	Preliminary investigation into allegations that an employee was involved in soliciting donations from private donors.	No		Pending
1634-001 R. Wilson	8/11/2017	Agency	Formal Investigation into allegations that an employee failed to disclose outside employment as required	Yes, Oct. 19, 2017	On August 27, 2018, the Director of Government Ethics imposed a \$2,750 ministerial fine on Respondent for failing to file fully completed financial disclosure forms.	Pending
1643-001 Non-public	9/20/2017	ORM	Preliminary Investigation into allegations that an employee was wrongfully compensated for falsely claiming injuries from an alleged assault that occurred while they were on duty.	No		Stayed 9/20/17 Reopened 3/8/18
1027-005 Non-public	12/1/2017	Agency	Preliminary Investigation into allegations that an employee used public office for private gain by selling food during their tour of duty.	No		Pending
1031-013 Non-public	1/9/2018	Agency	Preliminary Investigation into allegations that an employee is receiving kickbacks in exchange for participation in the altering of official government records and monitoring of staff.	No		Pending
1031-014 Non-public	1/17/2018	Public	Preliminary Investigation into allegations of sexual harassment, forgery of student signatures, and falsifying student grades.	No		Pending
1682-001 Non-public	1/19/2018	Public	Preliminary Investigation into allegations that an elected official conspired to violate a USPS statute.	No	On July 9, 2018, the Director of Government Ethics dismissed this matter for failure to allege a credible violation of the Ethics Act.	Closed 7/9/2018
1101-003 J. Evans	1/22/2018	Public	Formal Investigation into allegations that an elected official took an action or participated in a decision that affected their (or an affiliated person's) financial interest.	Yes - presented to the Ethics Board on March 19, 2018		Pending
1592-002 Non-public	2/9/2018	Agency	Formal investigation into allegations that employee provided confidential information to an unauthorized person in exchange for payment.	Yes - presented to the Ethics Board on March 19, 2018		Stayed 9/21/18

Investigation #	Date Received	Source Type	Nature of Allegation(s)	Referral to Ethics Board (Y/N)	Disposition (including fines/penalties imposed by Ethics Board)	Status
1684-001 Non-public	2/15/2018	Public	Preliminary Investigation into allegations that a public official violated the Hatch Act.	No	On August 8, 2018, the Director of Government Ethics dismissed this matter because there was insufficient evidence to believe that a Code of Conduct violation had occurred.	Closed 8/22/18
1420-004 Non-public	2/16/2018	Agency	Preliminary investigation into allegations that a former employee, is appearing before the agency as an expediter in violation of the one-year cooling off period.	No		Pending
1031-017 J. Niles	2/16/2018	Agency/OIG	Formal Investigation into allegations that a public official failed to act impartially in violation of the DPM and Mayor's Orders, which govern discretionary transfers.	Yes - presented to the Ethics Board on March 19, 2018		Pending
1031-016 A. Wilson	2/16/2018	Agency/OIG	Formal Investigation into allegations that a public official failed to act impartially in violation of the DPM and Mayor's Orders, which govern discretionary transfers.	Yes - presented to the Ethics Board on March 19, 2018		Pending
1685-001 Non-public	2/28/2018	Agency	Preliminary Investigation into allegations of time and attendance abuse by an employee.	No		Pending
1516-004 Non-public	2/28/2018	Agency	Preliminary Investigation into allegations that an employee is soliciting business from companies that do business with their agency.	No		Pending
1109-004 Non-public	2/28/2018	OIG	Preliminary Investigation into allegations that an employee misused nonpublic information for an improper purpose.	No	On October 18, 2018, the Director of Government Ethics dismissed this matter due to insufficient evidence to support a reasonable belief that a Code of Conduct	Closed 10/18/2018
1391-001 Non-public	3/15/2018	Agency	Formal investigation into allegations that an employee provided confidential information and worked for a prohibited source.	No	Yes - June 7, 2018	Stayed 9/21/18
1204-002 Non-public	3/27/2018	Agency	Preliminary investigation into allegations that an employee operated a business within the agency using government property.	No		Pending
1031-019	4/5/2018	Public	This is a sworn complaint (formal investigation) asking BEGA to request copies of documents from another District agency.	Yes - presented to the Ethics Board on May 3/2018	On August 10, 2018, the Ethics Board dismissed this matter because it had been resolved by the Office of Open Government.	Closed 8/10/2018
1689-001 Non-public	4/13/2018	Public	Preliminary investigation into allegations that employee failed to disclose business on financial disclosure statement.	No		Pending

Investigation #	Date Received	Source Type	Nature of Allegation(s)	Referral to Ethics Board (Y/N)	Disposition (including fines/penalties imposed by Ethics Board)	Status
1019-017 Non-public	4/25/2018	Public	Preliminary investigation into allegations of a conflict of interest regarding open source awards to companies affiliated with a current employee	No		Pending
1204-003 Non-public	5/10/2018	OIG	Preliminary Investigation into allegations that an employee used a District government vehicle for personal use, and falsified time and attendance records	No		Pending
1698-001 Non-public	5/23/2018	Public	Preliminary Investigation into allegations that an employee misused government time.	No		Pending
1696-002 Non-public	5/23/2018	Public	Preliminary Investigation into allegations that an employee misused government time.	No		Pending
1697-003 Non-public	5/23/2018	Public	Preliminary Investigation into allegations that an employee misused government time.	No		Pending
1695-004 Non-public	5/23/2018	Public	Preliminary Investigation into allegations that an employee misused government time.	No		Pending
1702-001 Non-public	6/20/2018	OIG	Preliminary investigation into allegations that an employee used coworkers for babysitting services.	No		Pending
1701-001 Non-public	6/25/2018	Public	Preliminary investigation into allegations that an employee abused time and attendance rules, and accepted travel in violation of the Donations Act.	No	On October 22, 2018, the Director of Government Ethics dismissed this matter due to insufficient evidence to support a reasonable belief that a Code of Conduct violation occurred.	Closed 10/22/18
1700-001 Non-public	6/25/2018	Public	Formal investigation into allegations that a DCPS employee assisted a contractor in defrauding the District government.	Yes - July 9, 2018.		Pending
1205-006 Non-public	6/28/2018	Agency	Preliminary investigation into allegations that an employee approved overtime pay for a relative.	No		Pending
1515-003 Non-public	6/28/2018	OIG	Preliminary investigation into allegations that an employee abused time and attendance rules.	No		Pending
1703-001 Non-public	6/29/2018	Agency	Preliminary investigation into allegations an employee may be engaged in outside activities that conflict with official duties and responsibilities.	No		Pending
1705-001 Non-public	7/2/2018	Agency	Preliminary investigation into allegations an employee failed to disclose his outside business on his confidential financial disclosure statements.	No		Pending

Investigation #	Date Received	Source Type	Nature of Allegation(s)	Referral to Ethics Board (Y/N)	Disposition (including fines/penalties imposed by Ethics Board)	Status
1706-001 R. Lewis	7/2/2018	Public	Formal investigation into allegations an employee violated the Hatch Act by declaring as a candidate while employed by the District government.	Yes - presented to the Ethics Board on August 10, 2018	On October 4, 2018, the Ethics Board approved a negotiated disposition in which Respondent agreed to pay a \$1,000 fine for violating the local Hatch Act by declaring as a candidate while employed by the District government.	Closed 10/4/18
1449-002 Non-public	7/2/2018	Agency	Formal investigation into allegations of wrongful termination and abuse of authority by a Workforce Investment Council Executive Director.	Yes - presented to the Ethics Board on July 9, 2018	On July 9, 2018, the Ethics Board dismissed this matter as being without merit pursuant to D.C. Official Code § 1-1162.16 (a).	Closed 7/9/2018
1031-020 Non-public	7/9/2018	OIG	Preliminary investigation into allegations an employee worked in excess of 2 telework days per work week.	No		Pending
Non-public	7/13/2018	OIG	Preliminary investigation into allegations that employee made unauthorized commitment for procurement of vehicles.	No	On July 16, 2018, the Director of Government Ethics dismissed this matter because there was insufficient evidence to believe that a Code of Conduct violation had occurred.	Closed 7/18/2018
1416-002 Non-public	7/27/2018	Agency	Formal investigation into allegations multiple employee employees are ceating a hostile work environment	Yes - presented to the Ethics Board on August 10, 2018	On August 10, 2018, the Ethics Board dismissed this matter for failure to state a credible violation of a violation of the Code of Conduct.	Closed 8/10/2018
1034-005 Non-public	8/22/2018	OIG	Preliminary Investigation into allegations that multiple employees were running a large scale sports gambling pool	No		Pending
1294-006 Non-public	8/22/2018	OIG	Preliminary Investigation into allegations that employee distributed free parking in a District government parking facility.			Pending
1109-006 Non-public	8/22/2018	Public	Formal Investigation into allegations that manager made false and defamatory statements against a subordinate.	Yes - presented to the Ethics Board on September 6, 2018	On Sept. 6, 2018, the Ethics Board dismissed this matter without prejudice because there was insufficient evidence to believe that a Code of Conduct violation had occurred.	Closed 9/6/18
1420-006 Non-public	8/22/2018	Public	Formal Investigation into allegations that employees are using their offices for personal and financial gain.	Yes - presented to the Ethics Board on September 6, 2018	On Sept. 6, 2018, the Ethics Board dismissed this matter because there was insufficient evidence to believe that a Code of Conduct violation had occurred.	Closed 9/6/18
1717-001 Non-public	9/20/2018	OIG	Preliminary Investigation into allegations that employee had a conflict of interest in awarding a grant to spouse's company.			Pending

Investigation #	Date Received	Source Type	Nature of Allegation(s)	Referral to Ethics Board (Y/N)	Disposition (including fines/penalties imposed by Ethics Board)	Status
1718-001 Non-public	9/20/2018	OIG	Preliminary Investigation into allegations that employee used public office for private gain.			Pending
			*This report is current as of September 30, 2018. It does not reflect activity and dispositions after September 30, 2018.		**The term "stayed" means a case that is not under active investigation by BEGA, usually because there is an ongoing investigation or review by the courts or another law enforcement or investigatory body.	

BEGA FY19 Complaint Report				Exhibit 13
Number	Date Received	Current Status	Category	Specific 1
19-0003-P	26Oct2018	Closed - Pending Collection	Conflict of Interest Violation	[None]
19-0002-P	09Nov2018	Closed FINAL (Consolidated with Prior Case)	Miscellaneous Violation	Creating the appearance of impropriety
19-0001-P	09Nov2018	Open	Miscellaneous Violation	Creating the appearance of impropriety
18-0035-P	22Aug2018	Open	Conflict of Interest Violation	[None]
19-0004-F	08Jan2019	Open	Miscellaneous Violation	Violation of a federal law or regulation
19-0003-F	27Jun2018	Open	Conflict of Interest Violation	[None]
19-0002-F	27Nov2018	Stayed - US District Court Case	Miscellaneous Violation	Violation of a federal law or regulation
19-0001-F	11Oct2018	Stayed - US District Court Case	Conflict of Interest Violation	Use of official position or title that employee knows is likely to have a direct and predictable effect on the employee's own financial interest
19-0031-C	04Jan2019	Closed FINAL (Consolidated with Prior Case)	Miscellaneous Violation	
19-0030-C	04Feb2019	Open	Non-Public Information Violation	Divulging non-public information to any unauthorized person or in advance of its authorized issuance
19-0029-C	25Jan2019	Open	Gifts/Donation Violation	Accepting a gift from a District employee with a lower salary
19-0028-C	22Jan2019	Closed FINAL	Miscellaneous Violation	
19-0027-C	17Jan2019	Open	Miscellaneous Violation	
19-0026-C	16Jan2019	Closed FINAL (Consolidated with Prior Case)	Misuse of Government Resources	
19-0025-C	15Jan2019	Open	Misuse of Government Resources	Misusing District government property for unauthorized purposes
19-0024-C	13Jul2018	Open	Miscellaneous Violation	
19-0023-C	03Jan2019	Open	Conflict of Interest Violation	
19-0022-C	02Jan2019	Open	Miscellaneous Violation	
19-0021-C	10Sep2018	Closed FINAL	Conflict of Interest Violation	Use of official position or title that employee knows is likely to have a direct and predictable effect on the employee's own financial interest
19-0020-C	30Aug2018	Open	Misuse of Government Resources	Misusing District government property for unauthorized purposes
19-0019-C	15Jun2018	Open	Lobbyist Registration Violation	
19-0018-C	03Apr2018	Open	Conflict of Interest Violation	
19-0017-C	08Nov2018	Open	Nepotism Violation	
19-0016-C	27Nov2018	Closed FINAL; Investigation Initiated	Miscellaneous Violation	Violation of a federal law or regulation
19-0015-C	15Nov2018	Open	Conflict of Interest Violation	Personal and substantial participation in a particular matter that could affect the employee's own financial interests
19-0014-C	13Nov2018	Open	Miscellaneous Violation	Creating the appearance of impropriety
19-0013-C	08Nov2018	Open	Miscellaneous Violation	[None]
19-0012-C	09Nov2018	Closed FINAL; Investigation Initiated	Miscellaneous Violation	Creating the appearance of impropriety
19-0011-C	09Nov2018	Closed FINAL; Investigation Initiated	Miscellaneous Violation	Creating the appearance of impropriety
19-0010-C	01Nov2018	Open	Miscellaneous Violation	Violation of a District law or regulation

19-0009-C	17Oct2018	Open	Conflict of Interest Violation	Use of official position or title that employee knows is likely to have a direct and predictable effect on the employee's own financial interest
19-0008-C	11Oct2018	Closed FINAL	Conflict of Interest Violation	Use of official position or title that employee knows is likely to have a direct and predictable effect on the employee's own financial interest
19-0007-C	26Oct2018	Closed FINAL; Investigation Initiated	Conflict of Interest Violation	[None]
19-0006-C	26Oct2018	Open	Miscellaneous Violation	Gambling on duty
19-0005-C	12Oct2018	Closed FINAL (Consolidated with Prior Case)	Non-Public Information Violation	Divulging non-public information to any unauthorized person or in advance of its authorized issuance
19-0004-C	24Oct2018	Open	Conflict of Interest Violation	Engaging in outside activities that conflict with the employee's official government duties and responsibilities
19-0003-C	04Oct2018	Closed FINAL	Conflict of Interest Violation	Engaging in outside activities that conflict with the employee's official government duties and responsibilities
19-0002-C	07Sep2018	Closed FINAL	Misuse of Government Resources	Misusing District government property for unauthorized purposes
19-0001-C	11Sep2018	Closed FINAL	Hatch Act Violation	Knowingly solicit, accept or receive a political contributor