

Stephan W. Fogleman, Chair
Donna M. Davis, Vice-Chair
Melodie Hengerer
Arnold Sampson
Vacant



Executive Director: Isabel Mercedes Cumming
Director: Jeffrey Hochstetler

Baltimore City Board of Ethics Lobbying -- Complaint Summary 008

The complaint alleged that a lobbyist who was required to register with the Ethics Board (“Board”) had not timely registered after engaging in legislative lobbying activity, in violation of § 8-7 of the Ethics Law.¹ That section requires a lobbyist engaged in legislative lobbying to register with the Board if they earn at least \$2,500 in compensation related to that lobbying activity or meet certain other threshold requirements.²

The Board made a preliminary determination that the lobbyist had failed to register for 14 days after engaging in lobbying activity that required registration, thus constituting a *prima facie* violation of the Ethics Law’s lobbying registration requirements. The Board reminded the lobbyist that it takes the timely registration of lobbyists seriously because it is only through timely registration that the public is adequately informed of lobbying activity in the City.³

The Board provided the lobbyist with the opportunity to resolve the violation by paying a late fee of \$50 per day, for a total of \$750. In calculating the fee, the Board considered that the lobbyist had self-reported the late registration and had otherwise operated in good faith. The lobbyist paid the late fee and the Board dismissed the complaint without further proceedings. *See* Ethics Law § 5-4.

¹ The Ethics Law is contained in Article 8 of the City Code. All citations are to the Ethics Law unless otherwise indicated.

² Under the Ethics Law’s legislative lobbying provisions, a person must register if, during a reporting period, the person:

- (1) for the purpose of influencing any legislative action, communicates with a public servant; and
- (2) in furtherance of or in connection with all such communications for that or any other legislative action, and all activities relating to those communications:
 - (i) expends \$100 or more for gifts, including meals, beverages, or special events, to 1 or more public servants;
 - (ii) incurs any expenses of \$500 or more; or
 - (iii) earns \$2,500 or more in compensation.

§ 8-7. There are also registration requirements for executive lobbying and grassroots lobbying. *See* Ethics Law §§ 8-8 and 8-9.

³ A list of registered lobbyists is available on the Board’s website here:
<https://ethics.baltimorecity.gov/lobbyist-registration-lists>