



Washington Suburban Transit Commission (WSTC)

Compliance Report: Conflict of Interest

Reporting Period: Calendar Year 2024

Following the 2020 Regular Session of the Maryland General Assembly, House Bill 370 was Enacted on May 8, 2020, as Chapter 185 – Bicounty Commissions – Annual Reports – Conflicts of Interest and Lobby – PG/MC 102-20 (hereafter Chapter 185, or Ch. 185) under Article ii, § 17(c) of the Maryland Constitution. Chapter 185 requires each Maryland bicounty Commission to produce an annual report on conflict-of-interest issues and regulation during the previous Calendar year, submit the report to the governing body of each county in which the bicounty Commission operates and publishes the report on the bicounty Commission’s website.

WSTC Conflict of Interest Policy

Regulations governing conflict of interest for the Washington Suburban Transit Commission (WSTC, or the Commission) are specified in the enabling legislation which established the Commission. Equivalent language is included in the county code of both Montgomery and Prince George’s Counties (the district).

10. Conflicts of Interest

- 1) No commissioner, nor any other officer, employee, agent or consultant, shall have any interest in any person or company engaged in the business of provide public transportation in the district or within the metropolitan area in which the district is located, or in the manufacture or sale of passenger transportation equipment or facilities.
- 2) No commissioner nor any agent, officer, employee, or consultant thereof, shall contract with the district or be interested in, either directly or indirectly, any contract with the district or in the sale of any property, either real or personal, to the district.
- 3) Any violation of this provision shall be a misdemeanor and punished as provided by law.
- 4) All commissioners are public officials as defined under the Maryland Public Ethics Law and are subject to the restrictions and requirements set forth in Title 15 of the State of Government Article of the Annotated Code of Maryland, as amended and supplemented.

(Laws 1965, Ch. 870, Sec. 1; Laws 1963, Sec. 83A-10; Ch. 433, Laws of Md., 2012)

Compliance

- Financial Disclosure Statements

As required by public officials under Title 15 of the State Government Article, the Commissioners of the WSTC must submit by April 30 a Financial Disclosure Statement with the

Maryland State Ethics Commission. As of April 23, 2025, eligible commissioners have successfully submitted a Financial Disclosure Statement.

The Commissioners of record for the Washington Suburban Transit Commission during Calendar Year 2024 included:

- Mr. Thomas Graham
- Hon. Tom Hucker
- Mr. Michael Goldman
- Mr. Donald Drummer
- Hon. Eric Olson
- Mr. Raymond J. Briscuso, Jr.
- Assistant Secretary of Transportation Paul Joseph McAndrew

- Vendors

The following list includes all vendors with which the Commission conducted routine business during Calendar year 2024. This list was provided to WSTC Commissioners for use in completing their Financial Disclosure Statements:

- Comcast
- Corporate Payroll Services
- C.N.A. Insurance/NFP
- Empower Retirement
- Garden City Investors, LLC
- GoDaddy.com
- INDEED
- Keys & Associates, P.C.
- KFH Group
- Lowes Corporate
- M&T Bank
- Montgomery County Government
- PDC METRO EAST, LLC
- Staples
- VistaPrint.com
- Washington Post
- Zip Moving & Storage
- Zip Recruiter

- Recusals

In the event that a commissioner held an interest (personal or property) in an outside organization which would create a conflict of interest in their ability to discuss or determine Commission policy, or to approve or authorize a contract or grant, the Commissioner(s) would be expected to self-identify the potential conflict and recuse themselves from the discussion and/or vote.

In Calendar Year 2024, Commissioner Graham recused himself from reviewing and scoring proposals for WSTC's *Maryland Metro Access Strategy Study* Request for Proposals. Upon discovering a formal business relationship with one of the proposers, Commissioner Graham self-identified the relationship and recused himself from participation in the evaluation committee and voting. As a result, Commissioner Graham was replaced with an alternate member for scoring and

evaluation purposes. After discussion and a comparison of scores, the evaluation committee reached a consensus on the firm offering the best approach to the study and value for WSTC. The selected firm was not the firm to which Commissioner Graham is associated. The Commission then approved the evaluation committee's recommendation by a vote of 6-0-1 (Commissioner Graham abstaining).

Questions

Any questions, comments, or requests for additional information should be directed to:

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