

**CONFIDENTIAL. FOR CONSIDERATION OF THE BOARD OF EDUCATION ONLY.
NOT FOR PUBLIC DISCLOSURE.**

BEFORE THE WASHINGTON COUNTY BOARD OF EDUCATION

ETHICS ADVISORY PANEL

IN THE MATTER OF: *

MICHAEL GUESSFORD *

SUPPLEMENTAL FINDINGS OF FACT,

CONCLUSIONS OF LAW, AND REVISED RECOMMENDATION

A Complaint was filed against Michael Guessford ("Respondent" hereinafter) on or about November 30, 2015, which contained allegations concerning conflict of interest and failure to file complete and accurate Financial Disclosure Statements for 2013 and 2014. The Ethics Advisory Panel ("Panel" hereinafter) received information from the Washington County Public Schools and upon reviewing that information, concluded that there was a reasonable basis for believing that violations of the Board of Education's Ethics Regulations had occurred. Therefore, the Panel afforded an opportunity to the Respondent for a Hearing before the Panel, which was held on Monday, March 7, 2016. After that Hearing, the Panel submitted to the Board of Education of Washington County its Findings of Fact, Conclusions of Law, and Recommendation, in which the Panel concluded that the Respondent had committed, over time, several violations of the Board's Ethics Regulations and it recommended that the Respondent be directed to fully, completely, and accurately prepare and submit amended Financial Disclosure Statements for 2013 and 2014. It further recommended that the Respondent thoroughly review the 2015 Form and re-submit it after ensuring that it is complete and accurate, and that it is properly, signed, dated, and notarized.

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Subsequent to the submission of the Panel's Report, dated March 14, 2016, the Panel received additional questions from Board Members and copies of the actual cancelled checks at issue. The Panel also received a report of an additional catering job that allegedly had been performed by Applause Caterers for a school in the Fall of 2015, several months after the jobs of which the Panel was made aware at the Hearing on March 7. The Panel scheduled a follow-up Hearing with the Respondent for June 29, 2016, in order to provide an opportunity for the Respondent to respond to additional questions presented to the Panel by Board Members and to answer the questions regarding the additional catering job. Several days prior to that Hearing, the Respondent submitted revised Financial Disclosure Forms for 2013 and 2014. The Panel also reviewed a Form for 2015, which was dated April 29, 2016. (Attached is a summary of the Financial Disclosure Forms submitted, as prepared by the Office of Chief Legal Counsel, which is the caretaker of such Forms).

As a result of information determined by the Panel subsequent to its previously submitted Report, the Panel submits to the Board of Education the following Supplemental Findings of Fact, Conclusions, and Revised Recommendation, along with a copy of the written transcript and a copy of the documents reviewed by the Panel.

SUPPLEMENTAL FINDINGS OF FACT

Based on the documents before the Panel and the testimony of the Respondent, the Panel makes the following supplemental findings of fact:

1. After the Respondent was sworn in as a Board Member on December 2, 2014, Applause Caterers, an entity owned by the Respondent, performed catering work for

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Washington County Public Schools on at least the following five (5) occasions, for the amounts identified:

- a. April 14, 2015 – Eastern Elementary, Volunteer Dinner – Purchase Order No. LL9443 - \$350.00
 - b. April 14, 2015 – Eastern Elementary, Volunteer Dinner – Purchase Order No. LL9728 - \$175.00
 - c. April 29, 2015 – Eastern Elementary, Mentor Program Dinner – Purchase Order No. LL10009 - \$278.25
 - d. August 13, 2015 – Northern Middle, Faculty Breakfast - \$667.20
 - e. August 13, 2015 - Greenbrier Elementary, Faculty Breakfast - \$286.20.
2. The check from the Board of Education of Washington County for Purchase Order No. 9443 (April 14, 2015) was endorsed with a stamp.
 3. The check from the Board of Education of Washington County for Purchase Order No. 9728 (April 14, 2015) was endorsed by the Respondent, who acknowledged that his initials appear on the back of the check
 4. The check from the Board of Education of Washington County for Purchase Order No. 10009, (April 29, 2015) was endorsed by the Respondent, who acknowledged that his initials appear on the back of the check.
 5. The check from Northern Middle School for the August 13, 2015, job was endorsed by the Respondent, who acknowledged that his initials appear on the back of the check.
 6. The Panel did not review the check for the August 13, 2015, job for Greenbrier Elementary School, because the Panel was made aware of that catering job, by the Respondent, for the first time, at the Hearing on June 29, 2016.

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7. The Respondent acknowledged that he personally delivered the food for both of the catering jobs on August 13, 2015, at Greenbrier Elementary and at Northern Middle School.

8. The Respondent filed an Amended Financial Disclosure Form for 2013, which was dated June 27, 2016.

9. The Respondent filed an Amended Financial Disclosure Form for 2014, which was dated June 27, 2016.

10. The Respondent filed a Financial Disclosure Form for 2015, which was dated April 29, 2016.

SUPPLEMENTAL CONCLUSIONS OF LAW

At the Hearing held on March 7, 2016, the Respondent testified that after he was elected to the Board, he "explained to my staff ... we can't do any business whatsoever with the School Board and you know, I don't have hands-on, on the business day-to-day." (March 7, TR 43). The Respondent further testified that even before he was elected, when it "started looking more and more positive that I was going to get elected," he told his staff "you better start ... making sure that if anyone calls in here, just tell them no." (March 7, TR 43). The Respondent explained that after his election to the Board, calls to the office from schools were repeat customers who wanted "the same thing as the last 5 years" and it did was not a trigger to the person taking the order that the job should be declined. After the jobs were booked, the Respondent told his staff that regarding jobs from the School System or from individual schools, "we cannot do any;" that "you cannot take anything else;" and if there is "anything on your books now, call them and they'll have to find another caterer because we cannot do it." (March 7, TR 44). The Respondent repeated that he is "just not hands-on" and was not in the office on a daily basis.

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As a result of that testimony, the Panel originally concluded that the Respondent's actions were "inadvertent" and not "purposeful, malicious, or an intent to deceive or hide information."

At the June 29, 2016, Hearing, the Respondent produced invoices from two catering jobs dated August 13, 2015, along with an email from a staff person at Applause that she "personally took both of these caterings as repeat caterings" and that she handles all of the scheduling. She indicated that the Respondent "does not solicit or schedule caterings." (Respondent Ex. 1). The Panel learned from the Respondent at the Hearing on June 29, for the first time, however, that the Respondent, personally, delivered the food for both of the catering jobs for August 13, 2015. The Respondent testified that although he did not participate in the taking of the orders, he "just happened to show up and make the deliveries." (June 29, TR 9). The Respondent acknowledged that he personally made the deliveries to Northern Middle School and to Greenbrier Elementary School. (June 29, TR 14). The Respondent further indicated that after making the deliveries to the schools, he returned to the office and "gave her hell" for accepting work from schools. (June 29, TR 13). In light of the review of the checks and the additional information regarding work done in August, 2015, the Panel concludes that the Respondent cannot claim that he was "hands-off" as to the work done for the School System. Applause did work for the schools on three occasions from April 14 through April 29, 2015, and on two of those jobs, the Respondent personally endorsed checks from the Board of Education. According to the Respondent's testimony, the deposits for Applause were handled by the Respondent and his wife and the initials appearing on the checks were those of the Respondent. (June 29, TR 14, 18)(Panel Exhibits 1, 3, 4). The checks with the stamped endorsement were stamped by a person in the office. (June 29, TR 15).

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Even if the Respondent was unaware of the April jobs when they occurred, he certainly knew that they happened when he endorsed the checks received by Applause from the Board of Education, in payment for the work done. Moreover, in August, 2015, Applause was hired to do jobs at two different schools and the Respondent acknowledged that he personally made the deliveries to each school. He also endorsed those checks with his initials. It is noted that the Respondent did not disclose these August jobs when he testified before the Panel in March. Moreover, in the Financial Disclosure Form for 2015, dated April 29, 2016, and signed under oath, the Respondent reported:

During the first few months of 2015, my staff took a couple caterings that we have been doing for 5-8 years. Because it was called in by a name and not by school, it never was caught until it was too late. 3 caterings were performed. Once that occurred, I spoke to my staff and told them that we could not do *any* catering with any school. We stopped before anything was said to me about them or others. Nothing has happened since.

Unfortunately, it turns out that was untrue, since two additional jobs were performed in August, 2015, after those three April jobs. It is difficult to understand how Applause did work for two schools in August if, as the Respondent testified in March, he told his staff not to accept such jobs before he was actually elected to the Board and again afterwards. In his Financial Disclosure Statement for 2015, the Respondent repeated that after the three April jobs, he told his staff that Applause could not do any catering with any school. The Respondent could not have been so hands off as to not realize in April and again in August that his company was engaged in work for the County schools. Even giving the Respondent the benefit of all doubts, it was, at a minimum, willful ignorance on his part to allow Applause to continue to do catering work for public schools in Washington County after his election to the Board.

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The Panel also reviewed the revised Financial Disclosure Forms that were submitted just prior to the June 29 Hearing and a review of those documents demonstrates how woefully inadequate the original filings were. (The Panel also reviewed a "second" Form previously filed for 2014, which was not significantly different from the first Form filed for that year.) The revised filings provide much more information and detail about the Respondent's real estate and business holdings and all of that information should have been disclosed in the original filings. (The Panel also notes that most of the questions from Board Members were answered by the amended Statements.) As noted in the Panel's previous report, the Respondent's original Financial Disclosure Forms for 2013 and 2014 failed to list Applause Caterers as a "non-corporate entity ... that did business with WCBOE or WCPS during the reporting period" in Schedule C and as an "entity that did business with WCBOE or WCPS" in Schedule E. The amended Forms clarify and correct those omissions.

Furthermore, as noted in the Panel's original Report, the Respondent voted on two contracts before the Board involving Stamper Builders, even though the Respondent advised the Panel at the March Hearing that he and Milton Stamper were part of the business entity known as City Theater, LLC. In his amended Disclosure Forms for 2013 and 2014, the Respondent listed a real estate interest in 58 E. Washington Street, in which Milton Stamper was a co-owner. That property was not listed on the original Forms. Schedule A of the Disclosure Form specifically requires the listing of "any interest ... in real property in Maryland..." Question 5 asks if the real estate was held solely or jointly and it then asks for the name of the "other joint owner." The Respondent's interest in that property and the fact that Milton Stamper was a co-owner should have been disclosed in the original Forms.

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Of somewhat lesser significance, but still relevant, is the fact that the 2015 Disclosure Form does not list Guessford 16, LLC, which was “officially” formed in December, 2015. The Respondent testified that the entity did not get underway until 2016, even though it was registered with the State in December, 2015. (June 29, TR 28-29).

The Panel appreciates the fact that the Respondent has filed amended Financial Disclosure Forms that appear to address the inadequacies contained in the original filings, but the Panel is concerned that it took so long for the Respondent to do so. The Panel continues to have concerns regarding the Respondent’s apparent lack of attentiveness regarding the obvious conflict of interest in allowing his catering company to continue to do work for the School System after the Respondent became a Member of the Board of Education.

REVISED RECOMMENDATION

Pursuant to Regulation BBFE-R, section II.F.4., the Panel shall report its findings and recommendation for action to the Board which, if it concurs with the Panel, shall take enforcement action in accordance with the Regulations. The Panel has concluded that the evidence is conclusive and that the Respondent has committed several violations of the Board’s Ethics Regulations. (Attached is a summary of the violations.)

For all of the above-stated reasons, the Panel has concluded that the Respondent did violate the Board’s Ethics Regulations and it recommends that the Board make such a determination and finding. In light of the Supplement Findings and Conclusions noted above, the Panel would modify and revise the recommendation previously made. The Panel, at a minimum, recommends the following sanctions.

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1. The Board should issue a private censure to the Respondent, expressing its disapproval of the Respondent's violations of the Ethics Policy regarding the Respondent's failure to fully and accurately complete and file his Financial Disclosure Forms for 2013 and 2014; his conflict of interest in doing work for the School System, through his business, Applause Caterers ; and his failure to recuse himself from voting on contracts between the Board and Milton Stamper Builders.
2. The censure should criticize the Respondent's conduct, counsel him about the obligation to comply with the Ethics Regulations, and admonish him that repeated violations may be grounds for removal.¹
3. The 2015 Financial Disclosure should be revised to accurately report the catering jobs performed by Applause in August, 2015 and the formation of Guessford 16, LLC.
4. Finally, the Panel recommends that the Board direct the Respondent to refund the money paid to Applause Caterers by the School System and/or schools during the period when he was a Board Member, which totals \$1,756.65.

[Signatures on following page.]

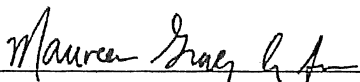
¹ The Panel refers the Board to the Maryland State Board of Education Opinion issued in *Edward Burroughs v. Prince George's County Board of Education*, Op. No. 11-23, p. 3 (2011), where the State Board upheld a private censure, citing an Opinion of the Attorney General, noted that a County Board of Education "certainly has the power to adopt a resolution that, while having no formal legal effect as a sanction, criticizes what the Board perceives as improper conduct." (65 Op. Att'y Gen. 347, 350 (1980).


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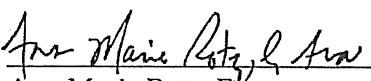
Respectfully submitted,

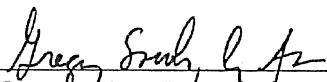
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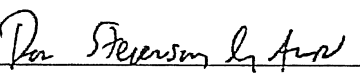
WASHINGTON COUNT BOARD OF EDUCATION
ETHICS ADVISORY PANEL


Maureen Grove


Dr. George Newman


Ann Marie Rotz, Esq.


Gregory Snook


Don Stevenson

SUMMARY OF ETHICS VIOLATIONS

The Panel finds the following to be violations of the Board's Ethics Regulations:

- The Respondent knew, or should have known, that his business, Applause Caterers, did at least five jobs for Washington County Public Schools after he became a Member of the Board of Education.
- The Respondent's Financial Disclosure Forms for 2013, 2014, and 2015, were all incomplete and inaccurate, in terms of real estate and business holdings.
- The 2013 and 2014 Disclosure Forms failed to list Applause Caterers as an entity that did business with the School System during those reporting periods.
- The 2013 and 2014 Disclosure Forms failed to identify real property co-owned with Milton Stamper.
- The Disclosure Form for 2015 lists three catering jobs by Applause Caterers during 2015, when there were actually five such jobs.
- The 2015 Disclosure Form fails to list Guessford 16, LLC, which was formed in that year.

SUMMARY OF FINANCIAL DISCLOSURE FORM A'S SUBMITTED BY RESPONDENT

| <u>Calendar Year</u> | <u>Period Covered</u> | <u>Filed On</u> |
|-----------------------------|---|---------------------------------|
| A. 2013 | January 1, 2013 to December 31, 2013 | February 26, 2014 |
| B. 2013 | January 1, 2013 to December 31, 2015 | AMENDED ON June 27, 2016 |
| C. 2014 | January 1, 2014 to December 10, 2014 | December 19, 2014 |
| D. 2014 | January 1, 2014 to December 31, 2014 ¹ | May 1, 2015 |
| E. 2014 | January 1, 2014 to December 31, 2014 | AMENDED ON June 27, 2016 |
| F. 2015 | January 1, 2015 to December 31, 2015 ² | February 3, 2016 |
| G. 2015 | January 1, 2015 to December 31, 2015 | April 29, 2016 |

Prepared by Office of Chief Legal Counsel
3.22.16. Updated 6.23.16. Updated 6.27.16

¹ This disclosure form was submitted on a form that apparently was printed by the Respondent. The pagination and font size is different from the standard form.

² Revised form submitted by Respondent's counsel.

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ETHICS ADVISORY PANEL

IN THE MATTER OF: *

MICHAEL GUESSFORD *

FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATION

A Complaint was filed against Michael Guessford ("Respondent" hereinafter) on or about November 30, 2015, which contained allegations concerning conflict of interest and failure to file complete and accurate Financial Disclosure Statements for 2013 and 2014. The Ethics Advisory Panel ("Panel" hereinafter) received information from the Washington County Public Schools and upon reviewing that information, concluded that there was a reasonable basis for believing that violations of the Board of Education's Ethics Regulations had occurred. Therefore, the Panel afforded an opportunity to the Respondent for a Hearing before the Panel, which was held on Monday, March 7, 2016.

The Hearing was held on the record and the Respondent testified, under oath, pursuant to Board Regulation BBFE-R. This report is being transmitted to the Board of Education, along with a copy of the written transcript and a copy of the documents reviewed by the Panel.

FINDINGS OF FACT

Based on the documents before the Panel and the testimony of the Respondent, the Panel makes the following findings of fact:

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1. The Respondent is a Member of the Board of Education of Washington County ("Board" hereinafter), having been elected to that position and having been sworn in on December 2, 2014.
2. As required by Maryland law and Board Regulation BBFE-R, section IV.D., the Respondent, as a candidate to be a Member of the Board, filed a Financial Disclosure Form A dated February 20, 2014, covering the calendar year 2013. As a Member of the Board, the Respondent filed a Financial Disclosure Form A dated December 19, 2014, covering the period of January 1 through December 10, 2014.
3. In the 2013 Disclosure Form, the Respondent listed two pieces of real property in Schedule A: his residence and an unimproved lot located on West Franklin Street. Schedule B requests disclosures of interests in "corporations, partnerships and similar entities." The Respondent disclosed that he had a 25% interest in City Theater, LLC, dba Academy Theater and a 50% interest in Guessford-Byers, LLC. The Respondent did not disclose any real property owned by either of the two LLCs.
4. In the 2014 Disclosure Form, the Respondent listed only one piece of real property in Schedule A: his residence. Schedule B requests disclosures of interests in "corporations, partnerships and similar entities." The Respondent disclosed that he owned a 100% interest in Will Boys, LLC, dba Always Ron's and Applause Catering. City Theater, LLC was listed as it was in 2013, but Guessford-Byers, LLC was crossed off, with a note: "LLC Dissolved."
5. In the 2013 Disclosure Form and in the 2014 Disclosure Form, on the checklist on page 2 of 23, the Respondent checked "No" to the question: "I held interest in a non-corporate business entity which did business with WCBOE or WCPS, other than a partnership." (Schedule C). The Respondent also checked "No" to the question: "I or a member of my immediate family ... was a partner or held an office, directorship, or salaried employment

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during reporting period in or with a business entity doing business with WCBOE or WCPS.”
(Schedule E). Schedules C and E were both checked “No.”

6. Pursuant to a School System review of invoices, during the period from January 1, 2013 to December 31, 2013, Applause Caterers was paid a total of \$3,848.74 from the Board; from January 1, 2014 to December 10, 2014, Applause was paid a total of \$939.25; and from December 11, 2014 to October 15, 2015, Applause was paid \$803.25. Neither the 2013 nor the 2014 Disclosure Forms disclosed that Applause, a business entity in which the Respondent had a financial interest, received payments from the Board.

7. The Respondent, through his counsel, filed a Financial Disclosure Form for the period of January 1 through December 31, 2015. That Form disclosed that the Respondent had an interest in Applause Caterers, which did business with the Board or the School System.

8. The Respondent had a business relationship with Milton Stamper, specifically, Stamper had a 75% interest in City Theater, LLC, in which the Respondent had a 25% interest. On May 5, 2015 and again on May 19, 2015, the Board approved construction contracts with Milton Stamper Builders, in amounts of \$110,950 and \$713,910. The Respondent voted to approve those items. At some point thereafter, the Respondent contacted the Board’s counsel to discuss his voting on contracts with Milton Stamper Builders and on August 18, 2015 and on January 5, 2016, the Respondent recused himself from voting on contacts with Milton Stamper Builders because of his business relationship with Milton Stamper. (The Respondent testified that he did not have a financial interest in the construction company.)

CONCLUSIONS OF LAW

In compliance with Maryland law, the Board has adopted an Ethics Policy in Policy BBFE and Ethics Regulations in Regulation BBFE-R. In the Policy, the Board states its

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recognition that "the system of representative government is dependent in part upon the people maintaining the highest trust in their public officials and employees" and it found and declared that "the people have a right to be assured that the impartiality and independent judgment of public officials and employees will be maintained." Furthermore, in order to guard against improper influence, the Board "endorses and adopts this policy" and the Ethics Regulations "that will require certain school officials to disclose their financial affairs and to set minimum standards for their conduct of school system business." Both the law and the Regulations require that Financial Disclosure Statements be filed by Members of the Board and by candidates to be Members of the Board. The Financial Disclosure Form A is the Statement required to be completed and filed. The Form contains nine (9) Schedules. Schedule A seeks the disclosure of "any interest ... in real property in Maryland or in any other state or country." Schedule C asks: "Do you have an interest in any non-corporate business entity ... that did business with WCBOE or WCPS during the reporting period?" Schedule E asks: "During the reporting period, did you or any member of your immediate family ... have any salaried employment or hold any office or directorship with an entity that did business with WCBOE or WCPS?"

The Panel concluded that the Respondent failed to fully and accurately complete and file his Financial Disclosure Forms for 2013 and 2014 in two respects. First, the Form seeks disclosure of all interests in real property and the questions in that schedule make it clear that property held by entities in which the Respondent had a financial interest should have been included. Although the Respondent advised the Panel that City Theater, LLC and Guessford-Byers, LLC, in which he had a financial interest, both owned real property, such information was not disclosed on the Forms. Furthermore, the questions on Schedule A include information

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about transferring property, so even though the properties may have been sold at some point during the reporting period, the information regarding the transfer of the property should have been disclosed as well as the information about ownership of the properties. The Respondent did disclose his interest in the two LLCs and suggested, in his testimony, that the Forms contained all of the information, just in the wrong place. However, while the Forms referenced the LLCs, there was no mention of the real property they owned, so the Forms were inaccurate and incomplete in that respect.

Second, it is abundantly clear from the Forms that a person completing the Form should disclose information regarding interests in business entities that did business with the Board or the School System. Both Schedule C and Schedule E reference that subject matter. However, the Respondent failed to disclose in both 2013 and 2014 that a business entity he owned, Applause Caterers, did business with the School System in both years. The Respondent, through his counsel, suggested during the Hearing that the Form was confusing and unclear and that was why the disclosure was not made. Counsel to Respondent suggested that since Applause Caterers was a "dba" ("doing business as"), rather than an entity in itself, it was unclear whether that needed to be disclosed. Although the Panel does not believe that the omission was purposeful, malicious, or done with an intent to deceive or hide information, the Panel does not accept the suggestion that the Form was confusing or unclear or that the "dba" status of the entity justified its omission from the disclosure. It seems very apparent that at a minimum, the Respondent should have known that the purpose of Schedules C and E was to disclose any financial dealings between the Board and any business entity in which the Respondent had a financial interest. The Panel further notes that the last page of the Form provides an address, a telephone number, and an email address of the Board's Chief Legal

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Counsel, with a notice that "Filers wanting more detailed information about these requirements should contact the offices of the Ethics Advisory Committee." If the Respondent had any questions about the information sought on the Form, he should have sought help or assistance from the Chief Legal Counsel, as he apparently did with respect to voting for contracts with Milton Stamper Builders, as discussed below. For these reasons, the Panel concludes that the Respondent violated the Ethics Regulations.

Third, it should also be noted that Applause Caterers continued to do business with the Board even after the Respondent became a Member of the Board in December, 2014. The information shows that the Board paid three (3) invoices on April 16, April 30, and May 15, 2015, for a total of \$803.25. The Respondent explained that these invoices reflected "repeat" work done for school system customers who called the business and requested services. The Respondent also testified that he made it clear to his staff that they should not accept any business from the School System and any business relationship seems to have last occurred in May, 2015.

The other issue reviewed by the Panel concerned the Respondent voting on two contracts between the Board and Milton Stamper Builders. Although the Respondent did not have any financial interest in the entity known as Milton Stamper Builders, he did advise the Panel that he and Mr. Stamper were part of the business entity known as City Theater, LLC, in which Mr. Stamper had a 75% interest and the Respondent had a 25% interest. The Panel acknowledges that the Respondent eventually sought legal counsel from the Board's Chief Legal Counsel and did recuse himself from voting on two contracts before the Board on August 18, 2015, and January 5, 2016. However, given the business relationship between the Respondent and Mr. Stamper, the Panel concluded that the Respondent should have recused

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himself from voting on the contracts between the Board and Milton Stamper Builders on May 5, 2015, and May 19, 2015, and that it was a violation of the Ethics Regulations for him not to have done so.

RECOMMENDATION

Pursuant to Regulation BBFE-R, section II.F.4., the Panel shall report its findings and recommendation for action to the Board which, if it concurs with the Panel, shall take enforcement action in accordance with the Regulations. The Panel has concluded that the evidence is conclusive and that the Respondent has committed several violations of the Board's Ethics Regulations

For all of the above-stated reasons, the Panel has concluded that the Respondent did violate the Board's Ethics Regulations and it recommends that the Board make such a determination and finding. With regard to corrective action, the Panel recommends that the Respondent be directed to fully, completely, and accurately prepare and submit amended Financial Disclosure Statements for 2013 and 2014, which address all of the matters noted above. Furthermore, the Panel notes that the Form submitted for 2015 is incomplete in that it was not signed, dated, or notarized. The Panel would urge the Respondent to thoroughly review the Form for 2015 and re-submit it after ensuring that it is complete and accurate, and that it is properly signed, dated, and notarized.

The Panel does not recommend any additional corrective action, because the Panel concluded that the violations discussed above were inadvertent on the part of the Respondent and were not purposeful, malicious, or an intent to deceive or hide information.

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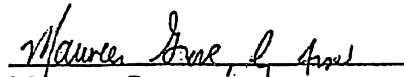
The Panel would further caution and advise the Respondent that in future filings of Financial Disclosure Forms, all relevant information must be complete and accurate. The Respondent should also note that if the Form seems unclear as to where information should be listed, Schedule I on the Form provides: "Is there any additional information or interest you would like to disclose?" Any questions regarding the Form should be directed to the Board's Chief Legal Counsel, as set forth on the last page of the document.

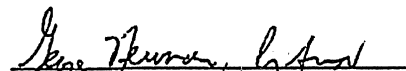
As a final matter, the Panel notes that pursuant to Regulation BBFE-R, Section VIII, a finding of a violation of the Regulations by the Board is public information, meaning that if the Board concurs with the Panel's Recommendations, the Board is authorized to release its final determination. However, in the Panel's opinion, these Findings of Fact, Conclusions, and Recommendations are not public and should not be disclosed publically.

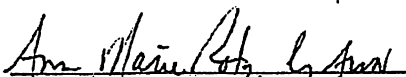
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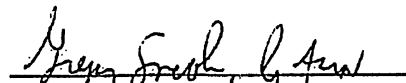
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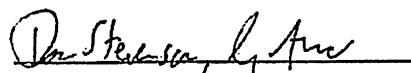
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