



**ANNE ARUNDEL COUNTY  
ETHICS COMMISSION**

March 20, 2009

***By Electronic Mail Only***

Re: AO-09-13

You inquired whether you may accept free lodging during your trip to visit two casinos, one in Indianapolis, Indiana, and one in Hollywood, Florida. The purpose of your trip is to gain insight into the proposed casino at Arundel Mills. The donor of the gift is The Cordish Company.

The ethics commission advises that you may not accept free lodging from the Cordish Company. Acceptance of this gift is prohibited by §7-5-106(b)(3) and (b)(4) of the Public Ethics Law. In the first instance, Bill 10-09, which is now pending, would if enacted, permit video lottery facilities in W-1 and regional commercial complex districts. The Cordish Company, which seeks to develop a slots casino in one of these districts, “has a financial interest that may be substantially and materially affected, in a manner distinguishable from the public generally, by the performance or nonperformance” of your official duties as a council member.

Second, the PPE Casino Resorts Maryland, LLC and its parent company, The Cordish Company, are lobbyists<sup>1</sup> represented by several registered lobbyists.<sup>2</sup> According to their registration materials, they are lobbying on “any and all matters relating to zoning legislation and the approvals for a casino in Anne Arundel County.” The ethics law, §7-5-106(b)(4), expressly prohibits an employee (including an elected official) from accepting gifts from lobbyists with respect to matters within that employee’s jurisdiction. The Cordish Company is specifically lobbying the county council. Based upon these facts, there are simply no exceptions in the law that would permit you to accept this gift.

You, The Cordish Company, and its registered lobbyists should also be aware that under §7-5-106(a)(2), a lobbyist “may not knowingly make a gift, directly or indirectly, to an employee whom the lobbyist knows or has reason to know is in violation of [the gift prohibitions].”

Thank you for your inquiry. Please contact the ethics commission office if you have any other questions.

The Anne Arundel County Ethics Commission

/s/

By: \_\_\_\_\_  
Betsy K. Dawson, Executive Director

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<sup>1</sup> Under §7-1-101(18), a lobbyist includes anybody who spends at least \$500 to compensate one or more persons required to register as a lobbyist. A lobbyist under this definition is not required to register if there are other registered lobbyists who will be doing all the lobbying work.

<sup>2</sup> The lobbyists registered for PPE Casino Resorts Maryland LLC and The Cordish Company are: Jonathan Cordish, David Cordish, Kathryn J. Dahl, Alan J. Hyatt, Zed Smith, and Joe Weinberg.