

**GOVERNMENTAL
ETHICS
COMMISSION**

**2018
ANNUAL
REPORT**



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PREFACE

This annual report and recommendations is submitted to the Governor and the Legislative Coordinating Council for transmittal to the Legislature pursuant to K.S.A. 25-4119a and K.S.A. 46-1212c. With some exceptions, the report covers the period from July 1, 2017, through June 30, 2018, the end of Fiscal Year 2018. Occasionally, data for the first quarter of Fiscal Year 2019 is used in order to provide a more complete picture of the Commission's operations.

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Mission:

The Governmental Ethics Commission works to foster public trust and confidence in state government decision-making through education, administration, and enforcement of the Campaign Finance Act and State Governmental Ethics Laws.

The Kansas Governmental Ethics Commission was established by the Kansas Legislature in 1974 to administer, interpret, and enforce the Campaign Finance Act (K.S.A. 25-4142 *et seq.*) and laws relating to conflict of interests, financial disclosure, and the regulation of lobbying (K.S.A. 46-215 *et seq.*). These laws establish the public's right to information about the financial affairs of Kansas' public officials, lobbyists, and candidates for state and local office. The Commission also renders advisory opinions and can adopt rules and regulations under a less comprehensive conflict of interest law covering local government officials and employees (K.S.A. 75-4301 *et seq.*).

Agency Philosophy:

The Kansas Governmental Ethics Commission believes the strongest safeguard against unethical conduct by public officials and employees is an informed and active public. For the disclosure elements of the legislation to have meaning, the public must be made aware of the legislation and the financial disclosure information must be accessible to the public. To this end, the Commission and its staff will approach their duties with a dedicated sense of purpose and responsibility to the individuals subject to the Campaign Finance Act and State Governmental Ethics Laws and the citizens of Kansas by performing their activities in an efficient and impartial manner. The Commission places a high priority on providing assistance to those subject to the Commission's jurisdiction in order to prevent violations.

Commission Members

The Kansas Governmental Ethics Commission is a nine member, bipartisan, citizen commission authorized by K.S.A. 25-4119a. Members serve two-year terms with the Commission's Chairperson appointed by the Governor. The Vice-Chairperson is elected by the membership. Commission appointments are made by the Governor, Attorney General, Secretary of State, Chief Justice of the Supreme Court, President of the Senate, Minority Leader of the Senate, Speaker of the House of Representatives, and the Minority Leader in the House. The Governor makes two appointments, each from a different political party.

The Commission usually meets once a month. The Commission's meetings are open to the public and information prepared by the staff for each meeting is available to the public. During FY 2018, the Commission held 10 meetings. Meetings are scheduled to address a variety of matters including the review of and action on complaints filed, investigations undertaken, and audits performed. In addition, the Commission issues advisory opinions to answer questions involving interpretation of a particular section of the law, it makes policy decisions, amends and adopts new administrative regulations and handles administrative matters including personnel, budget preparations, and office procedures.

Commission Staff

The staff of the Commission assumes all responsibility for the daily operations of the agency which include administration, legal, investigation, audit, information technology, and clerical functions. As a service oriented agency, the staff strives to assist individuals in complying with applicable laws by responding quickly, efficiently, and impartially. Commission staff also works diligently to ensure campaign finance and lobbying data is compiled, entered, and posted on the Internet to be viewed by the citizens of Kansas.

Current Commission Members

Dan Harden, Chairperson, Libertarian, Topeka

Term expires January 31, 2019

Jerome Hellmer, Vice-Chairperson, Republican, Salina

Term expires January 31, 2020

Amy James, Democrat, Overland Park

Term expires January 31, 2019

John Solbach, Democrat, Lawrence

Term expires January 31, 2019

Todd Scharnhorst, Republican, Olathe

Term expires January 31, 2019

Kenneth Moore, Democrat, Kansas City

Term expires January 31, 2019

Kyle Krull, Republican, Overland Park

Term expires January 31, 2020

Jane Deterding, Republican, Wichita

Term expires January 31, 2020

Marisel Walston, Republican, Lenexa

Term expires January 31, 2020

Commission Staff

Executive Director – Mark Skoglund
Commission & Staff Attorney – Brett Berry
Office Manager – Sherry Fergel
State Candidate Report Examiner – Karina Renna
Local Candidate Report Examiner – Jennifer Schneider
Lobbyist Coordinator – Jessica White
PACs/Parties Coordinator, Auditor – Kaitlin Hubbell
IT Specialist – Roxie Valdivia

Budget

In FY 2018, the Commission was originally appropriated \$385,372 from the State General Fund with a fee fund limitation of \$243,762. The following chart reflects revenue and expenditures for the fiscal year.

Fiscal Year 2018 Budget	Actual
Revenue:	
State General Fund Utilized	\$385,375
Fee Fund Utilized	\$196,684
Total Revenue Utilized	\$582,059
Expenditures:	
Salaries & Benefits	\$462,033
Contractual Services	\$117,402
Commodities	\$ 2,605
Capital Outlay	\$ 19
Total Expenditures	\$582,059

Legislative Activity

There were two bills enacted by the 2018 Legislature that impact the Commission and the laws under its jurisdiction.

The Legislature passed **SB 394**, primarily relating to executive and judicial branch lobbying. The legislation adds lobbying the executive branch and the judicial branch into the definition of "lobbying." Individuals who are a "lobbyist" under the statute and who are engaged in lobbying the executive or judicial branch must register as a lobbyist and file periodic and public expenditure reports.

The legislation also increases the value of a meal that a member of the executive branch can receive from \$25 to \$40. Additionally, a lobbyist may provide a meal to a member of the executive branch in any amount as long as the amount is reported on lobbyist expenditure reports; this is consistent with how meals may be provided by lobbyists to the Legislature under current law.

Lastly, the bill requires that lobbyists disclose the agencies that they are lobbying on their registration forms, which may be amended if that changes.

The Legislature also passed **HB 2642**, primarily relating to increased civil penalties for late filing of certain reports. Previously, civil penalties were applied for the late filing of any report after a 15-day grace period amounting to \$10/day with a maximum of \$300. The bill increased this amount for lobbyist reports, as well as for primary and general election campaign finance reports. These reports are now subject to a 48-hour grace period, after which a penalty of \$100 is assessed. An additional \$50/day is assessed for each day the report remains outstanding up to a maximum of \$1000. Penalties may always be waived for good cause by the Commission.

Additionally, the legislation requires that all lobbyist registrations and reports must be filed electronically.

Organization & Operation

The Commission's efforts focus on full compliance with the Kansas campaign finance, conflict of interests, and lobbying statutes. Each year the Commission receives thousands of financial disclosure reports filed by candidates, political and party committees, public officials, and lobbyists. Staff time is devoted to assuring the accurate and timely disclosure of required financial information about those in state and local government. The processing and evaluation of filed reports and statements and an analysis of the supporting records, where appropriate, are crucial to the Commission's efforts. It is through the initial and comprehensive review of these reports, and the later audit and investigation when necessary, that the Commission can determine compliance with the laws.

The Commission's work encompasses five areas:

- (1) education and public awareness;
- (2) advisory opinions;
- (3) reviews and audits;
- (4) enforcement (including inquiries and investigations, the filing of complaints, holding public hearings and assessing civil penalties); and
- (5) general administrative activities.

Education & Public Awareness

The Commission's goal remains to improve communications regarding the reporting requirements of those subject to one or more of the disclosure laws, and to increase public awareness with respect to the impact and importance of information contained in the reports filed. The Commission's website has become an efficient instrument for disseminating and distributing Commission information. Information concerning the Commission, the advisory opinions it issues, scanned copies of state level candidate, party committee and political action committee campaign finance reports, campaign finance and lobbying reporting forms, and campaign election and lobbying statistics can be found at <https://ethics.kansas.gov>.

The Commission utilizes informational brochures, the Internet, the news media, and speaking engagements to inform not only those under the Commission's jurisdiction, but also the public about the laws and their meaning. Statistical information is summarized and printed, in addition to being posted on the Commission's website, in the areas of campaign finance and lobbying. However, most time in this area is devoted to informing those directly covered by the

laws of their duties and responsibilities. To accomplish this task, the Commission conducts informational seminars, and prepares and distributes handouts, campaign finance handbooks, lobbying handbooks, and conflict of interest laws brochures. In addition, staff fields calls to provide information and advice. In FY 2018 the Commission's staff made 9 presentations.

Advisory Opinions

Advisory opinions are issued by the Commission to clarify the application of the statutes in a particular situation. The Commission can issue these opinions on its own initiative or in response to individual inquiries. If an individual requests an opinion and conducts themselves according to the guidelines in the opinion, they are presumed to be in compliance with the law.

Six opinions were issued in FY 2018. Five opinions were issued in response to inquiries by individuals and one opinion was initiated by the Commission to provide guidance to candidates concerning a provision in the Campaign Finance Act. Since 1974, the year the Commission was established, through June 30, 2018, the Commission has issued a total of 1,245 advisory opinions. A synopsis of the six advisory opinions issued in FY 2018 can be found at the conclusion of this report.

<p>FY 2018 Advisory Opinions</p> <p>Campaign Finance – 1 State Conflict of Interests – 3 Local Conflict of Interests – 2</p>

Review & Audit Program

Complete, accurate and timely disclosure of certain kinds of financial information by candidates, elected officials, state employees and lobbyists is the key requirement of the legislation. Active review and auditing of reports is essential for the proper administration of the law.

CAMPAIGN FINANCE

In the area of campaign finance, the Commission's procedures include a preliminary review and post-election comprehensive desk review of all receipts and expenditures reports filed. In addition, a certain number of campaigns and committees are selected for field audits.

Candidates, party committees, and political committees filed 1,488 receipts and expenditures reports in FY 2018. All receipts and expenditures reports received a comprehensive desk review.

Additionally, staff processed the 324 state candidates, 292 county candidates, and 430 party and political action committees participating in the 2018 primary election. The candidates, their treasurers, and the party and political committee officers all received handbooks, guides, statutes, and other material to assist them in understanding their responsibilities under the Campaign Finance Act.

Audits

Audits of the records of candidates and political action committees are conducted using generally accepted auditing standards and are conducted on a priority basis. Accorded first priority are situations involving formal complaints. The next priority is assigned to situations in which it is necessary to clarify problems identified during the desk reviews. A general investigation may also be authorized at this point.

Finally, a random sample of candidates and committees is audited. If a candidate is selected for a random audit, his or her opponent is also examined. In FY 2018, there were 5 campaign finance audits conducted.

FY 2018 Campaign Finance Statistics

- Candidates for 2018 State Office - 324
- Carryover State Candidates – 346
- Candidates for 2018 County Office – 292
- Carryover County Candidates - 136
- Candidates for 2017 First Class City Office – 123
- Carryover First Class City Candidates – 75
- Political Action Committees – 235
- Party Committees - 190
- Campaign Finance Reports Filed – 1,488
- Failure to File Notices Issued – 97
- Error or Omission Notifications Issued - 229

CONFLICT OF INTERESTS

The Kansas conflict of interests statutes provide for (1) the filing of statements of substantial interests; (2) a code of conduct making it illegal for state officials and employees to be involved in certain conflicts; and (3) the issuance of advisory opinions.

The Commission's staff processed and reviewed 5,679 financial disclosure statements filed by state officers, state employees, and elected officials in FY 2018. Throughout the year, staff updates computer databases as appointments are made, officials resign or their terms end, and new positions are created. Financial disclosure forms and instructions are mailed to new appointees and candidates as the Commission receives official notice of their appointment or eligibility. Thereafter, forms and instructions are emailed or mailed on an annual basis to all persons subject to the filing requirements. All financial disclosure statements are public records and may be reviewed during regular business hours in the Secretary of State's office or on the Secretary of State's website. Those required to file Statements of Substantial Interests are elected state officials and candidates for such office, individuals whose appointments are subject to confirmation by the Senate, general counsels for state agencies, and state officers, employees, and members of boards, councils or commissions meeting the definition of a "designee" and so listed by the head of their agency.

2018 Statements of Substantial Interests Filings

- Employees Listed as Designees – 5,085
- Elected Officials – 186
- Appointees Subject to Senate Confirmation – 49
- Board Members Listed as Designees – 329
- General Counsels - 30

The Commission has found that the conflict statutes are not widely understood either by state officers, state employees or the public at large, yet these laws are of fundamental importance to the workings of state government. They draw the line between private interests and the public trust which must be guarded carefully. Efforts to clarify and enforce the line are increasingly important as public concern mounts over abuses of the public trust.

Many state officials and employees are in a position to make or influence decisions which could directly affect their personal interests. The state conflict of interest laws prohibit such activity. To assist these individuals, the Commission issues advisory opinions upon its own initiative and upon the request of any person to whom the relevant law applies.

REPRESENTATION CASE DISCLOSURE

There were zero Representation Case Disclosure Statements filed in FY 2018. It is possible that individuals required to file such statements have not done so. However, given the structure of the statutory requirements, there is no way of knowing who should file such statements.

LOBBYING PROVISIONS

There are 538 lobbyists registered for calendar year 2018 as of November 16, 2018. This compares with the total of 556 registered lobbyists in calendar year 2017. Of the 538 registered, some are registered on behalf of more than one person or organization. To date, 1,478 organizations or persons have been represented this year. This compares to 1,520 organizations being represented by a lobbyist in 2017. The Commission's statistical analysis of the lobbyist employment and expenditures reports filed shows that \$687,200 has been spent on lobbying activities through August 31, 2018. Registered lobbyists are required to file a lobbyist employment and expenditures report six times a year. These reports show expenditures if the lobbyist spent more than \$100 in a reporting period. To date this calendar year, 4,849 Lobbyist Employment and Expenditures Reports have been filed. A lobbyist can file an Affidavit of Exemption from filing the Lobbyist Employment and Expenditures Report if they do not expend in excess of \$100 in any reporting period.

Lobbyist Registrations and Expenditures

To Date for Calendar Year 2018

- Number of Registered Lobbyists – 538
- Number of Lobbyist Registration Statements Filed – 1,478
- Number of Reports Filed by Lobbyists – 4,849
- Number of Affidavits of Exemption Filed – 452
- Total of Expenditures for Year to Date – \$687,200
- Number of Failure to File Notices Issued - 34

Enforcement Program

INQUIRES & INVESTIGATIONS

In FY 2018, the Commission initiated 8 inquiries and conducted 5 investigations. Investigations can be conducted prior to a complaint being filed or following the filing of a complaint. Inquiries and investigations remain confidential until a complaint has been filed and a probable cause determination has been made regarding the complaint. Whenever an investigation does not disclose facts sufficient to warrant further action, the Commission may issue a report concerning the findings of the Commission to the person or persons investigated. This report can be made public by the person or persons investigated.

COMPLAINTS

There were 19 complaints filed in FY 2018. Fourteen complaints were dismissed on the basis that there was insufficient evidence to support a probable cause determination or were dismissed after being set for hearing. Three complaints were withdrawn. Two complaints had a public hearing. It should be understood that after an investigation, if the Commission concludes there is no evidence to establish probable cause that there was an intentional violation of law, a complaint is dismissed and no public hearing is held. The determination as to whether an intentional violation has occurred is a decision which is not reached until the conclusion of a public hearing. Anyone who suspects that any of the provisions administered by the Commission have been violated may file a complaint in writing with the Commission.

CIVIL PENALTIES & FINES

The statutes enforced by the Commission provide for the assessment of civil penalties for failure to file certain reports or statements under the campaign finance, lobbying and state conflict of interest statutes. Individuals can be subject to a \$10 per day penalty for each day the report or statement remains unfiled up to a maximum of \$300. Effective July 1, 2018, for primary and general election campaign finance reports, as well as for lobbyist expenditure reports, the civil penalty is \$100 for the first day and \$50 for each day the report remains unfiled, up to a maximum of \$1000. The Commission is authorized to waive any imposed civil penalty upon a finding of good cause. There were civil penalties totaling \$12,500 assessed and \$4,520 in civil penalties waived in FY 2018. The Commission collected \$2,460 in civil penalties. A few civil penalties which were assessed in prior years were collected in FY 2018. Some of the civil penalties assessed in FY 2017 still remain outstanding.

In addition to any other penalty prescribed under the campaign finance, lobbying or state conflict of interest statutes, the Commission can assess a civil fine not to exceed \$5,000 for the first violation, \$10,000 for the second violation and \$15,000 for the third and each subsequent violation. Before a civil fine can be assessed, the person must be given proper notice and an opportunity to be heard. Civil fines in the amount of \$750 were assessed in FY 2018 as a result of a civil fine hearing. These civil fines have been collected.

FY 2018 Civil Penalties and Fines

Campaign Finance Civil Penalties Assessed - \$10,540

Lobbying Civil Penalties Assessed – \$1,960

Statement of Substantial Interests Civil Penalties Assessed - \$0

Total Civil Penalties Assessed – \$12,500

Total Civil Penalties Waived – \$4,520

Total Civil Penalties Collected - \$2,460

Total Civil Fines Assessed – \$750

Total Civil Fines Collected - \$750

Commission Recommendations

The Commission is directed by statute to make recommendations to the Governor and Legislature. It recognizes that any major piece of legislation periodically needs revision, modification, and in some cases, major changes. To that end, the Commission makes the following recommendations:

1. **Formal Executive Session Open Meetings Exemption** - The Kansas Governmental Ethics Commission is subject to strict confidentiality statutes ensuring that an individual under investigation or a respondent to a complaint is protected until such time that the Commission determines that probable cause for a violation exists. The Commission utilizes broader confidentiality authority in statute and regulation for discussions regarding sufficiency and probable cause in executive session, but would benefit from a specific agency exemption to the Kansas Open Meetings Act. This exception would ensure the Commission's ability to protect confidentiality of accused parties as well as maintain that the Commission remain informed on current investigations, audits, inquiries, and complaints.
2. **Electronic Filing for State Candidates** - K.S.A. 25-4148 permits state and local candidates, other than for statewide office, to file their campaign finance reports on paper or electronically. Candidates for statewide office must file all forms electronically. Requiring electronic campaign finance reporting would provide a wide variety of benefits, including but not limited to:
 - Cost and efficiency savings for the state data entry reductions and more rapid report processing;
 - Cost savings from decreased numbers of Errors and Omissions notices sent due to errors that could be prevented by filling fields in an electronic form, such as calculation errors and required fields not being left blank;
 - Decreased costs for printing forms and reports;
 - Increased accuracy of data presented to the public as it would reduce avenues for errors;
 - Increased transparency and decreased time delay in presenting campaign finance data to the public.

Due to these benefits and others, the Commission believes that significant benefits warrant requiring electronic submission of all campaign finance reports for state office.

3. **Adding the Only Reasonable Interpretation Test to Express Advocacy** – K.S.A. 25-4143(h) defines “expressly advocate the nomination, election, or defeat of a clearly identified candidate” with specificity. The statute defines the phrase as “any communication which uses phrases including, but not limited to:

- "Vote for the secretary of state";
- “re-elect your senator”;
- “support the democratic nominee”;
- "cast your ballot for the republican challenger for governor”;
- “Smith for senate”;
- "Bob Jones in '98”;
- "vote against Old Hickory”;
- "defeat" accompanied by a picture of one or more candidates; or
- "Smith's the one."

Express advocacy is utilized frequently in the Campaign Finance Act and is often a touchstone of whether an organization is required to provide transparency regarding the funding of the communication to Kansas citizens. Express advocacy also affects coordination of candidates with organizations that do not disclose their donors, as a communication is not an “independent expenditure” under Kansas law unless it contains “express advocacy.”

The statute does indicate that express advocacy is not necessarily limited to these exact phrases by noting that this definition is “not limited to” the provided examples; however, the Commission currently follows guidance from a 1999 District of Kansas decision that ruled against “taken as a whole” interpretations of express advocacy.

The Federal Election Commission has a codified model for communications that are clearly express advocacy but avoid the specific “buzz” words in statute. 11 CFR 100.22(b) provides that a communication is express advocacy if “reasonable minds could not differ as to whether it encourages actions to elect or defeat one or more clearly identified candidate(s)....” Since that time, the Supreme Court of the United States has appeared to support the disclosure requirement.

This addition, utilizing language identical or similar to the strict and narrow language utilized by the FEC, is a critical step in ensuring transparency for Kansas citizens by guaranteeing that organizations cannot avoid disclosure requirements solely because they altered the specific words they utilized in an advertisement.

4. **Lobbyist and Statement of Substantial Interest Late Filing** – K.S.A. 46-280 provides that the Commission shall send a notice to any lobbyist who has not timely filed a report and any individual who has not timely filed a Statement of Substantial Interest form. The statute, as amended by 2018 HB 2642, increased the civil penalties for lobbyist expenditure reports and shortened the applicable grace period to file the form without penalty. The amended statute creates a potential conflict in the notice provision regarding whether the grace period begins from receipt of the notice or from the sending of the notice. Since lobbyists and individuals subject to filing Statements of Substantial Interest are aware of the relevant deadlines and in order to create consistency with similar statutory provisions in other areas, the Commission recommends a procedural amendment so that the grace period provided in statute begins running from the time the Commission sends the notice of failure to file, rather than from the time of receipt.

5. **Other social media attribution** - K.S.A. 25-4156(b)(1)(E) defines corrupt political advertising as any person making (or causing to be made) any website, e-mail or other type of internet communication which expressly advocates the nomination, election or defeat of a clearly identified candidate for a state or local office to follow such matter with a statement which states: "Paid for" or "Sponsored by" followed by the name of the chairperson or treasurer of the political or other organization sponsoring the same or the name of the individual who is responsible therefor. Appending such attributions to e-mails is analogous to printed matter and compliance with the attribution requirement is simple and straightforward. Compliance for some websites and some social media websites can be difficult or impossible.

The Commission believes that the rigid formats of certain websites or other internet communications make appending the required attributions problematic or impossible. The Commission believes the Legislature should consider methods to require open and obvious attribution on social media platforms.

Appendix I

**SUMMARY
OF
ADVISORY OPINIONS
ISSUED IN
FY 2018**

Opinion No. 2017-06 – Issued August 23, 2017

A state employee is not prohibited from contracting to provide services to an outside organization under the specific facts provided, including that the contracted work will not include participation in a contract, involve any work for which they are compensated as a state employee, or involve use of confidential information for financial gain. Prohibitions still apply regarding solicitations made by state employees to a person with a special interest under circumstances where the granting of the donation could influence the performance of the state employee's official duty.

Opinion No. 2017-07 – Issued August 23, 2017

Under the facts provided, individuals do not have an imputed substantial interest in entities related to other entities in which they have a substantial interest. Additionally, a real estate agent listing the property through the Multiple Listing Service does not meet the publication requirement of K.S.A. 75-4304(d).

Opinion No. 2017-08 – Issued November 29, 2017

Under the facts presented, Kansas Board of Regents employees may solicit gifts of sponsorships from persons that do not have a special interest in the Board's actions, with the provision that accepting the sponsorships meet K.S.A. 46-237a exceptions.

Opinion No. 2018-01 – Issued January 31, 2018

The local conflict of interest laws, K.S.A. 75-4301a et seq., define "substantial interest" to include customers of businesses from which a local government official or employee receives compensation only when (1) the compensation is a portion or percentage of each separate fee or commission paid by the customer to the business, and (2) the compensation from that portion or percentage aggregates to \$2,000 or more in the preceding calendar year.

Opinion No. 2018-02 – Issued April 24, 2018

For campaign receipts and expenditures reports, the reporting of proceeds from the sale of political materials hinges on whether the sale is bona fide. Proceeds from bona fide sales are reported in the aggregate and are not subject to contribution limits. Proceeds from non-bona fide sales are reported as contributions and subject to contribution limits.

Opinion No. 2018-03 – Issued June 27, 2018

Under the facts presented, teachers employed by the Kansas Schools for the Deaf and the Blind may not accept gifts of Garmin Vivofit devices.

Appendix II

**STATISTICAL COMPARISON
OF LOBBYING
EXPENDITURES
2008-2018**

Statistical Comparison of Lobbying Expenditures 2008-2018

Year	Number of Lobbyists/Registrations		Food and Beverage	Recreation	Entertainment Gifts Honoria and Payments	Mass Media	Communications	Other	Total
2008	592	1476	466,685	16,705	14,644	553,355	262,018	17,841	1,331,252
2009	582	1513	425,089	14,796	12,967	259,965	437,997	24,998	1,175,815
2010	541	1505	416,821	18,638	15,395	632,498	306,451	21,063	1,410,868
2011	568	1562	468,229	12,621	19,245	185,944	16,657	19,746	722,445
2012	550	1531	475,936	9,613	16,143	134,899	114,851	12,791	764,236
2013	542	1506	551,649	26,126	13,154	642,475	60,457	10,279	1,304,140
2014	548	1585	523,393	15,813	24,495	507,340	104,323	12,037	1,187,401
2015	557	1672	570,815	14,926	21,532	609,551	505,443	23,242	1,745,509
2016	552	1491	456,850	9,271	9,491	144,365	370,759	3,074	993,810
2017	556	1520	563,897	8,360	20,367	114,238	766,018	12,359	1,485,239
2018 YTD	538	1478	474,318	5,085	6,730	60,481	127,978	12,608	687,200