



FACT

FOUNDATION FOR
ACCOUNTABILITY
AND CIVIC TRUST

July 15, 2019

The Honorable Brian E. Frosh
Maryland Attorney General
200 St. Paul Place
Baltimore, MD 21202

Dear Attorney General Frosh,

I respectfully request that the Maryland Attorney General's Office investigate potential abuse and misuse of a Maryland nonprofit through its coordination with a Maryland corporation. The nonprofit Center for Global Policy Solutions ("Center"), through the for-profit Global Policy Solutions, LLC ("GPS"), appears to provide an improper financial benefit to Ms. Maya Rockey Moore Cummings and her husband, Representative Elijah Cummings. As part of your mission to protect citizens donations to legitimate nonprofit organizations, this situation requires oversight and investigation to ensure that these entities are operating in accordance with the law.

The Center is a nonprofit organization with its most recent Form 990 filed for 2017. In the 2017 filing, the address for the nonprofit is listed as 2221 St Paul Street, Baltimore MD 21218.¹ The principal officer is listed as Ms. Rockey Moore Cummings.²

GPS is registered with the state of Maryland. Its principal place of business is located at 2221 Saint Paul St. Suite 1, Baltimore, MD 21218. The resident agent for the entity is Ms. Maya Rockey Moore Cummings, located at the same address.³ Additionally, Representative Cummings disclosed with the U.S. House of Representatives a financial interest in GPS, stating that Ms. Rockey Moore Cummings owns 100 percent of GPS, a for-profit company.⁴

The Center and GPS bear a strikingly close resemblance. Ms. Rockey Moore Cummings serves as the principal officer and is the sole staff member listed on the Center's website.⁵ Ms. Rockey Moore Cummings is also the sole owner and only staff member listed for GPS.⁶ The entities share the same phone number and the same address.⁷

¹ Internal Revenue Service, Center for Global Policy Solutions, 2017 Form 990 (Nov. 15, 2018), <https://projects.propublica.org/nonprofits/organizations/454856194/201813199349309941/IRS990>.

² *Id.*

³ Maryland.gov, Maryland Business Express, Global Policy Solutions, LLC (last visited June 17, 2019), <https://egov.maryland.gov/BusinessExpress/EntitySearch/BusinessInformation/Z19701804>.

⁴ Clerk of the House of Representatives, Hon. Elijah E. Cummings, 2018 Financial Disclosure Report (May 13, 2019) http://clerk.house.gov/public_disc/financial-pdfs/2018/10026296.pdf.

⁵ Internal Revenue Service, *supra* note 1; Center for Global Policy Solutions, Staff (last visited June 17, 2019), <http://globalpolicysolutions.org/staff/>.

⁶ Clerk of the House of Representatives, *supra* note 4; Global Policy Solutions, Our Team (last visited June 17, 2019), <http://globalpolicysolutions.com/our-team-2/>.

⁷ Center for Global Policy Solutions, *supra* note 5; Global Policy Solutions, *supra* note 6; Internal Revenue Service, *supra* note 1; Maryland.gov, *supra* note 3.

Additionally, there is significant overlap in the projects and revenue of the two entities. In 2017, GPS was selected for a \$1 million grant from the General Services Administration for the “Leadership for Healthy Communities” project while the Center served as the national program office for the same project.⁸ Further, the Center and GPS have each received over \$5 million from the Robert Wood Johnson Foundation.⁹ This close relationship alone is worthy of investigation.

Moreover, since the Center’s inception in 2012, significant amounts of money have been exchanged directly between the nonprofit Center and the for-profit GPS. Two independent audits have found that the Center and GPS were related parties and had entered into cost sharing agreements as early as 2013.¹⁰ Additionally, the Center paid a management fee of 5 percent of the Center’s expenses to GPS.¹¹ This management fee does not include an additional \$152,238 and \$78,180 in salary paid to Ms. Rockey Moore Cummings for her role in managing the Center, according to the two of the most recent Forms 990.¹²

Because of the significant shared projects, shared resources, and shared oversight between the Center for Global Policy Solutions and Global Policy Solutions, LLC, it is critical that your office investigate these entities doing business in Maryland. Ms. Rockey Moore Cummings’ nonprofit has paid significant management fees to her own for-profit company and she has been paid directly over \$200,000. This potentially improper financial benefit to Ms. Maya Rockey Moore Cummings and her husband, Representative Elijah Cummings is serious in nature. This is a unique situation that warrants necessary oversight to maintain public confidence in nonprofit donations. Therefore, we respectfully request that you review this financial arrangement to ensure full compliance with the law.

Sincerely,



Kendra Arnold
Executive Director, Foundation for Accountability & Civic Trust

⁸ [Alana Goodman, *Top Democrat’s wife may have gained ‘illegal private benefit’ from his committee activities*, Washington Examiner \(May 20, 2019\), <https://www.washingtonexaminer.com/politics/top-democrat-elijah-cummings-wife-may-have-gained-illegal-private-benefit-from-his-committee-activities>.](https://www.washingtonexaminer.com/politics/top-democrat-elijah-cummings-wife-may-have-gained-illegal-private-benefit-from-his-committee-activities)

⁹ *Id.*

¹⁰ Abrams, Foster, Nole & Williams, P.A., Center for Global Policy Solutions, Inc., Financial Statements And Independent Auditor’s Report Years Ended December 31, 2014 and 2013 (July 17, 2015), <https://cdn01.dailycaller.com/wp-content/uploads/2019/06/CGPS-2014-Audited-Financial-Statements.pdf>; Abrams, Foster, Nole & Williams, P.A., Center for Global Policy Solutions, Inc., Financial Statements And Independent Auditor’s Report Years Ended December 31, 2015 and 2014 (Apr. 1, 2016), <https://cdn01.dailycaller.com/wp-content/uploads/2019/06/CGPS-2015-Audited-Financial-Statements.pdf>.

¹¹ *Supra* note 11.

¹² Internal Revenue Service, *supra* note 1; Internal Revenue Service, Center for Global Policy Solutions, 2016 Form 990 (Nov. 10, 2017), <https://projects.propublica.org/nonprofits/organizations/454856194/201713149349302006/IRS990>.