



BALTIMORE COUNTY OFFICE OF THE INSPECTOR GENERAL

ANNUAL REPORT FOR FISCAL YEAR 2023

AUGUST 11, 2023

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I. Statement from the Inspector General

It is an honor for me to present the fourth annual report of the Office of the Inspector General (“the Office”). The report details our efforts during fiscal year 2023, which covers the time period July 1, 2022 to June 30, 2023. This report is required under Section 3-14-111 of the Baltimore County Code and its purpose is to summarize the work of the Office during the preceding fiscal year. The accomplishments highlighted in this report demonstrate the Office’s ongoing commitment to increasing accountability and oversight in the operations of the Baltimore County government.

Once again, the Office had quite a busy year. In line with our goals, we hired an attorney in late fall to assist with the ethics component of the Office as well as two investigators to work on Inspector General (IG) investigations. One of our new investigators attended the week-long Certified Inspector General Investigator course sponsored by the Association of Inspectors General (AIG). The course, which is comprised of instruction and case studies that are presented by various experts in the IG community, culminates in a final exam that tests the participant’s knowledge and proficiency in the various topics covered during the training. I am pleased to announce that we now have a third person on our team who is a certified member of the IG community. The Office’s other new investigator will be attending the same training this August. The Office also hosted two interns from local law schools. The interns were given opportunities to work on a variety of projects. They conducted research, organized and analyzed evidence, observed interviews, and drafted documents in support of our reports. The Office looks forward to hosting more interns in the coming fiscal year.

The Office spent a large portion of the past fiscal year working with the Schaefer Center for Public Police at the University of Baltimore (“the Center”) and the Blue Ribbon Commission on Ethics and Accountability (“the Commission”). The Commission, with the support of the Center, was tasked with performing a comprehensive review and evaluation of Baltimore County’s current laws and policies as they pertain to the Office, public ethics, and open government. The Commission held numerous public and private meetings, took testimony from various experts, including those in the IG community, and issued a final report in February 2023 detailing their recommendations. I was pleased that the Commission’s recommendations, which are consistent with established best practices in the IG community, have either already been incorporated into the Office’s policies and procedures or have been requested by the Office. In the coming fiscal year, I look forward to working with the County Executive to implement those recommendations by the Commission that are still pending. This includes ensuring the Office has access to its own independent legal counsel, establishing a code of conduct that is consistent with the ones followed by the State of Maryland and the federal government, and implementing safeguards that will protect the funding and structure of the Office.

Between the Office’s IG duties and its ethics-related work, this fiscal year has been our busiest to date. The Office has seen a significant increase in IG-related complaints, which has resulted in a greater number of IG investigations. During fiscal year 2023 the Office received 213 complaints and opened 19 investigations, which were increases of 37% and 27% respectively over last fiscal year’s numbers. The Office also issued eight IG reports on a variety of topics, four of which were made available to the public. The Office continued to provide support to the Ethics

Commission, attended and provided support for 14 Ethics Commission meetings, addressed 164 ethics-related inquiries, processed over 300 lobbying-related compliance documents, and achieved a 100% compliance rate for over 500 financial disclosure filings. One of our goals for the past two fiscal years has been the need for an internal case management system. The Office has been working with the Office of Information Technology (OIT) to design and implement a custom system that will allow the Office to securely store, organize, and manage data for all aspects of the Office's operations. The new system will significantly improve efficiencies and promote greater collaboration among the Office's employees. Thanks to the hard work of OIT, we are excited to announce the new system was implemented on July 1, 2023. Finally, at the request of the Office, we will be undergoing an independent peer review by the AIG this fall.

It is imperative that as the workload of the Office grows, the Office has adequate staffing to fulfill its mission, which includes: addressing IG complaints in a timely manner, conducting thorough investigations, issuing comprehensive reports, performing outreach, and providing training to employees. Therefore, I am extremely grateful to the County Executive and County Council for including a new management analyst position in the Office's budget for fiscal year 2024. This new position will greatly assist our current team by providing support in the areas of research and analysis. This should translate to a faster resolution of complaints, an increased capacity to work investigations, and a greater production of quality reports. My goal each fiscal year is that enhancements to the Office will translate to a greater cost savings to the citizens of Baltimore County and more transparency and accountability within their government.

While I am extremely proud of the Office's accomplishments in fiscal year 2023, the work continues with our unwavering commitment to everyone who has chosen to call Baltimore County home. It is my privilege to be the independent watchdog for Baltimore County, and I look forward to continuing to work on your behalf in the coming fiscal year.

Respectfully,

Kelly Madigan

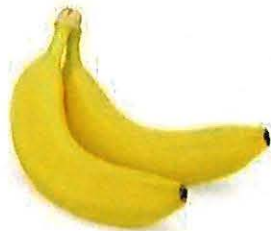
Kelly Madigan
Inspector General

II. Providing a Return on Your Investment

For fiscal year 2023, the Office had a budget of \$520,741. Approximately 97% of the budget was dedicated to the payment of salaries for the Office's six full-time employees. The remaining funds were spent on a variety of items including software programs, office supplies, training, and AIG membership fees. Based on Baltimore County's population of 869,388,¹ the cost to operate the Office was approximately \$0.60 per County resident, which is about the same cost as two bananas.

In return for their investment of sixty cents in the Office, Baltimore County residents received IG reports on a wide range of issues. In July 2022, the Office issued an Investigative Report detailing a prominent developer who received preferential treatment related to the proposed construction of a large indoor tennis facility at their personal residence. In September 2022, the Office issued an Investigative Report detailing an employee's misuse of County computer systems and related equipment while operating a private real estate appraisal business. In November 2022, the Office issued an Investigative Report detailing the County's improper payment of \$69,000 to an on-call paving contractor to repair and repave a commercial alley, which was surrounded by buildings that were primarily affiliated with one businessperson. In June 2023, the Office issued an Investigative Report detailing a roofing company that fraudulently inflated the amount of its proposed subcontract arrangement with a minority-owned business in order to secure an approximate \$1.8 million roofing contract with the County. In addition to these four public reports, the Office issued four internal reports, called Executive Management Referrals, which were delivered to the County's Administration.

In addition, the taxpayers of Baltimore County helped to ensure that County employees and members of the County's various boards and commissions received ethics training and ethics-related advice throughout the fiscal year. They also helped to verify that employees and lobbyists were in compliance with the annual financial disclosure and lobbying registration requirements respectively. All of this took place for roughly the cost of two bananas².



¹ See <https://worldpopulationreview.com/us-counties/md/baltimore-county-population>

² See [https://www.thedailymeal.com/1110592/the-astonishingly-low-cost-of-a-single-whole-foods-banana/#:~:text=The%20price%20of%20bananas%20is%20determined%20by%20weight&text=While%20food%20prices%20can%20vary,and%20Trader%20Joe's%20\(%240.19\).](https://www.thedailymeal.com/1110592/the-astonishingly-low-cost-of-a-single-whole-foods-banana/#:~:text=The%20price%20of%20bananas%20is%20determined%20by%20weight&text=While%20food%20prices%20can%20vary,and%20Trader%20Joe's%20(%240.19).)

III. Inspector General

One of the Office’s two primary functions is to conduct investigations into allegations of fraud, abuse, and illegal acts. Most of the Office’s investigations are in response to complaints, which are received by the Office in several ways from a variety of sources. When appropriate, the Office publishes its findings in the form of Investigative Reports. These Reports are issued to the County’s Administration, the County Council, other County stakeholders, and the public.

A. The Office’s Jurisdiction

The Office is only permitted to get involved in matters within its jurisdiction. Determining jurisdiction is a two-step process. First, the Office assesses whether a complaint concerns Baltimore County government personnel or resources. This includes vendors, contractors, and other entities that conduct business with Baltimore County government. The Office does not have jurisdiction over any of the following, which are often the subject of complaints received by the Office: Baltimore County Public Schools, state and federal government programs, private attorneys, family law matters, property disputes, or businesses that are simply based in Baltimore County. Second, the Office evaluates if the complaint involves an allegation of fraud, abuse,³ or an illegal act. The Office also takes into account whether investigating the complaint could result in better efficiency, accountability, or integrity within County government.

B. The Business Process

The Office responds to complaints from County employees and the public. Complaints are received by the Office in a variety of ways: telephone calls, emails, letters, in-person meetings, and through the Office’s online complaint form. The individual filing the complaint has the option to request anonymity. All complaints filed with the Office are carefully assessed to determine whether the complaint falls under the Office’s jurisdiction, as described in the prior section. This year, the Office received 213 complaints compared to 155 complaints in fiscal year 2022 – an increase of 37%. Of the complaints received, 86 of them were within the Office’s jurisdiction. That means 127 complaints were outside of the Office’s jurisdiction and were either referred to another County agency (Agency Referrals), forwarded to an entity outside of Baltimore County government (External Referrals), or in some cases, both occurred (Dual Referrals).

If it is determined that the Office has jurisdiction over the complaint, a preliminary investigation is performed in an effort to validate the information. Whenever possible, the person making the complaint is interviewed so credibility and motivation can be assessed. Based on the results of a preliminary investigation, a determination is made to either convert the complaint to a full investigation or to administratively close the complaint. During fiscal year 2023, the Office converted 18 of its 213 complaints that were received this fiscal year to full investigations. The

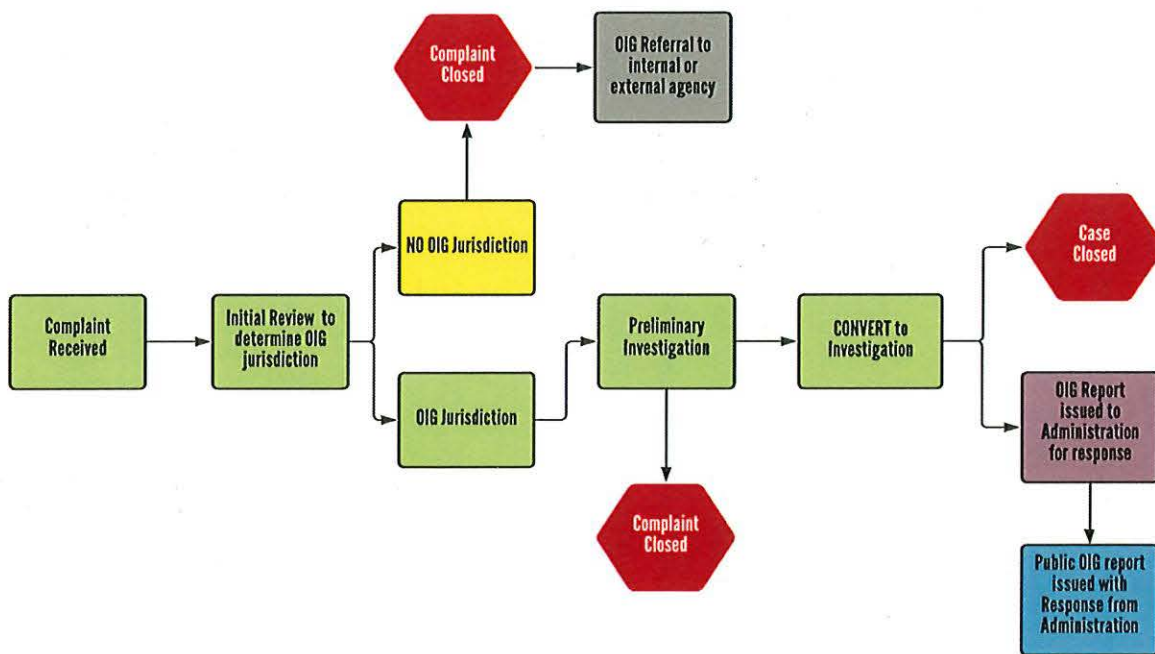
³ The Office interprets “abuse” as being synonymous with misconduct. The Office defines abuse as the use of County resources carelessly, extravagantly, or for a purpose that is not in the best interest of the County government or the citizens of Baltimore County. This includes incurring unnecessary costs from inefficient or ineffective practices, systems, or controls; or making decisions or choices in one’s capacity as an employee that are excessive, improper, unethical, or otherwise detrimental to the County government or the citizens of Baltimore County.

Office also converted a complaint that had been pending at the end of fiscal year 2022 to a full investigation. This equated to a total of 19 investigations opened by the Office. The Office’s complaint conversion rate this fiscal year was about 8.5% (18 ÷ 213), which was consistent with last year’s conversion rate of 8.4%. In other words, for the last two fiscal years, about eight out of every 100 complaints received by the Office have turned into investigations.

The Office conducts its investigations in accordance with a Policies and Procedures Manual (“the Manual”) that was drafted and adopted during fiscal year 2021 and periodically updated the last two fiscal years. The Manual incorporates aspects of the AIG’s Principles and Standards for Offices of Inspector General also known as *The Green Book*. At the conclusion of an investigation, allegations that have been substantiated are published by the Office in an Investigative Report. Initially, the Investigative Report is distributed to the Administration, and when appropriate the County Council and other stakeholders, for review and a response. In some cases, the Office will issue a reply to that response. Subsequently, these documents are combined and published by the Office on its website. For fiscal year 2023, the Office published four Investigative Reports.

In some instances, the Office determines that while the County’s Administration should be made aware of the results of the Office’s investigations, the release of that information publicly is not warranted. This typically occurs with personnel-specific matters, such as those involving security-related issues. These findings are provided to the Administration in a memorandum called an Executive Management Referral. In fiscal year 2023, the Office issued four Executive Management Referrals to the Administration.

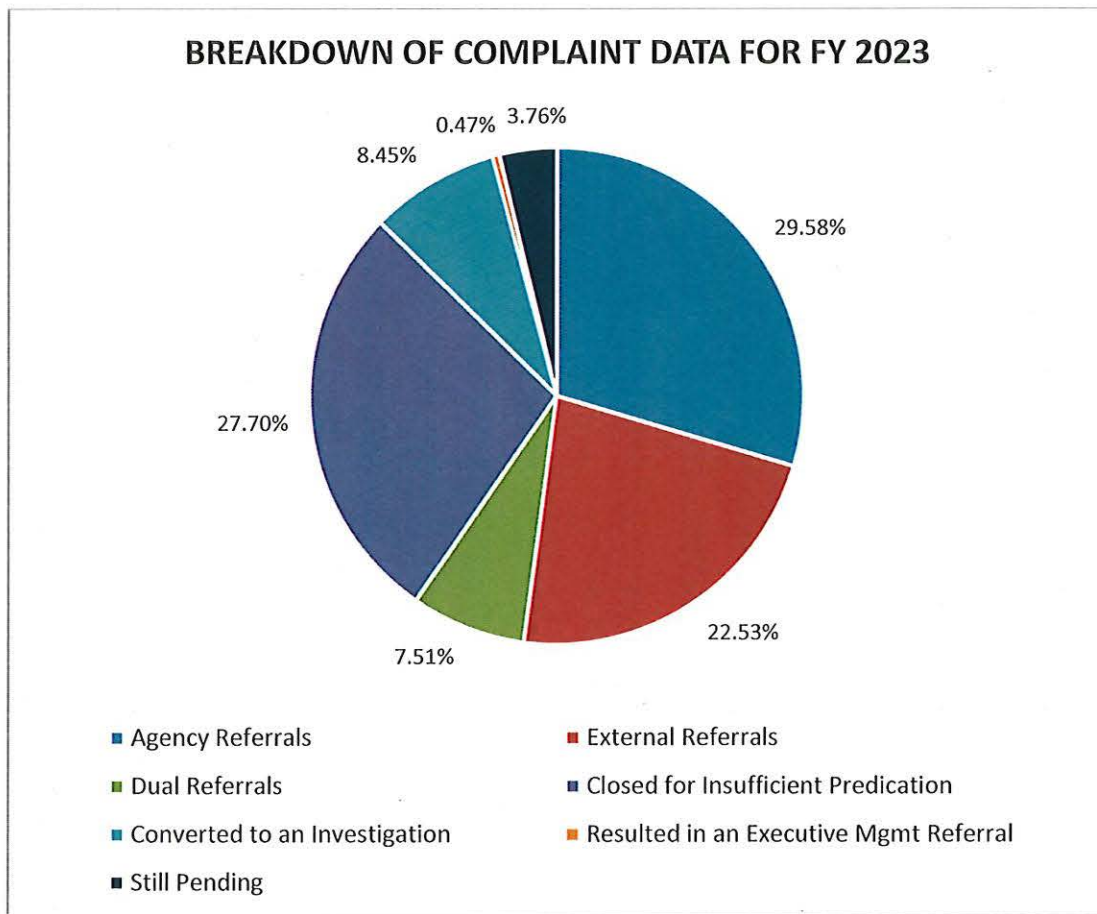
The following illustration depicts the business process of the Office from the receipt of the complaint to the publishing of a report:



C. Statistics on Complaints

The following charts summarize the disposition of the 213 complaints received by the Office in fiscal year 2023:

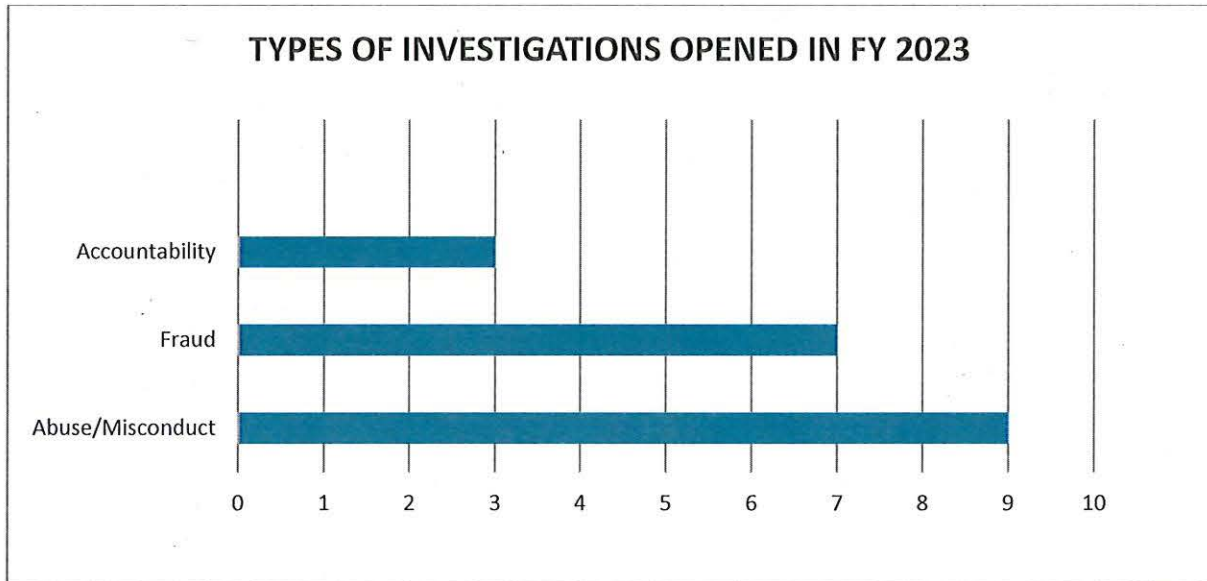
Total Complaints Received	Agency Referrals	External Referrals	Dual Referrals	Closed for Insufficient Predication	Converted to an Investigation	Resulted in an Executive Management Referral	Still Pending
213	63	48	16	59	18	1	8



D. Statistics on Investigations

The following two charts provide statistics on the number and types of investigations handled by the Office in fiscal year 2023:

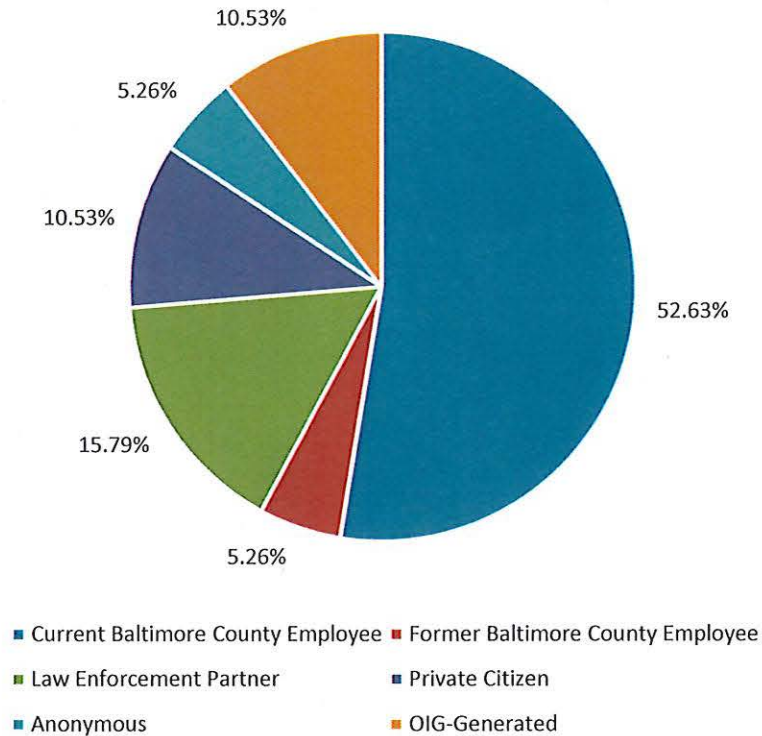
No. of Active Investigations as of 07/01/2022	No. of Investigations Opened During FY 2023	No. of Investigations Closed During FY 2023	No. of Active Investigations as of 06/30/2023
9	19	16	12



The following two charts show the sources of the 19 investigations opened by the Office in fiscal year 2023. As seen in the charts, there are occasions in which the Office, during its work, becomes aware of information that is unrelated to an existing investigation but appears to be evidence of fraud, abuse, or an illegal act within the Office’s jurisdiction. In those instances, the Office will open an “OIG-Generated” investigation.

Current Baltimore County Employee	Former Baltimore County Employee	Law Enforcement Partner	Private Citizen	Anonymous	OIG - Generated
10	1	3	2	1	2

SOURCES OF INVESTIGATIONS OPENED IN FY 2023



E. Investigative Reports

During fiscal year 2023, the Office issued four Investigative Reports to the public covering a range of topics. Brief summaries of these Investigative Reports are listed below.⁴

Case No. 21-001

In July 2022, the Office issued an Investigative Report regarding a prominent developer receiving preferential treatment regarding the proposed construction of a large enclosed tennis facility at their residence in Baltimore County. The Office received a complaint that the County had made a determination, against the advice of the senior staff in the Zoning Review Office, that the proposed tennis facility, which would be larger than the residence on the property, had met the definition of an Accessory Use or Structure per the Baltimore County Zoning Regulations. By making this determination, the project did not have to undergo a public review before an Administrative Law Judge (ALJ). It was also alleged that the County had asked for priority review of this residential project at the Soil Conservation District (SCD), a quasi-government agency tasked with reviewing plans for compliance with standards and specifications for soil erosion and sediment control, even though the project did not meet the requirements for a priority review.

⁴ All of the Investigative Reports are available at www.baltimorecountymd.gov/departments/inspectorgeneral/.

Although the project was never completed, the Office's investigation determined that the County appeared to give the prominent developer preferential treatment by issuing them a building permit for the project without requiring them to have a public hearing before an ALJ, as is customarily required in the County when a resident proposes to build a structure on their property that is larger than their principal residence. The investigation found that the County's decision was contrary to its treatment of numerous other petitioners who had similar zoning matters. The investigation also revealed that the project did receive priority treatment within the SCD at the request of a County official, which resulted in an expedited review of the soil erosion and sediment control plans associated with the project ahead of 33 other projects that were on file at the time. This occurred even though the project did not appear to meet the standard for projects that are typically given priority review status within the SCD. The investigation showed that no attempt was ever made by the County official to verify with anyone in the Administration that the County Executive wanted the project to be given priority status at the SCD. In fact, the Office found no evidence that the County Executive wanted this or intended for it to happen.

Case No. 22-003

In September 2022, the Office issued an Investigative Report related to an allegation that a County employee, who is a licensed real estate appraiser in the State of Maryland, was operating a private real estate appraisal business using County resources on County time. The Office's investigation substantiated that between approximately 2017 and 2021, the Employee had used the County computer system and its related equipment to facilitate the operation of their private business in violation of the County's electronic communication policy. While the investigation was unable to determine if the employee had operated their business on County time, it was revealed that the employee had used their relationship with a subordinate and a County-authorized real estate appraisal firm to facilitate appraisals for their business. At a minimum, this created the appearance of a conflict of interest. As a result of this investigation, the Office recommended that the County develop a plan to increase awareness among employees that they have a duty to not misuse County resources, including the computer system and its related elements.

Case No. 22-012

In November 2022, the Office issued an Investigative Report detailing the circumstances under which the County improperly paid \$69,900 to an on-call paving contractor to repair and repave a commercial asphalt alley in Towson pursuant to the County's Alley Reconstruction Program (ARP) in late 2021. The investigation found that the alley in question, which is located between Baltimore Avenue and Washington Avenue, did not meet the criteria or the spirit of the County's ARP as it is predominantly surrounded by commercial buildings that are owned by limited liability companies associated with one individual. The investigation also determined that the project was done outside of the normal ARP procedures, which include using concrete for all alleys renovated under the ARP and soliciting and evaluating bids for the work. Instead, asphalt was used and the work was performed using an on-call contractor. Further, because the repairs to the alley were done under the ARP, the County is responsible for the maintenance of the alley for a period of 15 years. According to certain Department of Public Works and Transportation personnel, it is likely that asphalt will require more maintenance than concrete. Thus, the County may need to expend additional funds for repairs in the coming years.

Case No. 23-009

In June 2023, the Office issued an Investigative Report summarizing its findings that a roofing company, which had been awarded an approximate \$1.8 million contract by the County to replace the roof on the County's Public Safety Building, had inflated the amount of its proposed subcontract arrangement with a minority-owned business in order to meet the County's twenty-five percent Minority Business Enterprise (MBE) goal for the contract award. Specifically, the roofing company told the County that the minority-owned business was to get \$449,500 of the contract to perform demolition work on the project, when in fact, the roofing company had only agreed to give the minority-owned business \$40,900 to remove a dumb waiter from the building. At times during the project, the roofing company perpetuated the fraud by submitting documents to the County with false information. The minority-owned business denied being complicit in the roofing company's misrepresentation to the County, and they asserted that they only learned of it because of the Office's investigation. The Office referred the conduct by the roofing company to the Baltimore County State's Attorney's Office for possible criminal prosecution.

F. Executive Management Referrals

During fiscal year 2023, the Office issued four Executive Management Referrals on various issues to the County's Administration. Brief summaries of these Referrals are listed below.

Case No. 23-007

In January 2023, an Executive Management Referral was delivered to the Administration detailing a County employee who between April 2022 and July 2022, violated the County's security policies on multiple occasions by transmitting sensitive County documents from their County email account to email accounts associated with their spouse.

Case No. 23-008

In May 2023, an Executive Management Referral was sent to the Administration concerning a supervisor within the Department of Health who authorized a non-employee to participate in hands-on patient care in 2017.

Complaint No. 23-169

In May 2023, an Executive Management Referral was provided to the Administration regarding alleged misconduct concerning a physician within the Department of Health.

Case No. 23-009

In June 2023, an Executive Management Referral was transmitted to the Administration concerning the Office's discovery that the roofing company, which was the subject of the Investigative Report for Case No. 23-009, had been awarded another roofing contract by the County during or about February 2023. Of particular concern to the Office was that several documents pertaining to this contract award were approved by County officials even though the

County had been on notice about the roofing company’s fraudulent conduct during the Public Safety Building project.

G. Outcomes Related to the Issuance of Prior Reports

Another aspect of the Office’s work is the continued pursuit of accountability after reports have been issued. Below is a table documenting some of the positive changes as a result of public reports issued by the Office:

Date of Report	Report No.	Report Summary	Outcome
10/21/2020	20-020	At least 20 employees were identified who were simultaneously collecting a salary and pension benefits in violation of two separate statutes of the Baltimore County Code.	The County Council passed Bill 22-21, which prohibited County employees from collecting both a salary and a pension. The Bill became effective May 3, 2021.
12/08/2020	20-018	Joint investigation with the Baltimore City Office of the Inspector General related to thousands of digital water meters that were not fully functional. Also, there were more than 8,000 open “tickets” pertaining to County water accounts that had not been addressed by the City of Baltimore.	As of July 20, 2023, all 8,000 open tickets have been resolved.
01/25/2021	20-014-1	The County spent over 1.1 million dollars to purchase commercial farming equipment and build a greenhouse that were put to limited use. Further, many items were never recorded on the County’s Fixed Asset Inventory System.	As of August 11, 2023, all of the farming equipment referenced in our report has been added to the County’s Fixed Asset Inventory System. Additionally, there are programs and other initiatives in place to begin to fully utilize the greenhouse.
07/30/2021	21-002	At times, entities participating in the Group Leadership Program, which is administered by the Department of Recreation and Parks, owed the County in excess of \$400,000.	As of August 7, 2023, all of the outstanding monies owed to the County have been paid.
09/24/2021	20-027	Internal report detailing improper conduct by a supervisor concerning the hiring of their relative, hiding the familial relationship from other employees, and protecting the relative from being disciplined.	In June 2023, the County put into effect a new Hiring of Relatives policy in an effort to avoid conflicts of interest as well as the appearance of conflicts of interest.
11/04/2021	20-015	Gaps in the Employment Background Program were identified that were creating vulnerabilities for the County.	In June 2022, the County put into place a new policy that requires background checks for employees who are being promoted.

Date of Report	Report No.	Report Summary	Outcome
	20-015 (cont.)		In June 2023, the County put into effect a new Arrest and Conviction policy establishing notification procedures when an employee is arrested.
01/04/2022	20-013	Millions of dollars in securities and fees were improperly waived for the developer of the Metro Centre at Owings Mills project by the former Director of Permits, Approvals, and Inspections. During the timeframe of the project, the Director received benefits from the developer.	The County Council passed Bill 41-22, which became effective August 29, 2022, which changed the definition of “fee waiver” as well as the reporting requirements for waivers of fees.
04/20/2022	22-011	There were 838 employees assigned to various County agencies who inadvertently did not receive the 2% cost-of-living adjustment that was effective in January 2022.	By January 2023, all 838 employees had received their 2% cost-of-living adjustment.
04/26/2022	20-002-2	A company that had an on-call plumbing contract with the County was misrepresenting itself as a Minority Business Enterprise (MBE). Also, a majority-owned company, which also had an on-call plumbing contract with the County, was possibly aiding the MBE with those misrepresentations.	In May 2023, the Maryland Department of Transportation issued a Notice of Intent to Decertify the MBE company as a result of the Office’s report. In lieu of contesting the Notice, the company has opted to voluntarily withdraw from the MBE program.

H. Behind the Scenes

While it is important to highlight the various reports that have been issued by the Office and the changes that have taken place within County government as a result of them, it is also worth noting that much of the Office’s work occurs behind the scenes and out of public view. In order to address complaints in a timely manner and to conduct thorough investigations, the Office regularly communicates with County employees and other individuals outside of County government, with many of those communications being in the form of official interviews. The Office also routinely makes requests for records and other information from the various County agencies, and when appropriate, subpoenas outside entities for records. The documents and other information received then must be analyzed and interpreted by the Office. While some of what the Office does behind the scenes is difficult to quantify, the Office thought it would be important to highlight two of the categories that can be quantified, which are critical to the Office’s operations – interviews conducted and requests for records and information. For fiscal year 2023, the Office conducted over 200 interviews and made over 240 requests for records and information pertaining to complaints and investigations.

IV. The Blue Ribbon Commission

Between June 2022 and February 2023, the Blue Ribbon Commission held 10 public meetings. The Commission issued their final report on February 16, 2023 with several recommendations, which are summarized below:

- The legislation that was passed by the County Council, which created the Office, should be incorporated into the County Charter.
- The Office should have financial independence.
- The Office will maintain responsibility for investigations only, and the audit function will remain separate.
- The Office should have direct access to government records and materials whenever feasible.
- The subpoena authority provision should be amended to eliminate the waiting period for subpoenas issued to outside entities or individuals who are not County employees; and allow for the issuance of a subpoena for records in the possession or control of the County or any County employee if the recipient of the request has not complied with the request within 30 days.
- To protect the independence and decision-making of the Office, the creation of an oversight board was not recommended.
- The Office should be provided with independent legal counsel when necessary to avoid a conflict of interest for the County's Office of Law.
- The Office should not be obligated to notify supervisors or agency heads before conducting interviews and the decision to share information about investigations should be at the discretion of the Office.
- The Code of Conduct requested by the Office in January 2021 and signed by the County Executive, requiring County employees to cooperate with the Office, should be distributed to all County employees. Also, it should be clarified to state that it is a violation of the Code of Conduct to obstruct or attempt to interfere with an investigation.
- Various recommendations were made regarding the Office's policies and procedures, including the process for issuing reports.
- The Commission recommended that the County not adopt a policy that would require the County to reimburse employees for personal legal expenses incurred in connection with an investigation conducted by the Office.

- The Ethics Commission should be separated from the Office and a new Executive Director for the Ethics Commission should be hired.
- The Commission recommended that an ethical climate survey should be conducted by an external body at regular, fixed intervals.

V. The Ethics Commission

Since January 2020, the Inspector General had been statutorily required to also serve as the Executive Director of the Ethics Commission. As of July 1, 2023, this role has been moved to the Office of Law. Therefore, this will be the last time that the work pertaining to the Ethics Commission will be included in the Office’s Annual Report. During fiscal year 2023, the Commission held a total of 14 virtual and in-person meetings.

The following charts summarize performance measures for the Ethics Commission for the last four fiscal and calendar years:

Performance Measures by Fiscal Year	FY 2020	FY 2021	FY 2022	FY 2023
Number of ethics inquiries	71 ⁵	221	197	164
Number of ethics-related complaints, allegations of ethics violations, and/or investigations	7	2	12	6
Number of formal opinions or waivers issued	1	2	10	5
Performance Measures by Calendar Year	2020	2021	2022	As of 06/30/2023
Number of registered lobbyists	39	40	33	33
Number of registered lobbied matters	120	126	225	166
Number of lobbyist activity reports	120	125	225	6 ⁶

⁵ Because ethics inquiries only started being tracked on January 3, 2020, this number only represents a portion of the ethics inquiries for fiscal year 2020.

⁶ Because the deadline for filing lobbyist activity reports is January 31st of the following calendar year, the majority of the lobbyist activity reports are typically filed at the end of the calendar year, which is why this figure is so low.

A. Ethics Commission Highlights

In fiscal year 2023, the Office processed 164 ethics inquiries for the Ethics Commission. These inquiries can be broken down as follows: 58 inquiries pertaining to financial disclosures; 10 inquiries related to lobbying activities; and 96 inquiries about gifts, conflicts of interest, and other ethics-related topics. Additionally, the Office processed and reviewed 393 lobbying-related documents and 504 financial disclosure statements for the Ethics Commission. Over the past two years, the Office has achieved a 100% compliance rate regarding financial disclosure filings. Also, during fiscal year 2023, the Ethics Commission received and addressed six ethics-related complaints as well as created an online lobbying training course.

B. Summary of Recent Ethics Advisory Opinions

In fiscal year 2023, the Ethics Commission issued five written advisory opinions on a variety of ethics-related topics. Summaries of the opinions are listed below.⁷

- 22-002 - A part-time Community College of Baltimore County (CCBC) instructor was considered for a position as a human resource trainer with the County's Office of Human Resources. CCBC is a party to a contract with the County. The Ethics Commission determined that the instructor could be hired as a human resource trainer but could not participate in any matters involving CCBC, nor could they share any confidential information learned as a County employee.
- 22-003 - A current County firefighter inquired as to whether they and two of their colleagues would be permitted to purchase a company, which manufactures four-way valves used by the Baltimore County Fire Department. The firefighter intended on remaining employed by the County after the purchase of the company. The Ethics Commission determined that the purchase of the company would violate §7-1-303 of the County Code, and the firefighter would not be permitted to purchase this company and remain employed by the County.
- 22-004 - A current County employee, who works in the 911 call center, inquired as to whether they could have secondary employment with a company that has a contract with their agency. The employment would include reviewing 911 calls; however, this is something the employee does for the County. The Ethics Commission found that this would violate §7-1-303 of the County Code because "[h]ere, the duties and responsibilities of the Employee are the same or substantially related to their duties as an employee with the Vendor."
- 23-001 - A former employee, who had served as a mechanical engineer, was hired at a private engineering company. The former employee sought guidance as to whether they were permitted to work on a contract for the County that was similar to the work they had

⁷ All the opinions are available to read in their entirety on the Ethics Commission website, which can be found at <https://www.baltimorecountymd.gov/boards-commissions/ethics>.

done while employed by the County. The Ethics Commission determined that under §7-1-304(b)(2) of the County Code, they had not participated significantly in the matter because they were not involved in the procurement of the contract, nor had they worked on a consultant selection panel in over 10 years. Therefore, the former employee was given permission to work on the contract.

- 23-002 - A member of the Baltimore County Design Review Panel, who is also employed by a local engineering firm, inquired as to what their recusal requirements were when their firm is presenting before the Design Review Panel. The Ethics Commission opined that under §7-1-301 of the County Code, the panel member is prohibited from participating in any discussion, vote, or presentation where the firm is a party.

VI. Goals for Fiscal Year 2024

The Office has established several goals for fiscal year 2024. From a personnel standpoint, the Office anticipates hiring a Management Analyst who will perform research and data analyses for complaints and investigations in support of our investigators. This should help the investigators to keep up with increasing workloads. The Office will also remain committed to ensuring that its personnel are afforded opportunities to attend training courses and conferences sponsored by the AIG. The Office also intends to continue its outreach efforts into the Baltimore County community to expand awareness of the Office's mission and function within County government. To further improve the operations and processes put in place by the Office, we have invited the AIG to conduct a thorough and independent peer review of our office. This review is scheduled for October 2023. Most importantly, the Office looks forward to working closely with the Administration and County Council to implement the carefully considered recommendations made by the Blue Ribbon Commission.

VII. Contact the Office

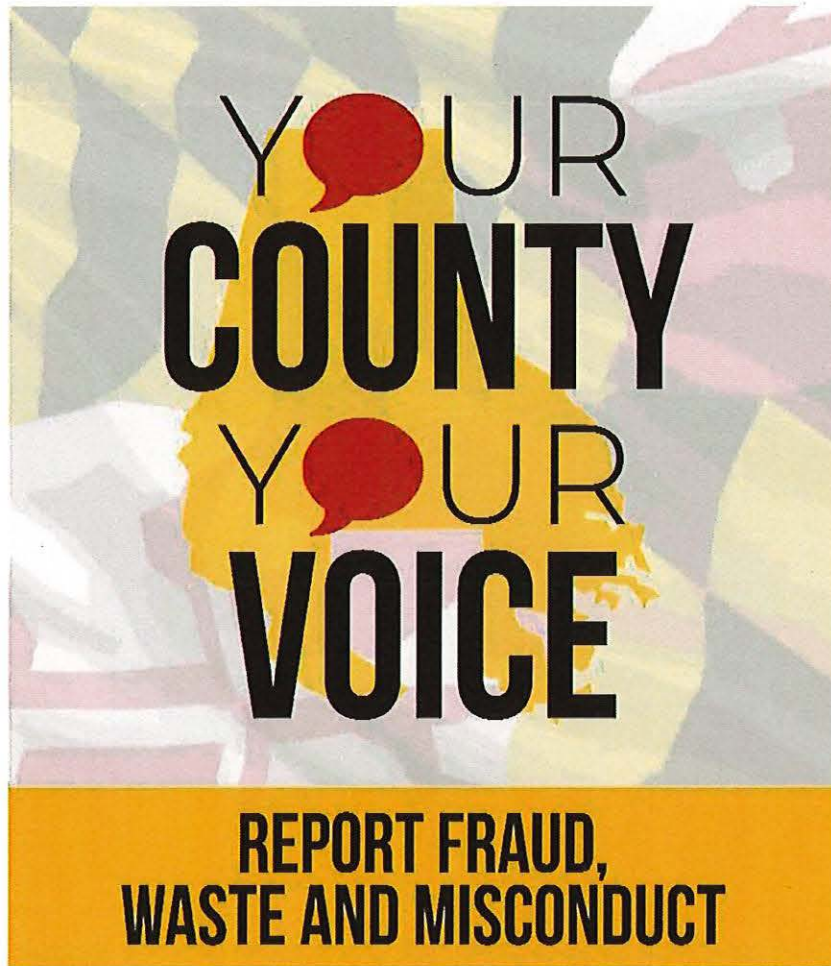
Please contact the Office using one of the methods below if you have any questions about this report, the Office and its mission, or if you have a complaint that could be addressed by our Office. We look forward to hearing from you.

Tip Line: 410-887-6500

Email: inspectorgeneral@baltimorecountymd.gov

Website: www.baltimorecountymd.gov/departments/inspectorgeneral/

*Mail: Office of the Inspector General
400 Washington Avenue, T-105
Towson, Maryland 21204*



Contact the Office of the
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