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BALTIMORE CITY BOARD OF ETHICS

August 12, 2022

Via Electronic Mail

The Honorable President
Members of the City Council
c/o Natawna Austin, Executive Secretary
Room 409, City Hall
100 N. Holliday St.
Baltimore, MD 21202

Re: City Council Bill 22-0254 (“Baltimore City Office of Aging”)

Dear President and City Council Members:

You have referred City Council Bill 22-0254 (“Bill”) to the Ethics Board for comment. The Bill establishes the Baltimore City Office of Aging (“Office”) as an independent agency, provides for the appointment of an Office Director, and creates a Baltimore City Commission on Aging (“Commission”) within the Office. Among other provisions concerning the administration of the Office and Commission, the Bill also amends the Ethics Law—specifically, section 7-8 of Article 8 of the City Code—to require the Director of the Office, all non-clerical employees¹ of the Office, and all Commission members to file a financial disclosure statement.

The Ethics Law requires many City officials and employees to file annual financial disclosure statements, including the members of many City boards and commissions. City Code, Article 8, Subtitle 7. The public disclosure of public servants’ financial and other interests furthers the purpose of the Ethics Law, which is “[t]o guard against improper influence or even the appearance of improper influence, and to ensure public trust in government.” City Code, Art. 8, § 1-2(2). The process of financial disclosure assists in identifying potential conflicts of interest between City duties and private interests. Because individuals within the Office and the Commission will be involved in the development and implementation of City policy and programs, among other responsibilities, it furthers the purpose of the Ethics Law to require these individuals to disclose their financial interests.

¹ The term “non-clerical employee” means any City official or employee “who: (1) is compensated for his or her services; and (2) is not employed solely in a secretarial, clerical, or custodial capacity.” City Code, Art. 8, § 7-6(b).

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There is likely minimal fiscal or administrative impact in requiring these additional individuals to file financial disclosure statements. The Ethics Board, in collaboration with Baltimore City Information Technology, provides an online financial disclosure portal. City officials and employees, including members of City boards and commissions, can easily create an account and file their disclosure statement online, which is then viewable by Ethics Board staff and members of the public who have registered for viewer accounts.

Accordingly, although the Ethics Board does not take a position on the Bill, the Bill's financial disclosure requirements are consistent with the Ethics Law's substance and administration.

Sincerely,

A handwritten signature in blue ink, consisting of a series of overlapping loops and a long horizontal stroke extending to the right.

J. Christoph Amberger
Director, Ethics Board

Cc: Stephan Fogleman, Ethics Board Chair
Members of the Ethics Board
Isabel Cumming, Ethics Board Executive Director
Nina Themelis, Deputy Director, Mayor's Office of Government Affairs

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