



OFFICE OF THE INSPECTOR GENERAL
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May 1, 2026

Via Electronic Mail

The Honorable President and
Members of the City Council
Room 409, City Hall
100 N. Holliday St.
Baltimore, MD 21202

Re: City Council Bill 26-0164

Dear President and Members of the City Council for Baltimore City:

The Baltimore City Office of Inspector General (“OIG”) has reviewed City Council Bill 26-0164 (Charter Amendment) (herein, “the Bill”).¹

The Bill proposes to amend the City Charter, Title X by assigning the Inspector General (herein, “IG”) a statutory designation as “authorized individual” responsive to MD CODE, GENERAL PROVISIONS, § 4-101. The Amendment, with proposed redactions, is appended to this report as Appendix 1. It aims to:

- (a) clarify the role and function of the OIG as an independent oversight entity established by the City as an integral part of a unified, single political unit, and
- (b) vest the IG with the required authorization for purposes of the Maryland Public Information Act (“MPIA”),² pertaining to independent access to unredacted agency records for the limited purpose of lawful OIG investigations.

A. Legislative Background

¹ Bill Report 26-0164 filed by the Ethics Board for Baltimore City on April 29, 2026, is hereby integrated by reference as if fully stated herein.

² MD CODE, GENERAL PROVISIONS, § 4-101 (formerly cited as MD CODE, SG, § 10-601; MD Code, SG, § 10-611).



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Until 2018, Baltimore City’s Office of Inspector General (“OIG”) was attached to the City’s Department of Law (“Law Dept.”).

Council Bill 18-0199, introduced and read first time March 12, 2018 (Res. 18-008, ratified Nov. 6, 2018) reflects the legislative intent behind the creation of the OIG as an independent Office. It proposed that the City Charter be amended to create an “independent Office of the Inspector General.” (*id*, 1, ln. 3; emphasis supplied). The unambiguous intent of the Resolution for a Charter Amendment adding “Article VII – Executive Departments} (Sections 135 to 142) to be under the new subtitle [currently, Art. X] named “Office of the Inspector General” was “establishing procedures to transition the existing Office of the Inspector General in the Law Department into the newly created Office of the Inspector General”, *id*. at ln. 14-15.

According to Question I that was posed to Baltimore City Voters in the 2022 Election, “the Advisory Board that appoints and removes the Inspector General for Baltimore City ... would now be comprised of eleven City residents who are not elected officials, candidates for office or lobbyists, among other restrictions.” Section 2. (a) {Office of Inspector General: Advisory board} now vests the 11 Members of the Advisory Board with the power to appoint an Inspector General.

This provision *de facto* eliminated elected and appointed officials from supervision and oversight of the IG, as well as interference in IG investigations to ensure its independence.

B. Sources of Power

(1) Authorization by Maryland Constitution and Article II of the Baltimore City Charter

The source of the OIG’s power as an investigative agency power is rooted in the Charter and carries the weight/equivalency of law. Article X of the Charter in turn is derived from Title II and the Maryland Constitution:

Section 2 of Article 11-A of the Maryland Constitution requires the General Assembly to provide a grant of express powers by public general law to Charter counties, including Baltimore City. The City's express powers as enacted by the General Assembly are contained in Article II of the City Charter:

“The Mayor and City Council of Baltimore shall have full power and authority to exercise all of the powers heretofore or hereafter granted to it by the Constitution of Maryland or by any Public General or Public Local Laws of the State of

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Maryland; and in particular, without limitation upon the foregoing, shall have power by ordinance, or such other method as may be provided for in its Charter, subject to the provisions of said Constitution and Public General Laws...”

The City is given broad police powers by Section (27) ("To have and exercise within the limits of Baltimore City all the power commonly known as Police Power to the same extent as the State has or could exercise that power within the limits of Baltimore City"). Section (47) gives the City broad powers to legislate the general welfare and to promote good government ("To pass any ordinance ... which it may deem proper in the exercise of any of the powers, either express or implied, enumerated in this Charter, as well as any ordinance as it may deem proper in maintaining the peace, good government, health and welfare of Baltimore City..."). (Emphasis supplied.)

(2) Authorization by Article X of the Baltimore City Charter

Under the plain language of Article X, § 4 Office of Inspector General {Powers and Duties}, the OIG is unambiguously vested with the express authority to investigate any elected official and City employee and subpoena *any* information from *any* City employee or elected official:

The statutory authority of the City's Inspector General, including the subpoena power in Section 4 (d) of Article X of the Charter, thus is derived from State public general law as enacted in the Charter's express Article II powers described above.

The general subpoena power of the IG *for any information* extends to not merely *any* City Employee, but to any person, pursuant to Article X, § 4 (a)(2) and (d). Limitations of this expressly authorized power – such as imposed by redactions required under the relevant MPIA provisions – would be contrary to the statutory framework outlining the OIG’s powers and duties to the City and its electorate.

C. OIG Powers

Art. X § 4 {Office of Inspector General: Powers and Duties}, at (b), defines the {Responsibilities of Office}:

The Office of the Inspector General is responsible for:

- (1) investigating complaints of fraud, financial waste, and abuse in City government;
and
- (2) promoting efficiency, accountability, and integrity in City government.

According to (c) {Jurisdiction of Office},

The Office of the Inspector General may investigate allegations that involve City government and potential violations of laws or regulations by any:

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- (1) City elected official;
- (2) City employee;
- (3) member of a board or commission established or governed by the City Charter, City Code, or an executive order issued by the Mayor;
- (4) City contractor or person negotiating a contract with the City;
- (5) person seeking certification to provide goods or services to the City; or
- (6) external recipient of City funds, benefits, or services.

(1) The OIG's subpoena power

The Charter Art. X § 4 also vests the OIG with extensive subpoena powers:

“(d) Issuing subpoenas.

- (1) To perform the duties of office, the Inspector General may issue a subpoena to require:
 - (i) any person to appear under oath as a witness; or
 - (ii) the production of any information, document, report, record, account, or other material.
- (2) The Inspector General may enforce any subpoena issued pursuant to this subsection in any court of competent jurisdiction.”

(Emphasis supplied.)

The Charter extends the subpoena power of the OIG to those in its direct jurisdiction (*see*, Art. X § 4 (c)), qua City employees, but to any person, as well as to any information, etc.,_unconditioned on superseding “other law”.

It is evident that the express intent of the Charter was to establish an OIG that was entirely independent and to vest the office with the necessary powers to perform its duties independently and without interference.

(2) OIG subpoena power: Legislative intent

The OIG's investigative and subpoena powers contemplated by the legislature in Council Bill 18-0199, were extensive:

1. **“D. Section 137 (C) {Inspections, Investigations, and Evaluations}:**

The Office of the Inspector General may conduct independent reviews of government operations, including inspections, investigations, and evaluations of:

- (1) Any activities, records, or individuals involved with City contracts and procurements; or

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(2) Any other official Act or Function of any Government entity under the jurisdiction of the Office.

(*id.* at 4, lns. 22-29; emphasis supplied.)

2. “E. Section 139. {Office of the Inspector General: Access to Persons and Records; Subpoena Power}:

(B) *Access to Records.*

As allowed by law, the Inspector General shall have access to all records of any City entity under the Jurisdiction of the Office of the Inspector General. Officers and employees of City entities shall promptly provide to the Inspector General any information, document, report, account, or other material requested by the Inspector General, and the Inspector General is not required to obtain a subpoena for any records request made to any City entity.

(C) *Subpoena Power*

(1) As part of an investigation under the jurisdiction of the Office of the Inspector General, the Inspector General may issue a subpoena **independent of any further approval from the Mayor and City Council** of Baltimore, requiring any person to give testimony, or produce any document, report, record, account, or other material.

(2) A subpoena issued under this subsection may be judicially enforced by the City Solicitor in any Court of competent jurisdiction.”

(*id.* at 7, lns. 1-21; emphasis supplied.)

Article X’s final all-encompassing “[t]o perform the duties of office, the Inspector General may issue a subpoena to require: (i) any person to appear under oath as a witness; or (ii) the production of any information, document, report, record, account, or other material” clearly demonstrates the Mayor and City Council’s intent to give the OIG the most independent scope of investigatory power and oversight possible.

Moving the proposed assignment to litigate enforcement of such subpoenas in Circuit Court from the City Solicitor to the Inspector General in the final Article X suggests that the legislature considered potential conflicts of interest as it assigned that power to the OIG.

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The Law Dept. did not oppose that provision: In a letter dated June 15, 2018, the City Solicitor's Office "reserved comment until we review the amended version." No additional communication is on file.

D. The OIG as *de facto* custodian under the MPIA

By statute, the OIG is to be independent of both the executive and the legislative in City government.

However, the OIG has of late encountered obstacles to obtaining information pertinent to its lawful investigations. Specifically, the Law Dept. has established a policy that (a) records pertinent to an IG investigation must be requested and (b) all requests are to be considered requests made under and subject to the limitations of the MPIA. The City's internal guidance of May 15, 2024, "RE: City Bills-- ATTORNEY CLIENT COMMUNICATION" (herein "City's guidance") states that "[a]ny request by any City entity (agency, board, commission) to any other City [entity] is a PIA request under State law. Md. Code, Gen. Prov., §4-202.³ In *Montgomery County v. Shropshire*, 420 Md. 362, 383 (2011) Maryland's highest court held that a request from one agency in Montgomery County to another was a PIA request as defined in the PIA statute itself. Any request from a state or federal or foreign entity for records would also be a PIA request.)" (Emphasis supplied.)⁴

³ MD General Provisions Code § 4-202 (2024): "(a) Except as provided in subsection (b) of this section, a person or governmental unit that wishes to inspect a public record shall submit a written application to the custodian." It thus addresses the formal process for a general agency that is not already in *de facto* possession and control of the records.

⁴ The holding in *Shropshire* itself reflects the narrow issue that was placed before the Court:

"In sum, the internal affairs records involving alleged administrative rule violations by Sergeant Shropshire and Captain Parker-Loan are "personnel records" pursuant to Section 10-616(i) of the State Government Article, and are, therefore, mandatorily exempt from disclosure by the custodian of records."
Id., at 366. (Emphasis supplied.)

Even *Shropshire* allows for disclosures under the MPIA: Section 10-616, governing "required denials," provides, in relevant part ... "(2) A custodian shall permit inspection by: (i) the person in interest; or (ii) an elected or appointed official who supervises the work of the individual."

The *Shropshire* Court did not classify all government, municipal, or agency records as "personnel records." The *Shropshire* Court also did not mandate that the MPIA's "personnel records exemption" to be applied to all government, municipal, or agency records.



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In 2025, this policy removed the IG’s prior access to all City agency records and is now applied indiscriminately to document requests by the public and to OIG subpoenas.

The misguided application of *Shropshire* to the IG’s statutory oversight responsibilities ignores the fact that, under the MPIA’s own definition, the IG, was already a *de facto* custodian for purposes of the MPIA until being denied access by the Department in 2025:

The MPIA recognizes the role of “custodian” of government records and at § 4-101 provides the following definitions:

(f) “Official custodian’ means an officer or employee of the State or of a political subdivision who is responsible for keeping a public record, whether or not the officer or employee has physical custody and control of the public record.

(d) ‘Custodian’ means:

(1) the official custodian; or

(2) any other authorized individual who has physical custody and control of a public record.”

(Emphasis supplied.)

The MPIA does not establish a process or licensure for the nomination, assignation, or authorization of a municipal “custodian”. This is left to the municipal administration to determine, either expressly or implicitly by “physical custody and control of the public record”: § 4-101 (d) (2) only calls for “authorization”—not by the State or by the MPIA but by an agency or municipality. (Emphasis supplied.)

This corresponds to established City practice: The Charter does not designate any individual department or agency as “custodian of records” for purposes of the MPIA. Each “officer or employee ... of a political subdivision who is responsible for keeping a public record, whether or not the officer or employee has physical custody and control of the public record” or access to unredacted agency records is a custodian by default for purposes of the MPIA. These individual agency custodians may assign some of their duties under the MPIA to the Department of Law – which is not a custodian by statute – for the sake of convenience and efficiency.⁵

“Physical” custody and control of electronic/digital records is *established by full access* to unredacted agency records. **By having full, unobstructed access, the OIG (prior to the 2025**

⁵ Baltimore City Information Technology (“BCIT”), also without special designation, fulfills the requirements of “actual possession and control” of the City’s electronic information, thus also is a *de facto* custodian with access to all unredacted agency records.



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change in the Department’s policy) was in actual and constructive custody and control of the public record and thus already in compliance with the MPIA definition of “custodian”.

Bill 26-0164 aims to re-establish a *status quo* that was uncontested before the unilateral change in policy.⁶

E. Scope of the MPIA

The MPIA has created a “general presumption in favor of disclosure of government or public documents.” *Kirwan v. The Diamondback*, 352 Md. 74, 80 (1998). “The provisions of the Public Information Act reflect the legislative intent that citizens of the State of Maryland be accorded wide-ranging access to public information concerning the operation of their government.” *Fioretti v. Md. State Bd. of Dental Exam’rs*, 351 Md. 66, 73 (1998) (quoting *A.S. Abell Publ’g Co. v. Mezzanote*, 297 Md. 26, 32 (1983)); see also GP § 4-103(a) (“All persons are entitled to have access to information about the affairs of government and the official acts of public officials and employees.”).

The Act, however, “highlights that its provisions shall be construed in favor of permitting inspection of a public record, with the least cost and least delay to the person or governmental unit that requests the inspection” but only to the extent there is no “unwarranted invasion of the privacy of a person in interest.” GP § 4-103(b). Furthermore, the Court of Appeals has explained that the act “must be liberally constructed” to ensure that the Act’s “broad remedial purpose” is met. *Kirwan*, 352 Md. at 81 (quoting *Mezzanote*, 297 Md. at 32).

The MPIA attempts to balance the public’s right to access government records with other policies that respect the privacy or confidentiality of certain information.

Some protections may be waived. Other records may be withheld if the agency decides that disclosure of those records would be “contrary to the public interest.” Examples of records subject to discretionary disclosure include investigatory records, information related to academic, licensing, and employment examinations, and documents of a pre-decisional and deliberative

⁶ In addition to the now forced breach of the OIG’s investigatory confidentiality (by being obligated to identify the investigative subject and pertinent keywords to agency custodians and the Law Dept., this policy has resulted in excessive delays that threaten the viability of IG investigations: The Law Department took 4 (four!) months to provide the OIG with records that were redacted to the degree of uselessness and absurdity. In a current investigation, it has taken the Law Department more than two weeks just to communicate the “need” for further refinement of keywords and time frames requested by OIG staff under the new policy, claiming the amount of data is too inconvenient for the Department to handle. If the Council’s intent is to hamstring OIG investigations, obfuscate transparency, and shield potential misconduct by City employees from scrutiny and accountability, it seems hard to imagine a more effective way that that implemented by the Mayor and his appointee, the City Solicitor.



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nature. GP §§ 4-343 to 4-357 (Part IV).” *See*, MARYLAND PUBLIC INFORMATION ACT MANUAL (19th ed., Dec. 2024) Appendix I-2.

It would be incomprehensible that the Mayor and City Council for Baltimore City would consider the OIG’s statutory oversight responsibilities as “contrary to the public interest.”

F. MPIA Request v. OIG Subpoena

Further distinguishing OIG subpoenas from MPIA request is the fact that the OIG may enforce its subpoenas directly through the Circuit Court. However, in the case of an MPIA request, the right to invoke judicial review is predicated on the requestor’s prior appeal to and subsequent denial by the State Public Information Compliance Board.⁷

To arbitrate disagreements between parties as to what records are disclosable, the MPIA provides an approved statutory pathway for the public to contest denials of information by a custodian:

- The Public Access Ombudsman (who mediates disputes between requesters and records custodians that can't be resolved directly and functions as a fully independent entity from the Attorney General's Office),
- the PIA Compliance Board (which can review complaints that a custodian wrongfully denied inspection of public records or that the custodian failed to respond to a request),
- the Appellate Court of Maryland, and
- the Supreme Court of Maryland.

The Department’s position that it alone is authorized to undertake legal action on behalf of the City or a City entity means that the OIG would not be able to pursue appellate review and relief that is otherwise available to every citizen and non-City entity:

The Department now acts as the *de facto* custodian of all government records and, relying on its legal services monopoly, has “foreclosed, cut off, shut down any enforcement or enforceability option on the part of the inspector general to pursue its subpoenas and to advance its investigatory responsibilities.” (The Hon. J. Pamela White, 4/17/26.)

⁷ “Except as otherwise provided in Subtitle 1A of this title and subject to paragraph (3) of this subsection, an applicant, a complainant, or a custodian may appeal to the circuit court a decision issued by the State Public Information Act Compliance Board as provided under § 4-1A-10 of this title.” MD General Provisions Code § 4-362 (b) (2) (2024).



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G. Effect of Bill 26-0164

Bill 26-0164 formally recognizes the IG as a *de facto* custodian of agency records by establishing the INSPECTOR GENERAL AS AN AUTHORIZED INDIVIDUAL AS DESCRIBED IN THE STATE PUBLIC INFORMATION ACT LAW, for the limited purpose of lawful investigations.

The proposed Amendment would formally satisfy the element of “authorization” that

- (a) re-establishes the IG access to unredacted City and agency records *via* authorized individual status; and
- (b) obligates the IG to apply the restrictions and redactions as required by the MPIA for any potential requests that may be received from the public.

This was recognized by the Attorney General’s Office:

In **86 Op. Att’y Gen, 94 (2001)**, 108-109, the Attorney General opined that

“any exception to the general prohibition against public access to personnel records must be supported by a clear legal basis ... **as when ‘the requesting agency has statutory duties which demonstrably cannot be effectively executed without access.’**”

(*citing* 60 Op. Att’y Gen 556, 559 (1975): “If the requesting agency has statutory duties which demonstrably cannot be effectively executed without access to personnel files, the inspection of records which you would otherwise have an obligation to deny, is authorized within the meaning and intent of Article 76A Section 3 (c)”, *id.* at 565))⁸

The Attorney General (in 86 Op Att’y Gen., 109) stated: “**It is implicit in the personnel records exemption that a City agency charged under a municipal ordinance with responsibilities related to personnel administration have access to those records necessary to carry out its duties.**”⁹ (Emphasis provided throughout.)

⁸ https://oag.maryland.gov/resources-info/Documents/pdfs/Opinions/1975/Volume60_1975.pdf

⁹ <https://oag.maryland.gov/resources-info/Documents/pdfs/Opinions/2001/86OAG94.pdf>

Both opinions are still cited in the AG’s MPIA MANUAL (19th Ed.) (December 2024.)

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The Department's absolute control of the IG's access to agency records for specific use in lawful investigations under Title X of the City Charter is demonstrably denying the OIG's ability to effectively execute its statutory mandate to"

“(1) investigat[e] complaints of fraud, financial waste, and abuse in City government; and
(2) promot[e] efficiency, accountability, and integrity in City government.”
Charter Title X, § 4 (b).

The proposed Charter Amendment does not supersede State law, but—by expressly integrating the IG's standing as an authorized individual/custodian of agency records for the limited purpose of carrying out its oversight mandate—is narrowly tailored within the framework of the MPIA.

H. Involvement of the IG's Advisory Board in Investigations

The IG opposes the proposed change to the Charter calling for review and redactions of OIG investigative reports prior to submission to the Mayor and City Solicitor and, subsequently, before redacted reports are publicized.

There is not a single instance where confidential, classified or privileged information was illicitly released to the public by members of the OIG. (The same cannot be said for other agencies and/or offices who have, in recent months, disseminated such information to the public and select media for political purposes.)

The IG's Advisory Board members must retain their independence and cannot inject themselves into the viscera of investigative reports prepared by IG investigators.¹⁰ As they are not members of the OIG, they are also not members of the IG's investigative team. Pre-publication to the Board would pierce the confidentiality of OIG's investigations.

If preservation of confidentiality and compliance with the restrictive provisions of the MPIA are indeed a general concern for this Honorable Council, the Board should appoint, certify or otherwise vest a member of the OIG staff with that responsibility — an OIG Special Agent for Policy and Compliance whose qualifications must include (but are not limited to) the degree of Juris Doctor from an accredited law school and a licensure to practice law in the State of Maryland.

With the redactions outlined *supra*, the OIG fully supports the proposed Amendment with redactions as indicated below.

¹⁰ While uniquely qualified for their oversight position, members of the Board generally also have no specialized investigatory experience.



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Sincerely,

Isabel M. Cumming
Inspector General

Cc: Gayle Guilford, Chair

Members of the OIG Advisory Board

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Appendix 1:

Proposed Charter Amendments:

Article IV Mayor

§ 4. General Powers

1. The Mayor, by virtue of the office, shall have all the powers of a conservator of the peace...

The Mayor may call upon any officer of the City entrusted with the receipt or expenditure of public money, for a statement of account as often as the Mayor thinks necessary, and may at any time by expert accountants and bookkeepers, examine the books and accounts of any department, commission, board, officer, assistant, clerk, subordinate or employee.

The Mayor shall report to the City Council as soon as practicable after the end of each fiscal year, the general state of the City, with an accurate account of the money received and expended, to be published for the information of the citizens.

THE MAYOR SHALL PROMPTLY FACILITATE THE TRANSMISSION OF RECORDS TO THE OFFICE OF THE INSPECTOR GENERAL AS AN AUTHORIZED INDIVIDUAL AS DESCRIBED IN THE STATE PUBLIC INFORMATION ACT LAW.

- **“Facilitation” by the Mayor will necessarily involve identification of respondent and investigative details, thus breaching confidentiality of proceedings. Assignment of “authorized individual” permits the IG or a designee to procure records without breach of confidentiality.**

OIG’s Proposed Language:

THE MAYOR SHALL DESIGNATE THE INSPECTOR GENERAL AS AN AUTHORIZED INDIVIDUAL WITH ACCESS TO ALL AGENCY RECORDS IN COMPLIANCE WITH MD CODE, GENERAL PROVISIONS, § 4-101.

Article V Comptroller

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§ 3. General Duties

The Comptroller shall:

(h) PROMPTLY FACILITATE THE TRANSMISSION OF RECORDS TO THE OFFICE OF THE INSPECTOR GENERAL AS AN AUTHORIZED INDIVIDUAL AS DESCRIBED IN THE STATE PUBLIC INFORMATION ACT LAW.

Article VII Executive Departments

§ 140. City Administrator: Powers and duties.

Except as otherwise provided in this Charter and under the direct authority and supervision of the Mayor, the City Administrator:

(8) SHALL PROMPTLY FACILITATE THE TRANSMISSION OF RECORDS TO THE OFFICE OF THE INSPECTOR GENERAL AS AN AUTHORIZED INDIVIDUAL AS DESCRIBED IN THE STATE PUBLIC INFORMATION ACT LAW.

OIG's Proposed Language:

(8) SHALL DESIGNATE THE INSPECTOR GENERAL AS AN AUTHORIZED INDIVIDUAL WITH ACCESS TO ALL AGENCY RECORDS IN COMPLIANCE WITH MD CODE, GENERAL PROVISIONS, § 4-101.

Moot if modification to Article IV § 4. (supra) is applied.

Article X Office of the Inspector General

§2. Office of the Inspector General: Advisory Board

(1) **MEETINGS** ~~Annual Overview~~

(1) The advisory board shall appear before the City Council at least once a year...

(2) THE ADVISORY BOARD SHALL MEET PERIODICALLY AS IT DEEMS NECESSARY TO REVIEW INVESTIGATION REPORTS FROM THE INSPECTOR GENERAL PRIOR TO THEIR PUBLICATION. THE ADVISORY BOARD SHALL CONSULT REVIEW REPORTS FOR NECESSARY REDACTIONS IN ACCORDANCE WITH STATE AND FEDERAL LAW.

- The Advisory Board is not the custodian of OIG records. The IG and the Deputy IG are the proper custodians who may designate an OIG member (ideally one with a JD) to

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redact investigative reports for public release. It should be noted that thus far, there have been no known leaks of confidential materials from the OIG.

OIG's Proposed Language:

(2) THE ADVISORY BOARD SHALL MEET PERIODICALLY AS IT DEEMS NECESSARY TO REVIEW INVESTIGATIVE REPORTS FROM THE INSPECTOR GENERAL. THE IG SHALL DESIGNATE A QUALIFIED MEMBER OF THE OIG'S STAFF TO CERTIFY NECESSARY REDACTIONS IN ACCORDANCE WITH STATE AND FEDERAL LAW.

§ 4. Office of the Inspector General: Powers and Duties

(b) Responsibilities of Office

The Office of the Inspector General is responsible for:

(3) SUBMITTING REPORTS ON INVESTIGATIONS TO THE OFFICE OF INSPECTOR GENERAL ADVISORY BOARD PRIOR TO ANY PUBLICATION OF THOSE REPORTS.

OIG's Proposed Language:

~~**(2) THE ADVISORY BOARD SHALL MEET PERIODICALLY AS IT DEEMS NECESSARY TO REVIEW INVESTIGATION REPORTS FROM THE INSPECTOR GENERAL. THE ADVISORY BOARD DESIGNATE A QUALIFIED MEMBER OF THE OIG'S STAFF TO CERTIFY NECESSARY REDACTIONS IN ACCORDANCE WITH STATE AND FEDERAL LAW.**~~

~~Moot upon Amendment of Article X, §2 (1)(2), *supra*.~~

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