

*Stephan W. Fogleman, Chair*  
*Donna M. Davis, Vice-Chair*  
*Melodie Hengerer*  
*Arnold Sampson*  
*Vacant*



*Director: J. Christoph Amberger*

**BALTIMORE CITY BOARD OF ETHICS**

March 14, 2023

**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 23-0353 (“Community Reinvestment and Reparations Commission”)

Dear President and City Council Members:

The Ethics Board has reviewed City Council Bill 23-0353 (“Bill”). The Bill establishes the Baltimore City Community Reinvestment and Reparations Commission (“Commission”) as an independent entity and provides for the appointment of seventeen (17) Commission Members. 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 all Members of Commission and all non-clerical employees<sup>1</sup> of the Commission 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 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.

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 filing website. City officials and

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<sup>1</sup> 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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***Baltimore City Board of Ethics***

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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,



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