



**Prince George's County
Office of Ethics and Accountability and
Board of Ethics**

Annual Report

**INCLUSIVE OF
CALENDAR YEAR 2017 &
FISCAL YEAR 2018**

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Table of Contents

Message from the Executive Director..... 1

Mission and Purpose 2

Message from the Board of Ethics Chair 3

Purpose of the Board of Ethics..... 4

Members of the Board of Ethics..... 4

Meetings of the Board of Ethics 4

Charter §1002 Waivers..... 4

Board of Ethics Referrals 5

Enforcement Activities 5

Ethics Training 6

Proposed Legislative Changes 7

FY 2018 Key Accomplishments 7

Major Objectives for Fiscal Year 2019..... 11

Financial Disclosure Statements 12

Financial Disclosure Statements Exemptions and Waivers..... 15

Financial Disclosure Statements Late Fee Waiver Requests 15

FY 2018 Advisory Opinions 16

Ethics Advice by the Office of Ethics and Accountability..... 17

FY 2018 Informal Ethics Advice and Information Requests 18

FY 2018 Investigations 41

Recommendations and Actions Taken 57

Lobbying 67

Lobbyists Disclosure and Annual Reports 68

2017 Registered Lobbyists 69

2018 Registered Lobbyists 78

APPENDIX 84

Message from the Executive Director

Robin Barnes-Shell, Esq.

I am excited to provide the fourth annual report for the Office of Ethics and Accountability – an agency which is truly committed to promoting trust in County government and provides an important service to the public and to the County. The Office of Ethics and Accountability is always looking for ways in which we can better achieve its mission of providing increased accountability and oversight in the operations of the County government by identifying fraud, abuse, and illegal acts as well as support the Board of Ethics.

Following a robust ethics training campaign, over 6,158 officials and employees have completed mandatory ethics training via online and in-person this fiscal period. Additionally, we instituted oversight of secondary employment requests to ensure compliance with the County's Code of Ethics. We firmly believe these functions will benefit the public and County government.

Progress requires continuous review, analysis, and accountability to promote a culture of integrity and public trust. During the 2018 fiscal period, there were 6 substantiated complaints, of which 2 related to noncompliance in operations reviews and 4 involved ethics violations that were referred to the Board of Ethics. Three (3) additional substantiated allegations will be heard by the Board after FY 2018. With the increase in the number of cases received, the Office of Ethics and Accountability observed a 100% increase in recommendations. In FY 2018, the Office of Ethics and Accountability made ten (10) recommendations to Executive Leadership and a referral to Audits and Investigations, resulting in recommendations, compared to 5 in 2017. These recommendations are provided in accordance with Section 2- 303 of the Prince George's County Office of Ethics and Accountability Code, in response to investigations or operational reviews conducted in Fiscal Year 2018. The Office of Ethics and Accountability has made a total of 31 recommendations since Fiscal Year 2016, resulting in significant policy development and organizational change.

It is with great gratitude that I continue to serve and provide increased accountability and oversight in the operations of Prince George's County government.

Sincerely,



Robin Barnes-Shell
Executive Director

Mission

The mission of the Office of Ethics and Accountability is to promote public trust in County Government through:

- Providing comprehensive intake, processing, investigations, management, and adjudication of allegations of waste, fraud, abuse and illegal acts in County government.
- Promoting disclosure of the outside business and monetary interests of County government employees/officials and real-time notice of lobbying activity directed towards County government.
- Providing training, technical assistance and public education necessary to ensure County government services are delivered with integrity and in accordance with the standards of professional conduct identified within the ethics code.

Purpose

The Office of Ethics and Accountability provides increased accountability and oversight in the operations of the County government by identifying fraud, waste, abuse, and illegal acts. Prince George's County Code § 2-299. It also provides support to the Prince George's County Board of Ethics in the exercise of its authority to interpret the County Code of Ethics in order to promote public trust in County Government by ensuring impartiality of the employees and elected officials. Prince George's County Code § 2-292.

The Office of Ethics and Accountability's two main functions are best described as investigative of County operations and administrative in its support to the Board of Ethics. Investigations are initiated in several ways: (1) through the PGCEthics Hotline, (2) directly to the Office, (3) via media, or (4) by other means. After an initial investigation by the Office of Ethics and Accountability, a matter may eventually be referred to law enforcement, an appropriate agency, or the Board of Ethics. Administratively, the Office of Ethics and Accountability oversees Financial Disclosure Statement submissions and lobbyists' registrations and reports; renders ethics advice to individuals governed by the Ethics Code; maintains compliance with the Open Meetings Act for the Board of Ethics; and provides ethics training to County officials, employees and lobbyists.

Message from the Board Chair

The Honorable Covette Rooney

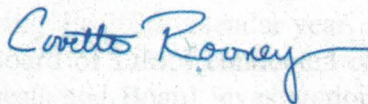
I am pleased to provide the 2018 Annual Report of the Board in accordance with Section 2-292(a)(6) of the Prince George's County Code. Accordingly, an annual report is required setting forth the Board's activities to the County Executive and County Council.

Calendar Year 2017 included the continuation of the County's global ethics training for employees and officials. Through the efforts of the Office of Ethics and Accountability, agencies received customized ethics training in addition to the on-line training. 763 employees received in-person ethics training and 5,395 employees successfully completed the Mandatory Online-Ethics Training Course.

The Board of Ethics and Office of Ethics and Accountability staff continue to handle a large number of requests for ethics advice regarding conflicts of interest, gifts, secondary employment, and post-employment matters throughout the year. During the Financial Disclosure Statement filing season, the Office of Ethics and Accountability staff resolved a large number of calls for advice in connection with mandated electronic filings. The Office of Ethics and Accountability's staff of six full-time employees, issued over 140 formal and informal opinions and provided assistance to countless officials and employees with Financial Disclosure Statement filings. To date, staff has processed over 1,000 Financial Disclosures Statements from officials and employees. In addition to its other responsibilities, the Office of Ethics and Accountability staff investigated several complaints alleging violations of the Ethics Code and processed over 240 lobbyist registration forms and reports.

Going forward, the Board of Ethics will continue to focus its energy on performing its core functions of providing ethics advice to County officials and employees and receiving complaints alleging violations of the Ethics Code. I look forward to continuing to serve the County and promoting public trust in its officials and employees.

Sincerely,



Covette Rooney
Chair

BOARD OF ETHICS

to the Board of Ethics' determination that the employee's involvement does not violate the public trust, and that there is full disclosure of all pertinent facts.

Board of Ethics Referrals

The Board of Ethics is empowered with authority to determine violations of the County Ethics Code. The Board of Ethics reviews all complaints of alleged violations, conducts fact findings and hearings, and determines if an Ethics Code violation has occurred. Investigations of ethics violations completed by the Office of Ethics and Accountability are referred to the Board of Ethics for a determination of violations. Some complaints may be determined by the Board of Ethics in the following fiscal year upon completion of investigations. During the 2018 Fiscal Year, the Board received fourteen (14) referrals of alleged ethics violations of which four (4) were substantiated (partially or completely) through investigations by the Office of Ethics and Accountability.

Enforcement Activities

The Board of Ethics is empowered to impose fines and other penalties as warranted and to seek judicial enforcement of its sanctions. The Board of Ethics did not seek judicial enforcement but did impose late filing fees for delinquent filing of Financial Disclosure Statements and Lobbyists Annual Reports during the 2017 calendar year.

Ethics Training

The Office of Ethics and Accountability provided in-person ethics training to 763 employees, officials, and board and commission members and 5,395 online ethics training for the compliance period ending July 31, 2017. Training types included the following: (1) Online training at County facilities; (2) on-site ethics trainings provided at the request of various agencies; (3) PGCEthics Training, which is an hour-long ethics course for employees and officials offered monthly at the RMS Building in Largo; (4) New Employee Orientation Program training offered in collaboration with the Office of Human Resources Management for all new County employees; and (5) Ethics special topics provided at agency events or upon request.

The following table shows compliance by agency with the County's mandatory on-line ethics training:

Mandatory Ethics Training			
Count	County Government	Number of Staff	Compliance %
1	Board of License Commissioners (staff)	26	100%
2	Citizen Complaint Oversight Panel (staff)	2	100%
3	County Executive Office	31	97%
4	Department of Corrections	555	96%
5	Department of Family Services	39	92%
6	Department of Housing and Community Development	75	95%
7	Department of Permitting Inspections Enforcement	257	100%
8	Department of Public Works & Transportation	321	87%
9	Department of the Environment	259	86%
10	Fire-EMS Department	981	86%
11	Office of Ethics and Accountability	7	100%
12	Office of Central Services	178	99%
13	Office of Community Relations	51	100%
14	Office of Finance	59	100%
15	Office of Homeland Security	183	100%
16	Office of Human Resources Management	59	100%
17	Office of Information Technology	59	98%
18	Office of Law	49	100%
19	Office of Management & Budget	23	96%
20	Personnel Board (staff)	2	100%
21	Police Department	1986	89%
22	Prince George's County Council (staff)	101	100%
23	Revenue Authority (staff)	82	100%
24	Soil Conservation District	15	100%
Total		5395	90%

Proposed Legislative Changes

Periodically, certain provisions in the Prince George's County Code will require revisions to comply with statutory changes made by the State Ethics Commission or to clarify interpretation to ensure compliance. Any proposed amendments to the Prince George's County Code of Ethics embodied in legislative proposals require approval by the State Ethics Commission in addition to an enactment by the County Council.

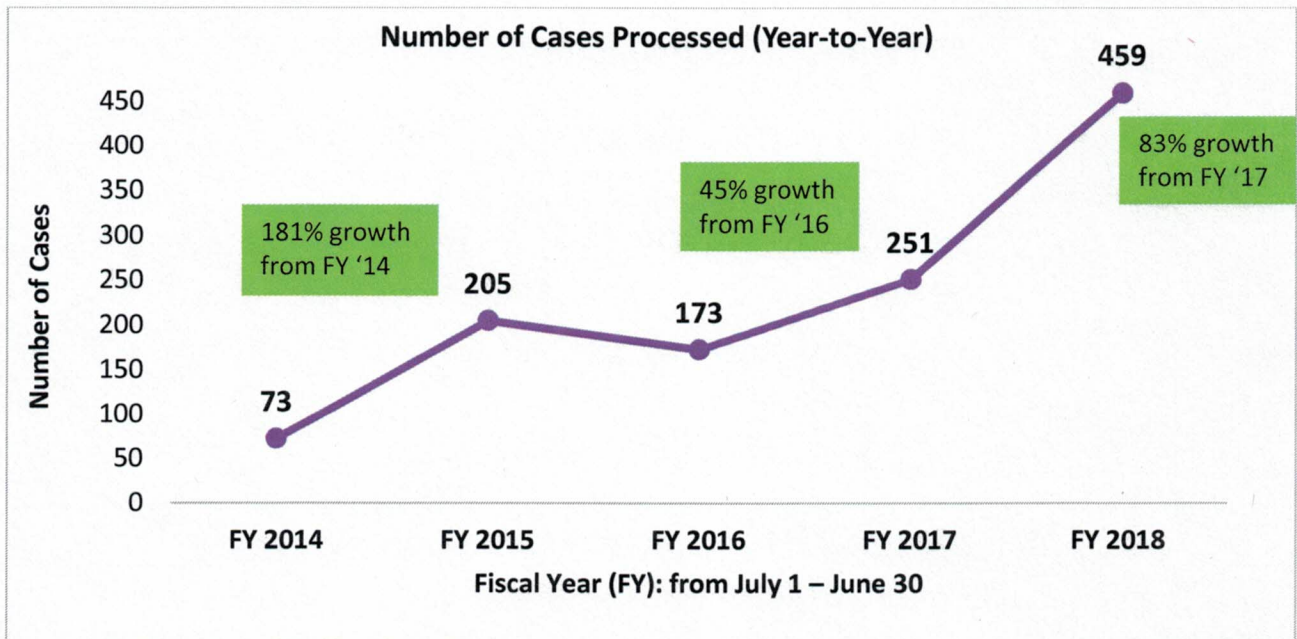
FY 2018 Key Accomplishments

The Office of Ethics and Accountability (OEA) achieved the following key milestones:

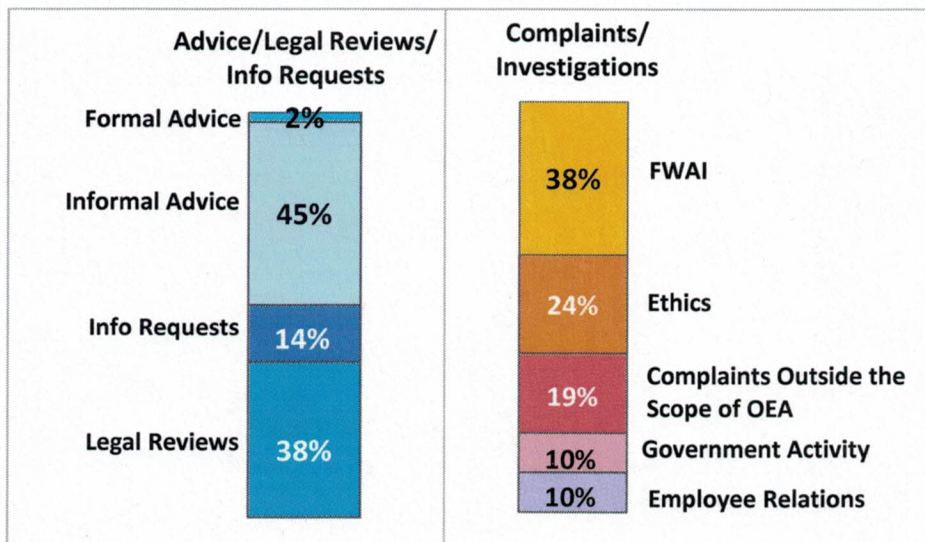
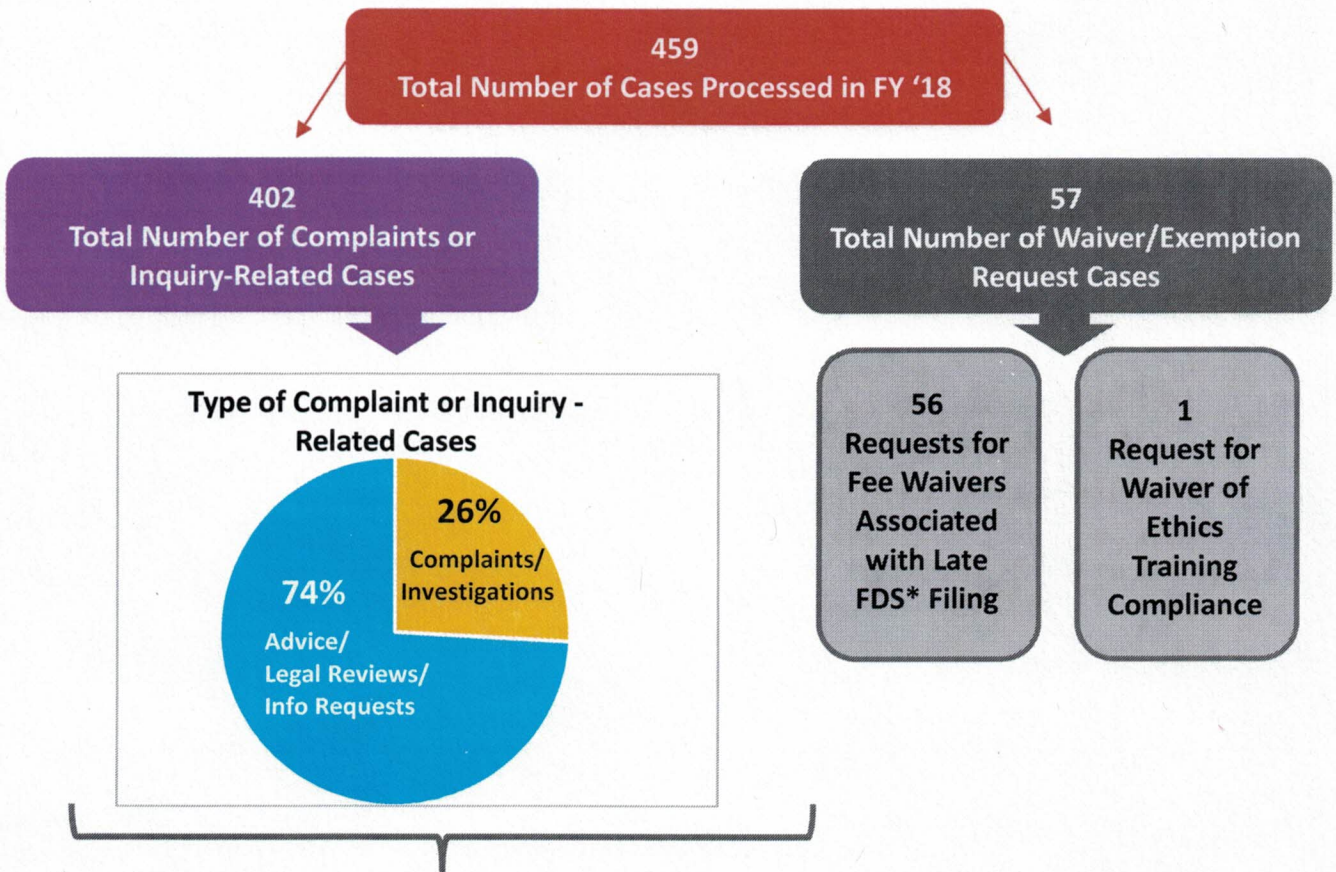
- ✦ Processed over 1,000 Financial Disclosure Statements filings and conducted error audits. In addition, the Office piloted a Schedule-A Audit that involved a thorough review of selected Financial Disclosure Statements to ensure proper disclosure of real property items.
- ✦ Implemented compliance reporting of mandatory ethics training to Executive and Legislative Branch Leadership. (See ***Ethics Training*** section earlier on in this report).
- ✦ Continued to meet one of its principal objectives of global ethics education of officials and employees systematically via increasing the number of individuals trained this fiscal year to 6,158.
- ✦ As a result of investigations, the Office of Ethics and Accountability provided ten (10) recommendations to Executive leadership, prescribing corrective action(s) and/or identifying opportunities to affect process improvement(s) throughout County government and promote efficiency and accountability in County government. The recommendations resulted in (i) institution of procedures to address conflict of interests related to executive leadership, (ii) development of internal controls to minimize the occurrence of errors and fraud, (iii) initiation of agency policy to memorialize and address complaints, (iv) revision of County policy governing use of temporary staffing services, (v) improved monitoring of County vehicles utilization to ensure compliance with current County policy, (vi) development of agency procedure for tracking procurements, (vii) compliance with County policy related to secondary employment, (viii) evaluation of hiring practices, and (ix) provision of ethics training to address concerns involving political activities and use of County resources. (See ***Recommendations*** section later on in this report).
- ✦ Instituted legal audit procedures for review of secondary employment requests to ensure employees' secondary interests do not pose a conflict of interest under the County's Code of Ethics.

The Office of Ethics and Accountability processed over 459 requests for ethics advice, information provision, legal review and investigations, largely via the OEA Web-Portal (See *Exemptions and Waivers, Advisory Opinions, Informal Ethics Advice and Investigations* sections later on in this report for specific case information).

Number of Cases Processed in FY 2018 Increased by 83% from FY 2017

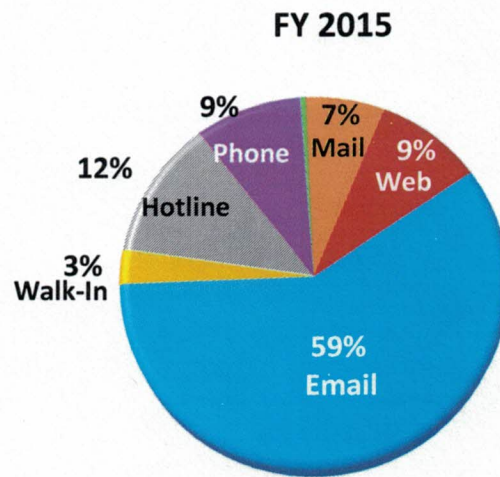
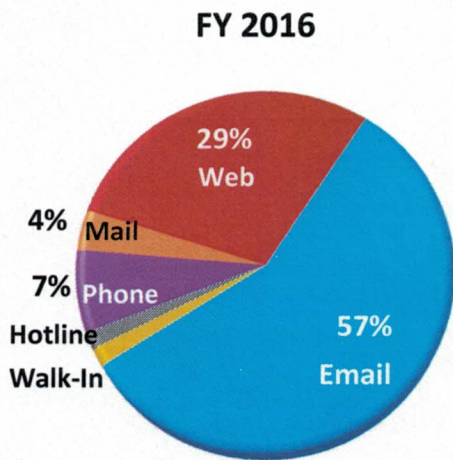
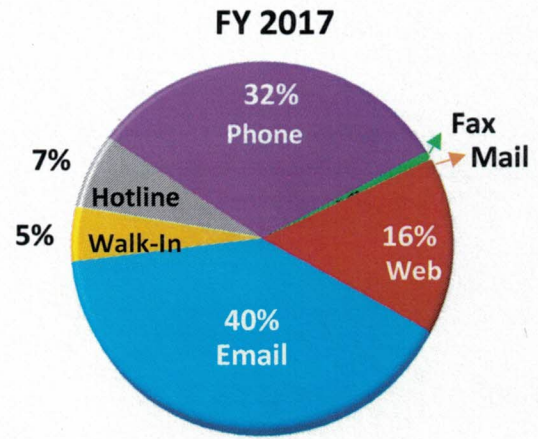
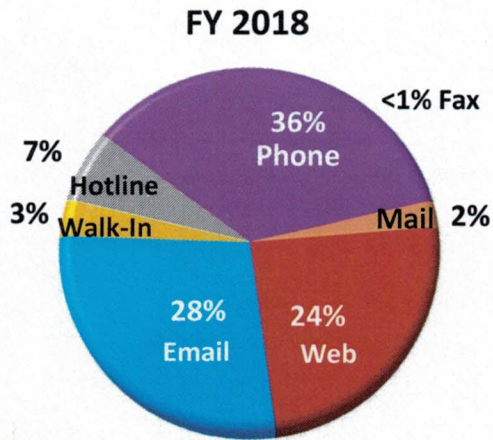


Case Types Reviewed in FY 2018



Source: OEA Case Management File (FY 2018)
*FDS (Financial Disclosure Statement)

Method of Case Receipt (FY 2015 – FY 2018)



Source: OEA Case Management File (FY 2014 – 2018)

Major Objectives for Fiscal Year 2019

The Office of Ethics and Accountability will continue to focus on establishing processes to govern its core services: (1) Investigation of fraud, waste, abuse, illegal acts and ethics violations, (2) evaluation of County operations, (3) collection of Financial Disclosure Statements for employees and officials, (4) collection of registrations and annual reports for lobbyists, and (5) provision of ethics training and advice.

The Office has deemed the following items as priorities for 2019:

- ✚ Developing policies and procedures based on current legal precedents and interpretations of County and State ethics law for the Board of Ethics to assist with referrals to the Board of allegations of Code of Ethics violations.
- ✚ Expansion of global ethics educational campaigns via use of online and face-to-face training, newsletters and email to promote awareness of and compliance with the County's Code of Ethics and Office of Ethics and Accountability Code.
- ✚ Collaborating with the County's Boards and Commissions and Executive and Council Leadership to provide enhanced training opportunities to maximize comprehension of the County's Code of Ethics requirements by appointed officials.
- ✚ Promoting awareness of and compliance with the County's Administrative Procedure on secondary employment, assisting agency's with review of employees' requests for employment outside of County government and referring certain requests that require waivers to the Board of Ethics for review and approval.
- ✚ Enhancing analytical review of cases, compliance evaluations of disclosure statements and reporting of operational reviews in accordance with the Office and Ethics and Accountability Code and the County's Ethics Code.
- ✚ Aligning the County's Code of Ethics with State Law and requesting County legislative amendments accordingly.

Financial Disclosure Statements

After the launching of the County's first Web-Portal for filing Financial Disclosure Statements in 2015, the Board of Ethics has mandated electronic filing absent extenuating circumstances.

A review of the Financial Disclosure Statements filed in April 2018 for the 2017 calendar year showed 1,044 designated County officials, employees, board members and/or commissioners were required to file Financial Disclosure Statements. Notices of this requirement were issued to these individuals through the County's e-mail and U.S. Postal System by the Office of Ethics and Accountability. Additionally, further review later determined that some of the designated filers were not required to file due to a Board of Ethics exemption or other qualifying exemption.

The Office of Ethics and Accountability is in the process of reviewing Financial Disclosure Statements submitted in April 2018. A review of the common errors for 2017 Financial Disclosure Statement submitted were the following: failure to report mortgage balances, percentage of ownership or amount paid for the property. The Office of Ethics and Accountability has notified those outstanding filers through mail, e-mail and certified mail of their requirement to file and applicable late fees. The Board will make a final determination on the imposition of late fees for noncompliance.

(see Financial Disclosure Statements charts on the next page)

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Financial Disclosure Statement (Executive and Legislative Branches)

Count	County Government	Number of Employees	Total Employees Filed	Compliance %
1	Prince George's County Council	75	75	100%
2	Office of the County Executive	45	45	100%
3	Department of Corrections	3	3	100%
4	Department of the Environment	82	82	100%
5	Department of Housing and Community Development	37	37	100%
6	Department of Permitting, Inspections, and Enforcement	245	245	100%
7	Department of Public Works and Transportation	83	83	100%
8	Department of Family Services	7	7	100%
9	Office of Finance	16	16	100%
10	Fire and Emergency Medical Services Department	42	42	100%
11	Health Department	3	3	100%
12	Office of Central Services	37	37	100%
13	Office of Ethics and Accountability	2	2	100%
14	Office of Community Relations	2	2	100%
15	Office of Human Resources and Management	11	11	100%
16	Office of Homeland Security	5	5	100%
17	Office of Information and Technology	2	2	100%
18	Office of Law	41	41	100%
19	Office of Management and Budget	4	4	100%
20	Police Department	14	14	100%
21	Department of Social Services	9	9	100%
22	Board of Ethics Staff	2	2	100%
23	Human Relations Commission Staff	1	1	100%
24	Board of License Commissioners Staff	23	23	100%
25	Prince George's County Candidates for Elected Office	38	38	100%
Total		829	829	100%

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Financial Disclosure Statement (Boards and Commissions)

Count	Board and Commission	Number of Board Members	Total Board Members Filed	Compliance %
1	Accokeek Development Review District Commission	7	7	100%
2	Agriculture Land Preservation Commission	5	5	100%
3	Anacostia Watershed Management Committee	3	3	100%
4	Animal Control Commission	7	6	86%
5	Art and Humanities Council	12	11	92%
6	Art in Public Places Panel	4	4	100%
7	Board of Appeals	4	4	100%
8	Board of Ethics	4	4	100%
9	Board of License Commissioners	5	5	100%
10	Board of Registration for Building Contractor	4	4	100%
11	Board of Registration for Master Electricians and Electrical Contractors	4	3	75%
12	Cable Commission	7	7	100%
13	Commission for Children, Youth and Families	12	12	100%
14	District of Columbia Water and Sewer Authority	4	4	100%
15	Enterprise Road Corridor Development Review District Commission	4	4	100%
16	Fire Commission	9	9	100%
17	Historic Preservation	9	9	100%
18	Housing Authority	7	7	100%
19	Human Relations Commission	11	11	100%
20	Maryland-National Capital Park and Planning	4	4	100%
21	Board of Library Trustees	7	7	100%
22	Mental Health Advisory Board	7	7	100%
23	Nuisance and Abatement Board	3	3	100%
24	Parks and Recreation Advisory Board	11	11	100%
25	Personnel Board	6	6	100%
26	Redevelopment Authority	9	9	100%
27	Revenue Authority Board	14	14	100%
28	Solid Waste Advisory Commission	9	9	100%
29	Spending Affordability	2	2	100%
30	Taxi Cab Board	6	5	83%
31	Telecommunication Transmission Facility Coordinating Committee	5	5	100%
32	Wage Determination Board	3	3	100%
33	Washington Metropolitan Area Transit Authority Board of Directors	2	2	100%
34	Washington Suburban Sanitary Commission	3	3	100%
35	Washington Suburban Transit Commission	2	2	100%
Total		215	211	98%

Financial Disclosure Statement Exemptions and Waivers

During fiscal year 2018, the Board of Ethics received two (2) exemption requests regarding the filing of Financial Disclosure Statements (FDS). The Board granted one request and waived the filing requirement for the specified period of time on the other request. The Board also on its motion exempted another County affiliated entity from the filing requirements. The requests were treated confidentially in closed sessions of the Board of Ethics meetings.

Exemptions and Waivers

Date	Case	Source	Case Type	Issue	Response
9/2017	18-0113	Board/ Commission	Financial Disclosure Statement	Commission for Animal Control Request to exempt its members from filing FDS	Denied - Members are required to complete an annual FDS
2/2018	18-0292	Board/ Commission	Financial Disclosure Statement	DPW&T inquiry as to whether County members of the Central Maryland Transportation and Mobility Commission are required to file a FDS.	Members are exempted from filing a FDS in their capacity as representatives of the County on the Commission
3/2018	18-0319	Board/ Commission	Financial Disclosure Statement	Request by the Park and Recreation Advisory Board to exempt its members from filing a FDS	Members are required to complete an annual FDS, however the BOE waives the requirement for calendar year 2017. Members will be required to file for calendar year 2018

Financial Disclosure Statement Late Fee Waiver Requests

Financial Disclosure Statements are due on April 30 of each calendar year. If an individual fails to submit their completed form to the Office of Ethics and Accountability by the April 30, deadline, they are subject to a late fee at the rate of \$2.00 per day up to a maximum of \$250.00 in accordance with Section 2-292 of the County's Ethics Code. The requests were discussed confidentially in closed sessions of the Board of Ethics meetings. The Board of Ethics has delegated the review of late fees waivers to the Office of Ethics and Accountability and appeals of denials are provided to the Board of Ethics for determination. There were fifty-six (56) requests to waive late fees received related to the filing of the calendar year 2017 Financial Disclosure Statements.

Advisory Opinions

The Board of Ethics received four (4) requests for formal Advisory Opinions or reconsideration in Fiscal Year 2018. One (1) request involved post-employment, one (1) request involved newly created County boards, one (1) involved secondary employment, and one (1) request involved Financial Disclosure Statements.

FY 2018 Advisory Opinions

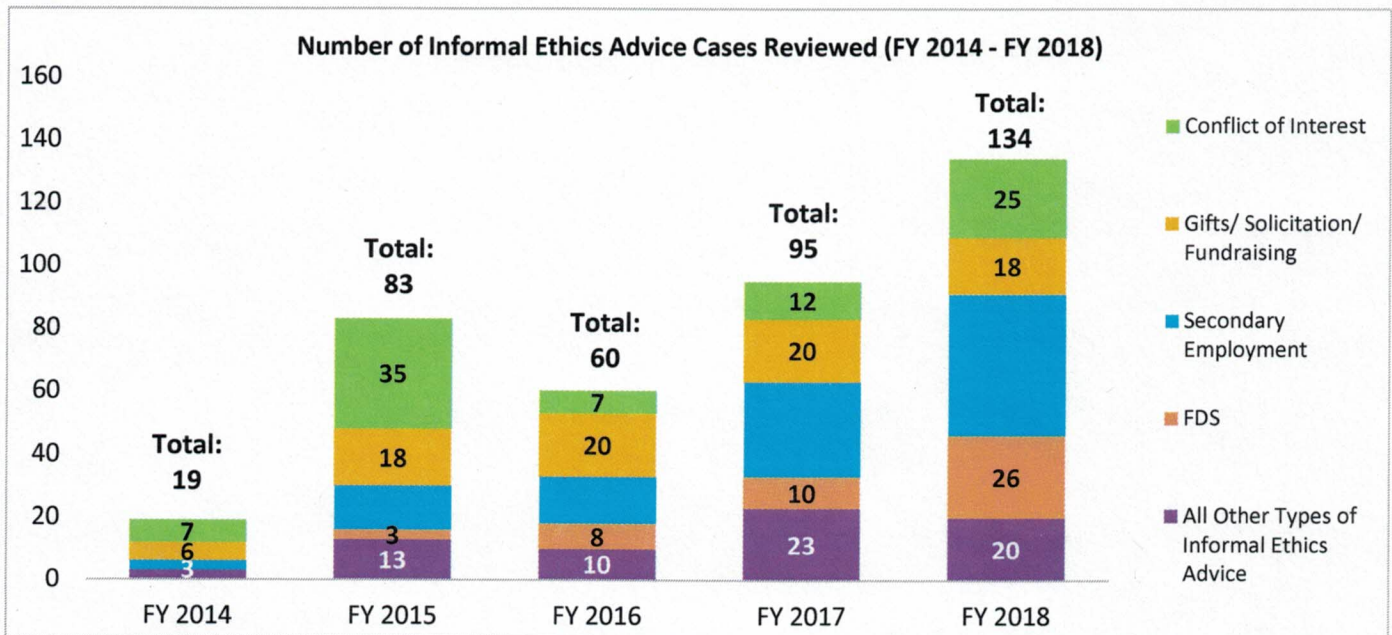
Date	Case	Source	Case Type	Issue	Opinion/Response
8/2017	18-0073	Other	Legal Review	State Ethics request the Board of Ethics review two new County Boards (Prince George's County Pretrial Release, Work Release and Diversion Programs Task Force and Workgroup on Transportation for Middle and High School Students in Prince George's County) for jurisdiction	The new boards are not a County Board or Commission subject to the authority of the Code of Ethics and its members are not required to file a Financial Disclosure Statement
10/2017	18-0171	Former Employee	Post-Employment	Request to reconsider ethics advice rendered by the Office of Law in March 2013	Decision upheld. Former employees who were members of a PAG are permanently barred from being involved in any work that flows from the awarded contract pursuant to Board of Ethics Advisory Opinion 15-0130 and Section 2-293(b)(2)(A).
11/2017	18-0459	Employee	Conflicts of Interest	Request from Executive Leadership to grant an exception to a DPIE official's conflict of interest	Exception will be granted under the conditions set forth in the opinion
1/2018	18-0243	Employee	Secondary Employment	Appeal of Agency's denial of Secondary employment request	Appeal Withdrawn

Ethics Advice by the Office of Ethics and Accountability

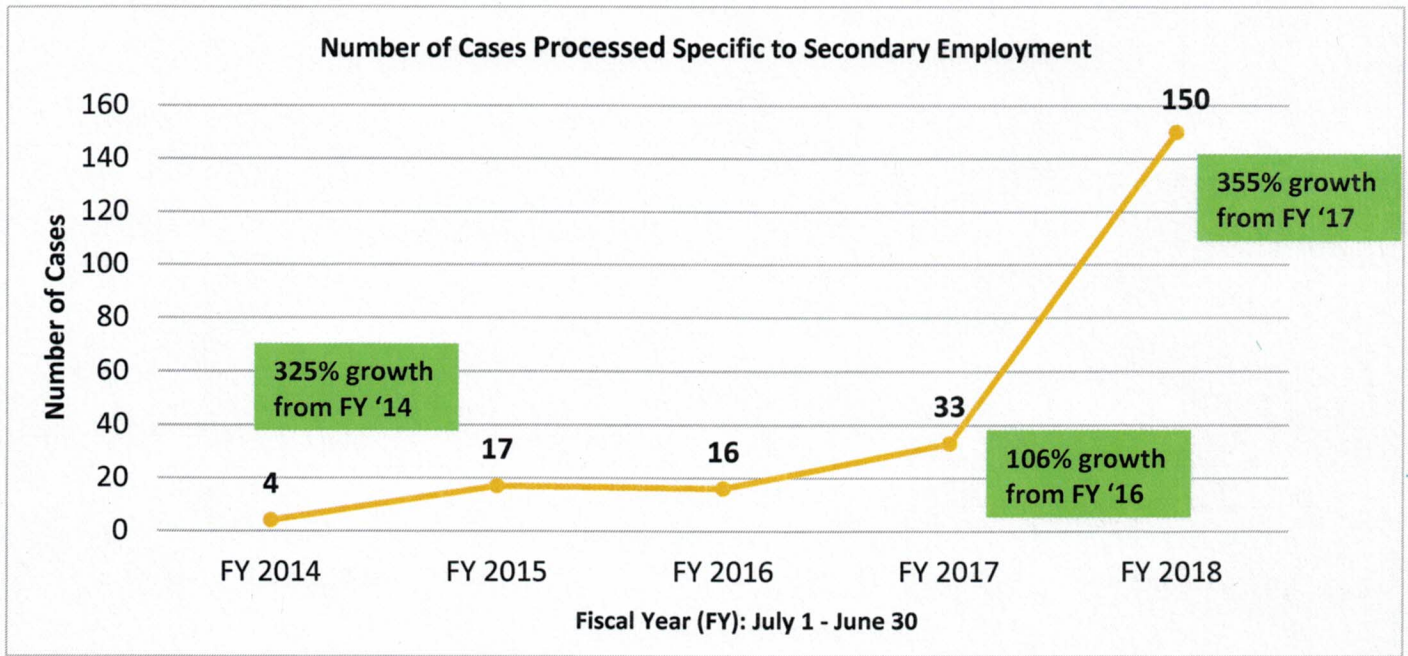
The Office of Ethics and Accountability provides support to the Board of Ethics in accordance with the Code of Ethics and Accountability, Section 2-303. The Office provides written and verbal advice to County officials, employees, agencies and the public who seek advice regarding the application of the County's Code of Ethics. The Office of Ethics and Accountability received a combined total of two hundred and seventy-five (275) requests for Informal Ethics Advice, Legal Reviews or Information Requests in Fiscal Year 2018. One hundred and thirty-three (133) involved requests for information review and/or provision of legal advice, which included MPIA requests and legal reviews; nineteen (19) involved conflicts of interest; twenty-one (21) involved gifts; five (5) involved post-employment inquiries; forty-eight (48) involved secondary employment inquiries; eight (8) involved prestige of office; six (6) involved requirements for mandatory ethics training; one (1) involved misuse of county resources; three (3) involved fundraising/solicitation activities; two (2) involved lobbying; two (2) involved political activity; one (1) involved disclosure of confidential information; two (2) involved employee relations; and twenty-four (24) involved Financial Disclosure Statements. Several of the opinions contained multiple issues.

Informal Ethics Advice Cases Reviewed Increased More Than 40% from FY 2017 to FY18

Source: OEA Case Management File (FY 2018) 2014-2017 OEA Annual Report



Secondary Employment Cases Increased Substantially from FY17 to FY18



Source: OEA Case Management File (FY 2018) 2014-2017 OEA Annual Report

FY 2018 Informal Ethics Advice, Legal Reviews and Information Requests

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
1.	7/2017	18-0021	Employee	Secondary employment	Can an employee in OCS accept an appointment on a Board	Yes. The Board is not doing business with, nor regulated by the County, the employee's agency or any other County Department therefore the employment restrictions of §2-293(b) are not applicable.
2.	7/2017	18-0028	Employee	Conflict of Interest	Can a County vendor sit on a County Board	Request retracted.
3.	7/2017	18-0032	Board/ Commission	Gifts	Can a member of a County Board accept tickets to a dinner from a vendor that has an active contract with the County and the Board	Request retracted.
4.	7/2017	18-0033	Employee	Post-employment	Can an County employee accept post-employment with company that has contract with their agency	Insufficient information provided to provide advice.
5.	7/2017	18-0037	Employee	Gifts	Can the chief of staff of a Councilmember accept an award from an entity that is a recipient of a grant from the Council at large and Council Member	Requestor after contact with OEA, instead sought advice from the Legislative/Zoning Counsel – OEA offered general written advice to Zoning Counsel.

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
6.	7/2017	18-0040	Employee	Conflict of Interest	Can OMB appoint employees of the County library, community college and school system to the Spending Affordability Committee	Yes, the proposed appointees would not be prohibited or restricted from serving on the committee by the Code of Ethics.
7.	7/2017	18-0067	Employee	Legal review	DPW&T employee's request to approve secondary employment request to work as a travel agent	Agency approved. OEA reviewed and no conflicts of interests present.
8.	8/2017	18-0041	Employee	Secondary employment	Can an OCS employee accept an appointment to a trade magazine's advisory board	Yes. The Board is neither doing business with or regulated by the County, the employee's agency or any other County Department therefore the employment restrictions of §2-293(b) are not applicable.
9.	8/2017	18-0044	Employee	Secondary employment	Is an employee who is the president of the Lions Clubs, required to disclose this as Secondary Employment	Yes. Volunteer services is considered secondary employment if the employee has a fiduciary duty to the organization.
10.	8/2017	18-0045	Employee	Secondary employment	Does the requirement to disclose secondary employment apply to a 700-hour employee?	Yes. Employees must file.
11.	8/2017	18-0049	Employee	Secondary employment	Is it a conflict of interest for Finance employees to engage in secondary employment with a County vendor who has a contract with the agency	Agency denied secondary employment request. OEA reviewed and concurred there is a conflict of interest present.
12.	8/2017	18-0051	Employee	Secondary employment	Employee of the State's Attorney's Office wants to report outside employment	Employees of the SAO are not covered by the County Ethics Code. Employee referred to the State Ethics Commission.
13.	8/2017	18-0052	Employee	Secondary employment	Employee of the State's Attorney's Office asks whether their position on a nonprofit board is prohibited	Employees of the SAO are not covered by the County Ethics Code. Employee referred to the State Ethics Commission.
14.	8/2017	18-0054	Employee	Secondary employment	Is a role on a high school alumni committee considered secondary employment	No. Generally such volunteer participation is not considered secondary employment.
15.	8/2017	18-0055	Employee	Gift	Can employees of PGCPD accept a check received as payment for their appearance in federal court	The check does not meet the definition of a gift under the Ethics Code and acceptance of the check would not be a violation. Still, actions of employees is subject to department's general orders on receipt of compensation by private parties.
16.	8/2017	18-0057	Employee	Secondary employment	Does the County's secondary employee policy apply to all employees and can employees have outside employment with a County vendor	All employees not expressly exempted by the Ethics Code are subject to the secondary employment policy. Each employee must individually have their secondary employment reviewed for conflicts of interest.
17.	8/2017	18-0058	Lobbyist	Gifts	Can a registered lobbyist make campaign donations to a candidate who is also a sitting council member in light of the prohibitions regarding donations	Campaign contributions are outside the scope of the OEA. Referred to State Board of Elections.

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
					by lobbyists in zoning matters	
18.	8/2017	18-0059	Employee	Secondary employment	Employee of the Health Department seeks advice on secondary employment as faculty at local university	Employees of the Health Department are not covered by the County Ethics Code. Employee referred to the State Ethics Commission.
19.	8/2017	18-0060	Employee	Secondary employment	Employee of the Health Department seeks advice on secondary employment as private counselor	Employees of the Health Department are not covered by the County Ethics Code. Employee referred to the State Ethics Commission.
20.	8/2017	18-0061	Employee	Secondary employment	Employee with the State's Attorney's Office asks whether their position on a professional board is prohibited	Employees of the SAO are not covered by the County Ethics Code. Employee referred to the State Ethics Commission.
21.	8/2017	18-0063	Employee	Information request	Assistance on filing a secondary employment request form.	Employees of the Health Department are not covered by the County Ethics Code. Employee referred to the State Ethics Commission.
22.	8/2017	18-0095	Employee	Ethics Training	Request by Sheriff's Office for ethics training slides and whether an employee has completed the training	Employee of the Sheriff Office are not subject to the County's Ethics Code pursuant to §2-292(a)(4.2).
23.	8/2017	18-0092	Employee	Secondary employment	Employee of the Health Department seeks advice on secondary employment as private counselor	Employees of the Health Department are not covered by the County Ethics Code. Employee referred to the State Ethics Commission.
24.	8/2017	18-0042	Employee	Information Request	Auditors requests for any outstanding investigations regarding the BOLC	OEA's investigations are confidential unless and until the Board of Ethics finds a violation.
25.	8/2017	18-0108	Employee	Legal Review	DPW&T employee seeking to engage in secondary employment at a day spa	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval. Request was rejected.
26.	8/2017	18-0047	Employee	Legal review	Fire/EMS Department employee Secondary employment filing to work performing residential surveys	Agency approved. OEA reviewed and no conflicts of interests present.
27.	8/2017	18-0048	Employee	Legal review	Fire/EMS Department employee Secondary employment filing	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval. Request was rejected.
28.	8/2017	18-0050	Employee	Legal Review	DPW&T employee secondary employment filing to work as a traffic controller	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval. Request was rejected.
29.	8/2017	18-0066	Employee	Legal review	OHRM employee Secondary employment filing to work at graphic design company	Agency approved. OEA reviewed and no conflicts of interests present.
30.	8/2017	18-0053	Employee	Legal review	DOE employee filed a secondary employment request to work at a charitable foundation to assist students at State University	Agency approved. OEA reviewed and no conflicts of interests present.
31.	8/2017	18-0056	Citizen	Information Request	EDC request for a copy of the County's conflict of interest	Information provided.

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
					provisions	
32.	8/2017	18-0068	Employee	Legal review	DOE employee Secondary employment filing to work at a car wash	Agency approved. OEA reviewed and no conflicts of interests present.
33.	8/2017	18-0069	Employee	Legal review	PGCPD employee Secondary employment filing	Agency approved. PGCPD reviews its' employee's secondary employment request. Request logged but no action taken by OEA.
34.	8/2017	18-0070	Employee	Legal Review	DOC employee's request to engage in secondary employment as adjunct professor	Agency approved. OEA reviewed and no conflicts of interests present.
35.	8/2017	18-0064	Employee	Legal Review	DOC employee's request to engage in secondary employment as a supervisor at a residential facility	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval. Request was rejected.
36.	8/2017	18-0065	Employee	Legal Review	DPIE employee's request to engage in secondary employment as a bookkeeper	Agency approved. OEA reviewed and no conflicts of interests present.
37.	8/2017	18-0076	Employee	Legal Review	DPIE employee's request to engage in secondary employment as attorney in private practice	Agency approved. OEA reviewed and no conflicts of interests present.
38.	8/2017	18-0077	Official	Legal Review	OEA employee's request to engage in secondary employment providing counseling services	CAO approved. OEA reviewed and no conflicts of interests present.
39.	8/2017	18-0078	Official	Legal Review	OEA employee's request to engage in secondary employment by serving on a State Board	CAO approved. OEA reviewed and no conflicts of interests present.
40.	8/2017	18-0079	Citizen	Information Request	Citizen inquiring about access to complaint form	Information Provided
41.	8/2017	18-0075	Employee	Legal Review	DOC Employee Secondary employment filing request to work as a family counselor	Agency approved. OEA reviewed and no conflicts of interests present.
42.	8/2017	18-0098	Employee	Legal review	Review of DoE's Policy Program and Project Information confidentiality & Security - Follow-up to Case #17-0103	Reviewed. OEA provided no additional feedback
43.	9/2017	18-0089	Employee	Legal Review	OEA Employee Secondary employment filing reporting employment at a retail store	Agency approved. OEA reviewed and no conflicts of interests present.
44.	9/2017	18-0090	Employee	Legal Review	OEA Employee Secondary employment filing reporting employment with Uber	Agency approved. OEA reviewed and no conflicts of interests present.
45.	9/2017	18-0091	Employee	Legal Review	OEA Employee Secondary employment filing reporting employment with Lyft	Agency approved. OEA reviewed and no conflicts of interests present.
46.	9/2017	18-0096	Employee	Ethics Training	Are new employees required to complete Ethics Training and FDS	Yes. Employees must file FDS within 30 and complete ethics training within 60 days.
47.	9/2017	18-0100	Employee	Secondary employment	Employee of Health Department seeking secondary employment	Employees of the Health Department are not subject to the County's Code

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
					with community-based organization	of Ethics. Employee referred to the State Ethics Commission
48.	9/2017	18-0102	Employee	Legal Review	Council Employee seeking to engage in secondary employment selling life insurance, mutual funds, and other financial products	Legislative Branch approved. OEA reviewed and no conflicts of interests present.
49.	9/2017	18-0103	Employee	Legal Review	Council Employee seeking to engage in secondary employment as the owner of an accounting firm	Legislative Branch approved. OEA reviewed and no conflicts of interests present.
50.	9/2017	18-0104	Employee	Secondary employment	Employee of Health Department seeking to engage in secondary employment with a substance abuse treatment center	Employees of the Health Department are not subject to the County's Code of Ethics. Employee referred to the State Ethics Commission.
51.	9/2017	18-0105	Employee	Conflict of Interest	PGCPD wants to purchase alcohol to use in the training at police academy	Code of Ethics does not prohibit the purchase of alcohol for the purposes described, however other County laws or policy may. The solicitation of donations must be done in accordance with Administrative Procedure 153.
52.	9/2017	18-0106	Employee	Legal review	DPW&T employee seeking to engage in secondary employment doing voiceover work	Agency approved. OEA reviewed and no conflicts of interests present.
53.	9/2017	18-0107	Citizen	FDS	Are candidates for office required to file a FDS	Yes. Candidates for elected office are required to file FDS pursuant to §2-294.
54.	9/2017	18-0109	Citizen	Gifts	Do the restrictions on contributions to council members apply to candidates for office	Referred to State Ethics Commission outside scope of OEA.
55.	9/2017	18-0110	Employee	Gifts	Can an employee accept a gift from M-NCPPC	Yes. The gift was nominal in value and unsolicited and meets the exceptions of §2-293.
56.	9/2017	18-0111	Employee	Secondary Employment	Are PGCPD employees who have secondary employment requests for non-uniformed outside employment required to submit requests	Yes, they need to submit their requests to the PGCPD for review and approval.
57.	9/2017	18-0112	Employee	Ethics Training	Is the Board of Elections subject to the County's Code of Ethics	No, it is a State Board and is therefore exempt from the requirements of the County's Code of Ethics and instead members are subject to State Ethics Laws.
58.	9/2017	18-0114	Employee	Conflict of Interest	Can a County employee sell their products in the County's various museum shops	The Ethics Codes does not prohibit this activity which is deemed secondary employment. The company is not doing business with, nor regulated by the County, the employee's agency therefore the restrictions of §2-293(b) are not applicable.

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
59.	9/2017	18-0115	Employee	Secondary Employment	Is there any conflict with a Board of Election employee engaging in private law practice	Referred to State Ethics Commission outside scope of OEA.
60.	9/2017	18-0118	Employee	Information request	Request for copy of County's Administrative Procedure 152	Information provided.
61.	9/2017	18-0119	Employee	Secondary Employment	Do employees of judiciary have to file secondary employment request	Referred to State Ethics Commission outside scope of OEA.
62.	9/2017	18-0120	Employee	Secondary employment	Do the guidelines for secondary employment cover apprenticeships and volunteer positions	Yes. Employee must follow AP-152
63.	9/2017	18-0121	Employee	Information request	Request for secondary employment request forms	Link provided to access forms
64.	9/2017	18-0122	Employee	Secondary Employment	Is an employee working as an adjunct professor subject to the secondary employment procedures	Yes. Employee must follow AP-152
65.	9/2017	18-0123	Employee	Legal Review	Fire/EMS Employee Secondary employment filing request to work in private industry performing home surveys	Agency approved. OEA reviewed and no conflicts of interests present.
66.	9/2017	18-0124	Board/ Commission	Secondary employment	Does policy apply to all employees	Yes, all employees except those expressly exempted are subject to Administrative Procedure 152
67.	9/2017	18-0125	Employee	Secondary employment	Employee of Health Department seeking secondary employment to provide DWI counseling	Employees of the Health Department are not subject to the County's Code of Ethics. Employee referred to the State Ethics Commission
68.	9/2017	18-0126	Employee	Secondary employment	Employee of Health Department seeking to provide DWI counseling at treatment center	Employees of the Health Department are not subject to the County's Code of Ethics. Employee referred to the State Ethics Commission
69.	9/2017	18-0128	Employee	Secondary employment	Employee of Health Department seeking to provide counseling services	Employees of the Health Department are not subject to the County's Code of Ethics. Employee referred to the State Ethics Commission
70.	9/2017	18-0129	Employee	Secondary employment	Employee of Health Department seeking to provide mental health counseling services	Employees of the Health Department are not subject to the County's Code of Ethics. Employee referred to the State Ethics Commission
71.	9/2017	18-0130	Employee	Legal Review	Office of Finance employee's request to engage in secondary employment as a real estate agent	Agency approved with limitation that employee recuse themselves from any matters involving the County. OEA reviewed and no conflicts of interests present.
72.	9/2017	18-0131	Employee	Secondary employment	Is secondary employment with Uber required to be reported	Yes, all employees except those expressly exempted are subject to Administrative Procedure 152.
73.	9/2017	18-0132	Employee	Secondary employment	Finance employee's request to engage in secondary employment with an employer who has a contract with their Agency	Agency denied. OEA reviewed and concur there is a conflict of interests present.

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
74.	9/2017	18/0133	Citizen	Information request	Request for Administrative Procedure 152	Information provided
75.	9/2017	18-0134	Citizen	Information request	Request for Administrative Procedure 152	Information provided
76.	9/2017	18-0135	Citizen	Information Request	Request to complete questionnaire for the Council on Governmental Ethics Laws (Cogel)	Information provided
77.	9/2017	18-0136	Employee	Information Request	Request for information regarding Administrative Procedure 153	Information provided
78.	9/2017	18-0137	Employee	Secondary employment	Employee of Health Department seeking to work as front desk manager at recreation center	Employees of the Health Department are not subject to the County's Code of Ethics. Employee referred to the State Ethics Commission.
79.	9/2017	18-0138	Employee	Gifts	Can an employee accept a gift of a pot holder	Yes. The gift was nominal in value and unsolicited and meets the exceptions of §2-293.
80.	9/2017	18-0139	Employee	Information request	Request for Code of Ethics and whether a separate code of conduct exists for Common Ownership Communities Commission	Information provided
81.	9/2017	18-0140	Employee	Secondary employment	Is an employee whose secondary employment was approved prior to AP-152 required to submit a new request	Yes, employee must comply with AP-152 and obtain written approval.
82.	10/2017	18-0144	Employee	Use of County Resources	Complaint about the County's administration of the Chesapeake Bay Trust awards	Outside of the jurisdiction of the OEA.
83.	10/2017	18-0154	Employee	FDS	What is the process for FDS filing when employee separates from the County	OHRM provides a report each month and OEA notifies the employee to file; if they do not, a letter is placed in their personnel record.
84.	10/2017	18-0155	Employee	FDS	Employee's request to be exempted from FDS filing requirement	Employee is required to file under provisions of 2-294 and employee has been designated to file by their agency.
85.	10/2017	18-0158	Official	Prestige of Office	Can a supervising employee solicit sick leave donations from subordinate employees	Ethics code does not prohibit an employee from receiving a benefit otherwise available and approved by OHRM. However, the method of solicitation must be done so as not to place undue pressure on potential donors in violation of Section 2-293(c) Prestige of Office.
86.	10/2017	18-0159	Employee	Conflict of interest	OCS employee wants to start a business and receive or solicit donations from Art in Public Places and EDC	Request for advice withdrawn
87.	10/2017	18-0161	Official	Conflict of Interest	Is it a conflict for County employees to engage in secondary employment with a vendor that has a contract with	Pursuant to section 2-293(a) the secondary employment is a conflict of interest and also creates an appearance of a conflict of interest. The

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
					the County to do work for the employee's agency	employment also violates the abuse of prestige of office provisions of the code, section 2-293(c).
88.	10/2017	18-0163	Employee	Prestige of Office	Is an employee who is also notary public, prohibited from offering notary services on county property during work hours	Section 2-293(a)(1) prohibits a County employee from participating in any matter in which they have a financial interest.
89.	10/2017	18-0165	Employee	Ethics Training	When are employees required to take ethics training	Next compliance period to complete mandatory ethics training will take place between 1/1/2018 through 6/30/2018.
90.	10/2017	18-0166	Employee	Prestige of Office	If a county employee providing notary services to other County employees, does it fall under "The performance of usual and customary constituent service" exception in the County's Ethics Code	An employee offering services that are not a part of their official job duties as detailed in the employee's 544 form, are not considered usual and customary constituent services under an analysis of misuse of prestige of office 2-293(a)(1).
91.	10/2017	18-0167	Official	Prestige of Office	Can a member of a County Task Force who is also a County official, post a press release created by a non-county entity to official's campaign website	Questions regarding political activity should be answered by the Office of Law; however, if there is reference made to County position in any way it may implicate the Ethics Code.
92.	10/2017	18-0170	Employee	Secondary employee	Judiciary employee wants to accept employment as a loan settlement agent	Employees of judiciary are not subject to County's Ethics Code. Referred to state ethics commission.
93.	10/2017	18-0178	Employee	Gifts	Can employee of Fire Department accept an unsolicited gift	No. Employee cannot receive additional compensation for doing their job.
94.	10/2017	18-0145	Employee	Legal review	CEX Employee Secondary employment filing request to work as elected official in municipality	Approved by Chief of Staff. OEA reviewed and no conflicts of interests present.
95.	10/2017	18-0147	Employee	Legal review	PGCPD employee Secondary employment filing	PGCPD reviews its' employee's secondary employment request. Request logged but no action taken by OEA.
96.	10/2017	18-0148	Employee	Legal review	PGCPD employee Secondary employment filing	PGCPD reviews its' employee's secondary employment request. Request logged but no action taken by OEA.
97.	10/2017	18-0146	Citizen	Information request	Questionnaire from M-NCPPC analyst regarding Financial Disclosure Statements	Information Provided.
98.	10/2017	18-0149	Employee	Legal Review	Office of Finance employee working as real estate agent	Agency approved. OEA reviewed and no conflicts of interests present.
99.	10/2017	18-0151	Employee	Legal Review	OMB employee serving as president of a nationally chartered private organization	Agency approved. OEA reviewed and no conflicts of interests present.
100.	10/2017	18-0157	Employee	Legal Review	Office of Finance employee working as real estate agent	Agency approved with limitation that employee recuse themselves from any matters involving the County. OEA reviewed and no conflicts of interests

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
						present.
101.	10/2017	18-0156	Employee	Legal Review	Office of Finance employee request to work to provide financial reporting solutions	Agency approved. OEA reviewed and no conflicts of interests present.
102.	10/2017	18-0160	Employee	Legal Review	Office of Finance employee request to work as a private limousine driver	Agency approved. OEA reviewed and no conflicts of interests present.
103.	10/2017	18-0164	Employee	Legal Review	DHCD employee serving as President/Treasurer of HOA	Agency approved. OEA reviewed and no conflicts of interests present.
104.	10/2017	18-0173	Employee	Legal Review	Legislative employee request to provide legal services in real estate transactions	Agency approved. OEA reviewed and no conflicts of interests present.
105.	10/2017	18-0172	Employee	Legal Review	Office of Finance employee request to work for weight watchers	Agency approved. OEA reviewed and no conflicts of interests present.
106.	10/2017	18-0177	Official	Legal Review	OHRM official request to engage in secondary employment as adjunct professor	CAO approved. OEA reviewed and no conflicts of interests present.
107.	11/2017	18-0179	Employee	Political Activity	Can an employee participate in a Political Action Committee (PAC)	Outside of the jurisdiction of the OEA. Referred to the Office of Law
108.	11/2017	18-0182	Board/Commission	FDS	What is the manner used to store filed FDS	FDS are typically stored electronically, however exceptions can be granted if the circumstances warrant it.
109.	11/2017	18-0183	Employee	FDS	Which position grades are required to file a FDS	Designated filers are determined based on the expressed designation in the Code of Ethics, functionality of their position or by Executive Order 13-2014.
110.	11/2017	18-0186	Citizen	Secondary employment	Can PGCPs employee engage in secondary employment on the weekends.	PGCPs employees are not covered by County Code of Ethics. Referred to PGC Board of Education, Ethics Panel.
111.	11/2017	18-0191	Employee	Secondary employment	Can a 1000 employee engage in secondary employment	1000-hour employees are not covered by County Code of Ethics.
112.	11/2017	18-0193	Citizen	Lobbying	Are lobbyists required to wear badges; does the County require training for lobbyists	Lobbyists are not required to wear badges. Nor are they required to undergo training.
113.	11/2017	18-0180	Employee	Legal Review	DOC Employee Secondary employment	Rejected, request did not provide sufficient information for review.
114.	11/2017	18-0184	Employee	Legal Review	DPIE employee filed a secondary employee request to work as a musician in private concerts	Agency approved. OEA reviewed and no conflicts of interests present.
115.	11/2017	18-0185	Citizen	Information request	Request for a copy of the County's mandatory ethics training	Information provided
116.	11/2017	18-0187	Employee	Legal Review	DPIE employee filed a secondary employee request to work as an Uber drive	Agency approved. OEA reviewed and no conflicts of interests present.

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
117.	11/2017	18-0188	Official	Legal Review	OCR official request to engage in secondary employment as a private attorney in another state	Chief of Staff approved. OEA reviewed and no conflicts of interests present.
118.	11/2017	18-0189	Official	Legal Review	OCR official request to engage in secondary employment as an Uber drive	Chief of Staff approved. OEA reviewed and no conflicts of interests present.
119.	11/2017	18-0190	Employee	Legal review	DOE employee Secondary employment request to engage in secondary employment as mental health counselor	Agency approved. OEA reviewed and no conflicts of interests present.
120.	12/2017	18-0195	Employee	Solicitation	Can the DPW&T solicit donations from local businesses and residents to support a National Bike to Work Day event	Administrative Procedure (AP) 153 was provided and advised all activities must comply with the AP.
121.	12/2017	18-0196	Employee	Legal Review	Feedback on Legislative Bill PG 508-18 (create OIG for PGCPs)	Written comment submitted on behalf of OEA.
122.	12/2017	18-0197	Employee	Legal Review	Feedback on Legislative Bill PGMC 101-18 (create OIG for WSSC)	Written comment submitted on behalf of OEA.
123.	12/2017	18-0198	Employee	Legal Review	Feedback on Legislative Bill PGMC 111-18 (WSSC to develop website for reporting funding activity)	Written comment submitted on behalf of OEA.
124.	12/2017	18-0199	Employee	Conflict of Interest	Is it a conflict of interest for a County vendor to participate in County's COOP efforts as an IT coordinator for FSC, if the vendor may submit a bid on the project	Issue is moot. The County has already selected a vendor for the project using sole source procurement.
125.	12/2017	18-0202	Employee	Legal Review	OHRM employee filed a secondary employee request to sell books through their business	Agency approved. OEA reviewed and no conflicts of interests present.
126.	12/2017	18-0203	Employee	FDS	Which exempt employees in the CEX office are required to file FDS	Executive Order No. 13-2014, states employees identified within the CEX Office in a professional or paraprofessional classification, regardless of whether the position is detailed or a temporary assignment, and regardless of their exempt status are designated filers.
127.	12/2017	18-0204	Official	Gifts	Can a County agency give gift baskets to its board members	Public Board members may accept an unsolicited gift from a non-controlled donor. Any gifts in excess of \$20.00 must be reported on FDS. Ex officio members cannot accept the gift pursuant to the provisions of Section 2-293(d)(3)(A) and 2-293(d)(3)(C).
128.	12/2017	18-0210	Employee	Secondary employment	Can an official of the Housing Authority accept employment as an official with a local housing authority	No. Section 2-293(b) prohibits such employment as the proposed employment would constitute a conflict of interest as well as give the appearance of a conflict of interest, due to the relationship between the proposed employer and the County.

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
129.	12/2017	18-0211	Official	Secondary employment	What are the next steps pursuant to Administrative Procedure 152 if an agency head denies a secondary employment request? Can the employees be given a time frame to resign from the secondary employment?	An employee who received an adverse decision from their agency head or OEA, may appeal to the Board of Ethics. The Board of Ethics will determine if an exception to the identified conflicts will be granted. 30 days to resign is acceptable.
130.	12/2017	18-0212	Citizen	MPIA Request	Request for documentation on case #15-0139	Referred to OOL. Documentation provided to the OOL.
131.	12/2017	18-0214	Official	Gifts	Can employees accept a gift basket from investors in a company with which the County has a contract	No. employees are prohibited from accepting gifts from vendors who are doing business with their agency.
132.	1/2018	18-0217	Employee	FDS	How to disclose real property acquired during the calendar year on a FDS	Employee should provide information regarding acquisition costs and relevant information on ownership and date of acquisition in accordance with Section 2-294(e)(1) of the Ethics Code.
133.	1/2018	18-0218	Employee	FDS	What are the requirements to file FDS based on separation from County in previous calendar year	Upon verification of separation date from OHRM, the former employee will only have to file if separation occurred in 2017.
134.	1/2018	18-0219	Lobbyist	Lobbying	Does a Lobbyist with a County contract have to register as a lobbyist	Request for advice rescinded.
135.	1/2018	18-0221	Citizen	Gifts	Local business wants to invite County officials to an office opening where food will be provided and ceremonial gifts will be given to attendees	Meals and beverages consumed in the presence of the donor is an exception to the prohibition regarding the acceptance of gifts by County officials and employees.
136.	1/2018*	18-0222	Employee	Legal Review	OHS employee's request to engage in secondary employment at a retail store	Agency approved. OEA reviewed and no conflicts of interests present.
137.	1/2018	18-0223	Lobbyist	Gifts	Can a lobbyist donate to an elected County official's campaign for state office	Campaign contributions are covered by the Maryland Campaign Finance Laws. Contributions are exempt from coverage under the County's Code of Ethics. The matter is outside the jurisdiction of OEA and requestor was referred to State Board of Elections.
138.	1/2018	18-0224	Official	Secondary employment	DSS employee's request for secondary employment as a board member	Employees of the DSS are not subject to County's Code of Ethics. Referred to State Ethics Commission.
139.	1/2018	18-0225	Employee	FDS	What financial disclosure statement must a separating employee file	A separating employee must file FDS for previous calendar year if not already filed and another FDS for the current year through the separation date from County employment.
140.	1/2018	18-0229	Employee	Legal Review	Feedback on Legislative Bill on HB-174 (establish County-based system of public campaign)	Written comment submitted on behalf of OEA.
141.	1/2018	18-0230	Employee	Legal Review	Feedback on Legislative Bill SB-0246 (Maryland Hatch Act)	Written comment submitted on behalf of OEA.

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
142.	1/2018	18-0232	Board/ Commission	Conflict of Interest	County Board requesting the OEA review changes to the Board's grant application process for conformity with the County's Code of Ethics conflict of interest provisions	The changes are consistent with Sections 2-293(a)(1) and 2-293(a)(2), which prohibit an official from participating in matters in which they have a direct financial interest or in which he is an officer, director, trustee, partner or employee is a party.
143.	1/2018	18-0233	Employee	Gifts	Can a DPIE employee accept an invitation to a dinner being hosted by a former employer	Yes. The employee would be accepting the invitation in their private capacity and there are no other facts to implicate a violation of the Code of Ethics.
144.	1/2018	18-0435	Employee	Legal Review	County Council employee's request to engage in secondary employment as a program manager at a community center	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval. Request was rejected.
145.	2/2018	18-0241	Employee	Information request	Are new employees that attended an ethics class prior to the new compliance period still required to take online training	Yes. All employee except those expressly exempted or otherwise met the requirement, are required to take the mandatory ethics training.
146.	2/2018	18-0242	Employee	Information request	Request from Office of Law of all employees who completed the ethics training	Requested information provided.
147.	2/2018	18-0244	Employee	FDS	Employee inquiring why they are designated to file a Financial Disclosure Statement	Employee is required to file under provisions of 2-294 and employee has been designated to file by their agency.
148.	2/2018	18-0245	Official	Gifts	Can an official of DPW&T accept an unsolicited gift from the Chinese Delegation	Yes. The gift was unsolicited, of nominal value and the person giving the gift is not doing or seeking to do business with the count. Acceptance is permitted under Section 2-293 of the Code of Ethics.
149.	2/2018	18-0246	Employee	Legal Review	Legislative Comment on HB 695 (Open Meetings Act)	Written comment submitted on behalf of OEA.
150.	2/2018	18-0247	Employee	Legal Review	Legislative Comment on HB 677 (Public Information Act)	Written comment submitted on behalf of OEA.
151.	2/2018	18-0248	Employee	Legal Review	Legislative Comment SB 474 (Meeting and Reporting Requirements)	Written comment submitted on behalf of OEA.
152.	2/2018	18-0249	Employee	Ethics Training	A County employee with OHRM contacted OEA to inquire whether OHRM staff is exempted from mandatory training for 2018 since most of OHRM staff were in attendance at the Ethics training conducted on October 20th, 2017	OHRM's training on October 20, 2017 will satisfy the requirement for the 2018 compliance period.
153.	2/2018	18-0251	Employee	Legal review	Legislative Comment on SB 0788 (Public Information Act – Revisions)	Written comment submitted on behalf of OEA.
154.	2/2018	18-0252	Employee	Legal Review	Office of Finance employee request to engage in secondary employment at a retail store	Request was incomplete and form rejected.

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
155.	2/2018	18-0253	Official	Conflict of Interest	Review of Chapter 819, HB 1573 (2017) as it applies to County employees and officials	County employees in the Departments and Divisions that participate in the tax sale process who have access to confidential information should be prohibited from engaging in the bidding process as there is no apparent way to mitigate any appearance of impropriety or unfair practices if allowed.
156.	2/2018	18-0258	Employee	Legal Review	Legislative Comment SB 1035 (Declaration of Rights - Right to Information)	Written comment submitted on behalf of OEA.
157.	2/2018	18-0260	Lobbyist	Information Request	Are lobbyists required to wear and/or obtain an identification badge when conducting lobbying activity Additionally, are lobbyists required to complete ethics training	Lobbyists are not required to wear identification nor complete ethics training.
158.	2/2018	18-0261	Citizen	Information Request	Request for a copy of a lobbyist's annual report	Information provided.
159.	2/2018	18-0262	Citizen	Information Request	Financial Disclosure Review Request	Request reviewed but documents were not provided because of lack of response regarding required fee and request form.
160.	2/2018	18-0263	Employee	Legal Review	OOL employee request to engage in secondary employment at a retail store	Agency approved. OEA reviewed and no conflicts of interests present.
161.	2/2018	18-0264	Employee	Secondary Employment	Can a DOE official engage in secondary employment as an investor and sales representative for a private company to sell pet products	Yes. The employment would not be a violation so long as the employee adheres to the specified guidelines.
162.	2/2018	18-0265	Employee	Legal Review	OEA employee request to engage in secondary employment offering mediation services	CAO approved. OEA reviewed and no conflicts of interests present.
163.	2/2018	18-0266	Employee	Legal Review	Fire/EMS employee requests to engage in secondary employment as Deputy Fire Marshall for another entity	Approval previously given under case #17-0189.
164.	2/2018	18-0267	Employee	Legal Review	County Council employee request to engage in secondary employment offering legal services	Approval previously given under case #17-0173.
165.	2/2018	18-0272	Employee	FDS	Employee's request on how to complete Schedule B on the FDS	Detailed instructions provided and uploaded attachments.
166.	2/2018	18-0273	Employee	Secondary Employment	SAO employee request to serve as Treasurer for a candidate for County Council	SAO employees are not subject to the County's Code of Ethics. Requestor referred to State Ethics Commission.
167.	2/2018	18-0274	Employee	Secondary Employment	Judiciary employee secondary employment request	Employees of judiciary are not subject to County's Ethics Code. Referred to state ethics commission.

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
168.	2/2018	18-0275	Employee	Legal Review	OOL employee request to engage in secondary employment at a golf course	Agency approved. OEA reviewed and no conflicts of interests present.
169.	2/2018	18-0276	Employee	Legal Review	OOL employee request to engage in secondary employment as a bartender	Agency approved. OEA reviewed and no conflicts of interests present.
170.	2/2018	18-0277	Employee	Legal Review	OCR employee's request to engage in secondary employment with a non-profit organization which provides social services in Southern Prince George's County & Northern Charles Counties	Agency approved. OEA reviewed and no conflicts of interests present.
171.	2/2018	18-0278	Employee	Secondary Employment	Inquiry by inspector as to whether he can engage in secondary employment as electrician outside of county	All employees except those expressly exempted are subject to Administrative Procedure 152.
172.	2/2018	18-0279	Employee	Legal Review	DOE employee request to engage in secondary employment offering psychiatric services	Agency approved. OEA reviewed and no conflicts of interests present.
173.	2/2018	18-0281	Employee	Secondary Employment	Do employees need to reapply annually for secondary employment that was approved in the past	No, unless there is a change in circumstances.
174.	2/2018	18-0282	Citizen	Information Request	Financial Disclosure Review Request	Requesting information to access ethics testing.
175.	2/2018	18-0283	Employee	Legal Review	Fire/EMS employee request to engage in secondary employment as a fire ground program instructor	Agency approved. OEA reviewed and no conflicts of interests present.
176.	2/2018	18-0285	Employee	Legal Review	Fire/EMS employee request to engage in secondary employment providing fire training	Agency approved. OEA reviewed and no conflicts of interests present.
177.	2/2018	18-0286	Employee	Legal Review	OOL employee request to engage in secondary employment providing crisis support to members of the military	Agency approved. OEA reviewed and no conflicts of interests present.
178.	2/2018	18-0287	Employee	Legal Review	OOL employee request to engage in secondary employment as an elected member of the County's Board of Education	Agency approved. OEA reviewed and no conflicts of interests present.
179.	2/2018	18-0289	Citizen	Secondary Employment	Employee of PGCPs requesting secondary employment review	Employees of the PGCPs are not covered by the County's Code of Ethics. Referred to PGC Board of Education, Ethics Panel.
180.	2/2018	18-0291	Citizen	Legal Review	Fire/EMS employee's request to engage in secondary employment for a nonprofit agency	Agency approved. OEA reviewed and no conflicts of interests present.

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
181.	2/2018	18-0292	Citizen	FDS	DPW&T explanation of County requirements for FDS compliance for member of the Regional Transportation Agency of Central Maryland's (RTA's) Board of Commissioners	The Board of Ethics approved a motion to exempt the member from filing a Financial Disclosure Statement in their capacity as a Representative of the County within the Commission.
182.	2/2018	18-0295	Employee	Legal Review	OHS Employee's request to engage in secondary employment as a bus driver for a private company	Agency approved. OEA reviewed and no conflicts of interests present.
183.	2/2018	18-0296	Employee	Legal Review	OHS employee's request to engage in secondary employment as a process server for a private company	Agency approved. OEA reviewed and no conflicts of interests present.
184.	2/2018	18-0297	Employee	Legal Review	OHS employee's request to engage in secondary employment as an adjunct professor	Agency approved. OEA reviewed and no conflicts of interests present.
185.	2/2018	18-0298	Employee	Legal Review	OHS employee's request to engage in secondary employment as an actor	Agency approved. OEA reviewed and no conflicts of interests present.
186.	2/2018	18-0299	Employee	Legal Review	OHS employee's request to engage in secondary employment as a quality assurance evaluator for emergency dispatch centers	Agency approved. OEA reviewed and no conflicts of interests present.
187.	2/2018	18-0300	Employee	Legal Review	OHS employee's request to engage in secondary employment as a quality assurance evaluator for emergency dispatch centers	Agency approved. OEA reviewed and no conflicts of interests present.
188.	2/2018	18-0302	Board/ Commission	FDS	Inquiry from M-NCPPC as to why board members have to include certain pieces of information on their FDS and who has access to the document once submitted	Code of Ethics details the information collected, who is required to file and what happens to the records. Executive Order No. 13-2014, designates members to file.
189.	2/2018	18-0321	Employee	Legal Review	DHCD employee request to engage in secondary employment as a program coordinator for PGCCC	Agency approved. OEA reviewed and no conflicts of interests present.
190.	2/2018	18-0436	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment providing federal disaster response coordination	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval. Request was rejected.
191.	2/2018	18-0439	Employee	Legal Review	DPIE employee's request to engage in secondary employment providing security services on private property	Agency approved. OEA reviewed and no conflicts of interests present. Employee must follow restrictions imposed by Agency Director.
192.	3/2018	18-0304	Employee	Information Request	Request for received complaints by OEA against the Board of License Commissioners for CY 2015-2017	Information provided.

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
193.	3/2018	18-0306	Citizen	Information Request	Inquiring about any State Regulations that prohibit land use applicants and that pertain to the County Council	Referred to State Ethics Commission.
194.	3/2018	18-0309	Employee	Legal Review	Legislative comment on HB 1788 (Appointments Office in the Office of the Governor – Reporting)	Written comment submitted on behalf of OEA.
195.	3/2018	18-0310	Board/ Commission	Legal Review	BOLC employee request to engage in secondary employment with the M-NCPPC	Request deemed rescinded as a result of employee's resignation from BOLC.
196.	3/2018	18-0311	Employee	Conflict of Interest	Can a County employee start a business with a current County contractor who contracts with the employee's agency, and the prospective business may seek contracts within the County	No. Section 2-293 of the County's Ethics Code prohibits employee from participating in any matter involving a business entity in which he (1) has a financial interest, (2) is an officer, director, trustee, partner or employee (or relative), (3) is negotiating prospective employment with, or (4) entity that is a party to an existing contract with him or his relative.
197.	3/2018	18-0313	Board/ Commission	Secondary Employment	Is a new member of a County Board/Commission required to report their prior and continuing employment with outside entities	Yes. Administrative Procedure 152 on secondary employment applies to all County official and employees.
198.	3/2018	18-0314	Board/ Commission	Information Request	Request for list of Board of Elections commission members who have taken the mandatory ethics training.	Information provided.
199.	3/2018	18-0315	Board/ Commission	FDS	Member of the PRAB request for assistance in completing Schedule A on FDS and inquiry on filing for an exemption	Provided information on the requirements to file under Section 2-294 of the Ethics Code.
200.	3/2018	18-0316	Employee	FDS	Seeking advice on completing Schedule B on the FDS	Advised to provide information and attached broker statements for beginning and end of calendar year 2017. He is not required to include information on 401 or mutual funds.
201.	3/2018	18-0317	Employee	Secondary Employment	OCR employee's request to engage in secondary employment to work as an adjunct professor	Agency approved. OEA reviewed and no conflicts of interests present.
202.	3/2018	18-0318	Employee	Conflicts of Interest	DPW&T employee inquiring about performing notary services at work	If this service is not a part of the employees' official duties they are not allowed to perform the service.
203.	3/2018	18-0319	Board/ Commission	FDS	Request for exemption from filing a FDS from a member of the PRAB	BOE approved a resolution to waive the requirement for current Board members to file a FDS for calendar years 2017 and 2018. However any new or reappointed members will be required to file.
204.	3/2018	18-0320	Board/Com mission	FDS	Is a designated FDS filer required to disclose reimbursements received related to travel expenses on their FDS	Section 2-293 exempts disclosure of reasonable expenses for food, travel, lodging, and scheduled entertainment of an official given in return for

**PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018**

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
						participation in a panel or speaking engagement.
205.	3/2018	18-0324	Employee	FDS	Employee's request to submit a paper version of the FDS	FDS are required to be electronically submitted unless the Board of Ethics grants and exemption due to extenuating circumstances.
206.	3/2018	18-0329	Citizen	Informal Request	Does the Ethics Code categorically prohibit gifts to sporting events	Section 2-293(d) permits elected officials to accept tickets or free admission, but only if it is for a charitable, cultural, or political event and the gift is a courtesy or ceremony extended to the entire office and the gift would not impair their impartiality and independence of judgment.
207.	3/2018	18-0331	Employee	Ethics Training	Request for list of DPW&T employees who have taken the mandatory ethics training	Information provided.
208.	3/2018	18-0333	Employee	FDS	Is the State's Attorney required to complete a FDS form online	Yes. All FDS forms must be submitted electronically unless the Board of Ethics grants an exception.
209.	3/2018	18-0334	Employee	Legal Review	OOL employee's request to engage in secondary employment as a private attorney	Agency approved. OEA reviewed and no conflicts of interests present.
210.	3/2018	18-0335	Board/ Commission	Legal Review	BOLC employee's request to engage in secondary employment as the Chair for a foundation	DCAO approved. OEA reviewed and no conflicts of interests present.
211.	3/2018	18-0336	Board/ Commission	Legal Review	BOLC employee's request to engage in secondary employment as the Director for a Business Roundtable	DCAO approved. OEA reviewed and no conflicts of interests present.
212.	3/2018	18-0337	Board/ Commission	Legal Review	BOLC employee's request to engage in secondary employment as the Director for a bank	DCAO approved. OEA reviewed and no conflicts of interests present.
213.	3/2018	18-0338	Board/ Commission	Legal Review	BOLC employee's request to engage in secondary employment as a Board Member for a hospital	DCAO approved. OEA reviewed and no conflicts of interests present.
214.	3/2018	18-0339	Board/ Commission	Legal Review	BOLC employee's request to engage in secondary employment as a Director for an organization	DCAO approved. OEA reviewed and no conflicts of interests present.
215.	3/2018	18-0340	Board/ Commission	Legal Review	BOLC employee's request to engage in secondary employment as a Principal for their own company.	DCAO approved. OEA reviewed and no conflicts of interests present.
216.	3/2018	18-0341	Employee	Prestige of Office	Can a County employee endorse a private entity in a promotional video	An employee cannot use their affiliation with the County or County resources to promote a private entity. To do so would be a violation of Sections 2-293(c) and 2-293(f). Employee may participate on their

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
						own time.
217.	3/2018	18-0342	Employee	FDS	Inquiry as to whether an employee is required to complete a FDS to disclose their secondary employment	Employee is not a designated FDS filer however they must comply with Administrative Procedure 152 and submit a request for secondary employment approval.
218.	3/2018	18-0343	Board/Commission	Prestige of Office	Can a state official attempt to use their influence on a BOLC or staff member to determine a personnel outcome within an agency	State officials are governed by State Ethics Laws. Advised to contact State Ethics Commission.
219.	3/2018	18-0344	Board/Commission	Info Request	BOLC requesting ethics advice on behalf of another member regarding political fundraising	OEA cannot opine without relevant information. Requestor advised to have BOLC member contact OEA for advice.
220.	3/2018	18-0346	Board/Commission	Gifts/Solicitation	Can a BOLC host political fundraisers for a delegate	Request rescinded.
221.	3/2018	18-0347	Board/Commission	Conflict of Interest	Should a BOLC Commissioner recuse themselves from a matter when they know the party involved	Commissioners are not prohibited from taking part in matters simply because they know a party; however, Section 2-293(a) prohibits them participating in matters that present a conflict of interest.
222.	3/2018	18-0348	Board/Commission	Legal Review	BOLC employee's request to engage in secondary employment as chairman for a foundation	DCAO approved. OEA reviewed and no conflicts of interests present.
223.	3/2018	18-0350	Citizen	Legal Review	Request from a PGCPs employee to engage in secondary employee	PGCPs employees are not subject to County's Code of Ethics
224.	3/2018	18-0352	Employee	Political Activity	Employee with fire/EMS inquiring about what action can be taken to ensure political signage removed from fire house property	The OEA does not have jurisdiction over non-County entities. Any issues that arise as a result of funding received from the County to support the activities organization receiving County funds should be directed to the OOL.
225.	3/2018	18-0414	Citizen	FDS	What is the difference between the County's FDS and the Town of Capitol Heights' FDS	Request Rescinded.
226.	3/2018	18-0437	Employee	Legal Review	OOL employee's request to engage in secondary employment with a private law firm	Agency approved with restrictions. OEA reviewed and no conflicts of interests present.
227.	3/2018	18-0438	Employee	Legal Review	Office of Finance employee's request to engage in secondary employment as a cashier	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval. Request was rejected.
228.	4/2018	18-0356	Board/Commission	Secondary Employment	Are an employee's volunteer services considered secondary employment subject to Administrative Procedure 152	Volunteer work is not subject to secondary employment restrictions unless there is a legal or ethical relationship between the employee and the entity, such as service on a

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
						board of directors.
229.	4/2018	18-0357	Employee	Legal Review	Legislative employee's request to engage in secondary employment at a retail store as a sales clerk	Agency approved. OEA reviewed and no conflicts of interests present.
230.	4/2018	18-0361	Employee	Legal Review	DOE employee's request to engage in secondary employment at retail store in food services	Agency approval was not submitted deeming request incomplete and unable to review.
231.	4/2018	18-0362	Employee	FDS	Does secondary employment income need to be reported on FDS	Income should be reported under Schedule H – Other sources of earned income on the FDS.
232.	4/2018	18-0363	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment providing tax preparation services	Agency approved. OEA reviewed and no conflicts of interests present.
233.	4/2018	18-0366	Employee	Legal Review	Finance employee's request to engage in secondary employment as a cashier	Agency approved. OEA reviewed and no conflicts of interests present.
234.	4/2018	18-0367	Employee	Conflict of Interest	What process should employees who purchased property prior to the effective date of the Special Tax Sale law take to ensure no conflicts of interest exist in the transaction	Transaction should be reviewed by outside counsel to mitigate the appearance of a conflict of interest.
235.	4/2018	18-0368	Citizen	FDS	Does a candidate have to edit their FDS if the information reported changes during calendar year	Requestor failed to respond to OEA inquiry - request deemed rescinded.
236.	4/2018	18-0369	Employee	Legal Review	DPW&T employee's request to engage in secondary employment as a traffic controller	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval. Request was rejected.
237.	4/2018	18-0370	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment as a project manager for a staffing company	Agency approved. OEA reviewed and no conflicts of interests present.
238.	4/2018	18-0372	Employee	Post-Employment	Can a County employee, upon retirement work for a County vendor that has a contract with their prior agency	Section 2-293(b)(2)(A) does not prohibit the employee from accepting post-employment with a County vendor because the employee will not be working on the same matters on which they worked as a County employee.
239.	4/2018	18-0373	Employee	Confidential Information	Can an employee of DHCD provide members of the public, to include potential candidates for office, copies of a housing list	Section 2-293(g) prohibits the disclosure of confidential information. The information being requested is not confidential, as it is readily accessible in the public domain.
240.	4/2018	18-0375	Employee	Secondary Employment	Can a DPIE inspector engage in secondary employment offering electrical services outside the	Employee advised to complete a secondary employment request form pursuant to Administrative Procedure

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
					County	152 and submit to agency for review.
241.	4/2018	18-0376	Employee	Conflicts of interest	Can a DPW&T employee be involved in matters in which their spouse has an interest	Section 2-293(a) prohibits employees from participating in matters which involve their spouse.
242.	4/2018	18-0377	Employee	Conflict of Interest	Can a County employee display a political advertisement on their private vehicle, while the vehicle is parked on County property	Referred requestor to OOL as political activity that does not involve the use of County resources is outside of the jurisdiction of OEA.
243.	4/2018	18-0379	Employee	Legal Review	OOL employee request to engage in secondary employment as a Board Member for a charter school	Agency approved. OEA reviewed and no conflicts of interests present.
244.	4/2018	18-0382	Employee	Gifts	Can OCS employees accept an invitation from a County vendor to attend the vendor's showcase of new products	No. Section 2-293(d)(3) prohibits employees from accepting gifts from controlled donors.
245.	4/2018	18-0384	Employee	Secondary Employment	OCR employee's request to engage in secondary employment providing legal services in private practice	Agency approved. OEA reviewed and no conflicts of interests present.
246.	4/2018	18-0385	Employee	Secondary Employment	OCR employee's request to engage in secondary employment to serve as a board member for a senior living community	Agency approved. OEA reviewed and no conflicts of interests present.
247.	4/2018	18-0386	Employee	Secondary Employment	OCR employee's request to engage in secondary employment with a non-profit organization assisting with membership services.	Agency approved. OEA reviewed and no conflicts of interests present.
248.	4/2018	18-0393	Employee	Conflict of Interest	Is it a conflict of interest for a Health Department employee's spouse to work as an independent contractor for the agency	Health Department employees are not subject to the County's Code of Ethics. Requestor referred to State Ethics Commission.
249.	5/2018	18-0387	Employee	Legal Review	OHS employee's request to engage in secondary employment in private business teaching creative writing and providing mentoring services	Agency approval was not submitted deeming request incomplete and unable to review.
250.	5/2018	18-0390	Employee	Secondary Employment	OCR employee's request to engage in secondary employment as an Uber driver	Agency approved. OEA reviewed and no conflicts of interests present.
251.	5/2018	18-0391	Employee	Secondary Employment	OCR employee's request to engage in secondary employment as a parking manager with the Revenue Authority	Agency approved. OEA reviewed and no conflicts of interests present.
252.	5/2018	18-0399	Employee	Employee Relations	Is a LTGF employee whose contract is ending, required to submit a resignation letter	Employee relations are outside the jurisdiction of OEA. Requestor referred to agency HR and OHRM
253.	5/2018	18-0401	Citizen	Information Request	Request for a copy of FDS statement of the County	Information provided

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
					Executive	
254.	5/2018	18-0403	Employee	Gifts	Can the OCR and other County agencies participate in a fundraising event for a non-profit organization	All agencies must follow the protocol established under Administrative Procedure 153 and obtain approval from the CAO.
255.	5/2018	18-0404	Employee	Conflicts of Interest	Request from Local Development Council (LDC), as to the correct interpretation of the County's conflict of interest policy in relation to entities in which LDC members have an interest applying for Local Impact Grants (grants)	Sections 2-293(a)(1) and 2-293(a)(2) prohibit an official from participating in any matter when a business entity in which he or she has a direct financial interest or in which he is an officer, director, trustee, partner or employee is a party.
256.	5/2018	18-0405	Employee	Information request	Request for a copy of County's Code of Ethics	Information provided
257.	5/2018	18-0406	Employee	Post-employment	May an DPIE employee engage in post-employment providing management consulting services to a County vendor doing business with another agency	Section 2-293(b)(2)(A) does not prohibit the employee from accepting post-employment.
258.	5/2018	18-0407	Employee	Prestige of Office	Does a subordinate employee have to follow the instruction of a supervisor to document performance concerns of an employee	Employee relations and/or Discipline of employees is outside the jurisdiction of OEA. Requestor referred to agency HR and OHRM
259.	5/2018	18-0408	Employee	Legal Review	BOLC employee's request to engage in secondary providing A/V technical support services	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval. Request was rejected.
260.	5/2018	18-0410	Citizen	Gifts	Can vendor who does business with the Police Department give gifts to certain officers	Police Department employees are subject to the gift restrictions outline in §2-293(d) and Prince George's County Code Subtitle 18 Division 5 Subdivision 2 Sec. 18-151.
261.	6/2018	18-0416	Citizen	Post-Employment	Former RA employee seeks to engage in post-employment with a vendor who does business with the County	Section 2-293(b)(2)(A) does not prohibit the employee from accepting post-employment because the prospective work for the new employer is not related to any matters in which they were engaged as a County employee.
262.	6/2018	18-0417	Citizen	Post-Employment	Former DPIE employee seeks to engage in employment with DPIE and DOE as a contractor	Employee may participate in new and any ongoing projects with DPW&T. They may only participate in new projects with their former agency.
263.	6/2018	18-0419	Employee	Prestige of Office	Can a DOE employee give a presentation to a company on topics representing the County	If not on official County business, employee is not allowed to use their County title in any literature, advertisements and other communications associated with the event. Section 2-293(f) prohibits employees from using County time or any other resources of the County for

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
						speeches which would result in personal gain or compensation or for any other personal matters and services.
264.	6/2018	18-0420	Employee	Employee Relations	Employee's inquiry on how to handle a disciplinary issue with a subordinate employee and complaint on the way the agency handled the matter	Employee relations are outside the scope of OEA - referral made to OHRM
265.	6/2018	18-0430	Employee	FDS	What is the requirement to file an additional FDS upon separation	Sec 2-294(c) requires an employee leaving employment to file a FDS for the previous and current calendar year within 60 days of leaving. OEA cannot manipulate the system on filer's behalf. Extenuating circumstances-allowed to complete a paper form
266.	6/2018	18-0431	Employee	Gifts	Can a County employee accept a gift won during a raffle hosted by another County agency	Yes. None of the prohibitions in Section 2-293(d) are applicable.
267.	6/2018	18-0443	Employee	Conflict of Interest / Gifts	Can County employees/departments be nominated in a County Awards Event? Can County employees participate in judging or nominate someone	Employees may participate on the nominating committee with certain restrictions to maintain impartiality; the agency must follow the County's Administrative Procedure 153 on any fundraising efforts
268.	6/2018	18-0444	Employee	Information Request	What does the PGCPD Police Explorer Program need to do to comply with Administrative Procedure 153	Copy of Administrative Procedure 153 on fundraising provided. Directed to seek County approval
269.	6/2018	18-0445	Employee	Legal Review	OHS employee's request to engage in secondary employment as a bank teller	Agency approved. OEA reviewed and no conflicts of interest present.
270.	6/2018	18-0446	Official	Conflict of Interest	Should a member of the BOLC recuse themselves from reviewing the liquor license application of an individual who is involved in an outside organization in which the member is a participant	Yes. Section 2-290 prohibits officials/employees from engaging in activity that creates even an appearance of partiality, favoritism or pressure.
271.	6/2018	18-0447	Citizen	Information Request	Request for FDS of County Executive	Information Provided.
272.	6/2018	18-0451	Employee	Gifts	Can an employee accept a gift from a lobbyist if it is under \$20.00	Employees may not accept any gift from a lobbyist regardless of the amount if the lobbyist has matters before the employee's agency.
273.	6/2018	18-0452	Employee	Legal Review	DPIE employee's request to engage in secondary employment as structural engineer for an out of state homebuilder	Agency approved. OEA reviewed and no conflicts of interest present.
274.	6/2018	18-0454	Employee	Legal Review	DHCD employee's request to engage in secondary employment as real estate agent	Agency approved with restrictions. OEA reviewed and no conflicts of interests were present based on the restrictions as outlined by the Agency

**PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018**

Count	Date	Case	Source	Case Type	Issue	Opinion/Response
						Head.
275.	6/2018	18-0457	Employee	Gifts	Can a police department employee detailed to CEX office accept tickets to a sporting event	No. Police Department employees are subject to the gift restrictions outlined in §2-293(d) and Prince George's County Code Subtitle 18 Division 5 Subdivision 2 Sec. 18-151.

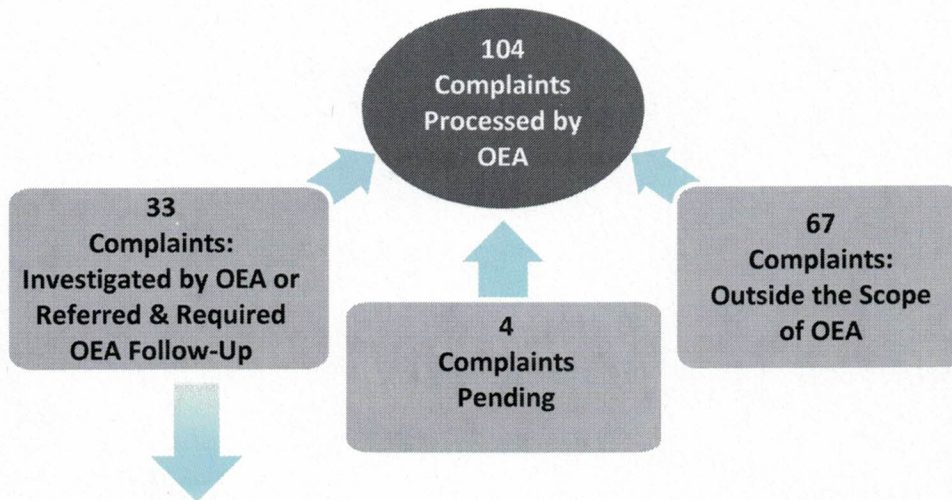
FY 2018 Investigations

The Office of Ethics and Accountability is authorized pursuant to the County's Ethics and Accountability Code, Section 2-303 to engage in the following specific functions:

- ✚ Evaluate, investigate and inspect the activities, records, and individuals with contracts, procurements, grants, agreements, and other financial or programmatic arrangements undertaken by or on behalf of the County Government and any other function, activity, process, or operation conducted by County government;
- ✚ Conduct criminal, civil, and administrative investigations;
- ✚ Provide information and evidence that relates to criminal acts to appropriate law enforcement officials;
- ✚ Initiate such reviews of operations of the County Government as deemed appropriate;
- ✚ Receive and investigate complaints from any source or upon its own initiative concerning alleged fraud, waste, abuse, and service deficiencies including deficiencies in the operation and maintenance of facilities; and
- ✚ Conduct joint investigations and projects with the Office of Audits and Investigations and other oversight, public safety or law enforcement agencies.

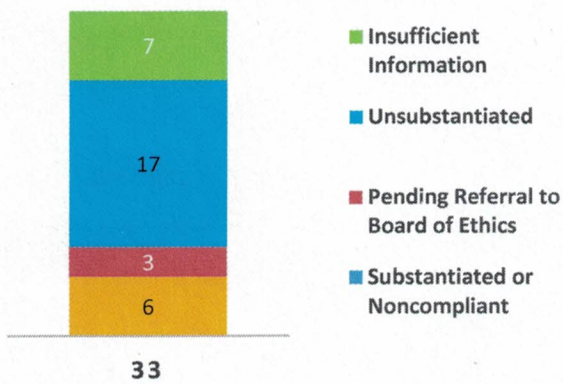
The Office of Ethics and Accountability does not prosecute criminal conduct. However, criminal conduct discovered by the Office of Ethics and Accountability during its investigation of a complaint or tip is referred to the appropriate prosecuting authority in accordance with the County's Ethics and Accountability Code. Moreover, the Office of Ethics and Accountability does not administer personnel matters or seek to resolve personnel conflicts that have existing procedures in place to address. The following charts and table provide data analytics and a list of the complaints or allegations reported to OEA during the 2018 fiscal period.

Breakdown of Complaint Types Processed by OEA in FY 2018

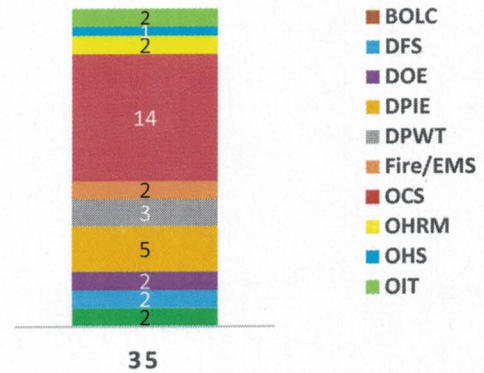


Data Analytics of Cases Investigated by OEA

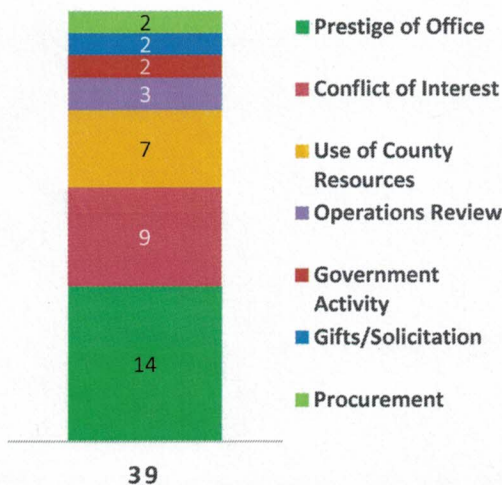
Case Disposition



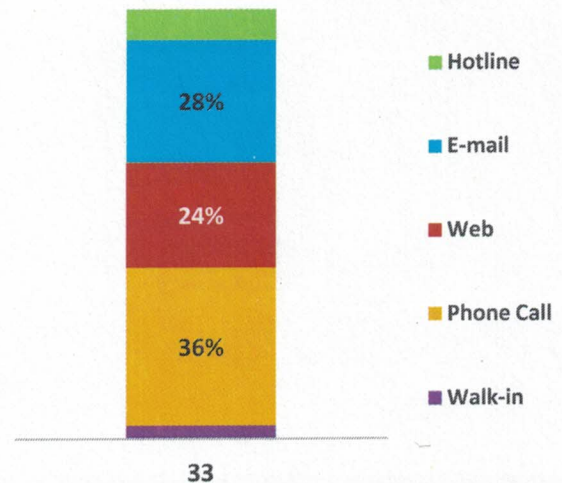
Agencies Impacted



Case Type

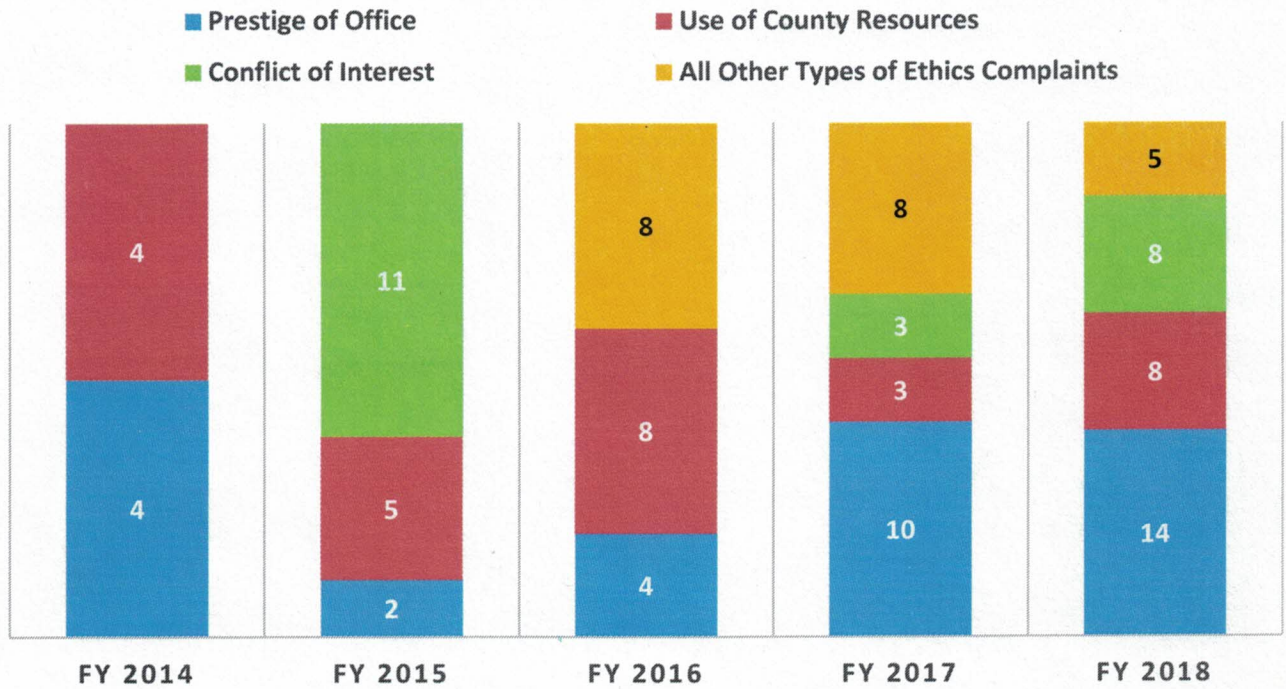


Method of Case Receipt



*Sum of case type may be more because cases may have several allegations

TYPES OF ETHICS COMPLAINTS RECEIVED FY 2014 - FY 2018



PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

FY 2018 INVESTIGATIONS

Count	Date	FY18 Case #	Source	Case Type	Nature of Allegation	Case Outcome	Case Disposition
1.	Jul-2017	18-0018	Citizen	Illegal Act	Citizen complaint regarding 311	Referred to OCR - Call Center Manager	Outside the Scope of Ethics
2.	Jul-2017	18-0019	Citizen	Illegal Act	Concerns related to a County apartment complex	Complainant Referred to DPIE- Enforcement Division	Outside the Scope of Ethics
3.	Jul-2017	18-0020e	Employee	Prestige of Office	Bribes by a Code Enforcement Officer	Investigated by OEA; Referred to BOE	Unsubstantiated - Recommendations Provided
4.	Jul-2017	18-0027	Citizen	Illegal Act	Allegations related to unsafe work by a condominium association	Complainant Referred to OCR	Outside the Scope of Ethics
5.	Jul-2017	18-0030e	Employee	Operations Review	An agency's Human Resources Department does not consistently adhere to County grievance procedures	Investigated by OEA; Referred to BOE	Noncompliance - Recommendations Provided
6.	Jul-2017	18-0034	Citizen	Illegal Act	Request for police assistance in apartment building	Complainant Referred to PGPD	Outside the Scope of Ethics
7.	Jul-2017	18-0035	Citizen	Illegal Act	Violation of privacy	Complainant Referred to PGPD	Outside the Scope of Ethics
8.	Jul-2017	18-0036	Employee	Employee Relations	Hostile work environment	Referred to OHRM	Outside the Scope of Ethics
9.	Aug-2017	18-0043	Citizen	Fraud	Citizen working and receiving Social Services benefits	Complainant Referred to DHR- MD OIG Welfare Fraud	Outside the Scope of Ethics
10.	Aug-2017	18-0046	Citizen	Government Activity	Yard waste on a County road has not been picked up timely	Referred to DOE - WMD	Outside the Scope of Ethics

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	FY18 Case #	Source	Case Type	Nature of Allegation	Case Outcome	Case Disposition
11.	Aug-2017	18-0062e	Employee	Prestige of Office	Employee granted access to a manager's email without authorization	Investigated by OEA; Referred to DOE; Referred to BOE	Agency advised - Substantiated
12.	Sep-2017	18-0099	Employee	Employee Relations	County employee alleges harassment and retaliation after reporting worsening health condition	Referred to OHRM	Outside the Scope of Ethics
13.	Sep-2017	18-0101	Citizen	Fraud	Citizen living under a stolen identity in order to qualify for housing	Complainant Referred to PGPD - Financial Crimes	Outside the Scope of Ethics
14.	Sep-2017	18-0141	Citizen	Fraud	Town of Fairmont Heights is committing fraud by receiving funds from the County for trash and bulky trash pickup but not providing consistent service	Investigated by OEA – Referred to Town Manager	Outside the Scope of Ethics
15.	Oct-2017	18-0142	Citizen	Employee Relations	Citizen selected for a substitute teacher position is barred from being hired	Complainant Referred to PGCPD - IA	Outside the Scope of Ethics
16.	Oct-2017	18-0153	Citizen	Illegal Act	Citizen received a letter alleging individual was receiving Social Services benefits while living in another state	Complainant Referred to DSS	Outside the Scope of Ethics
17.	Oct-2017	18-0162	Citizen	Fraud	Virginia resident received fraudulent notice for outstanding traffic violation	Complainant Referred to PGPD - Financial Crimes	Outside the Scope of Ethics
18.	Oct-2017	18-0168	Employee	Employee Relations	Hostile work environment	Complainant Referred to Fire/EMS EEOC Office	Outside the Scope of Ethics

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	FY18 Case #	Source	Case Type	Nature of Allegation	Case Outcome	Case Disposition
19.	Oct-2017	18-0169e	Employee	Prestige of Office/ Solicitation	Manager solicited business for a family member's business	Investigated by OEA; Referred to BOE	Substantiated
20.	Oct-2017	18-0174	Citizen	Fraud	Citizen is fraudulently receiving Section 8 benefits	Complainant Referred to HUD - IG	Outside the Scope of Ethics
21.	Oct-2017	18-0175	Citizen	Fraud	County resident is sending their children to school in DC using another address	Complainant Referred to DCPS - Office of Enrollment	Outside the Scope of Ethics
22.	Nov-2017	18-0192	Citizen	Illegal Act	Operation of a home bakery without a license	Complainant Referred to Health Department	Outside the Scope of Ethics
23.	Nov-2017	18-0194	Citizen	Fraud	Citizen alleges identity theft after lottery winnings are withheld for non-payment of a 2013 college bill	Complainant Referred to PGPD - Financial Crimes	Outside the Scope of Ethics
24.	Dec-2017	18-0200e	Employee	Use of Resources	Employee is clocking in for work and leaving to handle personal matters and clocking out from home	Investigated by OEA; Referred to BOE	Unsubstantiated - Recommendations Provided
25.	Dec-2017	18-0201	Citizen	Fraud	Citizen paid contractors for services that were never rendered	Complainant Referred to MD - DLLR - Home Improvement Commission	Outside the Scope of Ethics
26.	Dec-2017	18-0205	Citizen	Abuse	Citizens received a housing voucher but was denied the ability to move from one apartment to another	Complainant Referred to Housing Authority	Outside the Scope of Ethics
27.	Dec-2017	18-0206	Citizen	Waste	Citizen alleges dereliction of duties by PGC-CPS	Complainant Referred to DSS - CPS	Outside the Scope of Ethics

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

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28.	Dec-2017	18-0207	Citizen	Operations Review	Citizen alleges poor and unsafe living conditions and mishandling of grant funds by a domestic violence shelter operated by Family Crisis Center	Referred to Audits & Investigations; Governor's Office of Crime Control and Prevention	Agency Advised – Noncompliance Recommendations Provided
29.	Dec-2017	18-0208	Citizen	Fraud	Citizen is fraudulently using housing vouchers	Complainant Referred to HUD	Outside the Scope of Ethics
30.	Dec-2017	18-0215	Citizen	Fraud	Citizen alleges fraud and abuse of the Md. Judiciary System	Complainant Referred to PGPD	Outside the Scope of Ethics
31.	Jan-2018	18-0220	Citizen	Illegal Act	Citizen alleges illegal activity in apartment	Complainant Referred to PGPD; DPIE; Health	Outside the Scope of Ethics
32.	Jan-2018	18-0226e	Employee	Conflict of Interest/ Prestige of Office/ Honoraria	Employee used position to steer business to a County vendor, engaged in business with assigned agency through employee's owned company, and received honoraria from a County vendor for training services	Investigated by OEA; Referred to BOE	Partially Substantiated Recommendations Provided
33.	Jan-2018	18-0227	Citizen	Illegal Act	Waste management employee removed contents from a package on a resident's porch	Referred to DOE	Outside the Scope of Ethics
34.	Jan-2018	18-0228	Citizen	Illegal Act	Citizen alleges disability discrimination from inability to move to a new apartment using Housing Vouchers	Complainant Referred to Housing Authority	Outside the Scope of Ethics

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	FY18 Case #	Source	Case Type	Nature of Allegation	Case Outcome	Case Disposition
35.	Jan-2018	18-0231e	Board/ Commission	Conflict of Interest	Board of License Chair hosted a political fundraiser in violation of the MD Alcoholic Beverages Statute and County's Ethics Code	Investigated by OEA; Referred to BOE	Unsubstantiated - Recommendations Provided
36.	Jan-2018	18-0234	Employee	Fraud	Citizen repeatedly receiving phone calls/messages claiming a complaint has been filed regarding child	Complainant Referred to US - FCC	Outside the Scope of Ethics
37.	Jan-2018	18-0235	Citizen	Fraud	Tenants living in a County apartment whose names are not on the lease	Complainant Referred to US - HUD - IG	Outside the Scope of Ethics
38.	Jan-2018	18-0236	Citizen	Illegal Act	County Circuit Court employee violated various aspects of the US and State Code	Complainant Referred to Circuit Court; MD - Commission on Judiciary Disabilities; MD - OAG	Outside the Scope of Ethics
39.	Jan-2018	18-0237	Employee	Fraud	Deed transferred illegally	Complainant Referred to Circuit Court; MD - OAG; MD - OSA	Outside the Scope of Ethics
40.	Feb-2018	18-0239	Citizen	Illegal Act	Insurance company employee practiced fraudulent tactics, and threatened physical assault	Complainant Referred to MD - Insurance Administration - Enforcement Unit; MD - State Ethics Commission	Outside the Scope of Ethics
41.	Feb-2018	18-0240	Citizen	Government Activity	Disabled citizen denied benefits	Complainant Referred to DSS; US - OPRMI	Outside the Scope of Ethics
42.	Feb-2018	18-0250e	Anonymous	Prestige of Office	Multiple supervisors violated various County rules	Investigated by OEA - Referred to BOE	No Response Required - Insufficient Information

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	FY18 Case #	Source	Case Type	Nature of Allegation	Case Outcome	Case Disposition
43.	Feb-2018	18-0254	Citizen	Fraud	Citizen is fraudulently receiving subsidized housing	Complainant Referred to US - HUD	Outside the Scope of Ethics
44.	Feb-2018	18-0255e	Employee	Use of Resources	County employees misusing mileage reimbursement and other employee relations matters	Investigated by OEA and OOL – Referred to BOE	Partially Substantiated – Outside scope of ethics (contractor)
45.	Feb-2018	18-0256	Citizen	Government Activity	Housing Authority is not addressing citizen complaint in a timely manner	Complainant Referred to Housing Authority	Outside the Scope of Ethics
46.	Feb-2018	18-0259	Citizen	Government Activity	Disabled citizen is transported to a program-funded work location by Metro Access without appropriate supervision	Referred to MD - DOH - DDA	Outside the Scope of Ethics
47.	Feb-2018	18-0270	Citizen	Fraud	County residence is marketed for sale by a Realtor without the citizen's consent	Complainant Referred to MD - Real Estate Commission	Outside the Scope of Ethics
48.	Feb-2018	18-0271	Employee	Waste	Building complaints at Berwyn Heights Elementary School	Referred to PGCPS - Maintenance	Outside the Scope of Ethics
49.	Feb-2018	18-0284e	Anonymous	Procurement/ Conflict of Interest	Procurement assistant may have an inappropriate relationship with a County vendor	Investigated by OEA; Referred to BOE	Unsubstantiated
50.	Feb-2018	18-0288e	County Contractor	Conflict of Interest	Request for an investigation into the procurement process for a transit contract	Investigated by OOL – Referred to BOE	Agency Advised - Unsubstantiated
51.	Feb-2018	18-0293	Citizen	Government Activity	Alleges PGPD tampered with records involving a citizen's case	Complainant Referred to CCOP	Outside the Scope of Ethics

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	FY18 Case #	Source	Case Type	Nature of Allegation	Case Outcome	Case Disposition
52.	Feb-2018	18-0294	Employee	Employee Relations	County employee alleges being transferred as a result of a harassment allegation	Referred to OHRM	Outside the Scope of Ethics
53.	May-2018	18-0303	Citizen	Government Activity	Alleging PGPD misconduct	Complainant Referred to PGPD - IA	Outside the Scope of Ethics
54.	Mar-2018	18-0307	Citizen	Illegal Act	County employee removed sign from citizen's yard	Investigated by OEA	No Response Required - Insufficient Information
55.	Mar-2018	18-0308	Citizen	Government Activity	Citizen did not receive appropriate assistance when seeking to obtain State benefits	Referred to DSS	Outside the Scope of Ethics
56.	Mar-2018	18-0323	Citizen	Government Activity	DSS fraudulently took custody of a child	Complainant Referred to DSS - CPS; MD - Attorney Grievance Commission	Outside the Scope of Ethics
57.	Mar-2018	18-0326e	Citizen	Use of Resources	County employee's misuse of County vehicle	Investigated by OEA; Referred to BOE	Unsubstantiated
58.	Mar-2018	18-0327e	Anonymous	Conflict of Interest/ Prestige of Office/ Nepotism/ Fraternization	County employee participated in filling County positions with family members	Investigated by OEA; Referred to BOE	Partially Substantiated - Recommendations Provided
59.	Mar-2018	18-0328e	Anonymous	Employee Relations	County Official forced staff to gather to read religious material	Referred to OHRM	Outside the Scope of Ethics

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	FY18 Case #	Source	Case Type	Nature of Allegation	Case Outcome	Case Disposition
60.	Mar-2018	18-0330	Citizen	Fraud	Home sold without proper documentation from owner	Complainant Referred to MD - DLLR - Real Estate Commission; OSA; Circuit Court	Outside the Scope of Ethics
61.	Mar-2018	18-0332e	Employee	Use of Resources/ Fraud	Employee is falsifying timesheets	Investigated by OEA	Unsubstantiated - Recommendations Provided
62.	Mar-2018	18-0345	Citizen	Fraud	Citizen fraudulently receiving Temporary Assistance for Needy Families (TANF)	Complainant Referred to MD - DHS	Outside the Scope of Ethics
63.	Mar-2018	18-0349	Citizen	Illegal Act	Citizen falsely accused of crimes and various other acts of misconduct during the judicial process	Complainant Referred to MD - OIG; MD - Commission on Judicial Disabilities	Outside the Scope of Ethics
64.	Apr-2018	18-0351	Citizen	Illegal Act	Vacant lot is being used as dumping ground	Investigated by OEA; Referred to DPIE	Outside the Scope of Ethics
65.	Apr-2018	18-0353	Employee	Prestige of Office	County employee is abusing computer access privileges by creating accounts in other employees' names	Investigated by OEA – Referred to BOE	No Response Required - Insufficient Information
66.	Apr-2018	18-0354e	Employee	Use of Resources/ Fraud	Theft of time by a County employee	Investigated by OEA – Referred to BOE	Partially Substantiated - Recommendations Provided
67.	Apr-2018	18-0355	Citizen	Conflict of Interest	County employee is using position to enforce community regulations	Investigated by OEA	No Response Required - Insufficient Information

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	FY18 Case #	Source	Case Type	Nature of Allegation	Case Outcome	Case Disposition
68.	Apr-2018	18-0358e	Anonymous	Procurement Prestige of Office	County Officials engaging in unethical procurement practices	Referred to OOL; Referred to BOE	Agency Advised - Unsubstantiated
69.	Apr-2018	18-0359	Employee	Employee Relations	County employee alleges retaliation for filing complaint	Referred to OHRM	Outside the Scope of Ethics
70.	Apr-2018	18-0360e	Employee	Gifts/ Operations Review	Complaint about various agency practices related to acceptance of gifts by executive leadership and lack of operational controls for checks	Investigated by OEA	Investigation Pending
71.	Apr-2018	18-0364	Citizen	Fraud	County vendor is fraudulently claiming to have completed work	Complainant Referred to MD - State Attorney's Office	Outside the Scope of Ethics
72.	Apr-2018	18-0365e	Anonymous	Prestige of Office	County official is selling access to vendors	Investigated by OEA – Referred to BOE	No Response Required - Insufficient Information
73.	Apr-2018	18-0371e	Employee	Use of Resources	501(c)3 organization is renting a County-owned building making unlawful profit	Investigated by OEA	Investigation Pending
74.	Apr-2018	18-0374	Employee	Prestige of Office	County managers are hiring family members	Investigated by OEA	Investigation Pending
75.	Apr-2018	18-0378	Citizen	Fraud	Citizen is fraudulently receiving Section 8 housing benefits	Complainant Referred to HUD - OIG	Outside the Scope of Ethics
76.	Apr-2018	18-0380e	Employee	Prestige of Office	County employee is hiring County contractors for personal use	Investigated by OEA – Referred to BOE	No Response Required - Insufficient Information

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	FY18 Case #	Source	Case Type	Nature of Allegation	Case Outcome	Case Disposition
77.	Apr-2018	18-0381	Citizen	Government Activity	Bid provided to community association was based on inside information	Complainant Referred to OCR - COC	Outside the Scope of Ethics
78.	Apr-2018	18-0383	Employee	Illegal Act	County employees have accepted bribes in exchange for timely repairs of personal and County vehicles	Investigated by OEA	Investigation Pending
79.	May-2018	18-0389	Citizen	Prestige of Office	County inspector referenced their position while engaged in a disagreement with a business owner	Investigated by OEA – Referred to BOE	Unsubstantiated - Recommendations Provided
80.	May-2018	18-0394	Citizen	Government Activity	Citizen mistreated for request to transfer housing voucher	Complainant Referred to Housing Authority	Outside the Scope of Ethics
81.	May-2018	18-0395	Citizen	Fraud	Citizen is misrepresenting himself as a board-certified therapist or physician	Complainant Referred to MD - Board of Physicians; MD - Board of Therapists and Counselors	Outside the Scope of Ethics
82.	May-2018	18-0396	Citizen	Government Activity	Two citizens are involved in illegal activity	Complainant Referred to PGPD - OIG	Outside the Scope of Ethics
83.	May-2018	18-0397	Citizen	Government Activity	County police officer is harassing citizen for towing relative's vehicle	Complainant Referred to PGPD	Outside the Scope of Ethics
84.	May-2018	18-0398	Citizen	Government Activity	Citizen is a victim of a check fraud scheme and other financial crimes	Complainant Referred to PGPD - Financial Crimes	Outside the Scope of Ethics

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	FY18 Case #	Source	Case Type	Nature of Allegation	Case Outcome	Case Disposition
85.	May-2018	18-0399	Employee	Employee Relations	Grant funded County employee is being pressured to submit a resignation letter	Complainant Referred to OHRM	Outside the Scope of Ethics
86.	May-2018	18-0400	Employee	Prestige of Office	Two County HR Officers conspired to exchange eligible job candidates to ensure one's relative was hired	Investigated by OEA – Referred to BOE	Unsubstantiated - Recommendations Provided
87.	May-2018	18-0409	Citizen	Fraud	City of Seat Pleasant misused waivers used to avoid bid process that may have resulted in \$1M+ in taxpayer money misuse	Referred to (Non-County Government - Town of Seat Pleasant attorney	Outside the Scope of Ethics
88.	May-2018	18-0411e	Board/Commission	Conflict of Interest	Board of License Commissioners inspector engaged in political activity in violation of County's Ethics Code	Investigated by OEA – Referred to BOE	Unsubstantiated - Recommendations Provided
89.	May-2018	18-0412	Citizen	Fraud	Computer software scam	Complainant Referred to US - FTC	Outside the Scope of Ethics
90.	May-2018	18-0413	Employee	Use of Resources	County employee running for political office is engaging in political activity during work hours	Referred to State Ethics Commission	Outside the Scope of Ethics
91.	Jun-2018	18-0415	Employee	Conflict of Interest	Manager is involved in matters involving their child's employer that is a County vendor	Investigated by OEA – Referred to BOE	Substantiated - Recommendations Provided

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	FY18 Case #	Source	Case Type	Nature of Allegation	Case Outcome	Case Disposition
92.	Jun-2018	18-0418	Citizen	Fraud	Citizen's ex-spouse is fraudulently submitting documents to (non-County) agencies without his/her permission	Complainant Referred to Non-County Government (Rowan County - DSS)	Outside the Scope of Ethics
93.	Jun-2018	18-0420	Employee	Employee Relations	Supervisor filed a complaint against another subordinate	Referred to OHRM	Outside the Scope of Ethics
94.	Jun-2018	18-0429	Employee	Use of Resources	County official is falsifying timecards by not clocking out or using leave for personal time outside the office	Investigated by OEA – Referred to BOE	Unsubstantiated - Recommendations Provided
95.	Jun-2018	18-0433	Citizen	Illegal Act	Two citizens are involved in illegal activity to receive government benefits	Complainant Referred to PGPD	Outside the Scope of Ethics
96.	Jun-2018	18-0434e	Employee	Prestige of Office	County manager sits on a nonprofit board and is using his/her County position to help the organization	Investigated by OEA – Referred to BOE	Unsubstantiated
97.	Jun-2018	18-0440	Citizen	Fraud	Citizen receiving government assistance fraudulently	Referred to DSS	Outside the Scope of Ethics
98.	Jun-2018	18-0441	Employee	Employee Relations	Employee on Administrative Leave entered County building to intimidate staff	Referred to OHRM	Outside the Scope of Ethics
99.	Jun-2018	18-0442	Citizen	Government Activity	Citizen alleges he/she has been waiting since Dec 2017 for the transfer of their medical records to their doctor	Complainant Referred to Health Dept - Ombudsman	Outside the Scope of Ethics

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Date	FY18 Case #	Source	Case Type	Nature of Allegation	Case Outcome	Case Disposition
100.	Jun-2018	18-0448	Citizen	Employee Relations	Wrongful termination and retaliation of former MNCPPC employee	Referred to MNCPPC	Outside the Scope of Ethics
101.	Jun-2018	18-0449	Citizen	Government Activity	Traffic court clerk falsified records to appear as if one of two traffic tickets was outstanding due to failure to appear in court	Complainant referred to State Ethics Commission	Outside the Scope of Ethics
102.	Jun-2018	18-0450	Anonymous	Government Activity	County agencies were provided information regarding a homeowner's violations who then alerted the owner who then removed home from seller listing	Investigated by OEA	No Response Required - Insufficient Information

Recommendations and Actions Taken

The Office of Ethics and Accountability provided the following ten (10) key recommendations and one (1) referral to Audits and Investigations resulting in recommendations to Executive Management in response to the specified investigations and/or operational reviews conducted in Fiscal Year 2018. Actions taken in response to recommendations in Fiscal Year 2018 are also provided in the table below and include significant changes undertaken by agencies affected through the development of appropriate policies and, in some instances, reorganization of business practices to align with best practices and efficient use of County resources.

Agency: OCS and OHRM	Recommendation(s)	Action(s) Taken/Response(s)
<p>1. Issue: 17-0208 – Agency Director violated County policy by hiring an employee with a criminal background who has access to personnel personal information</p> <p>Disposition: Unsubstantiated</p>	<p>1. Pursuant to Prince George's County Fair Criminal Record Screening Standards, questions regarding criminal background cannot be asked until the conclusion of the first interview. To ensure hiring personnel and agencies have a better understanding of the County's criminal background check process, OEA recommends a targeted training on the Fair Criminal Record Screening Standards during an HR Liaison meeting and development of guidelines to apprise agency heads of the process for requesting a criminal background check accordingly. The County may also consider broadening the category of positions subject to criminal background checks.</p>	<p>1. OHRM will work to develop a training on the subject of <i>the Prince George's County Fair Criminal Records Screening Standards</i> that relates to criminal background checks for prospective County employees.</p>
Agency: DPIE	Recommendation(s)	Action(s) Taken/Response(s)
<p>2. Issue: 17-0213e – Official has conflict of interests in financial interests in family entity that is doing business with the County and misusing the position to provide confidential information to family business owners</p> <p>Disposition: Partially Substantiated</p>	<p>1. OEA recommends that Executive Leadership seek a formal advisory opinion from the Board of Ethics regarding the conflicts of interests of the official. The Board of Ethics may conduct hearings and take appropriate enforcement actions in matters in which it has a reasonable basis to believe a violation has occurred.</p> <p>2. Request an external audit of the agency's records to determine which properties the official and/or the family has an interest that are also under the agency's regulatory authority.</p> <p>3. Consider proposals to the Legislative branch to amend current law which allows violations to be issued and enforcement actions be taken, against the current homeowner instead of the party who actually performed work in violation of the building codes. As it stands homeowners</p>	<p>1. Executive Leadership requested a formal advisory opinion from the Board of Ethics, providing a proposed <i>Recusal Process</i> concerning the official. The Board of Ethics issued Advisory Opinion # 18-459.</p> <p>2. External audit was completed.</p> <p>3. No action taken.</p> <p>4. Executive Leadership will address with a formal written response.</p> <p>5. OOL will provide clarifying advice to agencies and where necessary training to address the appropriate way to handle and process MPIA requests. Executive Leadership implemented that each agency</p>

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Agency: DPIE	Recommendation(s)	Action(s) Taken/Response(s)
	<p>are liable for all work performed on the home, even if the work was completed prior to their ownership by another individual and without their knowledge. The only situation in which the current County Code addresses violations committed by the builder or seller are those which involve property being sold for the first time. In those circumstances, the sale or transfer of ownership to a subsequent owner will not absolve the builder or seller from the responsibility of correcting the violations.</p> <p>4. Require the agency to establish a policy to address the use of third-party certifications in residential properties similar to its Third-Party Inspection Program, used for commercial properties.</p> <p>5. Direct the OOL to establish a written countywide policy regarding the handling of all MPIA requests received by a County agency.</p> <p>6. Direct the OOL to establish written policies and protocol for providing notification to Executive Leadership regarding any and all legal matters that involve appointed officials and/or their family, as well as any and all matters that have potential media risks.</p>	<p>designate person who interfaces with the OOL.</p> <p>6. Executive leadership will determine on a case-by-case basis what will be the appropriate notification process on matters involving appointed officials and/or their family and matters that pose potential media risk.</p>
Agency: DPIE	Recommendation(s)	Action(s) Taken/Response(s)
<p>3. Issue: 17-0130 – County employee is removing customers' fees without supervisor approval</p> <p>Disposition: Unsubstantiated</p>	<p>1. Segregation of incompatible duties is a key internal control used to minimize the occurrence of errors and/or fraud by ensuring that no employee has the ability to perpetrate and conceal errors or fraud. Although management has indicated that only supervisors have the authority to delete fees, it has been determined that all employees, with access to DPIE's e-permitting system, have the ability to create, update, and delete fees. Management should ensure there is a clear distinction or separation of duties for all staff who have access to the e-permitting system and that no one person has the authority or ability to create, update and delete fees.</p>	<p>1. A memorandum was issued by DPIE on December 19, 2017, instructing Building Plan Review Engineers, Permitting & Licensing staff, that they are not authorized to waive or reduce the fees on any document. Failure to observe this instruction, may result in disciplinary action, up to/and including termination. The memorandum also stated, that staff are not authorized to alter any documents including permit applications (all types), fees, issued permits or e-Permits records, once they are processed. corrections/changes need to be made in the system, due to errors discovered, note the issue in e-Permits and immediately bring it to the attention of your respective supervisors</p>

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Agency: DPIE	Recommendation(s)	Action(s) Taken/Response(s)
	<p>2. OEA is aware that the current e-permitting system is limited and will be replaced in the next few years. However, in the interim, management should implement a policy to include, changes in staff access level, as well as, mandating the use of the comments field to document the reason for updates or deletions of permit fees.</p>	<p>and the permit center manager, who are authorized to make such corrections.</p> <p>2. When changes are made to the existing records in e-Permits, the supervisor or the permit center manager is required to note the change by case commenting accordingly in e-Permits.</p>
Agency: DPIE	Recommendation(s)	Action(s) Taken/Response(s)
<p>4. Issue: 18-0020 – Inspector attempted to solicit a bribe from a citizen</p> <p>Disposition: Unsubstantiated</p>	<p>1. Require that all complaints be memorialized in writing by all employees involved, to include those which the agency intends to refer to other agencies to investigate.</p>	<p>1. DPIE drafted a directive (pending DPIE Leadership review and Union President review), titled DPIE Directive 601.05 – Addressing Customer Complaints, stating, “Employees are required to document/record the following types of complaints received by customers within twenty-four (24) hours of receipt.” The types mentioned were harassment, negligence and bribery. The directive also stated, “Employees must record/document all complaints reported, observed, and/or involved in, to ensure appropriate action is considered if the matter is referred to another Agency to investigate.”</p>
Agency: OCS	Recommendation(s)	Action(s) Taken/Response(s)
<p>5. Issue: 18-0030 – Hostile work environment and mismanagement of funds to hire friends of executive leadership</p> <p>Disposition: Unsubstantiated</p>	<p>1. OEA recommends a written County policy be implemented to ensure that adequate controls and monitoring safeguards are put into place regarding the use of temporary staffing services by all County agencies. The policy should include when temporary services may be used; under what circumstances; how rates of pay will be determined in relation to the class of work; and the duration of the use of temp services.</p> <p>2. Conduct an external audit of OCS’ use of temporary staffing services and to determine if OCS is circumventing the competitive hiring process for filling permanent positions.</p> <p>3. Instruct OHRM to inquire as a part of its due diligence in the approval process for temporary/ provisional appointments, to inquire from the applicants and requesting Department Heads, if the applicant has worked with the County.</p>	<p>1. OHRM is reviewing and updating Personnel Procedure 204 which currently addresses 700-hour employees. The Procedure will be updated to reflect current policy, as it relates to 1000-hour and temporary employees.</p> <p>2. Awaiting official response from Agency Executive Leadership on remaining items.</p>

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Agency: OCS	Recommendation(s)	Action(s) Taken/Response(s)
	<p>4. Request the Office of Finance to audit OCS' expenditures on use of temporary staffing services. If it is determined that CMT Services received payment on behalf of the temporary employee for hours that were not worked, direct CMT Services to reimburse the County. In addition, cease payment of rates paid to a temporary employee for Realty Specialist II services at a Realty Specialist III pay rate without a legitimate business reason.</p> <p>5. Consult with the Office of Law and OHRM to determine if the alleged confidentially breaches by OCS Human Resources (HR) Manager require further investigation. Determine if any pending Human Resources complaints have been filed with the OCS HR Manager.</p> <p>6. Instruct OCS to consult with OHRM to ensure that the classifications of work used when requesting temporary staff to fill a position is done in alignment with OHRM classifications and corresponding rates of pay for those positions.</p>	
Agency: DPIE	Recommendation(s)	Action(s) Taken/Response(s)
<p>6. Issue: 18-0200 – A County employee is misusing County time and taking County vehicle home</p> <p>Disposition: Unsubstantiated</p>	<p>1. As a result of a prior investigation conducted by OEA Case #17-0156, DPIE advised that during Senior Staff meetings managers would be reminded to monitor their employees' vehicle usage to ensure compliance with Departmental and County policies and procedures. The information provided by the supervisor in this instance, demonstrates that this directive may not be disseminated uniformly outside of the meetings with Associate Directors. DPIE should confirm that managers are monitoring vehicle usage, and ensure that policy is uniformly disseminated to all supervisors. Further, a measurable framework should be put in place to ensure that vehicle usage can be monitored.</p> <p>2. Administrative Procedure (AP) 610 prohibits keeping Designated Work Day Use Vehicles at employees' residences overnight under any circumstances. Considering there is a legitimate business</p>	<p>1. Monthly reminders will be issued via email to the Associate Directors and their respective Vehicle Coordinators to monitor staffs County vehicle usage to ensure compliance with Departmental and County policies and procedures. Further, the Department will review the vehicle mileage report from the Office of Central Services Fleet Management Division for County vehicles that exceed a monthly threshold of 300 miles; and will obtain justification from the user, when applicable.</p> <p>2. DPIE will consider the following actions for employees to take a County vehicle home overnight:</p> <p>a. Employees will not be authorized to take a County vehicle home overnight if they</p>

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Agency: DPIE	Recommendation(s)	Action(s) Taken/Response(s)
	<p>purpose or safety issue for certain staff to take County vehicles home overnight, OEA recommends DPIE reclassify staff identified in this category to avoid violating AP 610. As an alternative, Executive Leadership may also consider revising AP 610 to provide for certain exceptions as discussed in this investigation.</p>	<p>live outside of Prince George's County.</p> <p>b. DPIE will discuss with the DCAO to designate areas for staff to park their County vehicles overnight.</p> <p>c. Employees will be allowed to take their County vehicle home overnight if they attend a meeting or event after their scheduled work hours which may present a safety concern. Authorization must be approved from the employee's Associate Director and/or Deputy Director in advance.</p>
Agency: FIRE EMS	Recommendation(s)	Action(s) Taken/Response(s)
<p>7. Issue: 18-0226 – A conflict of interest with a County employee's secondary employment because the outside employment has contracts with the County and is benefitting from the employee's County position</p> <p>Disposition: Partially Substantiated</p>	<ol style="list-style-type: none"> 1. Fire Chief enforce uniform compliance with the secondary employment provision of the Ethics Code as outlined by Administrative Procedure 152. Further, Fire Chief advise the subject of the investigation to obtain ethics advice from OEA with regards to his/her company. 2. Fire/EMS ensure that the employee recuse him/herself from any contract negotiations, selection, extensions or related matters with regards to AES and the County to avoid an actual or appearance of a conflict of interest. 3. Fire/EMS Apparatus Division develop a written procedure for staff to request parts, equipment or services from vendors. The procedure should include, but not limited to, staff name, date of request, and part, equipment or service requested. 4. The Fire Chief establish a secondary employment policy that meets the needs of the Department, for review and approval by the Board. 	<ol style="list-style-type: none"> 1. A Department wide memo was issued directing sworn, civilian, volunteer personnel to follow Administrative Procedure 152. The memo states those who fail to follow will be subject to disciplinary action in accordance with General Order 11-03. 2. The infraction incurred was due to not being familiar with the OEA policy on secondary employment. The act was not deliberate or defiant therefore the decision was made to not recuse the employee from the activities requested. The employee is integral with providing information for matters related to his/her position. 3. Procedure has been developed as requested. 4. The Fire/EMS Department is following the policy as established by Administrative Procedure 152.

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Agency: BOLC	Recommendation(s)	Action(s) Taken/Response(s)
<p>8. Issue: 18-0231 - Commissioner is involved in political activity that violates the County's Ethics Code and the Maryland Alcoholic Beverages Act</p> <p>Disposition: Unsubstantiated</p>	<ol style="list-style-type: none"> 1. The Commissioner along with the Attorney for the Board of License Commissioners consult with the Office of Law regarding permissible political activities as previously recommended in OEA Case #18-0411. 2. The Commissioner along with the Executive Director coordinate appropriate training with the Board's Attorney, OEA and the Office of Law for Commissioners and staff to review the County's Ethics Code and certain provisions of the Alcoholic Beverages. Article. 	<ol style="list-style-type: none"> 1. The Maryland Attorney General's Office and the Office of Law have provided advice on the scope of permissible political activities. The Chair and staff leadership of the Board of License Commissioners have been advised of the opinions regarding the permissible activities. 2. Appropriate training has been coordinated between the Board of License Commissioners and OEA to review the County's Ethics Code. via Mandatory Ethics Training.
Agency: OCS	Recommendation(s)	Action(s) Taken/Response(s)
<p>9. Issue: 18-0327 - Manager involved with hiring family members</p> <p>Disposition: Partially Substantiated</p>	<ol style="list-style-type: none"> 1. DCAO instruct the Director of OCS to consult with the Office of Audits and Investigation and/or the Office of Law to conduct an audit of employee's involvement in hiring employees during the employee's tenure as Manager. Consider restricting employee's duties and authority until the audit is completed. 2. The CAO and DCAO consult with Audits and Investigations regarding conducting a full audit of how OCS is using temporary staffing services and how those services are being paid by OCS. 3. OHRM conduct a review of the following: <ol style="list-style-type: none"> a. Hiring practices and activities in the General Services Division b. The Direct Hire provision of the Personnel Law to determine the necessity and continuation of this practice c. Personnel Procedure 208 as it relates to the use of noncompetitive hiring and its conformity with Personnel Law 16-1[4]8. <i>sic</i> 4. OHRM develop a County wide written policy for the use and selection of 1000-hour employees. 	<ol style="list-style-type: none"> 1. Awaiting official response from Agency Executive Leadership 2. Awaiting official response from Agency Executive Leadership 3a. Currently, OHRM has no evidence that there are systemic hiring issues in GSD. As such, no changes in GSD's hiring practices are warranted. In order to make a determination about this, OHRM would need to conduct an audit of GSD's hiring practices. 3b. OHRM believes that the Direct Hire provision of the Personnel Law is relevant and suggests that we should continue this practice, as it is used effectively and widely to hire laborers, custodians, and other positions where education and experience are not required. 3c. Personnel Law Section 16-148 deals with "Noncompetitive methods of filling vacant positions." OHRM is reviewing and updating Personnel Procedure 208 which addresses "Methods and Procedures for Filling Positions" in order to clarify the language.

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Agency: OCS	Recommendation(s)	Action(s) Taken/Response(s)
		4. OHRM is reviewing and updating Personnel Procedure 204 which currently addresses 700-hour employees. The Procedure will be updated to reflect current policy, as it relates to 1000-hour and temporary employees.
Agency: BOLC	Recommendation(s)	Action(s) Taken/Response(s)
<p>10. Issue: 18-0411 - BOLC inspector may be serving as a PAC treasurer in violation of Maryland's Alcoholic Beverages Act</p> <p>Disposition: Unsubstantiated</p>	<ol style="list-style-type: none"> 1. Based on the Office of Law's previous informal advisory opinion, that any questions by the Chairman regarding the political activities of the Inspector, be forwarded to the Office of Law for response. 2. DCAO instruct the Chairman to consult with the Office of Law, the Office of Human Resources Management, the Attorney and the Director for the BOLC, before taking any personnel action. 3. The Office of Law consult with the Chairman, the Attorney and the Director for the BOLC to develop specific written guidelines regarding political activity for members, employees and inspectors of the BOLC. 4. The Chairman, after consultation with the Attorney and the Director for the BOLC and the Office of Law, if deemed necessary, contact the State Board of Elections for any potential violations. 	<ol style="list-style-type: none"> 1. The Maryland Attorney General's Office and the Office of Law have provided advice on the scope of permissible political activities. The Chair and staff leadership of the Board of License Commissioners have been advised of the opinions regarding the permissible activities.
Agency: DFS	Recommendation(s)	Action(s) Taken/Response(s)
<p>11. Issue: 18-0207 - Citizen alleges a domestic violence shelter that receives funds from DFS is mishandling County funds.</p> <p>Disposition: Agency Advised Noncompliance Referred to Audits & Investigations; Referred to Maryland State Governor's Office of Crime Control and Prevention</p>	<p>Recommendations issued from Prince George's County Audits & Investigations regarding this case can be found below. A full report can be viewed by visiting the County's Office of Audits and Investigations webpage. A summary of the recommendations is listed below:</p> <ol style="list-style-type: none"> 1. The County government should require the Family Crisis Center of Prince George's County, Inc. to demonstrate the existence of a sound accounting and internal control 	<p>1, 3, 4, 5, & 10. The Family Crisis Center has secured a contract with a CPA firm, Donald L. Wood CPA & Associates, to assist the FCC in developing appropriate internal control policies and procedures and provide third party oversight of the accounting functions of the organization. The estimated contract date is May 4, 2018. Within this contractual relationship, the CPA will be given access to the audit document in order to assist in developing the necessary protocols that will help move the organization forward. This firm will also be</p>

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Agency: DFS	Recommendation(s)	Action(s) Taken/Response(s)
	<p>system that can properly account for funding, and can document its financial operations, prior to distributing any additional grant awards.</p> <p>2. The Family Crisis Center should evaluate and strengthen its Board of Directors to ensure the Board can provide the appropriate oversight of the organization.</p> <p>3. Family Crisis Center should take the necessary steps to ensure that a sound accounting and internal control system is in place to properly account for future funding that it may receive.</p> <p>4. Family Crisis Center should have financial statement audits performed by an independent Certified Public Accountant in good standing for FY 2016 and FY 2017. The Board should hire the auditor, should approve the audited financial statements, and should receive a copy of the management letter (if any). Additionally, the Board should monitor the implementation of any audit recommendations made.</p> <p>5. The Board of Directors should disallow the practice of advancing payroll to employees. If the Board determines that this practice should continue, it should develop and implement a payroll advance policy that clearly states that the amount of money advanced to an employee will be deducted from the next paycheck. The policy should also include a provision for recovery of the money if the employee should leave the organization, such as a deduction from the final pay.</p> <p>6. To ensure financial sustainability, the Board of Directors for the Family Crisis Center should seek to secure the fiscal resources necessary to fulfill its core mission - providing emergency shelter to</p>	<p>engaged to conduct a full review of 2015 – 2018 transactions for any additional improprieties requiring further investigative or legal responses. The additional recommendations of the audit report, including segregation of duties, key financial records, cash disbursements and receipts, will be addressed through the implementation of the contractual agreement with the CPA firm. Staff will be appropriately trained to implement the</p> <p>2, 6, 7. The audit identified several issues related to Board Capacity and the programmatic components that were outside of the organization's core mission. The current Board of the FCC reviewed the findings in careful detail. The audit revealed a number of issues that demonstrated the challenges the organization has had in finding appropriate executive leadership and in providing necessary oversight of the executive. This reinforces information that has been provided from our interim leadership team, Michele S. Williams, LLC. At this time, the current Board Members have determined that it does not contain the required skillset and would have difficulty recruiting individuals with the needed skills to assist the FCC in moving past its current state. It has also been examined and realized that a complete restructure of program offerings of the organization will be difficult, as the FCC has developed a reputation (per se) for the services historically offered. Therefore, the Board has decided to pursue a full merger with Community Crisis Services, Inc. This organization has expressed interest in this merger opportunity and currently has the capacity to absorb the current mission of FCC.</p> <p>8. The Safe Passages Emergency Shelter Resident and Communal Living guide is in final stages of revision and will clearly outline the program's</p>

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Agency: DFS	Recommendation(s)	Action(s) Taken/Response(s)
	<p>families fleeing domestic abuse. The Board should also consider making difficult choices related to its current expenses in order to ensure that the organization is able to meet its financial obligations.</p> <p>7. Given the ongoing operating deficits experienced by the organization, the Board should prioritize the services that it can provide and make efforts to manage "mission creep" - the expansion of the organization's mission beyond the original goals that were set. The Board should consider partnering with other organizations on the same mission that have dedicated funding and have proven positive outcomes of providing other needed services for domestic violence victims, in order to ensure current available funding is directed to its core mission.</p> <p>8. The Family Crisis Center should ensure that its formal grievance process is clearly documented in the "Safe Passage Emergency Shelter Resident and Communal Living Guide" provided to clients during intake to ensure participants are aware of the organization's grievance process. Additionally, the means for tracking issues/concerns and how those issues were resolved should also be clearly documented. Documented procedures should be communicated to participants and incorporated into the Family Crisis Center's policies and procedures manual for employees responsible for providing services to the target population.</p> <p>9. The Department of Family Services (DFS) should ensure follow-up visits are clearly documented in a written report to the FCC and ensure that copies of all reports are maintained in the grant file. Site visit and subsequent follow up reports produced by DFS can be further enhanced by including dated photographs of the deficiencies noted.</p>	<p>participant grievance process. The interim leadership team has developed a tracking system for participant grievances and will ensure that participants are informed of the grievance process in writing at the time of intake. Additionally, the grievance procedures will be posted in all shelter common areas.</p> <p>9. Pursuant to A&I's recommendation, the Department of Family Services (DFS) will ensure that all follow-up monitoring visits are clearly documented in a written report which will be distributed to the Family Crisis Center Executive Director and the Chair of the Family Crisis Center Board. All monitoring reports, as well as, follow-up monitoring reports will be recorded within a standard template that is retained in the Domestic Violence and Human Trafficking division grant file. Additionally, the DFS grant monitor will include dated photographs of deficiencies noted during monitoring site visits and follow up site visits reports. Should deficiencies not be corrected within a mutually agreeable timeframe, the department will request to meet with the FCC Board Chair to ensure they are aware of the deficiencies and to provide a corrective action plan.</p>

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
 ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Agency: DFS	Recommendation(s)	Action(s) Taken/Response(s)
	<p>10. The Board of the FCC should periodically request copies of the site visit reports from the Executive Director to ensure issues identified in the reports are brought to their attention, adequate corrective action plans are developed, and timely resolution of deficiencies noted occur.</p> <p>Recommendations issued by the Maryland State Governor's Office of Crime Control and Prevention through a memorandum of audit review, can be viewed by visiting the County's Office of Audits and Investigations webpage.</p>	

Lobbying

The Ethics Code requires an individual or entity to register annually by January 1st of the calendar year in which lobbying is expected or within 5 days after first engaging in any act that requires registration. Lobbying is communicating in the presence of a County official or employee with the intent to influence any official action of that official or employee. Prince George's County Code § 2-295. A lobbyist must register if the entity or individual spends more than \$200 on lobbying, is compensated more than \$1,000 in connection with lobbying, or spends more than \$2,000 on activities to solicit others to communicate with officials. Once registered, lobbyists are required to file an annual report by January 31st for the preceding calendar year in which lobbying occurred.

Activity reports must include, among other information, the total compensation paid to the lobbyist in connection with lobbying activities, expenses for offices, gifts, meals, special events, and expenses incurred related to publications, witnesses, and research. Activity reports must also include the name of each public official or employee and qualifying relative of an official or employee to or for whom the lobbyist or any person on the lobbyist's behalf has given one or more gifts with a cumulative value of \$75 or more, whether or not given in connection with lobbying activities. A review of the common errors for 2017 Registered Lobbyists were the following: failure to enter correct start and end dates.

Guidelines for lobbying are posted on the Office of Ethics and Accountability's website to assist lobbyists with frequently asked questions. Registered lobbyists are encouraged to contact the Office of Ethics and Accountability ethics advice pursuant to the County's Ethics Code.

Lobbyists Disclosure and Annual Reports

The review of the Lobbyists' Disclosure and Annual Report Forms for the 2017 calendar year showed sixty (60) registered lobbyists and one hundred and eighty-one (181) reports were filed and completed.

A list of lobbyists registered with the Office of Ethics and Accountability in calendar year 2017 and their clients can be found on the County's website.

The following is the summary of Lobbyists' Annual Reports for filed with the Board of Ethics for Calendar Year 2017. Total expenditures for 2017 lobbying activities was \$1,159,112.05. The summary of sub-categories on the 2017 Lobbyists' Reports are as follows:

Lobbying Activities	Total Expenditures
Total compensation paid to the lobbyist not including expenses reported under (B) through (I) below, salaries, compensations, or reimbursed expenses of the staff of the lobbyist:	\$1,114,253.25
Office expenses of the lobbyist not reported in (A):	\$3,919.38
Professional and technical research and assistance not reported in (A):	\$0.00
Publications which expressly encourage persons to communicate with Prince George's County officials or employees:	\$0.00
Fees and expenses paid to witnesses:	\$0.00
Meals and beverages for Prince George's County Officials or employees or their spouses or dependent children:	\$20,185.00
Special events in which all members of the Council or standing committee are invited:	\$15,330.00
Expenses for food, lodging, entertainment of officials or employees for a meeting which was given in return for participation in a panel or speaking engagement at the meeting:	\$5,104.42
Other gifts to or for officials or employees or their spouses or their dependent children:	\$0.00
Other expenses:	\$320.00

Subtotal of A through F:	\$1,138,357.63
Subtotal of G through J:	\$20,754.42
Grand Total:	\$1,159,112.05

Lobbyists

As of December 31, 2017, sixty (60) lobbyists were registered for the 2017 calendar year. The list for calendar year 2017 registered lobbyists can be found on the County's website.

2017 REGISTERED LOBBYISTS

Count	Lobbyist Name	Address	Organization Represented
1.	Abbruzzese, Richard	KOFA Public Affairs 111 S Calvert St Baltimore, Maryland 21202	Crown Castle NG Atlantic LLC
2.	Antonetti, Robert	Shiple & Horne 1101 Mercantile Lane, Suite 240 Largo, Maryland 20774	Buildsol, LLC.
3.	Banner, Lindsay (Municap)	8965 Guilford Road, Suite 210 Columbia, Maryland 21046	Capital Center LLC, RPAI US Management LLC Karrington, LLC. Neighborhood Development Co. (Mt. Rainer) PNGS Management Company Walton Development & Management (USA), Inc. (Westphalia) West Hyattsville Property Co. LLC
4.	Bennett, Tyler W.	Alexander & Cleaver, P.A 54 State Circle Annapolis, Maryland 21401	Digital Copier Associates (DCA Imaging) Blueline Security Service Prince George's County Career Firefighters Federal City Development Partners, LLC
5.	Berlow, Stuart	4301 N. Fairfax Dr., Suite 530 Arlington, Virginia 22203	American Heart Association
6.	Chambers, Kayann	6801 Kenilworth Avenue Suite 400 Riverdale Park, Maryland 20737	Kay Management Co., LLC

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Lobbyist Name	Address	Organization Represented
7.	Dlhopolsky, Heather	7200 Wisconsin Ave, Suite 800 Bethesda, Maryland 20814	Federal Capital Partners Kaiser Permanente
8.	Eaves, Megan	112 West St. Annapolis, Maryland 21401	Baltimore Gas and Electric
9.	Estepp, Jeffrey H. (G.S. Proctor and Associates, Inc.)	14408 Old Mill Road, Suite 201 Upper Marlboro, Maryland 20772	1323 E St SE, LLC Alice Ferguson Foundation MedStar Southern Maryland Hospital Panda Power Funds Royal Farms Timothy Branch, LLC TPE Maryland Solar Land Holdings, LLC
10.	Evans, Gerard	191 Main Street, Suite 210 Annapolis, Maryland 21401	Conduent Holistic Industries, LLC. Fraternal Order of Police, Lodge 89
11.	Evans, Hayley	191 Main Street, Suite 210 Annapolis, Maryland 21401	Conduent Holistic Industries, LLC. Fraternal Order of Police, Lodge 89
12.	Fesche, Camille	Alexander & Cleaver, P.A 54 State Circle Annapolis, Maryland 21401	Prince George's County Municipal Association
13.	Fowler, Michael Lee	47 State Circle, Suite 403 Annapolis, Maryland 21401	Baltimore Gas and Electric Company
14.	Gibbs, Edward	1300 Caraway Court, Suite 102 Largo, Maryland 20774	Broglan, LLC Clarence and Marg Hepe Petrie Richardson Ventures, LLC
15.	Gray, Tyler	Municap 8965 Guilford Road, Suite 210 Columbia, Maryland 21046	Bozutto Development Company Capital Center LLC, RPAI US Management LLC Karington, LLC

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Lobbyist Name	Address	Organization Represented
			<p>Neighborhood Development Co. (Mt. Rainier)</p> <p>Patuxent Companies</p> <p>PNGS Management Company</p> <p>Urban Atlantic</p> <p>Velocity Capital, LLC</p> <p>Walton Development & Management (USA), Inc. (Westphalia)</p> <p>West Hyattsville Property Co. LLC</p>
16.	Graziano, Michael Alan	9200 Basil Court, Suite 400 Largo, Maryland 20774	Prince George's County Association of Realtors
17.	Haller, Thomas	1300 Caraway Court, Suite 102 Largo, Maryland 20774	<p>M Square Associates</p> <p>Old Line Realty Company, LLC</p> <p>Velocity Capital, LLC</p> <p>Woodyard Road Associates, LLC</p>
18.	Harris, LaTara	1120 20 th Street, NW, Suite 800 Washington, DC 20036	AT&T
19.	Hatcher, Chris	7979 Old Georgetown Road Suite 400 Bethesda, Maryland 20814	<p>The Adler Corporation</p> <p>Bald Eagle Partners</p> <p>Raz Development</p> <p>Elm Street Development</p> <p>Palisades Development LLC</p>
20.	Howe, Joshua	Alexander & Cleaver, P.A 54 State Circle Annapolis, Maryland 21401	Prince George's County Municipal Association
21.	Johansen, Michael	225 Duke of Gloucester Street Annapolis, Maryland 21401	Children's National Health System
22.	Larocca, Michelle	6801 Kenilworth Avenue Suite 400 Riverdale Park, Maryland 20737	<p>Kay Management Co., LLC</p> <p>Martin's Inc.</p>

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Lobbyist Name	Address	Organization Represented
			Root 1 Manager, LLC
23.	Leonard, Victoria	11950 Freedom Drive Reston, Virginia 20190	Mid-Atlantic Region Organizing Coalition
24.	Lininger, Brett	Semmes, Bowens & Semmes 25 S. Charles Street, Suite 1400 Baltimore MD 21201	DME Consulting Metropolitan Life Insurance Company
25.	Massoni, Greg	1700 Pennsylvania Avenue, NW, Suite 200 Washington, DC 20006	Gallagher Bassett
26.	McDonough, Caitlin	Harris, Jones & Malone 2423 Maryland Avenue Baltimore MD 21218	Chesapeake Employers' Insurance Company Verizon Communications
27.	McIntosh, Shawn	1211 Cathedral Street Baltimore, Maryland 21201	Sugar Free Kids Maryland
28.	McLaughlin, Jennifer	125 Cathedral Street Annapolis, Maryland 21401	Airbnb Clear Channel Outdoor Community First Development Corporation Corizon Health Daycon Ernst & Young, LLP Recovery Centers of America Southern Management Corporation Sun Services, LLC Uber Technologies, Inc.
29.	Meister, Doug	6801 Kenilworth Avenue Suite 400 Riverdale Park, Maryland 20737	Martin's Inc.
30.	Metzler, Emily	Municap 8965 Guilford Road, Suite 210 Columbia, Maryland 21046	Patuxent Companies Urban Atlantic Velocity Capital, LLC

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Lobbyist Name	Address	Organization Represented
31.	Mickelinc, Johnny	8965 Guilford Road, Suite 210 Columbia, Maryland 21046	Bozzuto Development Company Karington, LLC Patuxent Companies Urban Atlantic Walton Development & Management (USA), Inc. (Westphalia) West Hyattsville Property Co. LLC
32.	Miedusiewski, A. Joe	Semmes, Bowen & Semmes 25 S. Charles Street, Suite 1400 Baltimore, Maryland 21201	Metropolitan Life Insurance Company
33.	Mingo, Dwayne B.	9200 Basil Court, Suite 400 Largo, Maryland 20774	Prince George's Association of Realtors
34.	Mossburg, Matthew	P.O. Box 91 Barnesville, Maryland 20838	Amy's Contracting Services, LLC
35.	Parker, Midgett	1 Park Place, Suite 585 Annapolis, Maryland 21401	Brandywine Realty Trust Potomac Valley Brick
36.	Pasternak, Jerry	701 9 th Street, NW Washington, DC 20068	Pepco Holdings, Inc.
37.	Percy, Davion	Alexander & Cleaver, P.A 54 State Circle Annapolis, Maryland 21401	American Forest & Paper Association Avaya, Inc. Blueline Security Services Bolton Partners Charles P. Johnson & Associates DCA Imaging Doctors Community Hospital Environmental Quality Resources Everytown for Gun Safety Action Fund

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Lobbyist Name	Address	Organization Represented
			Federal City Development Partners, LLC Maryland Health Information Management Association Mission First Housing Development Corporation PGC Career Fire Fighters Prince George's County Municipal Association PSEG Fossil Telaforce, LLC.
38.	Perez, Lawrence	5327 Crittenden Street Suite A Hyattsville, Maryland 20781	Benjamin Banneker/ National Studios Partners
39.	Proctor, Gregory S.,	G.S. Proctor and Associates, Inc. 14408 Old Mill Road, Suite 201 Upper Marlboro, MD 20772	1323 E St SE, LLC 7-Eleven, Inc. Adventist HealthCare CareFirst BlueCross BlueShield GAI Consultants, Inc Lidl US, LLC Martin's Crosswinds, LLC MedStar Southern Maryland Hospital Timothy Branch, LLC Passport Auto Pepco Region – Maryland Root 1 Manager, LLC / Behnke Family Real Estate, LLP Royal Farms

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Lobbyist Name	Address	Organization Represented
			<p>Transdev</p> <p>Velocity Capital, LLC</p> <p>Walton International Group (USA), Inc. & Walton Maryland, LLC</p> <p>Washington Suburban Sanitary Commission</p>
40.	Proctor III, Gregory S.	G.S. Proctor and Associates, Inc. 14408 Old Mill Road, Suite 201 Upper Marlboro, MD 20772	<p>Martin's Crosswinds, LLC</p> <p>Pepco Region – Maryland</p> <p>Royal Farms</p> <p>Timothy Branch, LLC</p> <p>Transdev</p> <p>Velocity Capital, LLC</p> <p>Walton International Group (USA), Inc. & Walton Maryland, LLC</p> <p>Washington Suburban Sanitary Commission</p>
41.	Proctor, Thomas A.	G.S. Proctor and Associates, Inc. 14408 Old Mill Road, Suite 201 Upper Marlboro, MD 20772	<p>1323 E St SE, LLC</p> <p>7-Eleven, Inc</p> <p>Martin's Crosswinds, LLC</p> <p>Royal Farms</p> <p>TPE Maryland Solar Land Holdings, LLC</p>
42.	Reith, John	225 Duke of Gloucester Street Annapolis, Maryland 21401	Century Engineering
43.	Rice, Keenan	Municap 8965 Guilford Road, Suite 210 Columbia, Maryland 21046	<p>Bozzuto Development Company</p> <p>Capital Center LLC, RPAI US Management LLC</p> <p>Karington, LLC</p> <p>Patuxent Companies</p> <p>PNGS Management Company</p>

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Lobbyist Name	Address	Organization Represented
			Urban Atlantic Neighborhood Development Co. (Mt. Rainier) Walton Development & Management (USA), Inc. (Westphalia) West Hyattsville Property Co. LLC
44.	Rivera, Norman	17251 Melford Blvd 200 Bowie, Maryland 20715	Metropolitan Medicinals, LLC St. Paul CDC
45.	Roddy, Pat	225 Duke of Gloucester Street Annapolis, Maryland 21401	Century Engineering
46.	Rodgers, Beatrice	10001 Derekwood Lane, Suite 101 Lanham, Maryland 20706	Resource Connections Inc.
47.	Ross, Justin	125 Cathedral Street Annapolis, Maryland 21401	Airbnb Clear Channel Outdoor Community First Development Corporation Corizon Health Energy Answers International Ernst & Young, LLP Recovery Centers of America Southern Management Corporation Sun Services, LLC Uber Technologies, Inc.
48.	Rozner, Joel	225 Duke Gloucester Street Annapolis, Maryland 21401	Century Engineering Children's National Health System Optotraffic Walmart Stores, Inc. Waste Management of Maryland

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Lobbyist Name	Address	Organization Represented
49.	Shipp, William	11785 Beltsville Drive, 10th Floor Calverton, Maryland 20705	Morning Calm Management Urban Atlantic
50.	Silverman, Steven	3012 Marlow Road Silver Spring, Maryland 20904	A Wider Circle, Inc.
51.	Thompson, Melvin	6301 Hillside Court Columbia, Maryland 21046	Restaurant Association of Maryland
52.	Tydings, Joseph	1825 Eye Street, NW Washington, DC 20006	Peter N. G. Schwartz Management Company, Inc.
53.	Valentino- Benitez, Ellen	4126 Crosswick Turn Bowie, Maryland 20715	MD-DE-DC Beverage Assn.
54.	Warfel, Russell E.	6801 Kenilworth Avenue Suite 400 Riverdale Park, Maryland 20737	Martin's Inc.
55.	Watkins, Tami	701 9 th Street, NW Washington, DC 20068	Pepco Holdings, Inc.
56.	Watson, Jr., Kerry R.	101 MGM National Ave National Harbor, Maryland 20745	MGM National Harbor
57.	Whelan, Sloane	KOFA Public Affairs 111 S Calvert St, Suite 2820 Baltimore, Maryland 21202 United States	Crown Castle NG Atlantic LLC
58.	White, Josh	125 Cathedral Street Annapolis, Maryland 21401	Uber Technologies, Inc.
59.	Wineholt, Ronald W.	1050 17 th Street, NW, Suite 300 Washington, DC 20036	Apartment & Office Building Association of Metropolitan Washington
60.	Young-El, Boaz	8400 Corporate Drive, Suite 200 Landover, Maryland 20785	United Food & Commercial Workers Union Local 400

As of June 30, 2018, forty (40) lobbyists were registered for the 2018 calendar year. The list for calendar year 2018 registered lobbyists can be found on the County's website.

2018 REGISTERED LOBBYISTS

Count	Lobbyist Name	Address	Organization Represented
1.	Abbruzzese, Richard	KOFA Public Affairs 111 S Calvert St Baltimore, Maryland 21202	Crown Castle NG Atlantic LLC
2.	Antoine, Joanne	121 Cathedral Street Suite. 3-4 Annapolis, Maryland 21401	Common Cause Maryland
3.	Banner, Lindsay	Municap 8965 Guilford Road, Suite 210 Columbia, Maryland 21046	Capital Center LLC, RPAI US Management LLC Karington, LLC Neighborhood Development Co. (Mt. Rainer) PNGS Management Company Walton Development & Management (USA), Inc. (Westphalia) West Hyattsville Property Co. LLC
4.	Bereano, Bruce	191 Duke of Gloucester Street Annapolis, Maryland 21401	Expedia, Inc.
5.	Dellarose, Linda	Law Office of G. Macy Nelson, LLC 401 Washington Avenue Suite 803 Towson, Maryland 21204	UFCW Local 400
6.	Dlhopsky, Heather	7200 Wisconsin Ave, Suite 800 Bethesda, Maryland 20814	Federal Capital Partners Kaiser Permanente
7.	Dwyer, Jennifer	Progressive Maryland 33 University Blvd. E Silver Spring, Maryland 20901	Progressive Maryland
8.	Eaves, Megan	BG & E 112 West St Annapolis, Maryland 21401	Baltimore Gas & Electric Company
9.	Effingham, Damon	903 Kearny St. NE Washington, DC 20017	Common Cause Maryland

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Lobbyist Name	Address	Organization Represented
10.	Evans, Gerard	191 Main Street, Suite 210 Annapolis, Maryland 21401	Conduent Fraternal Order of Police, Lodge 89 J&L Towing and Recovery
11.	Evans, Hayley	191 Main Street, Suite 210 Annapolis, Maryland 21401	Conduent Fraternal Order of Police, Lodge 89 J&L Towing and Recovery
12.	Forster, Dyana	8400 Corporate Drive, Suite 200 Landover, Maryland 20785	United Food & Commercial Workers Union Local 400
13.	Gray, Tyler	Muincip 8965 Guilford Road, Suite 210 Columbia, Maryland 21046	Bozutto Development Company Capital Center LLC, RPAI US Management LLC Karington, LLC Neighborhood Development Co. (Mt. Rainier) Patuxent Companies PNGS Management Company Velocity Capital, LLC Walton Development & Management (USA), Inc. (Westphalia) West Hyattsville Property Co. LLC
14.	Graziano, Michael	9200 Basil Court, #400 Largo, Maryland 20774	Prince George's County Assn of REALTORS
15.	Harris, LaTara	1120 20 th Street, NW, Suite 800 Washington, DC 20036	AT&T
16.	Howe, Joshua	Alexander & Cleaver, P.A 54 State Circle Annapolis, Maryland 21401	Prince George's County Municipal Association
17.	Larocca, Michelle	6801 Kenilworth Avenue Suite 400 Riverdale Park, Maryland 20737	Root 1 Manager, LLC

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Lobbyist Name	Address	Organization Represented
18.	Liningar, Brett	Old Line Government Affairs LLC 100 W Pennsylvania Ave Suite 101G Towson, MD 21204	MetLife
19.	Lucchi, Leonard	O'Malley, Miles, Nylen & Gilmore, P.A. 11785 Beltsville Drive 10th Floor Calverton, Maryland 20705	Cohen Seigel Investors CS Patuxent Greens, LLC Maryland Clean Energy Jobs Initiative
20.	McDonough, Caitlin	Harris Jones & Malone 2423 Maryland Avenue Baltimore, Maryland 21218	Associated Builders & Contractors of Metro Washington Verizon Communications
21.	McLaughlin, Jennifer	Perry White Ross & Jacobson 125 Cathedral Street Annapolis, Maryland 21401	Affordable Schools, LLC Airbnb Corvias Solutions Daycon Keolis Urban Investment Partners
22.	Metzler, Emily	Municap 8965 Guilford Road, Suite 210 Columbia, Maryland 21046	Bozzuto Development Company Patuxent Companies Velocity Capital, LLC
23.	Mickelinc, Johnny	Municap 8965 Guilford Road, Suite 210 Columbia, Maryland 21046	Bozzuto Development Company Capital Center LLC, RPAI US Management LLC Karington, LLC Neighborhood Development Co. (Mt. Rainier) Patuxent Companies PNGS management Company Velocity Capital, LLC Walton Development & Management (USA), Inc. (Westphalia)

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Lobbyist Name	Address	Organization Represented
			West Hyattsville Property Co. LLC
24.	Mingo, Dwayne	8300 Corporate Drive, Suite 100 Landover, Maryland 20785	Prince George's County Association of REALTORS
25.	Shipp, William	O'Malley, Miles, Nylen & Gilmore, P.A. 11785 Beltsville Drive 10th Floor Calverton, Maryland 20705	Cohen Seigel Investors CS Patuxent Greens, LLC
26.	Silverman, Steven	3012 Marlow Road Silver Spring, Maryland 20904	A Wider Circle, Inc. Prince George's County Volunteer Fire and Rescue Association
27.	Thompson, Melvin	Restaurant Association of Maryland 6301 Hillside Ct Columbia, Maryland 21046	Restaurant Association of Maryland
28.	Pasternak, Jerry	701 9 th Street, NW Washington, DC 20068	Pepco Holdings, Inc.
29.	Percy, Davion	Alexander & Cleaver, P.A 54 State Circle Annapolis, Maryland 21401	Avaya, Inc. Charles P. Johnson & Associates DCA Imaging Doctors Community Hospital Mission First Housing Development Corporation Prince George's County Career Fire Fighters Prince George's County Chamber of Commerce Prince George's County Municipal Association PSEG Fossil Telaforce, LLC.
30.	Perez, Lawrence	LA PEREZ CONSULTING, LLC 5327 Crittenden Street, Suite A Hyattsville, Maryland 20781	Amalgamated Transit Union Local 689 Benjamin Banneker/National Studios

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Lobbyist Name	Address	Organization Represented
31.	Proctor, Gregory S.,	G.S. Proctor and Associates, Inc. 14408 Old Mill Road, Suite 201 Upper Marlboro, MD 20772	1323 E St SE, LLC 7-Eleven, Inc. Adventist HealthCare CareFirst BlueCross BlueShield GAI Consultants, Inc Lidl US, LLC Martin's Crosswinds, LLC MedStar Southern Maryland Hospital Panda Power Funds Pepco Region – Maryland Root 1 Manager, LLC / Behnke Family Real Estate, LLP Timothy Branch, LLC TPE Maryland Solar Land Holdings, LLC Transdev Velocity Capital, LLC Walton International Group (USA), Inc. & Walton Maryland, LLC Washington Gas & Light Company Washington Suburban Sanitary Commission
32.	Pounds, Eddie	O'Malley, Miles, Nylen & Gilmore, P.A. 11785 Beltsville Drive 10th Floor Calverton, Maryland 20705	Cohen Seigel Investors CS Patuxent Greens, LLC Maryland Clean Energy Jobs Initiative
33.	Rice, Keenan	Municap 8965 Guilford Road, Suite 210	Bozzuto Development Company

PRINCE GEORGE'S COUNTY, OFFICE OF ETHICS AND ACCOUNTABILITY AND BOARD OF ETHICS
ANNUAL REPORT INCLUSIVE OF CALENDAR YEAR 2017 & FISCAL YEAR 2018

Count	Lobbyist Name	Address	Organization Represented
		Columbia, Maryland 21046	Capital Center LLC, RPAI US Management LLC Karington, LLC Neighborhood Development Co. (Mt. Rainier) Patuxent Companies PNGS Management Company Velocity Capital, LLC Walton Development & Management (USA), Inc. (Westphalia) West Hyattsville Property Co. LLC Westfield, LLC (Konterra Project)
34.	Rodgers, Beatrice	10001 Derekwood Lane, Suite 110 Lanham, Maryland 20706	Resource Connections for PG Provider Council
35.	Rozner, Joel	225 Duke Gloucester st Annapolis, Maryland 21401	Century Engineering Children's National Health System Optotraffic Walton Development and Management, Inc. Waste Management of Maryland
36.	Tydings, Joseph	1825 Eye Street, NW Washington, DC 20006	Peter N. G. Schwartz Management Company, Inc.
37.	Watkins, Tami	701 9 th Street, NW Washington, DC 20068	Pepco Holdings, Inc.
38.	Watson, Jr., Kerry R.	101 MGM National Ave National Harbor, Maryland 20745	MGM National Harbor
39.	Whelan, Sloane	KOFA Public Affairs 111 S Calvert St, Suite 2820 Baltimore, Maryland 21202	Crown Castle NG Atlantic LLC
40.	Wineholt, Ronald W.	1050 17 th Street, NW, Suite 300 Washington, DC 20036	Apartment & Office Building Association of Metropolitan Washington

APPENDIX

A&I	Audits and Investigations
AMD	Animal Management Division
BOLC	Board of License Commissions (Liquor Board)
BOE	Board of Ethics
CCOP	Citizen Complaint Oversight Panel
DCAO	Deputy Chief Administrative Officer
DFS	Department of Family Services
DHCD	Department of Housing and Community Development
DHMH	Department of Health and Mental Hygiene – State of Maryland
DLLR	Department of Labor, Licensing and Regulation – State of Maryland
DOE	Department of the Environment
DPIE	Department of Permitting, Inspections and Enforcements
DPW&T	Department of Public Works and Transportation
DSS	Department of Social Services
EDC	Economic Development Corporation
ESLR	Employee Services and Labor Relations
Fire/EMS	Fire and Emergency Medical Services
HA	Housing Authority
HD	Health Department
HOA	Home Owners Association
HRC	Human Relations Commission
IA/IG	Internal Affairs/Inspector General
IRS	Internal Revenue Service – U.S. Department of Treasury
MLS	Memorial Library System
M-NCPPC	Maryland-National Capitol Park and Planning Commission
MTA	Maryland Transit Association
OCR	Office of Community Relations
OCS	Office of Central Services
OEA	Office of Ethics and Accountability
OIG	Office of Inspector General
OIT	Office of Information Technology
OHRM	Office of Human Resources and Management
OHS	Office of Homeland Security
OOL	Office of Law
PGCC	Prince George's Community College
PGCPS	Prince George's County Public Schools
PGPD	Prince George's Police Department
PRAB	Parks and Recreation Advisory Board
PSC	Public Safety Commission
QACD	Quality Assurance and Compliance Division
RDA	Redevelopment Authority
RA	Revenue Authority
SAO	State's Attorney Office
WIC	Women, Children and Infants Program
WSSC	Washington Suburban Sanitation Commission