

FY2019 Informal Ethics Advice, Legal Reviews and Information Requests

Case	Source	Case Type	Issue	Opinion/Response
19-0002	Official	Conflict of Interest	Is it a conflict of interest for a lobbyist to attend an event hosted by a County official at the official's home?	It would be a conflict if lobbyist paid for the event or assisted, provided a gift to the official, or if the lobbyist has a matter or represented a client with matters before the official's agency.
19-0004	Employee	Secondary Employment	Is an employee who is engaged in uncompensated work required to file a secondary employment request.	Pursuant to AP-152, all other outside employment is considered secondary employment and a request must be submitted.
19-0005	Employee	Legal Review	Legislative employee's request to engage in secondary employment as an unpaid intern with a university professor.	Approved by Council Member's Chief of Staff. OEA reviewed and no conflicts of interest present.
19-0007	Employee	Solicitation	Can a County official solicit gifts from a County vendor to be used for a private fundraiser?	No. It may create a conflict of interest and rise to the level of misuse of prestige of office.
19-0010	Employee	Gifts	Can a County Agency accept a gift from a private vendor?	The gift was solicited in violation of the Code of Ethics and the agency must reimburse for the value of gift or return it.
19-0015	Board/ Commission	Information Request	Request for verification that a write-in candidate for election completed an FDS.	Information provided.
19-0019	Employee	Legal Review	OCS employee's request to engage in secondary employment selling concessions at a stadium.	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval.
19-0020	Employee	Legal Review	OHRM employee's request to engage in secondary employment with M-NCPPC as an usher for special events.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0023	Employee	Secondary Employment	Is a Health Department employee required to submit a secondary employment request for an unpaid elected position?	Health Department employees are covered under the State's ethics code. Employee advised to consult with the State Ethics Commission.
19-0024	Employee	Conflict of Interest	Can a volunteer firefighter bid on a County contract with the Fire Department?	Volunteer firefighters are not subject to the County's Code of Ethics; thus, the conflict of interest provisions which would ordinarily prohibit these actions are not applicable.
19-0025	Employee	Secondary Employment	Must an employee of the Health Department file notice with OEA if they are elected	Health Department employees are covered under the State's ethics code. Employee

			to a local or state office.	advised to consult with the State Ethics Commission. Otherwise, County employees elected to local or state government are required to notify OEA.
19-0027	Employee	Information Request	Request for a copy of the County's Workplace Disturbance Report form.	Information provided.
19-0029	Employee	Conflict of Interest	Fire/EMS inquiry as to whether an employee who also performs services for a 501(c)(3) organization that is affiliated with Fire/EMS raises any ethical concerns.	The work as described is secondary employment and employees must complete secondary employment requests in accordance with AP-152 which will also be reviewed by OEA for potential conflicts or other ethics issues.
19-0031	Employee	Information Request	Request for copy of Code of Ethics.	Information Provided.
19-0034	Employee	Legal Review	OCS employee's request to engage in secondary employment as a yoga instructor.	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval.
19-0035	Employee	Legal Review	OCS employee's request to engage in secondary employment as a manager at a retail store.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0043	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment as an editor for a magazine.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0045	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment as a paramedic in St. Mary's County.	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval.
19-0046	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment as a paramedic in Queens Anne's County.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0049	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment as an adjunct professor at a community college.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0050	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment performing home inspections.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0051	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment as nurse for a hospital.	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval.
19-0052	Employee	Legal Review	Fire/EMS employee's request to engage in secondary	Agency approved. OEA reviewed and no conflicts of

			employment as a trainer for MD Fire and Rescue Institute.	interest present.
19-0053	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment as health and wellness coach.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0057	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment providing explosive instructions to a federal agency.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0058	Employee	Gifts	Can a "controlled donor" (County vendor) pay DoE employee costs to attend a training?	The payment would be considered a gift and §2-293(d)(3)(A) prohibits County employees and officials from accepting gifts from "controlled donors".
19-0059	Citizen	Information Request	Citizen stated he/she was the guardian of a minor who was involved in a PGPD-related incident, and wanted information regarding the case.	Information Provided.
19-0061	Citizen	Gifts	Can a controlled donor invite a OCS official to a dinner as a gift?	§2-293(d)(3)(A) prohibits County employees and officials from accepting gifts from "controlled donors".
19-0064	Employee	Post-Employment	Can an employee retiring from a County agency be rehired?	The Ethics Code's post-employment restrictions are not applicable to post-employment with the County.
19-0066	Citizen	Information Request	Reporter requesting comment regarding on OEA investigations.	OEA cannot comment on open investigations or unsubstantiated allegations.
19-0067	Employee	Conflict of Interest	Can an employee appear in a video of a vendor?	Request rescinded.
19-0079	Employee	Legal Review	OCS employee's request to engage in secondary employment handling customer relations at a gym.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0080	Employee	Legal Review	OCS employee's request to engage in secondary employment as a Lyft driver.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0081	Employee	Legal Review	A&I employee's request to engage in secondary employment as the president of a non-profit organization.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0082	Employee	Conflict of Interest	Can an agency hire the spouse of an employee who is currently employed with the same agency?	Hiring a spouse of a current employee does not create a conflict of interest, so long as neither employee is involved in matters in which their spouse has an interest. Agencies should not create a supervisory relationship

				between spouses that violates the County's fraternization policy.
19-0086	Employee	Legal Review	Legislative employee's request to engage in secondary employment as a state elected official.	Secondary employment approved with the following restrictions: employee may not engage in political activity during County time; use County resources; or use position or title to promote secondary employment activities. OEA reviewed and no conflicts of interest present.
19-0088	Official	Conflict of Interest	BOLC member request for guidance on adding disclaimers to invitations for a political fundraiser.	Matters concerning political contributions are outside of the jurisdiction of OEA and the Board of Ethics. Such advice may be obtained from the OOL and/or the Attorney to the BOLC.
19-0089	Employee	Secondary Employment	Is it a conflict of interest for a Health Department employee to serve on the board of directors for a civic association?	Health Department employees are not subject to the County's Code of Ethics. Requestor referred to State Ethics Commission.
19-0090	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment as a paramedic for a non-profit paramedic service out of state.	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval.
19-0091	Official	Conflict of Interest	Elected official's request for guidance on (i) secondary employment restrictions; (ii) circumstances which may require recusal by the official; (iii) in what political activities are elected officials allowed to participate; (iv) and what County-funded media may be used for an official's private purposes.	County Officials and their staff are subject to the Ethics Code's conflict of interest secondary employment provisions, including AP-152. An affidavit of impartiality pursuant to §2-293.01 must be filed if a Council Member believes there is an appearance of, or an actual conflict of interest. Officials may not use County resources to engage in political activity. §2-293(f) prohibits use of County time or other resources for personal gain or that of any private entity. Photographs, video clips, or other related items captured in relation to a Council Member's duties are owned by the County's Legislative Branch and are limited to use in Council-related activities only.

19-0093	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment as a manager/bartender.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0094	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment as an EMT in another County.	Request was rejected due to insufficient information.
19-0096	Employee	Gifts	Can an employee accept complimentary hotel and flight accommodations to attend a vendor sponsored event?	The gift as described is not prohibited under §2-293(d)(3). However, employee must report the gift on their 2019 Financial Disclosure Statement.
19-0097	Citizen	Information Request	Request from the COGEL to provide updates on the County's enforcement activities and new legislative/regulatory change.	Information provided.
19-0100	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment as a FEMA instructor.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0102	Official	Use of County Resources	Can a County board purchase a table to the Prince George's Inaugural Gala, a fundraising event being hosted by a political campaign?	§2-293(f) prohibits the use of County resources for private matters, such as private political activities.
19-0104	Employee	Gifts	Can an OIT employee keep a gift received for completing a survey sent from a controlled donor?	§2-293(d)(3) prohibits County employees and officials from accepting gifts from a controlled donor. The gift must be returned, or vendor reimbursed.
19-0107	Lobbyist	Information Request	Does a company's employed lobbyist register individually or as a firm? Is there a waiting period between registration and engaging in lobbying activities?	If a lobbyist is acting on behalf of a firm, they should register as a firm. There is no waiting period. Lobbyist may register prior to beginning lobbying activities or no later than 5 days after engaging in lobbying activities.
19-0109	Employee	Post-employment	Can employee who participated in a Performance Analysis Group (PAG) but resigned prior to the RFQ being advertised or contract being awarded, accept work as a consultant with a company that will submit a bid on the RFQ?	Both current and former employees who were members of a PAG are permanently barred from being involved in any work that flows from the awarded contract or PAG group.
19-0110	Employee	Legal Review	OCS employee's request to engage in secondary employment as a bookkeeper for a church.	Agency approved. OEA reviewed and no conflicts of interest present.

19-0111	Employee	Legal Review	OCS employee's request to engage in secondary employment as a tax preparer.	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval.
19-0114	Official	Post-employment	Can a former elected official lobby the CEX and County on behalf of a company doing business with the County?	The official must register as a lobbyist with the County and follow the provisions of §2-293(b)(2).
19-0115	Employee	Conflict of Interest	Can an OCR employee serve as a permanent voting member of a civic association affiliated with OCR?	Requestor failed to respond to OEA inquiry - request deemed rescinded.
19-0116	Employee	Use of County resources	Can a County employee take extended leave of absence to pursue other employment opportunities on trial basis?	Leave without pay must be approved by the Director of OHRM. Referred to OHRM.
19-0117	Official	Solicitation	Does the County Code allow employees to solicit other employees for gifts for fellow coworkers?	BOE passed a resolution on 12/21/17 that allows employees/officials to give and receive gifts from other employees/officials for special occasions and holidays.
19-0118	Employee	Secondary employment	PGPD employee requesting advice as to whether it is permissible to seek part-time employment with Park and Planning.	Police Department employees are subject to the secondary restrictions of the agency's general orders. Employee instructed to file request with agency.
19-0119	Lobbyist	Gifts	Is a company's sponsorship of an event hosted by the County Executive considered lobbying; would it be considered a gift under the County's Ethics Law.	If the event is hosted by a political candidate or a PAC, sponsorship of such an event would likely be considered a political contribution. The Code does not apply to political contributions. If hosted by a County official or employee, it may be considered lobbying.
19-0120	Official	Conflict of Interest	Appointed official seeking OEA's review of official's business associations for possible conflict of interests.	A conflict of interest exists between the official's County position and their private business interest and affiliations. Recommends official requests a Formal opinion from the Board of Ethics.
19-0121	Official	Gifts	Can Fire/EMS employees accept free tickets to a football game given as a token of appreciation for their service?	The Code of Ethics does not expressly prohibit the gift; however, acceptance must conform to the general orders of the agency's policy on accepting gifts given for performing functions of job. If none exist, at a minimum the Fire Chief needs to be

				consulted.
19-0122	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment with PGCPs as a pupil personnel worker.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0123	Employee	FDS	What are the criteria used to determine which police department employees are required to file financial disclosure statements?	Employees who are not specifically designated to file financial disclosures in the Code or by Executive Order are determined based on their job functions as determined by the respective agency.
19-0124	Employee	Conflict of Interest	Can an employee of the Legislative branch serve as an officer on the Purple Line Alliance board?	Issue moot. Employee will not act as an officer, but instead will be involved as a part of their official duties.
19-0398	Employee	Gifts	Can a County vendor provide lunch to all OHRM employees?	Under the circumstances as described, it is prohibited under §2-293(d)(3). The vendor should be reimbursed by OHRM the cost of the luncheon.
19-0129	Citizen	Information Request	Applicant inquired about status of application.	Information Provided.
19-0130	Citizen	Use of County Resources	What is the County policy on using government issued equipment for personal business?	OIT's Acceptable Use Policy provides specific direction on the use of the County's equipment. §2-293(f) of the Ethics Code addresses the use of County resources.
19-0131	Employee	Conflict of Interest	May a SAO employee bid on a County project through the employee's private business.	SAO employees are not subject to the County's Code of Ethics. Requestor referred to State Ethics Commission.
19-0132	Official	Conflict of Interest	Official seeking advice on potential conflicts of spouse's lobbyist activities.	§2-293(d) prohibits the acceptance of any gift, directly or indirectly, from any person that the employee knows or has reason to know is a lobbyist with respect to matters within the jurisdiction of the employee. Official should exercise caution in attendance at events where meals and entertainment may be provided by lobbyists.
19-0133	Official	Secondary Employment	Employee of the CEX office seeking advice on collections of client referral fees and secondary employment.	This activity would be considered secondary employment which requires approval from employee's supervisor.
19-0136	Former Employee	Post-employment	Former DPWT official inquiring whether official is prohibited from bidding on an	The official is not prohibited from bidding on the replacement RFP. However,

			upcoming Request for Proposal by DPW&T	the official is prohibited from bidding on the portion of RFP that they specifically requested be added to the RFP while employed with the agency.
19-0137	Employee	Information Request	MPIA request from Washington Post.	Referred to OOL. Documentation provided to the OOL.
19-0138	Official	Post-employment	Can a former DPIE official assist a private entity with violations issued by DPIE during the official's term of employment with DPIE?	The former official may not assist or represent any party other than the County for compensation in a matter involving the County if that matter is one in which they significantly participated in as an official. Based on the representations, it does not appear that the former official significantly participated in the issuance of the violations at hand.
19-0139	Employee	Post-employment	Can a former County official engage in post-employment as a lobbyist with an entity that is seeking to do business with the County?	The description of the proposed post-employment activities would constitute lobbying. As such, the activity requires registration if the requisite dollar amounts are met. The Code prohibits a contingent compensation structure. Further information is needed to opine to the specific post-employment restrictions.
19-0140	Employee	Legal Review	Request for Legislative Comment on PG 502-19 - Prince George's County Board of Education – Members' Expense Forms – Publication on Website.	Written comment submitted on behalf of OEA.
19-0141	Employee	Legal Review	Request for Legislative Comment on Proposed State Legislation: PG 508-19 - Prince George's County Public Schools – Office of Accountability and Compliance – Establishment.	Written comment submitted on behalf of OEA.
19-0142	Employee	Legal Review	Request for Legislative Comment on Proposed State Legislation.	Written comment submitted on behalf of OEA.
19-0144	Employee	Conflict of Interest	Is it a conflict for a Housing Authority employee to rent out their property under the Section 8 housing program, if employee is involved in the processing of documents	Request rescinded.

			related to the program as a part of their official duties.	
19-0146	Citizen	Information Request	Citizen seeking advice on collection of escrow funds related to a real estate transaction about to go to settlement.	Outside the scope of ethics.
19-0149	Official	Secondary employment	Is it a conflict of interest for an employee of the CEX office to serve on the board of two nonprofit organizations, which have received County funds?	Service on the boards do not create a conflict, as the employee does not participate in an official capacity in any matters related to either of the boards.
19-0150	Employee	Legal Review	Employee of the CEX office request to engage in secondary employment operating a daycare facility.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0151	Employee	Legal Review	OOL employee's request to engage in secondary employment as an adjunct faculty member at a university.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0152	Citizen	Information Request	Citizen inquiry regarding trespass upon property	Information provided.
19-0153	Citizen	Information Request	Request for list of 2018 registered lobbyists.	Information provided.
19-0155	Employee	Legal Review	Employee of the CEX office request to engage in secondary employment as a musical director with a church.	CAO approved. OEA reviewed and no conflicts of interest present.
19-0158	Employee	Gifts	Can County officials accept tickets for sporting events?	§2-293(d)(4)(E) allows elected officials to receive tickets or free admission to attend charitable, cultural or political events if the purpose of the gift or admission is a courtesy or ceremony extended to the office. The official must disclose the gift on their FDS.
19-0159	Citizen	Information Request	Citizen would like to file a complaint against a Common Ownership Communities Commissioner.	Outside the scope of ethics.
19-0160	Employee	Legal Review	DSS employee's request to engage in secondary employment.	DSS employees are not subject to the County's Code of Ethics. Referred to State Ethics Commission.
19-0162	Official	Legal Review	DPIE official's request to engage in secondary employment as a legal advisor in estate matters	DCAO approved. OEA reviewed and no conflicts of interest present.
19-0163	Employee	Post-employment	Is there a cooling off period for post-employment restrictions; can a former DPIE official work on projects	There is no time limit to the prohibitions of §2-293(b)(2)(A) regarding post-employment. Based on

			with DPIE?	information provided, the work is not work in which the former official was involved and §2-293(b)(2)(A) would not prohibit the work.
19-0166	Lobbyist	Lobbying	Does a lobbyist need to register if the matters discussed with a County official are not active legislation?	Yes. The activities meet the definition of lobbying as outlined in §2-291(a)(9).
19-0167	Employee	Conflict of Interest	Can an employee in their private capacity be involved in the fundraising activities of an entity if that entity is requesting grant funds from the County?	§2-293(a)(2)(B) prohibits officials from being involved in matters in which they or an entity in which they serve as an officer has an interest.
19-0168	Official	Legal Review	OHRM official's request to engage in secondary employment as an adjunct professor.	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval.
19-0169	Employee	Legal Review	Legislative comment on HB 0227- Ethics – Limitations on Applicant Campaign Contributions PG 404–19.	Written comment submitted on behalf of OEA.
19-0170	Employee	Legal Review	A&I employee's request to engage in secondary employment as a board member of a neighboring school board.	Agency approved. OEA reviewed and no conflicts of interest present. OEA provided additional perimeters to approval.
19-0171	employee	FDS	Employee seeking advice on whether to disclose sale of home during CY 2018 and how much information is required.	Employee must disclose sale of home and purchaser information; employee must still file FDS for CY 2018.
19-0172	Official	Secondary Employment	Is it a conflict of interest for a DPW&T official to serve on the Board of the Center for Watershed Protection?	No. §2-293(b) is not applicable. The Center is not doing business with the County, has no contractual or regulatory obligations involving the County, and is not subject to the authority of the employee or DPW&T.
19-0173	Employee	Post-employment	What restriction period exists for former employees who seek to work as a vendor with the County.	There are no time limits to the post-employment prohibitions of §2-293(b)(2)(A).
19-0174	Official	Gifts	Can a County official accept an honorarium that is offered based on actions taken as a part of their official duties?	Employees are prohibited from accepting gifts given as a result of them performing their required work duties and responsibilities.
19-0175	Employee	Legal Review	Request for review on HB-0617-Public Ethics - Meals and Receptions - Governmental Unit That	Written comment submitted on behalf of OEA.

			Employs an Individual Regulated Lobbyist	
19-0176	Employee	Legal Review	Request for Legislative Comment on HB-0355 Public Ethics Law - School Boards - Disclosures and Requirements (School System Ethics and Transparency Act of 2019).	Written comment submitted on behalf of OEA.
19-0177	Employee	Political Activity	Disqualification of Council Members as a result of unsolicited donations to their campaigns from zoning applicants.	Outside of OEA's jurisdiction – Advised to contact State Ethics Commission.
19-0182	Citizen	Information Request	Request for OEA Investigation Reports.	Referred to the OOL.
19-0184	Citizen	Information Request	Citizen request information as to how to check the status of a case with PGPD.	Outside the scope of ethics.
19-0185	Citizen	Information Request	Citizen has a complaint regarding a company found online offering funeral services.	Outside the scope of ethics.
19-0186	Employee	Employee Relations	Can a supervisor who is not the direct supervisor of an employee complete the employee's performance evaluation?	Employee relation matters are outside of the jurisdiction of OEA. Employee advised to contact OHRM.
19-0187	Official	Conflict of Interest	Can a County Council Member give special appropriation grants to private organizations with which they are personally affiliated?	No. §2-293(a)(2)(B) prohibits officials from being involved in matters in which they have an interest.
19-0188		FDS	Request for extension to file FDS by a separated official.	Issue of extension is moot. Filer filed an FDS timely. However, the filed report was incomplete, and the Board sent a letter to former official directing them to file an updated and complete FDS by April 30, 2019.
19-0189	Employee	Gifts	Can an OHRM employee who has been asked to participate as a panelist at an event, accept the gift of food, lodging and registration fees from a non-county vendor?	§2-293(d)((4)(D) allows the acceptance of a gift that covers reasonable expenses for food, travel, lodging, and scheduled entertainment of an employee in return for participation on a panel.
19-0190	Employee	Legal Review	Employee's request to engage in secondary employment as a fire safety instructor.	Agency approved. OEA reviewed and no conflicts of interest present.
19-0193	Employee	Conflicts of Interest	May a DPIE employee write a reference letter for a company that is doing business with DPIE.	No. §2-293(c) prohibits an employee from using the prestige of their office for the private gain of another. §2-293(f) prohibits the use of

				County resources to assist an outside entity.
19-0195	Citizen	Gifts	Can an elected official accept gifts given by attendees at an event hosted by the official's campaign committee.	§2-293(d)(3) prohibits County officials and employees from accepting gifts from controlled donors. Gifts in the form of a campaign contribution are not subject to the Code of Ethics.
19-0196	Employee	Secondary Employment	Fire/EMS employee's request to engage in secondary employment selling real estate	Agency approved. OEA reviewed, no conflicts of interest present.
19-0197	Official	Gifts	Can OHRM employees accept a complimentary or discounted invitation to a gala hosted by a non-County vendor.	Yes. §2-293(d)(3)(A) is not applicable as the entity is not a controlled donor and is not doing business with, nor seeking to do business with the County, as defined by the Code.
19-0200	Employee	Legal Review	Request to review FDS of prospective appointee to Washington Suburban Transit Commission.	OEA reviewed, no conflicts of interest present. Appointee should be directed to disclose affiliations with other entities in which they have a financial or personal interest pursuant to §§2-293(a)(I) and 2-293(a)(2).
19-0201	Employee	Legal Review	Request to review FDS of perspective appointee to Board of License Commissioners.	OEA reviewed, no conflicts of interest present.
19-0202	Employee	Legal Review	Request to review FDS of perspective appointee to Washington Suburban Sanitary Commission	OEA reviewed, no conflicts of interest present.
19-0203	Employee	Information Request	Request for copy of the section of code regarding gifts.	Information provided.
19-0204	Employee	Legal Review	Request to review FDS of perspective appointee to Washington Suburban Transit Commission.	OEA reviewed, no conflicts of interest present.
19-0209	Official	Gifts	Can an OHRM official accept a gift to attend an event as the guest of a County vendor?	No, the gift lacks a nexus to the officials work. §2-293(d)(3) prohibits County employees and officials from accepting gifts from controlled donors unless it meets one of the enumerated exceptions.
19-0211	Employee	Secondary Employment	Is it a conflict of interest for a DFS employee to maintain employment with a home-based therapy provider.	Whether secondary employment will be allowed, will be based on whether it is a conflict of interest under the Ethics Code §2-293(b). Employee instructed to complete request form pursuant to AP-152 for review.

19-0213	Employee	Gifts	County employee seeks advice regarding a package of cookies sent from a former employee to whom staff sent unsolicited donations after former employee's home burned down.	The former employee is not a controlled vendor and therefore, staff can accept the cookies.
19-0215	Employee	Gifts	Can agency funds be used to purchase a table to the 34th Annual Prince George's County Women's History Month Luncheon?	No. §2-293(f) prohibits the use of County resources that would result in personal gain or for any other personal matters and services.
19-0216	Citizen	Information Request	Citizen called for information regarding how to purchase a home in Prince Georges County.	Outside the scope of ethics.
19-0221	Employee	Gifts	Can DPW&T employees accept nominal food gifts from patrons of the bus service?	Request rescinded. OEA guidance on gifts provided for future reference.
19-0224	Employee	Legal Review	CEX office employee's request to engage in secondary employment as a fitness instructor.	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval.
19-0225	Employee	Solicitation	Can DPIE post a flyer promoting an event being held to raise funds for a private individual?	No, the posting of the flyer is prohibited. §2-293 and AP-153 prohibit solicitations for the benefit of an individual.
19-0226	Employee	Legal Review	OCS' employee's request to engage in secondary employment as a tax preparer.	Agency approved. OEA reviewed, no conflicts of interest present.
19-0227	Employee	Legal Review	DPW&T employee's request to engage in secondary employment serving on the Board of Center for Watershed Protection.	Agency approved. OEA reviewed, no conflicts of interest present.
19-0228	Employee	Conflicts of Interest	Can DPW&T utilize a consultant firm that employs a former County official.	§2-293(b)(2)(A) is applicable to post-employment and provisions are fact specific; each project would need to be evaluated to determine if prohibitions are applicable.
19-0230	Employee	Legal Review	DFS employee's request to engage in secondary employment as a home-based therapist.	Agency approved. OEA reviewed, no conflicts of interest present.
19-0231	Employee	Legal Review	CEX employee's request to engage in secondary employment as a musical Director at a local church.	CAO approved. OEA reviewed, no conflicts of interest present.
19-0232	Employee	Legal Review	Request to review FDS of perspective appointee to DPIE.	OEA reviewed, no conflicts of interest present.
19-0233	Employee	Legal Review	Request to review FDS of perspective appointee to DOE.	OEA reviewed, no conflicts of interest present

19-0234	Employee	Legal Review	Request to review FDS of perspective appointee to OOL.	OEA reviewed, no conflicts of interest present.
19-0237	Employee	Legal Review	Request to review FDS of perspective appointee to Redevelopment Authority.	OEA reviewed, no conflicts of interest present. Appointee should be directed to disclose affiliations with other entities in which they have a financial or personal interest pursuant to §§2-293(a)(I) and 2-293(a)(2).
19-0238	Employee	Legal Review	OCR employee's request to engage in secondary employment as a board member.	OEA reviewed and approved. Outside employment is permitted so long as it is done in accordance with conditions set forth in the approval.
19-0246	Employee	Legal Review	Request to review FDS of perspective appointee to Revenue Authority.	OEA reviewed, no conflicts of interest present.
19-0250	Former employee	Gifts	Is it a gift if a County vendor pays the lodging expenses of a County official, who attends the vendor's event? Must it be disclosed on official's FDS.	Yes, it is a gift and must be disclosed on Schedule D of the official's FDS. Officials must disclose all gifts received from persons doing business with the County.
19-0244	Employee	Gifts	Can Finance employees attend a free training hosted by an entity from whom the County has purchased goods in the past and may do so again in the future.	Yes, they may attend. §2-293(d)(3) prohibits County employees from accepting gifts from controlled donors; the entity offering the training is not a controlled vendor as defined by the Code of Ethics.
19-0247	Employee	Legal Review	OEA employee's request to engage in secondary employment as delivery driver.	OEA reviewed and approved. No conflicts of interest present.
19-0248	Employee	Legal Review	DoE employee's request to engage in secondary employment providing construction services.	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval.
19-0253	Employee	Employee Relations	Use of sick leave once an employee separates from County government.	Employee relation matters are outside of the jurisdiction of OEA. Employee advised to contact OHRM.
19-0254	employee	Information Request	Requests information related to FDS application.	Information provided.
19-0256	Employee	Secondary Employment	Can an employee engage in secondary employment with a County vendor?	There is no a flat prohibition. However, the particular facts would need to be analyzed pursuant to the Ethics Code and AP-152 to determine if a conflict of interest exists.
19-0257	Employee	Legal Review	Housing employee's request to engage in secondary employment as an independent contractor.	Agency approved. OEA reviewed, no conflicts of interest present.

19-0258	Employee	Secondary Employment	Are employees required to re-submit their secondary employment requests to new directors.	If the position of the employee or their specific duties/responsibilities have not changed, then the ethics advice remains the same; if duties have changed, they may need to be reviewed again.
19-0259	Citizen	Information Request	Request for laws governing secondary employment by County employees, and whether there are different laws that apply to lobbying efforts.	Link to the County's Ethics Code Section 2-293 regarding Secondary Employment provided.
19-0261	Employee	Secondary Employment	Can an OOL employee serve on the board for the Public Election Fund Committee in Montgomery County.	Yes. A conflict of interest does not exist under §2-293(b), as the outside employer is not doing business with the County, has no contractual or regulatory obligations involving the County, and is not subject to the authority or that of the employee's agency.
19-0262	Employee	Legal Review	OCS employee's request to engage in secondary at restaurant as a waitress.	Agency approved. OEA reviewed, no conflicts of interest present.
19-0263	Citizen	Information Request	Request for information on behalf of citizen who alleges retaliation by means of termination for requesting ADA accommodations.	Advised complainant that matters involving retaliation and/or termination of a County employee would be referred to OHRM.
19-0264	Citizen	Information Request	Media's request for any ethics disclosures filed by the CAO with the Board of Ethics.	OEA maintains the FDS of designated County employees and officials pursuant to the Code of Ethics. Copies are provided upon the completion of an FDS review request form.
19-0267	Employee	Legal Review	OEA employee's request to engage in secondary employment as a member of Howard County's Board of Education Ethics Panel.	OEA Executive Director reviewed and approved. No conflicts of interest present.
19-0268	Employee	Legal Review	OEA employee's request to engage in secondary employment as a member of AGC Peer Review Committee.	OEA Executive Director reviewed and approved. No conflicts of interest present.
19-0270	Employee	Conflict of Interest	Can a Performance Analysis Group (PAG) member participate in a PAG if they attended a meeting with a potential bidder? Should the member be replaced?	Procurement procedures are outside of the jurisdiction of OEA and matter was referred to the OOL.
19-0271	Employee	Legal Review	Legislative employee's request to engage in secondary	Agency approved. OEA reviewed, no conflicts of

			employment providing legal services for real estate transactions.	interest present.
19-0273	Employee	Information Request	Request information about disclosures on FDS when renting an apartment	Must disclose interest in real property when renting.
19-0275	Employee	Legal Review	CEX employee's request to engage in secondary employment as a board member for the PGC Community Television.	Agency approval was not submitted, deeming request incomplete and not ripe for OEA review and approval.
19-0277	Employee	Legal Review	Request to review FDS of perspective appointee to Personnel Board.	OEA reviewed, no conflicts of interest present.
19-0278	Employee	Legal Review	Request to review FDS of perspective appointee to Personnel Board.	OEA reviewed, no conflicts of interest present.
19-0279	Employee	Legal Review	Request to review FDS of perspective appointee to Personnel Board.	OEA reviewed, no conflicts of interest present.
19-0280	Employee	Legal Review	Request to review FDS of perspective appointee to Personnel Board.	OEA reviewed, no conflicts of interest present.
19-0281	Employee	Legal Review	Request to review FDS of perspective appointee to Personnel Board.	OEA reviewed, no conflicts of interest present.
19-0282	Citizen	Information Request	Is it a violation of State ethics laws for a lobbyist not to identify themselves when asked?	He registered as lobbyist on 1/4/2019. Any violations of state laws are outside of OEA's jurisdiction, requestor referred to State Ethics Commission.
19-0283	Employee	Legal Review	DCHD employee's request to engage in secondary employment as independent contractor.	Agency approved. OEA reviewed, no conflicts of interest present.
19-0285	Employee	Information Request	Requests to know if a provisional employee must file an FDS.	Information provided.
19-0286	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment as personal income tax preparer.	Agency approved. OEA reviewed, no conflicts of interest present.
19-0288	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment.	The request failed to include the required information and therefore was not ripe for OEA review or approval.
19-0289	Employee	Legal Review	OHRM employee's request to engage in secondary employment as an apartment manager.	Agency approved. OEA reviewed, no conflicts of interest present.
19-0290	Employee	Legal Review	DOC employee's request to engage in secondary employment with an out-of-state shelter assisting	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval.

			occupants with finding permanent housing.	
19-0298	Employee	Legal Review	Request to review FDS of perspective appointee to MNCPPC.	OEA reviewed, no conflicts of interest present.
19-0300	Employee	FDS / Ethics Training	Do members of the Commission for Women need to file FDS? How soon after appointments are the members required to complete ethics training.	Members are not required to file FDS. However, they must complete the mandatory ethics training within 60 days of appointment.
19-0393	Employee	FDS	Requested advice related to filing requirements and disclosure requirements for FDS.	Advised on Section 2-294 disclosure requirements.
19-0394	Employee	FDS	Requested advice related to filing requirements and disclosure requirements for FDS.	Advised on Section 2-294 disclosure requirements.
19-0395	Employee	FDS	When are new employees notified they are required to file an FDS.	Each agency maintains a list of positions required to file and informs the employee accordingly.
19-0396	Employee	FDS	Requested advice related to FDS filing requirements due to promotion to new position	Individual may file annual FDS and include former employment.
19-0269	Employee	Conflict of Interest	Can SAO employee serve as monitor to another attorney as part of a diversionary program.	SAO employees are not subject to the County's Ethics Code. Requestor advised to contact the State Ethics Commission.
19-0293	Employee	Legal Review	Request to review FDS of perspective appointee to Cable TV Commission.	OEA reviewed, no conflicts of interest present.
19-0294	Employee	Legal Review	Request to review FDS of perspective appointee to Cable TV Commission.	OEA reviewed, no conflicts of interest present.
19-0295	Employee	Legal Review	Request to review FDS of perspective appointee to Cable TV Commission.	OEA reviewed, no conflicts of interest present.
19-0296	Employee	Legal Review	Request to review FDS of perspective appointee to Cable TV Commission.	OEA reviewed, no conflicts of interest present.
19-0297	Employee	Legal Review	Request to review FDS of perspective appointee to Cable TV Commission.	OEA reviewed, no conflicts of interest present.
19-0299	Employee	Secondary Employment	Can a health department employee engage in secondary employment as a board member on the Langley Park Civic Association without creating a conflict.	Health Department employees are not subject to the County's Ethics Code on matters related to secondary employment. Employee advised to contact the State Ethics Commission.
19-0301	Citizen	Conflict of Interest	Is it a conflict of interest for children of County employees to be awarded scholarships	The conflict of interest provisions of the Ethics Code is applicable to County

			from a private organization, if the same organization received grant funding from a County Appropriations Grant	employees and officials, not their children.
19-0304	Board / Commission	Solicitation	Can the Veteran's Commission solicit donations?	All solicitations must be done in accordance with Administrative Procedure 153.
19-0307	Employee	Legal Review	Employee of the County Council request to engage in secondary employment providing graphic design services.	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval.
19-0309	Employee	Legal Review	DFS employee's request to engage in secondary employment as a volunteer Community Outreach Committee member with the City of Bowie.	OEA reviewed, no conflicts of interest present.
19-0310	Employee	Secondary Employment	Is membership on church's committee considered secondary employment; must it be disclosed on the FDS.	For the purposes of the Ethics Code, a position with a non-profit entity that does not create a legal or ethical relationship is not considered secondary employment and disclosure is not required.
19-0313	Employee	Solicitation	Is it a violation for Fire/EMS to allow a County vendor to present their services to a recruit class?	It is not a violation for vendors who have been previously approved by OHRM to provide benefit services to County employees to present those same services.
19-0314	Employee	Secondary Employment	Can an employee within the CEX office serve on a nonprofit board.	Agency approved. OEA reviewed, no conflicts of intent present.
19-0315	Employee	Employee relations	Does an employee have to use personal leave during their attendance at a speaking engagement if the hosting entity covers the travel costs.	How leave is used and allocated is outside the scope of OEA. OHRM is the proper agency to respond.
19-0316	Employee	Conflict of Interest	Is it a conflict for an employee of the County Council to facilitate a retreat for an entity that is affiliated with the County.	Request rescinded.
19-0318	Employee	Legal Review	SAO employee's request to engage in secondary employment.	Employees of the SAO are not subject to the County's Ethics Code. Requestor advised to contact the State Ethics Commission.
19-0320	Employee	Legal Review	DPW&T employee's request to engage in secondary employment with an energy marketing firm.	Agency approval was not submitted deeming request incomplete and not ripe for OEA review and approval.
19-0323	Employee	Legal Review	Request to review FDS of perspective appointee to	OEA reviewed, no conflicts of interest present.

			Washington Suburban Sanitary Commission.	
19-0324	Employee	Conflict of Interest	Is it a conflict of interest for an OCS employee to serve as a member of a Performance Analysis Group (PAG)?	Request for advice retracted.
19-0326	Employee	Legal Review	Employee of the County Council request to engage in secondary employment with the Democratic Central Committee.	OEA reviewed and secondary employment will not be approved until such time as additional conditions are added.
19-0327	Employee	Legal Review	CEX employee's request to engage in secondary employment as member of the planning board for a nonprofit organization.	Agency approved. OEA reviewed, no conflicts of interest present.
19-0391	Board/ Commission	FDS	Will the filing of a financial disclosure statement with the State satisfy the FDS filing requirement.	Yes. If person files a FDS with the State, they may file an affirmation with the County.
19-0392	Board/ Commission	FDS	Requests advice regarding assessment of FDS late fee.	Informal advice rendered – late fee is administered as individual is a required filer.
19-0328	Citizen	Information Request	Seeks to know where to file a complaint regarding WSSC contractors in his neighborhood.	Outside the scope of ethics.
19-0330	Employee	Information Request	Request for Ethics Code provisions regarding conflicts of interest, political activity and prohibitions on political contributions.	Information provided. Ethics Code does not cover political contributions. Questions regarding contributions should be directed to the State Election Board.
19-0333	Employee	Gifts	Are there any ethical concerns if a Police Department official keeps an unsolicited perishable gift valued at approx. \$125.	The receiving official may return, reimburse for the value or donate a perishable gift they do not wish to keep. These actions would not create any ethical concerns.
19-0334	Employee	Conflicts of Interest	Is it a conflict of interest for County employees to serve on the board of a non-profit organization that receives funds from the CEX office.	No. The employee's affiliation with the organization has been at the direction of their respective agencies Their actions were carrying out what appeared to be the wishes of the CEX office to support the organization.
19-0335	Official	Conflicts of Interest	Is it a conflict of interest for an official to engage in a personal relationship with a lobbyist who is not registered in the County.	The Code does not restrict the proposed relationship. The official is advised to obtain a list of the lobbyist's clients and refrain from receiving gifts from anyone listed.
19-0337	Citizen	Information Request	Requests assistance with supportive housing; resides in	Outside the scope of ethics.

			DC homeless shelter but family members in MD.	
19-0339	Board	Conflicts of Interest	Can the Board of Elections obtain services from a business if an elected official is a partial owner of the business.	BOE is not covered under the County's Code of Ethics. Referred to the State Ethics Commission.
19-0340	Citizen	Information Request	Citizen contacted OEA to request assistance with legal custody dispute. Requested to know if OEA handled custody matters.	Information provided.
19-0341	Employee	Gifts	Can an employee give a gift valued at \$100+ to their supervisor as a thank you for their role in contract negotiations.	No. §2-293(d)(4) prohibits gifts that could create an appearance that an employee may gain some advantage or other favoritism because of the gift. Employees are not allowed to receive "other compensation" for fulfilling their official duty.
19-0344	Employee	Gifts	Can DPIE accept gifts from individuals who acts as permit runners for clients doing business with the agency.	No. The permit runners are agents of their clients who are controlled donors and have a financial interest distinguishable from the general public. §293(d)(3)(A) prohibits gifts from controlled donors.
19-0345	Employee	Legal Review	DPIE employee's request to engage in secondary employment with Hands of Hope.	Information regarding hours, duties and whether it does business with the County were not included.
19-0346	Employee	Solicitation	What are the guidelines for agencies to request/obtain monetary donations and promotional items?	All solicitations done by a County agency must be done in accordance with the guidelines set forth in Administrative Procedure 153.
19-0347	Employee	Legal Review	DPIE employee's request to engage in secondary employment as an UBER driver.	Agency approval was not submitted, deeming request incomplete and not ripe for OEA review and approval.
19-0348	Employee	Legal Review	Fire/EMS employee's request to engage in secondary employment as board member of nonprofit organization.	Agency approved. OEA reviewed, no conflicts of interest present. See also case #19-0334.
19-0353	Employee	Legal Review	DPIE employee's request to engage in secondary employment as a real estate broker.	Agency approval was not submitted, deeming request incomplete and not ripe for OEA review and approval.
19-0354	Citizen	Information Request	Request for information on becoming a member of the Board of Ethics.	Information provided.
19-0356	Official	Conflicts of Interest	Is it a conflict for a member of the WSTC to assist a private	The Ethics Code does not prohibit the proposed

			entity on P3 school construction project?	secondary employment because the outside employer is not subject to the official's authority or that of their commission.
19-0361	Citizen	Gifts	Are there any laws or restrictions that would prohibit a corporate client pursuing procurement opportunities in the County from making campaign contributions?	Matters involving campaign contributions are covered by the Maryland Campaign Finance Laws and are exempt from coverage under the County's Code of Ethics. Questions should be directed to the State Board of Elections.
19-0362	Employee	Legal Review	HRC employee's request to engage in secondary employment as a security supervisor at an amusement park.	Agency approved. OEA reviewed, no conflicts of interest present.
19-0363	Employee	Legal Review	Employee of the County Council request to engage in secondary employment as board member for a credit union.	Agency approved. OEA reviewed, no conflicts of interest present.
19-0365	Official	Gifts	Can a vendor pay for the travel and accommodations of an agency Director who sits on the vendor's board; can the vendor pay for an employee who is not a member of the board.	Yes. §2-29 (d)(4)(D) permits the acceptance of reasonable expenses for food, travel, lodging, and scheduled entertainment which is given in return for participation at a meeting; both employees will be participating in a roundtable discussion.
19-0366	Citizen	Information Request	What is the registration fee charged to lobbyists for their registration and what if any fees are charged for late filing?	There are no fees associated with registration. §2-292(k) states the Board may assess a late fee of \$10.00 per day up to a maximum of \$250.00 and §2-297(a)(2) provides for additional fines up to \$1,000.
19-0367	Official	FDS	Must an appointed official report on their FDS a dinner paid for by Council Member? If the official attended but paid for their own meal would it still need to be reported.	Payment of the meal by the official would negate its status as a gift and the dinner would not need to be reported on the FDS. If accepted the meal must be reported.
19-0368	Employee	Secondary Employment	What are the reporting requirements for secondary employment and is it based on job class.	All employees and officials are subject to guidelines set forth in Administrative procedure 152. Approval for Secondary Employment apply to all job classifications.
19-0369	Employee	Secondary Employment	Employee inquired if he is allowed to coach sports in County hosted programs.	Request rescinded.

19-0370	Employee	Legal Review	DOC employee's request to engage in secondary employment as board member for a credit union	Agency approved. OEA reviewed, no conflicts of interest present.
19-0372	Employee	Legal Review	DPIE employee's request to engage in secondary employment as the owner of a sport's official management business.	Agency approval was not submitted, deeming request incomplete and not ripe for OEA review and approval.
19-0373	Employee	Secondary Employment	Are employees required to resubmit their secondary employment requests if the Director of the agency changes.	No, a new form is not needed. The form is already on file with OEA and the agency HR should also have a copy on file.
19-0374	Citizen	Information Request	Requests list of property tax overages throughout the County.	Information provided.
19-0377	Citizen	Information Request	Citizen received notice of violation regarding property and trash in Largo.	Outside the scope of ethics.
19-0378	Official	Conflicts of Interest	Can an elected official engage in secondary employment with a private entity that has matters that are subject to the authority of their department.	§2-293(a) prohibits an official from participating in matters in which they have an interest. §2-293(b) prohibits an official from being employed by an entity that has ongoing matters that are subject to the authority of the official's department.
19-0379	Official	Legal Review	DPIE's request for OEA to review its new Use of County Vehicle policy.	OEA reviewed and provided written comment.
19-0382	Citizen	Information Request	Requests update on MPIA request with DPIE regarding record of injury.	Outside the scope of ethics.
19-0383	Employee	Legal Review	Health Department employee's request to engage in secondary employment.	Employees of the Health Department are not covered under the County's Code of Ethics in matters concerning secondary employment. Instead they are subject to the State's Ethics laws.
19-0384	Citizen	Information Request	Requests information to file a fraud victim report.	Information provided.
19-0385	Board/ Commission	Information Request	Requests contact information for Board liaison.	Information provided.
19-0386	Official	Legal Review	Revenue Authority's request for OEA to review its new Use of County Vehicle policy.	OEA reviewed and provided written comment.
19-0387	Employee	Solicitation	Requests guidelines for agency regarding solicitation of sponsors.	Agencies must adhere to guidelines established in AP-153.
19-0388	Employee	Legal Review	DoE employee's request to engage in secondary employment as an animal technician with a local kennel.	Agency approval was not submitted, deeming request incomplete and not ripe for OEA review and approval.

19-0390	Employee	Information Request	Requested from A&I regarding dates of ethics training and secondary employment for employee	Information provided.
19-0397	Employee	Legal Review	CEX employee's request to engage in secondary employment as board member of nonprofit organization.	Agency approved. OEA reviewed, no conflicts of interest present. See also case #19-0334.
19-0399	Employee	Legal Review	DPIE employee's request to engage in secondary employment with the Revenue Authority.	Agency approved. OEA reviewed, no conflicts of interest present.
19-0400	Official	Conflict of Interest	Can a Revenue Authority official be involved in selecting a vendor if the official's spouse is an employee of the vendor.	To avoid the appearance of a conflict, a Performance Analysis Group (PAG) or other like selection committee should be used to select the vendor. The official should not participate.