



## MONTGOMERY COUNTY ETHICS COMMISSION

Public Meeting, January 11, 2022  
Conducted via Zoom call  
Minutes

IN ATTENDANCE:

Commissioners: Susan Beard, Chair  
Bruce Romer, Vice-Chair  
Jennifer Collins  
Rahul Goel  
Mary Ann Keeffe

PUBLIC ATTENDEES:

Chuck Crisostomo

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Staff Members: Robert W. Cobb, Chief  
Counsel  
Erin Chu, Program Manager

Item 1. The meeting was called to order at 7:00 p.m.

Item 2. The Commission approved the minutes from the December 8, 2021, with the date of the meeting being corrected. A motion was made to reflect individual names of Commissioners in the minutes, and the motion was defeated by vote of 4 to 1.

Item 3. The Commission considered information about the HOC's proposed inclusion in its agreements of procurement integrity provisions similar to 11B-52(a) of the County Code. The Commission was also informed that the Montgomery County Revenue Authority is not subject to the County's procurement law and might benefit from an approach similar to that proposed by the HOC. A motion was heard for the Commission to agree with the approach taken by the HOC, direct staff to seek a similar approach with the MCRA, and for staff to prepare a legislative proposal that would clarify that HOC and MCRA contractors are covered by 11B-52(a). The motion was approved unanimously.

Item 4. Mr. Cobb proposed a general outline of a training plan for County employees. The plan in brief outline involves working with OHR to institute notices for applicants relating to outside employment; a new acknowledgement form for new employees relating to ethics;

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development and inclusion of more robust new employee orientation materials; development and delivery of one-hour training for employees other than public financial disclosure filers; development of accessible non-live training; continuation of public financial disclosure training; continued development of accessible non-live training for BCC members; and assurance through the implementation of exit procedures that notify employees of post-employment obligation. The Commission unanimously supported these programs and initiatives. In addition, the Commission requested that Mr. Cobb examine the question of training frequency, especially whether the public financial disclosure training should be required more frequently than once every three years. The status of implementation of these initiatives is to be a standing item on the Commission going forward.

Item 5. The Commission decided to use letterhead conforming to the recommended approach of the County's BCC office.

Item 6. A Commissioner recommended that the Commission make information about Commission meetings more prominent on the Commission's website landing page. Commission staff is to confirm doing so is consistent with County BCC practices and then implement the recommendation. There was discussion about providing relevant Zoom links to the public meeting occurred, with positive and negative consequences of altering current practices reviewed. Staff is to inquire as to what other BCC's are doing in terms of accessing public meetings through published links.

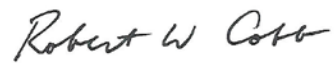
Item 7. Pursuant to GP Art. 3-305, at 8:15 p.m. the Commission voted unanimously to close the meeting to the public to discuss legal advice and confidential matters.

- a. The Commission considered a waiver so that a public employee could work on certain matters. Staff was directed to prepare the waiver.
- b. The Commission considered a request for an advisory opinion or in the alternative a waiver if the ethics law were deemed to apply, and the Commission determined that a waiver should be prepared.
- c. The Commission considered the appropriate disposition of honoraria received by an individual.
- c. The Commission reviewed correspondence concerning a financial disclosure filing.
- d. The Commission considered proposals to cure to resolve a matter. The Commission tentatively approved the proposals but deferred a final decision pending submission of requests for waivers to address continuing issues.
- e. The Commission considered outside employment requests and agreed with the recommendations of staff regarding the disposition of the requests. With respect to one individual's request for approval, the Commission decided to impose a one-year limit on the outside employment so the person will need to reapply after one year.

The meeting reopened at 9:52.

Item 8. The meeting adjourned at 9:55.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Robert W Cobb".

Robert W. Cobb  
Chief Counsel