



Montgomery County Ethics Commission

Annual Report for Calendar Year 2025

I. Introduction

Section 19A-6(f) of the Montgomery County Public Ethics Law requires the Ethics Commission (the Commission) to publish an annual report. This report summarizes the actions the Commission has taken during the preceding calendar year, the waivers it approved, and the advisory opinions it issued during the year.

The Commission's mission is to promote the public's trust of County government through the independent administration and enforcement of laws designed to promote and ensure the impartiality of County employees, including elected officials, in the execution of their responsibilities. The Commission undertakes a myriad of activities in support of the mission.

The Commission currently has five members, the full complement under the Public Ethics Law, with two members serving past their term expirations. They, along with the respective dates of their terms' expirations, are:

Kenita Barrow	10/2025
Susan Beard	10/2025
Eric Gallun	10/2027
Elizabeth Kellar	10/2027
Rahul Goel	10/2028

The selection of officers for calendar year 2025 was held in November 2024, at which time Elizabeth Kellar was voted in as Chair, and Rahul Goel was selected as Vice Chair. They both served in these capacities for the entire year. And, in November 2025, elections were again held, at which time the Commission voted to continue with Ms. Kellar as Chair and selected Ms. Barrow as Vice Chair in 2026.

The Commission held ten public meetings in 2025. The January, April, May, September and October meetings were hybrid, while the February, March, August and November meetings were held virtually. All virtual portions of meetings were held on the Zoom platform. The

Commission met fully in person for the June meeting. There were no meetings held in July or December of 2025.

II. Status of Programs and Operations

Ethics program statistics:

Performance Measures	Actual 2023	Actual 2024	Actual 2025
Number of Issuances of Formal Opinions, Waivers, or Guidance	18	15	18
Number of Lobbyists Registered	153	162	138
Number of Lobbyist Activity Reports	251	261	210
Number of Financial Disclosure Statements for Calendar Year	1895	1964	1970
Number of Outside Employment Requests	1852	1506	1595

This annual report summarizes the work of the Commission in each of the following areas:

1. **Financial Disclosure**
2. **Outside Employment**
3. **Lobbying**
4. **Complaints, Investigations and Hearings**
5. **Advisory Opinions, Interpretation and Advice, and Waivers**
6. **Education**
7. **Legislative and Regulatory**
8. **Outreach**
9. **Administration**

1. Financial Disclosure:

The Public Ethics Law promotes the public's confidence in the integrity of County employees by requiring certain employees, including elected officials, to file financial disclosure reports that are required to be made publicly available. The reports detail financial holdings and relationships so that conflicts of interest between an employee's County duties and the employee's personal activities and interests can be identified and addressed. The Public Ethics Law requires filings of financial disclosure reports when individuals are first appointed to a filing position, annually thereafter, and when terminating from a filing position. The Commission prepares financial disclosure forms, makes them available electronically and maintains reports filed by employees. It administers the electronic filing system for reporting and coordinates with the Office of Human Resources and all County agencies regarding the status of filers. It also resolves anomalous circumstances and questions associated with the filing of financial disclosure reports.

There were 1970 financial disclosure forms completed by public employees in 2025. Successful program administration is dependent on the accuracy of the database of employees and their status as filers. It depends on the employees who file the forms, on County senior management who are the designated reviewers of forms, and on County human resources liaisons and managers to follow-up with employees who have not filed and to obtain final reports from employees who are terminating from filing positions. Members of certain County boards, commissions, and committees who are considered "public employees" for purposes of the public ethics law are also required to file reports.

All full-time County employees required to file annual financial disclosure reports were 100 percent in compliance. Those terminating service as full-time employees were also compliant. The Commission ensures this by having the County withhold the final paycheck of employees until a final disclosure statement has been filed, in accordance with the ethics law. There are instances where the Commission is not notified of a filing employee's departure from service, and the employee is paid without having filed a final disclosure. Due to notification and enforcement challenges associated with obtaining these reports, on occasion Commission staff treats the last filed report by the filer as a final report. This also occurs with some terminating board, commission, and committee volunteers who terminate service without filing a disclosure report after leaving County service.

2. Outside Employment: The Public Ethics Law requires that County employees obtain approval from the Commission prior to engaging in any compensated service other than County employment. The Commission utilizes the Outside Employment Online System (OEOS) to process requests for outside employment. The system provides a vehicle for review by the employing department's management and the Ethics Commission.

The Commission's staff reviews and prepares all requests for consideration by the Commission, obtaining additional information from requestors and County agencies and conducting preliminary legal analysis of requests. The Commission approves requests, as appropriate, setting conditions on approval to ensure compliance with ethics requirements. The staff notifies

requestors by email of the disposition of requests by the Commission. The Commission publishes approved Outside Employment information as required by the Public Ethics Law.

The Commission acted on 1595 requests for outside employment in calendar year 2025.

A current list of outside employment approvals for County employees is incorporated into a database, publicly available. This can be found at:

https://data.montgomerycountymd.gov/Government/Outside-Employment/j6hr-gfpx/data_preview. Employees are notified prior to the expiration of their approvals so they can submit new filings if they desire to continue the outside employment.

3. Lobbying: The Public Ethics Law requires persons meeting certain criteria and thresholds who communicate with County employees to register as lobbyists and to file semi-annual activity reports with the Commission. Annual registration fees are required and are paid to the Commission and processed and deposited into the General Fund.

Since 2013, lobbying registration and activity reporting has been implemented through an online application developed by the Commission and Technology and Enterprise Business Solutions. The system has made registration easier for registrants, allows data to be captured electronically rather than by manual processes of Commission staff, and promotes transparency for the public in accessing the online data.

These systems have resulted in almost instantaneous availability of lobbying information on the Ethics Commission's website:

<https://www2.montgomerycountymd.gov/Lobbyist/ActivityReport.aspx>

As the system is easy to use, registering lobbyists' compliance with requirements is high. For example, 100 percent of required semi-annual reports on lobbying activity for the last several years (including 2025) have been filed. This compliance rate is in stark contrast to the system in place prior to 2013 when compliance was irregular and there were no systems in place to measure it.

In calendar year 2025, 138 lobbyists registered. The total receipts for calendar year 2025 were \$17,650.78. This compares with \$21,125.38 in 2024, and \$19,708.30 in 2023. There are variances in the number of lobbyists required to register; they may be correlated to community interest in land use matters before the County Council, particularly Master Plans.

In 2023, the Commission approved a reporting requirement change to the lobbying system. Beginning in calendar year 2024, registered lobbyists are required to identify the specific matters they lobbied in bi-annual activity reports. Those matters are now publicly disclosed on the Commission's website at

<https://www2.montgomerycountymd.gov/Lobbyist/ActivityReport.aspx>.

4. Complaints, Investigations and Hearings: Pursuant to the Public Ethics Law, the Commission receives complaints and, as appropriate, conducts investigations and hearings,

makes findings, and imposes sanctions and penalties. During 2025, the Commission received few allegations of ethics violations constituting “informal” complaints. (A complaint that is made that does not meet the ethics law’s requirements for submission of a formal complaint is treated as an “informal” complaint.)

Matters that do not raise issues within the jurisdiction of the Commission are closed or referred to a more appropriate office for disposition. Those subject to the Commission’s jurisdiction are considered and addressed by the Commission. When appropriate, matters are coordinated with the County Attorney, the relevant County agency, or the Inspector General. The Commission is authorized to conduct investigations on its own initiative and to bring complaints.

At the beginning of 2025, the Ethics Commission had no open investigatory matters. At the end of 2025, there were two formal complaints pending before the Ethics Commission.

5. Advisory Opinions, Interpretation and Advice, and Waivers: The Ethics Commission is expressly authorized to interpret the Public Ethics Law and advise persons as to its application. It does this on its own initiative, in response to, or as a result of formal or informal inquiries. Commission staff receives many informal inquiries from County employees and from members of the public. These questions relate to each of the programs operated by the Commission and with respect to the overall mandate of the Commission under the ethics law.

The Commission is authorized to publish advisory opinions and grant waivers of ethics law requirements. The Commission is required to publish its advisory opinions, or, in the event an opinion is not published, state the reasons for not publishing the opinion.

The Commission published two advisory opinions in 2025, which are published at <https://www.montgomerycountymd.gov/Ethics/Decisions/opinions/2025.html>.

The Ethics Commission issued fifteen waivers, which are published at: <https://www.montgomerycountymd.gov/Ethics/Decisions/waivers/2025.html>

Brief summaries of the advisory opinions and waivers appear below. The Commission’s decisions were limited to the facts presented; no assumption should be made regarding the application of any waiver to any other circumstances.

Advisory Opinions

The Commission issued two advisory opinions in 2025.

AO25-01-001

Izola Shaw is a sitting Rockville City Councilwoman and has been appointed by the County Executive to sit on the Housing Opportunities Commission of Montgomery County (“HOCMC”) as a commissioner. The HOCMC owns property within the City of Rockville. Ms. Shaw sought

ethics advice regarding separation of her two roles so as not to run afoul of Mont. Co. Code Secs. 19A-14 (misuse of prestige of office) and 19A-15 (disclosure of confidential information).

As a Commissioner, Ms. Shaw will be privy to confidential discussions related to programs and assets, both current and contemplated, of the HOCMC throughout Montgomery County, including within the confines of Rockville City. Currently, the HOCMC owns two properties within city limits as well as numerous individual units within the city that are either owned, managed or funded by HOCMC. Additionally, there have been discussions at the HOCMC about increasing its Rockville City holdings.

Moreover, the HOCMC is involved in tax abatement and permitting matters before all elected bodies within Montgomery County. The Ethics Commission advised that Ms. Shaw must recuse herself from any discussions related to any processes, properties or projects regarding these tax abatement and permitting matters pertaining to properties within Rockville City. Ms. Shaw must also not use confidential information learned as an HOCMC Commissioner for any purpose other than to support HOCMC objectives (see Mont. Co. Code 19A-15(a)).

[AO25-11-018](#)

The Ethics Commission was asked to review a County employee's role as the president of a professional organization and whether that role creates a conflict of interest in the employee's County chain of command.

The professional organization in question is instrumental in shaping state policies and guidance that are transmitted to local jurisdictions. The County employee, serving as president of the professional organization, works closely with state government decisionmakers who provide direction and guidance to the County employee's County manager. This arrangement effectively places the County employee in a policy-directing position over their County supervisor. As such, it is barred by Mont. Co. Code Sec. 19A-11(a)(2)(A) which states that "[U]nless permitted by a waiver, a public employee must not participate in any matter if the public employee knows or reasonably should know that any party to the matter is any business in which the public employee ... is an officer, director, trustee, partner, or employee."

Further, absent a waiver from the Ethics Commission, if this volunteer role were compensated outside employment, the ethics rules would prohibit the County employee from being in the chain of command for the employee's County manager. (See COMCOR 19A.12.01.04.2.) Although the County employee's volunteer role does not perform "supervisory" functions over the County employee's County manager, the influence and sway held by the County employee in their volunteer role with persons at the state level who do hold supervisory functions over the County employee's County manager effectively create an appearance of a level of supervision. In Mont. Co. Code Sec. 19A-2(b), the Public Ethics Law notes that not only true conflicts of interest, but also the mere appearance of such has the effect of eroding public trust and confidence in the government by its constituents. Based on the totality of the circumstances, the Ethics Commission determined that, absent a waiver to the restrictions contained within Sec. 19A-11, the County employee could not continue in their volunteer role while simultaneously

serving in their current County position. The County employee simultaneously asked the Ethics Commission for a waiver of the prohibitions contained within the ethics law. For reasons stated within the full body of the advisory opinion, the Commission declined to grant a waiver.

Waivers

The Ethics Commission issued 16 waivers in 2025.

Twelve of the 16 waivers related to outside employment activities.

A public employee is prohibited, pursuant to § 19A-12(b)(1)(B), from being employed by a business that negotiates or contracts with the County agency with which the public employee is affiliated, unless the Ethics Commission grants a waiver. Many employees are notified of the prohibition after they have submitted a request for outside employment after management or the Ethics Commission has reviewed it. In general, outside employment waiver applications are granted when there is no relationship between the conduct of the employee's County duties and the outside employer, and the duties performed in the outside position do not relate to the contract between the County and the outside employer. In short, they are approved when there is no actual conflict of interest.

The waivers issued of 19A-12(b)(1)(B) involved the following employees:

W25-03-002	Rebecca Fink	DHHS
W25-04-003	Julianne Tortolano	DHHS
W25-05-004	Kelly Mullendore	MCFRS
W25-05-005	Clint Sobratti	MCDOT
W25-08-008	Johanna Arias Bonilla	DHHS
W25-08-009	Anne-Marie Wessikoaba	DHHS
W25-10-012	Naanco Woewiyu	DHHS
W25-10-013	Bayan Al Sulaihat	DHHS
W25-11-014	Gladys Herrera Garrido	DHHS
W25-11-015	Deborah Fuller	DHHS
W25-11-016	Kemeka Henry	DHHS
W25-11-017	Gontran Archer	DHHS

These waivers are not discussed in detail here and can be reviewed by clicking on the individual links or with all waiver documents at:

<https://www.montgomerycountymd.gov/Ethics/Decisions/waivers/2025.html>

The remaining four waivers issued involved requests for waivers of the application of other provisions of the ethics law and abridged versions of these waivers can be found below.

[W25-05-006](#)

The Department of Correction and Rehabilitation (“DOCR”) sought a waiver of Montgomery County Code Sec. 19A-14 in order to participate in a medical study related to opioid addiction treatment protocols in incarcerated populations. The study was conducted by a third party, the Friends Research Institute (“FRI”), and DOCR employees could volunteer to participate in the research study without additional compensation. At the end of the study, FRI will publish the findings, and DOCR would be named as a study partner in the subsequent paper written by FRI.

This partnership implicated the prohibition against endorsement and use of agency title contained within Sec. 19A-14 as well as ethics regulations under COMCOR 19A.14.01.02. However, the Commission added an exception in its regulations that allows for endorsements when the endorsement will support the agency’s mission.

In light of that exception, and in conjunction with the potential benefit to the public through this study and the support for the partnership by the Chief Administrative Officer, the Ethics Commission granted the waiver.

[W25-06-007](#)

The Montgomery County Police Department (“MCPD”) sought a class waiver of Mont. Co. Code Sec. 19A-14 to allow the department to provide an educational benefit to sworn officers in partnership with University of Maryland Global Campus (UMGC). The benefit would include waived or reduced fees, a more favorable tuition rate structure, and credit hours granted for certain on-duty activities and trainings, subject to approval by UMGC.

Police recruits in Montgomery County are required to have at least 60 college credit hours in order to be hired by the department. This higher education requirement has proved challenging in terms of recruiting new hires. The proposed partnership would reduce that burden by creating a pathway for recruits to achieve the necessary education while on the job, and thus, improve the department’s goal of increasing its force and maintaining industry-leading higher education standards for sworn officers.

The arrangement would violate Sec. 19A-14, which prohibits the misuse of prestige of office for personal gain, as the benefit is only available to sworn officers. However, the arrangement serves a public goal of a better educated police force, and it adds to the benefits package MCPD can offer to entice new recruits. Based on these advantages that ultimately benefit the Montgomery County population, the Ethics Commission granted the waiver as to sworn Montgomery County Police officers and recruits. The Commission declined to discuss other classes mentioned in the request, as they are outside the Commission’s jurisdiction.

W25-09-010

Hilary Laskey is an employee of the Montgomery County Department of Health and Human Services (“DHHS”). Prior to becoming a county employee, Ms. Laskey worked for the State of Maryland. She is a graduate student at The Catholic University of America, where she developed a dissertation focus of Job Satisfaction of Child Welfare Workers among lingering covid-19, a topic she formulated while a State of Maryland employee. The thesis involves a voluntary, anonymous survey sent to child welfare workers throughout the state of Maryland at local jurisdictions, including child welfare workers at DHHS. However, the survey could implicate misuse of office concepts both for Ms. Laskey as a DHHS employee and for survey participants, should they complete the survey during work hours.

The leadership at DHHS is interested in the information this survey may uncover, as retention of child welfare workers is of vital importance to the department and to the public generally. Retention of child welfare workers since the pandemic has been challenging throughout the state and beyond.

After receiving assurances that Ms. Laskey will not use her County role or any County resources in disseminating the survey, and with the Department’s concurrence in the request, the Ethics Commission granted the waiver.

W25-09-011

Ali Ozair is a former Vice President of Property Management at the Housing Opportunities Commission of Montgomery County (“HOCMC”) seeking a waiver to Mont. Co. Code Sec. 19A-13, which contains a one-year bar against working for a vendor of your County agency after leaving county service. Mr. Ozair wished to leave County service and begin a new business in partnership with an HOCMC vendor. However, the new business plan involves maintenance services not currently provided by the vendor and not currently contemplated under the terms of the contract the vendor has with HOCMC. The new business would focus on maintenance of commercial properties, hotels, healthcare facilities and warehouse. Further, Mr. Ozair’s proposed new business would be national in scope, and not with a sole focus on Montgomery County, Maryland. Mr. Ozair also assured the Commission that he will not seek to do business with HOCMC for *at least* one year after separating from the organization.

Currently, the HOCMC does not own properties contemplated under the new business plan, so the potential overlap between Mr. Ozair’s former and proposed roles is theoretical at the moment.

After reviewing the waiver request and being assured that Mr. Ozair will honor a self-imposed one-year bar from seeking to do business with his former County agency, the Ethics Commission granted the waiver.

6. Education: The Commission conducts public education and other informational programs regarding the Ethics Law. Commission staff routinely provides individual instruction on filling

out and reviewing financial disclosure forms, outside employment requests and lobbying reports, and other matters falling within its jurisdiction.

Ethics Commission staff provide ethics training in a variety of ways. New County employees view a brief ethics video and are required to sign an acknowledgement form regarding ethics obligations. They also are required to attend a one-hour training session conducted by Ethics Commission staff. The one-hour trainings are held every four weeks. All persons who are required to file a public financial disclosure are required to take training once every three years. In 2025, ethics training was held during 65 different sessions, training a total of 1,409 public employees across County government. Individualized training sessions for Fire and Rescue and Police recruits were held as well as individualized training for certain quasi-governmental agencies, such as the Housing Opportunities Commission and the Montgomery County Revenue Authority.

The new employee training and the training for public financial disclosure filers are conducted using the Microsoft Teams platform. This allows for online presentation by Commission staff, along with appropriate PowerPoints. Further, it has a chat feature for Commission staff to monitor both technical problems of participating attendees as well as substantive ethics questions that arise, enabling the primary presenter to conduct the training with minimal distraction.

The Office of Human Resources Training and Organizational Development Division and the Application Management group at the Technology and Enterprise Business Solutions agency have provided support in the implementation of these training and compliance initiatives.

During 2023, Commission staff developed a new employee training video to act as a backup to the live online new employee training that new employees are required to take. New employees are automatically enrolled to take new employee ethics training. If a new employee twice fails to take the class the new employee is automatically enrolled in, the employee is notified of the requirement to access the new employee ethics training video.

Board, Committee and Commission members are also required to take training, which is administered through a one hour recorded training session developed in 2022. New BCC members are notified of the requirement to take the training (along with other required training for BCC members.)

7. Legislative and Regulatory: The Commission recommends and prepares new ethics legislation and regulations.

The Commission submitted no requests for legislative change in 2025.

8. Outreach and Other Activities: The Staff also serves as the principal public resource on the County's ethics laws and manages a website that reflects Commission programs, activities, and publications, including annual reports, approvals of outside employment requests, lobbying data, and waivers and opinions.

9. Administration: The Staff of the Commission is responsible for ensuring that Commission meetings are run in accordance with the Open Meetings Act and other applicable law. The Staff informs and advises the Commission as to all material matters under its jurisdiction. Commission staff are also responsible for budget, procurement, human resources, and resource management for the operation of the office in accordance with Montgomery County policies. Staff attends required County training in these and other office management areas.

Respectfully Submitted,



2/28/2026

Elizabeth Kellar, Chair