

FINANCIAL DISCLOSURE REVIEWER TIPS

Section 19A-18(e)(1)(C) states:

The director [or deputy director or division chief] or the Chief Administrative Officer must review the statement to see if:

- the answers are complete.
- there is any conflict of interest with the person's official duties.
- there is any potential conflict of interest.

Some of the very common errors we see with reports include:

- Failure to list salary/income from County employment
- Failure to list spouse's salary/income
- Failure to list source of income in Section 4 including name and address of income source
- Failure to list debts (mortgage, car loans), especially if real property listed in Section 1 is subject to a mortgage
- Failure to list address and jurisdiction of house for which mortgage is owed
- Failure to list mortgage company
- Failure to list interest rates on all debts
- Failure to confirm that one has no mortgage or other debts
- Failure to list family members' jobs
- Failure to list stocks, bonds, etc. or to confirm that one owns none of these
- Failure to disclose details on stocks. Often, we will see reports that will list "Charles Schwab" as a holding and then state "stocks" without any detail on what is in the Schwab account.

As regards identification of conflicts of interest, the key is looking at the information on the form and seeing if there is a potential relationship with the filer's County position; is there an opportunity for the filer to somehow affect through his official position any of the assets, property, or entities with which the employee or his family members are affiliated?

If a reviewer unintentionally accepts a deficient disclosure, please contact Erin Chu at the Ethics Commission, either by telephone at x76676 or by email at Erin.Chu@montgomerycountymd.gov, for assistance.