



## MONTGOMERY COUNTY ETHICS COMMISSION

**May 14, 2025**  
**Waiver 25-05-005**

Pursuant to § 19A-12(b)(1)(B) of the Public Ethics Law, a public employee must not be 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.

Clint Sobratti is the Transit Coordinator at the Transit Services Division of the Montgomery County Department of Transportation (MCDOT). He would like to engage in outside employment as a driver at Transdev, an entity that contracts with Montgomery County Department of General Services (DGS) on behalf of MCDOT.

As the Transit Coordinator, Mr. Sobratti oversees the bus operators' departure times from the Gaithersburg bus depot, and he investigates any operator-involved collisions. He also interacts with the public related to bus schedules, and he fields public complaints related to the transit operators. Mr. Sobratti's service location for MCDOT is at the Gaithersburg bus depot.

In his proposed role as driver with Transdev, he would be driving ride-on buses through the service lane at the Silver Spring bus depot to be washed and cleaned while allowing the Transdev tech to check the fluids on the buses and fill fluid reservoirs as needed.

Pursuant to § 19A-8(b)(3) of the Public Ethics Law, the Ethics Commission may grant a waiver of the prohibition of § 19A-12(b) if the Ethics Commission concludes that the proposed employment is not likely to create an actual conflict of interest. Upon a review of the request and the Department's concurrence in and support for the waiver request, the Commission finds that there is no actual conflict of interest. Pursuant to the standard of § 19A-8(b)(3), the Commission grants the waiver of the prohibition of § 19A-12(b).

The Commission notes that while 19A-12(b)'s prohibition is waived, the other provisions of the ethics law are not, including those prohibiting an employee from working on official matters relating to the outside employer. The approval of this waiver is conditioned on the facts upon which the waiver is based remaining unchanged. It is also conditioned on Mr. Sobratti not making referrals as a County employee to Transdev and remaining uninvolved in any future contract discussions between MCDOT and Transdev.

This waiver expires when the outside employment approval with which it is associated expires, unless a continuation request for outside employment is timely filed and subsequently approved

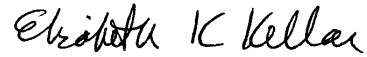
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by the Ethics Commission. In reaching this decision, the Commission has relied upon the facts as presented by Mr. Sobratti.

For the Commission:

A handwritten signature in black ink, appearing to read "Elizabeth Kellar".

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Elizabeth Kellar, Chair