



MONTGOMERY COUNTY ETHICS COMMISSION

September 13, 2025

Waiver 25-09-011

Pursuant to § 19A-13(b) of the Montgomery County Code, for one year after the effective date of termination from County employment, a former public employee must not enter into any employment understanding or arrangement with any person or business if, during the previous 3 years, the public employee significantly participated in regulating the person or business, or in any procurement or other contractual activity concerning a contract with the person or business. Further, § 19A-13(c) of the Public Ethics Law defines *significant participation* as “making a decision, approval, disapproval, recommendation, rendering of advice, investigation, or similar action taken as an officer or employee. Significant participation ordinarily does not include program or legislative oversight, or budget preparation, review, or adoption.”

Ali Ozair is the former Vice President of Property Management at the Housing Opportunities Commission (HOC) of Montgomery County. He has separated from HOC to start a new company and would like to partner with a third party property management company, Pratum Companies (“Pratum Cos.”), that has contracts with HOC. In his role as the VP for Property Management, Mr. Ozair oversaw property management operations in conjunction with several other HOC divisions. Mr. Ozair tracked property management agent performance, conducted regular meetings with agents, and participated in the contract solicitation and selection processes. Additionally, Mr. Ozair’s division at HOC managed the procurement process, but the awarding of a property management contract was a decision shared with several other HOC colleagues. Based on this extensive list of personal responsibilities, the Ethics Commission considers Mr. Ozair’s responsibilities in his former HOC role to constitute *significant participation* as defined by the Public Ethics Law. Therefore, Mr. Ozair would require a waiver to enter a business relationship with Pratum Cos. unless he waits one year after separating from HOC.

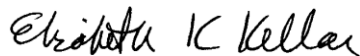
Mr. Ozair intends to create a new company that will provide maintenance services to commercial real estate, hotels, healthcare facilities, and warehouses. The new company will have a national presence and provide services across the nation. He will create this business in conjunction with Pratum Cos., but the new business will be a distinct legal entity. Mr. Ozair will be the president of the new company, while the CEO of Pratum Cos. will be a majority shareholder. Currently, Pratum Cos. does not offer this sort of maintenance service to any of its clients, so the business will truly be new and its maintenance services unoffered in any existing contract between Pratum Cos. and its current clients, including HOC.

Also, to maintain the spirit of the one-year bar, Mr. Ozair has pledged to both HOC and the Ethics Commission that the new legal entity will not seek to do business with HOC for the first year of his post-employment with HOC.

In accordance with § 19A-8(c), the Ethics Commission may waive the one-year post-employment prohibition against working with an entity that is regulated by, or negotiates or contracts with, a former public employee's County agency if the Commission determines that the proposed employment is not likely to create an actual conflict of interest. Given the distinct nature of the new business entity, Mr. Ozair's assurance that the new entity will not seek to do business with HOC for one year after his separation from HOC, and the concurrence with the waiver request from HOC, the Ethics Commission does not believe that the proposed employment is likely to create an actual conflict of interest. Therefore, the one-year bar under § 19A-13(b) is waived.

The Ethics Commission has based this waiver on the information provided by Mr. Ozair.

For the Commission:

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

Elizabeth Kellar, Chair