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STATE ETHICS COMMISSION

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June 16, 2022

CONFIDENTIAL

Sent via email to: bbalexander1@co.pg.md.us

Bamidele B. Alexander
Legal Counsel
Prince George's County Office of Ethics and Accountability
Largo Government Center
9201 Basil Court
Suite 155
Largo, Maryland 20774

Re: Prince George's County Proposed Ethics Ordinance

Dear Ms. Alexander:

At its June 16, 2022 meeting, the State Ethics Commission reviewed proposed changes to the Prince George's County Public Ethics Law, which you forwarded to the Commission for approval on March 24, 2022, in compliance with Subtitle 8 of the Maryland Public Ethics Law (Md. Code Ann., Gen. Prov., Title 5 (Supp. 2021)). As you are aware, legislation (HB 363 and 1058) enacted during the 2021 General Assembly session mandated some changes to county and municipal ethics laws and county boards of education ethics regulations and policies. The State Ethics Commission revised its local government regulations in COMAR 19A.04 in January 2022 to reflect the changes in the Public Ethics Law and to incorporate changes made by HB 363 and 1058.

The State Ethics Commission approved the proposed changes to the ethics ordinance for your jurisdiction as being at least equivalent to State law for local employees for conflict of interest provisions. The Commission approved other changes to the Prince George's County Ethics Ordinance as being at least equivalent to State law for financial disclosure provisions for local elected officials and candidates for local elected office. The State Ethics Commission also determined that the Prince George's County Ethics Ordinance is similar to the provisions of the Maryland Public Ethics Law for conflict of interest and financial disclosure provisions applicable to local elected officials, local employees and local appointed officials. The lobbying provisions of the Prince George's County Ethics Ordinance are also substantially similar to the provisions of the Maryland Public Ethics Law.

The State Ethics Commission's review was in accord with the Commission's review authority pursuant to Subtitle 8 of the Maryland Public Ethics Law and consisted of a comparison of the proposed revisions to the review criteria of COMAR 19A.04. The review was also in accord with the Commission's understanding of the requirements stated in the Court of Appeals decision in *Seipp v. Baltimore City Board of Elections*, 377 Md. 362, 833 A. 2d 551 (2003), as discussed in Opinion No. 06-01 of the Commission's Advisory Opinions.

Prince George's County must submit all future changes to its ethics ordinance for review and approval in compliance with Subtitle 8 of the Maryland Public Ethics Law and COMAR 19A.04. In addition, certification is an annual requirement. Certification is due each year by October 1st. Your next certification is due October 1, 2022. Please contact our office if you have any questions regarding this or any other matter. Thank you for your work on this project.

Sincerely,

A handwritten signature in black ink that reads "William J. Colquhoun". The signature is written in a cursive style with a large, stylized initial "W".

William J. Colquhoun
General Counsel