

FY 2025 OEA Annual Report Highlighted Recommendations & Cases

#	Case No.	Case Details	Recommendation(s)	Date Issued
I.	N/A	N/A	Proposed State Ethics Code clarifying legislation for State Financial Disclosure Statements (FDS) filing requirements with the County Board of Ethics/OEA in Prince George's County for Bi-County Commissions (M-NCPPC, WSSC, and WSTC)(Gen. Prov. Art. §§5-602, 5-822 — 5-832) (Continuation of 2023 Recommendation).	Continuing
2.	N/A	N/A	Proposed County Ethics Code §2-294(b) clarifying legislation for Bi-County Commissions (M-NCPPC, WSSC, and WSTC) to provide their State Financial Disclosure Statements (FDS) to the County Board of Ethics/OEA. (Continuation of 2023 Recommendation).	Continuing
3.	24-0307e	Case Type: Secondary Employment/ Conflict of Interest Agency/Board/Commission: County Council Subject: Allegation that an employee holding both positions with the County and municipal government is a conflict of interest. Disposition: Board Order, Finding of Facts and Law Issued	1. The simultaneous employment constitutes a <i>per se</i> apparent conflict of interest due to (a) the employee's position of authority in their Council position, (b) the lack of any structures to avoid or prevent conflicts of interest, and (c) the relationship between Prince George's County and the municipal government. 2. The dual employment created an appearance of impropriety that undermines the public's trust and faith in the institutions of Prince George's County government.	6/24

FY 2025 OEA Annual Report Highlighted Recommendations & Cases

#	Case No.	Case Details	Recommendation(s)	Date Issued
4.	24-0156e	<p>Case Type: Use of County Resources/ FWAI/Secondary Employment</p> <p>Agency/Board/Commission: DPWT</p> <p>Subject: Allegation that several employees were stealing time by changing timesheets to indicate that they were working when they were not actually at work and were working at a private business during work hours.</p> <p>Disposition: Substantiated</p>	<ol style="list-style-type: none"> 1. Department of Public Works and Transportation (DPWT) Management should confer with the Office of Human Resources Management (OHRM) to determine appropriate discipline for Respondent #1 and Respondent #3, as both Respondents committed violations of official timekeeping procedures. 2. Respondent #1 should immediately submit a Secondary Employment Request for approval. DPWT should require the Respondent #1 to review and sign an affidavit stating that the Respondent #1 understands all County Secondary Employment requirements and will adhere to the County Secondary Employment policy – Administrative Procedure 152. And that any additional violations of the Secondary Employment policy by Respondent #1 will result in further disciplinary action by DPWT. 3. Respondent #3 should be counseled by DPWT Management on County policy regarding County employees attending School, and the use of County Resources and Official Time to attend school or conduct classwork. Respondent #3 should be required to review and sign an affidavit stating that they will abide by all County policies regarding a County employee attending school and conducting classwork. And that any additional violations by Respondent #3 will result in further disciplinary action by DPWT. 4. DPWT should review and conduct mandatory official timekeeping training for all DPWT Management staff, to ensure proper accounting of Official Timekeeping procedures and records. 	10/24

FY 2025 OEA Annual Report Highlighted Recommendations & Cases

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5.	24-0174e	<p>Case Type: Use of County Resources/ FWAI</p> <p>Agency/Board/Commission: DPWT</p> <p>Subject: Allegation that several employees were stealing time to indicate that they were working when they were not actually at work, and attended class while on County time.</p> <p>Disposition: Substantiated</p>	<ol style="list-style-type: none"> 1. Allegation #1 regarding discrimination against a Department of Public Works and Transportation (DPWT) employee by Respondent #1 should be referred to DPWT and the Office of Human Resources Management (ORHM), to be investigated as a Personnel Complaint. 2. The Department of Public Works and Transportation (DPWT) Management should confer with the Office of Human Resources Management (OHRM) to determine appropriate discipline for Respondent #1 and Respondent #2, as both Respondents committed violations of official timekeeping procedures. 3. Respondent #2 should be counseled by DPWT Management on County policy regarding County employees attending school, and the use of County Resources and Official Time to attend school or conduct classwork. Respondent #2 should be required to review and sign an affidavit stating that they will abide by all County policies regarding a County employee attending school and conducting classwork. Any additional violations by Respondent #2 will result in further disciplinary action by DPWT. 4. Respondent #2 should be required to review the County Telework Agreement Program (TAP) policy. Respondent #2 should be required to sign an affidavit stating that he understands the conditions of the TAP policy and that any additional violations of the TAP policy will result in further discipline from DPWT and OHRM. 	10/24

FY 2025 OEA Annual Report Highlighted Recommendations & Cases

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6.	24-0345e	<p>Case Type: Prestige of Office/Gifts</p> <p>Agency/Board/Commission: County Council</p> <p>Subject: Allegation that County officials accepted tickets to a basketball game.</p> <p>Disposition: The Board found a reasonable basis to believe a violation had occurred and reserved taking further action for thirty (30) days to allow the officials to respond to the identified ethics violation. The Board accepted the actions taken by the officials as appropriate to address the violation.</p>	<p>I. Officials were required to list gifts of tickets on their Annual Financial Disclosure Statement.</p>	10/24
7.	25-0004/ 25-0026/ 25-0028/ 25-0048	<p>Case Type: FWAI/ Use of County Resources</p> <p>Agency/B/C: County Council</p> <p>Subject: Allegation that At-Large Council Member Special Election candidates' use of County resources (mailer, community meeting & cost of election).</p> <p>Disposition: Unsubstantiated</p>	<p>I. The Council Administrator should consider implementing a County policy for the Legislative Branch to govern elected officials' use of franking privileges close to all elections. (Previous OEA and Board of Ethics recommendations (OEA Cases #23-0016e and #24-0362).</p> <p>2. The Council Administrator is to remind Council Members and staff to refrain from discussion of campaign-related matters while conducting official County Council activities, especially during periods close to elections.</p>	10/24

FY 2025 OEA Annual Report Highlighted Recommendations & Cases

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8.	25-0019e	<p>Case Type: Conflict of Interest/Nepotism</p> <p>Agency/B/C: DPWT</p> <p>Subject: Allegation that a DPWT human resources employee is related to another DPWT employee and engaged in the hiring process.</p> <p>Disposition: Unsubstantiated</p>	<ol style="list-style-type: none"> 1. The Department of Public Works and Transportation (DPWT) Management should confer with the Office of Human Resources Management (OHRM) to provide the Respondent an official letter of counseling regarding this matter. 2. While the reported relationship between the Respondent and the employee does not violate the nepotism code, the Respondent should be fully aware of the appearance of a conflict when anyone with a family relationship is hired by the Agency. The Respondent should have fully reported the relationship with the employee at the time they submitted their application to the County. 3. Further, the Respondent should have recused themselves from any hiring processes regarding the employee. 4. That OHRM review and consider the impact of amending the Personnel Code Section 16-150 – Nepotism – to include a broader definition of family members and other personal relationships (i.e. friendships) to restrict the actual or appearance of conflicts of interest. 	10/24
9.	25-0034	<p>Case Type: FWAI/ Use of County Resources</p> <p>Agency/Board/ Commission: County Council</p> <p>Subject: Allegation that a member of the County Council was not a resident of their Council District.</p> <p>Disposition: Not subject to the authority of the Prince George's County Code of Ethics.</p>	<ol style="list-style-type: none"> 1. The matter should be referred to the County Council for any review or any action pursuant to the County Charter Sections 307, 307B, and 310, including review of the voter registration information with the Prince George's County Board of Elections. 	3/25

FY 2025 OEA Annual Report Highlighted Recommendations & Cases

#	Case No.	Case Details	Recommendation(s)	Date Issued
10.	25-0086e	<p>Case Type: Use of County Resources/ Prestige of Office Agency/Board/Commission: County Council Subject: Request for review of documentary produced by Council member regarding rent stabilization. Disposition: Unsubstantiated</p>	<ol style="list-style-type: none"> 1. According to the County Council procedure, the documentary should be reviewed by the Council Administration. 2. The documentary should include a disclaimer that was solely produced by the Council Member using County resources and does not express the opinion of the County Council. 3. If compensation or honoraria are received in the future, it would be subject to the disclosure and/or restrictions under the Code of Ethics. 	10/24
11.	25-0087e	<p>Case Type: Use of County Resources/ Prestige of Office Agency/Board/Commission: County Council Subject: Allegation that an employee tasked Summer Youth Employment Program interns with performing campaign duties during normal county work hours; sent print material through a local printer, without going through the proper procurement process; and directed office employees to create false meeting agendas for the expense reimbursements, to get approval for the expense reimbursements. Disposition: Partially Substantiated</p>	<ol style="list-style-type: none"> 1. A letter of caution should be issued to the Respondent regarding the solicitation and use of interns for political activity. 2. The County Council Administrator and Council Finance Office should confer with the County Office of Finance to amend the "Prince George's County Council Expense Reimbursement Requests Guidelines" and implement an official policy governing the Expense Reimbursement procedures for County Council employees, including specific rules pertaining to what items can be submitted for reimbursement and the timeline to submit these items for reimbursement. 3. The Respondent should be required to sign a statement stating that they understand the policies governing the submission of print material to print shops. The statement should state that the Respondent will follow all policies regarding the submission of print material and that any further violations of this policy will result in disciplinary action against the Respondent. 	3/25

FY 2025 OEA Annual Report Highlighted Recommendations & Cases

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12.	25-0103e	<p>Case Type: Use of County Resources</p> <p>Agency/Board/Commission: DPIE</p> <p>Subject: Allegation that employee was working for a municipal government at the same time they were working for the County, "double dipping"</p> <p>Disposition: Partially Substantiated</p>	<ol style="list-style-type: none"> 1. DPIE Management should require Respondent to review and sign an affidavit/agreement stating that Respondent understands all County Secondary Employment requirements and will adhere to the County Secondary Employment policy - Administrative Procedure 152. And that any additional violations of the Secondary Employment policy by Respondent could result in further disciplinary action by DPIE. 2. DPIE Management should confer with the Office of Human Resources Management (OHRM) on appropriate disciplinary action for the Respondent, regarding the violation of theft of time on May 14, 2024. 	12/24
13.	25-0159e	<p>Case Type: Use of Prestige of Office</p> <p>Agency/Board/Commission: PG Police Department</p> <p>Subject: Allegation that a PGPD officer participated in a political ad, identifying themselves as a County police officer</p> <p>Disposition: Partially substantiated</p>	<ol style="list-style-type: none"> 1. The Prince George's County Police Department (PGPD) should issue a letter of caution to the Respondent. The letter of caution should outline PGPD General Orders and County Code provisions related to political activities and prohibited political activities. 	3/25
14.	25-0227	<p>Case Type: FWAI/Operational Review</p> <p>Agency/Board/Commission: Fire Commission</p> <p>Subject: Allegation that the Fire Commission failed to elect a Chair and Vice Chair, violating General Orders.</p> <p>Disposition: Substantiated</p>	<ol style="list-style-type: none"> 1. Prince George's County Fire/EMS Chief and leadership provided OEA with a letter of action to address the issues stated in this complaint. 	3/25

FY 2025 OEA Annual Report Highlighted Recommendations & Cases

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15.	25-0278e	<p>Case Type: Formal Advisory Opinion /Financial Disclosure</p> <p>Agency/Board/Commission: Redevelopment Authority</p> <p>Subject: Request for exemption from filing Financial Disclosure Statement.</p> <p>Disposition: Formal Opinion Issued</p>	<p>I. After review of all matters, the Board of Ethics opined that the employee should be required to file a financial disclosure statement because: (1) Title 15B of the County Code states that the Authority's work entails the use of County funding for its programs, development, and management of real property assets; (2) a review of Executive Order No. 13-2014 which lists the Authority as one of the agencies, boards, and commissions designated by the County Executive as being required to file financial disclosure statements due to the significance of its work, (3) the employee is an "official" as defined in Section 2-191(10) of the Code; and (4) the employee's approved position description, includes aspects of "procurement or contracting"; "administering or monitoring grants or subsidies" and "licensing, regulating, . . . any nongovernmental enterprise," under the Section 2-294(a)(36) "functional criteria."</p>	4/25
16.	25-0378e	<p>Case Type: Formal Advisory Opinion/Use of Prestige of Office</p> <p>Agency/Board/Commission: Department of the Environment</p> <p>Subject: Whether employees who hold advanced and/or professional degrees or experience can use their County title, position, and work performed in their County capacity to be recognized for research in professional publications as part of their professional development or to meet continuing</p>	<p>I. The Board granted a limited modification to several provisions of the County Code of Ethics under Section 2-293(h). The Board found that the County benefits from its employees' expertise via the staff member's name, reputation, and work product within their industry or academy, the agency's mission, and the County's reputation. Therefore, employees generally can use their County title, position, and work performed in their County capacity to be recognized for research in professional publications for the purpose of their professional development or to meet continuing education requirements, absent any payment or honorarium.</p>	6/25

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		education requirements. Disposition: Formal Opinion Issued		