Ordinance No. 787-18

An Ordinance Amending Bel Air Town Code
Chapter 43 Code of Ethics

WHEREAS, Section 1-1409 Local Government Article of the Code of the State of Maryland requires local government entities to adopt a code of ethics for the authority's directors, officers, and employees; and

WHEREAS, State of Maryland House Bill 879, enacted during the 2017 Legislative session, made modifications to the State of Maryland Ethics Law requiring changes to local government ethics laws; and

WHEREAS, Town of Bel Air Town Code, Chapter 43, Code of Ethics was last amended by the Board of Town Commissioners on March 19, 2012 by Ordinance No. 749-12; and

WHEREAS, Board of Town Commissioners wishes to amend Section § 43-2 Definitions of the Bel Air Town Code to provide enhanced clarity regarding the definition of interest in exchange-traded funds (like a mutual fund); and

WHEREAS, the Board of Town Commissioners wishes to amend Section § 43-4 Conflicts of Interest of the Bel Air Town Code to include: a. participation prohibitions for former lobbyists from participating in matters they previously assisted or represented another party in; excluding uncompensated or minimally compensated elected or appointed officials or employees earning less than $4,000 in a twelve month period, b. post-employment limitations and restrictions prohibiting officials and employees from lobbying legislative matters for one calendar year after leaving office, c. use of prestige of office barring an official or employee from i. inappropriately influencing the award of a government contract to a specific person, ii. initiating a solicitation for a person to retain the compensated services of a particular lobbyist or firm, or iii. using public resources or title to solicit a political contribution regulated in accordance with the State of Maryland Election Law Article; and

WHEREAS, the Board of Town Commissioners wishes to amend Section § 43-5 Financial disclosure: elected officials (incumbents) and candidates to be elected officials of the Bel Air Town Code to include: a. public record amendments that require the home addresses of officials to be redacted from publicly available disclosure forms, b. changes to the contents of financial disclosure forms from incumbents and elected officials excluding exchange-traded funds (ETF), such as mutual funds, c. elected or appointed officials or employees, or candidates for such position, of the Town of Bel Air, to disclose if their spouse is or was a regulated

lobbyist, within one (1) calendar year of said position or candidacy, and to disclose the entity or entities that engaged the spouse to lobby; and

WHEREAS, the Board of Town Commissioners wishes to amend Section § 43-6 Financial disclosure: employees and appointed officials of the Bel Air Town Code to include: a. an amendment that requires the home addresses of employees or appointed officials to be redacted from publicly available disclosure forms, b. changes to the contents of financial disclosure forms from employees and appointed officials excluding exchange-traded funds (ETF), such as mutual funds, c. limiting disclosures of debt only to entities doing business with or regulated by the individual's governmental unit, d. elected or appointed officials or employees, or candidates for such position, of the Town of Bel Air, to disclose if their spouse is or was a regulated lobbyist, within one (1) calendar year of said position or candidacy, and to disclose the entity or entities that engaged the spouse to lobby; and

WHEREAS, the Board of Town Commissioners wishes to amend Section § 43-7 Lobbying to require: a. lobbyists who serve on a Town of Bel Air Board, Commission, or Committee to submit financial disclosure forms that mirror the forms for elected officials.

WHEREAS, the Board of Town Commissioners wishes to amend the Financial Disclosure Statements for the Board of Town Commissioners and Candidates for Commissioner to include: a. elimination of the redundant list of questions that preceded the Schedule Questions A through K, b. incorporating an acknowledgement of receipt and understanding of Chapter 43 Code of Ethics, c. inserting a second question to Schedule H inquiring if an official's spouse is or was a lobbyist, d. exclusion, under Schedule B, of interests in exchange-traded funds (ETF), such as mutual funds; and

WHEREAS, the Board of Town Commissioners wishes to amend the Financial Disclosure Statements for Designated Town Employees to include: a. elimination of the redundant list of questions that preceded the Schedule Questions A through I, b. incorporating an acknowledgement of receipt and understanding of Chapter 43 Code of Ethics, c. adopting the same Schedule A - Real Property Interest form as Board of Town Commissioners and Candidates for Commissioner must complete, d. inserting a second question to Schedule H inquiring if an official's spouse is or was a lobbyist, e. limiting disclosures of debt only to entities doing business with or regulated by the individual's governmental unit, f. exclusion, under Schedule B, of interests in exchange-traded funds (ETF), such as mutual funds.

NOW, THEREFORE, BE IT ORDAINED by the Board of Town Commissioners that the Town of Bel Air Town Code Chapter 43 Code of Ethics, shall be amended by Ordinance No. 787-18, attached hereto and incorporated herein as Exhibit A, is hereby adopted.

BE IT FURTHER ORDAINED that this Ordinance shall become effective on the 24th day of December, 2018.

INTRODUCTION: November 19, 2018
PUBLIC HEARING: December 3, 2018
ENACTMENT: December 3, 2018
EFFECTIVE: December 24, 2018
AYES: Commissioners Chmielewski, Einhorn, Hopkins, Richards and Burdette
NAYS: None
ABSENT: None

Susan U. Burdette, Chair
Board of Town Commissioners

Michael Krantz, Town Clerk

The following Code does not display images or complicated formatting. Codes should be viewed online. This tool is only meant for editing.

§ 43-2 **Definitions.**
For the purposes of this chapter, the following words and phrases shall have the meanings respectively ascribed to them by this section:

BUSINESS ENTITY
Any partnership, association, corporation, firm, institution, trust, foundation, sole proprietor, or other organization (except the state and the Town of Bel Air or any agency thereof), whether or not operated for profit.

CANDIDATE
A person filing for election to a municipal office.

COMPENSATION
Money or any other valuable thing, regardless of form, received or to be received by a person from an employer for services rendered.

FINANCIAL INTEREST
Ownership of an interest as the result of which the owner has received within the past three years, is currently receiving, or in the future is entitled to receive, more than $1,000 per year; or an official, employee or spouse of an official or employee has ownership of more than 3% of a business entity.

GIFT
The transfer of anything of economic value, regardless of form, without adequate and lawful consideration. A gift does not include the solicitation, acceptance, receipt, or regulation of a political contribution that is regulated in accordance with the Election Law Article of the Annotated Code of Maryland or any other state law regulating the conduct of elections or the receipt of political contributions.

INTEREST
Any legal or equitable economic interest that is owned or held, in whole or in part, jointly or severally, directly or indirectly, whether or not the economic interest is subject to an encumbrance or condition. However, "interest" shall not include an interest held in the capacity of an agent, custodian, fiduciary, personal representative, or trustee, unless the holder has an equitable interest in the subject matter; an interest in a time or demand deposit in a financial institution; **an interest in exchange-traded funds (like a mutual fund);** an interest in an insurance policy, endowment policy, or annuity contract by which an insurer promises to pay a fixed amount of money in a lump sum or periodically for life or some other specified period; or a common trust fund or a trust that forms part of a pension or a profit-sharing plan that has more than 25 participants and is determined by the IRS to be a qualified trust or college savings plan under the Internal Revenue Code.

NEW

OFFICIAL or EMPLOYEE
Any Town Commissioner of the Town of Bel Air or person employed by and receiving compensation from the Town of Bel Air in any capacity; or on boards or commissions of the Town.

[Amended 11-5-2012 by Ord. No. 755-12]

QUALIFYING RELATIVE
A spouse, parent, child or sibling.

REAL PROPERTY

Land owned, leasehold interest, or option to purchase.

TOWN AGENCY

Any Town office, department, institution, board, commission or corporation which is recognized as a branch or segment of Town government, either by the Town Charter or by any ordinance or resolution of the Town.

[Amended 11-5-2012 by Ord. No. 755-12]

TRANSACTION INVOLVING THE TOWN OF BEL AIR

Any proceeding, application, submission, request for filing or other determination, any contract, claim or case, any sale or purchase, any computer transfer of moneys or information, or other such matter that the Town of Bel Air or any of the agencies, boards, commissions and offices thereof may be a party to or in which the Town of Bel Air may reasonably be expected to be a party.

[Amended 11-5-2012 by Ord. No. 755-12]

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§ 43-2 **Definitions.**
For the purposes of this chapter, the following words and phrases shall have the meanings respectively ascribed to them by this section:

BUSINESS ENTITY
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CANDIDATE
A person filing for election to a municipal office.

COMPENSATION
Money or any other valuable thing, regardless of form, received or to be received by a person from an employer for services rendered.

FINANCIAL INTEREST
Ownership of an interest as the result of which the owner has received within the past three years, is currently receiving, or in the future is entitled to receive, more than $1,000 per year; or an official, employee or spouse of an official or employee has ownership of more than 3% of a business entity.

GIFT
The transfer of anything of economic value, regardless of form, without adequate and lawful consideration. A gift does not include the solicitation, acceptance, receipt, or regulation of a political contribution that is regulated in accordance with the Election Law Article of the Annotated Code of Maryland or any other state law regulating the conduct of elections or the receipt of political contributions.

INTEREST
Any legal or equitable economic interest that is owned or held, in whole or in part, jointly or severally, directly or indirectly, whether or not the economic interest is subject to an encumbrance or condition. However, "interest" shall not include an interest held in the capacity of an agent, custodian, fiduciary, personal representative, or trustee, unless the holder has an equitable interest in the subject matter; an interest in a time or demand deposit in a financial institution; **an interest in exchange-traded funds (like a mutual fund);** an interest in an insurance policy, endowment policy, or annuity contract by which an insurer promises to pay a fixed amount of money in a lump sum or periodically for life or some other specified period; or a common trust fund or a trust that forms part of a pension or a profit-sharing plan that has more than 25 participants and is determined by the IRS to be a qualified trust or college savings plan under the Internal Revenue Code.

NEW

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Any Town Commissioner of the Town of Bel Air or person employed by and receiving compensation from the Town of Bel Air in any capacity; or on boards or commissions of the Town.

[Amended 11-5-2012 by Ord. No. 755-12]

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A spouse, parent, child or sibling.

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Land owned, leasehold interest, or option to purchase.

TOWN AGENCY

Any Town office, department, institution, board, commission or corporation which is recognized as a branch or segment of Town government, either by the Town Charter or by any ordinance or resolution of the Town.

[Amended 11-5-2012 by Ord. No. 755-12]

TRANSACTION INVOLVING THE TOWN OF BEL AIR

Any proceeding, application, submission, request for filing or other determination, any contract, claim or case, any sale or purchase, any computer transfer of moneys or information, or other such matter that the Town of Bel Air or any of the agencies, boards, commissions and offices thereof may be a party to or in which the Town of Bel Air may reasonably be expected to be a party.

[Amended 11-5-2012 by Ord. No. 755-12]

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§ 43-4 **Conflicts of interest.**

A. Participation prohibitions.

(1) Except as permitted by the regulations or opinion of the Board of Ethics of the Town of Bel Air, an official or employee may not participate in:

(a) Any matter in which, to the knowledge of the official or employee, the official or employee, or a qualified relative of the official or employee, has an interest, except in the exercise of an administrative or ministerial duty that does not affect the disposition or decision of the matter.

(b) Any matter in which any of the following is a party, except in the exercise of an administrative or ministerial duty that does not affect the disposition or decision with respect to the matter:

[1] A business entity in which the official or employee has a direct financial interest of which the official or employee may reasonably be expected to know;

[2] A business entity for which the official, employee, or a qualified relative of the official or employee is an officer, director, trustee, partner, or employee;

[3] A business entity with which the official or employee or, to the knowledge of the official or employee, a qualified relative of the official or employee is negotiating employment or has any arrangement concerning prospective employment;

[4] A business entity that is a party to an existing contract with the official or employee, or which, to the knowledge of the official or employee, is a party to a contract with a qualified relative, if the contract reasonably could be expected to result in a conflict between the private interests of the official or employee and the official duties of the official or employee;

[5] A business entity doing business with the Town in which a direct financial interest is owned by another entity in which the official or employee has a direct financial interest, if the official or employee may be reasonably expected to know of both direct financial interests; or

[6] A business entity:

[a] Which the official or employee knows is a creditor or obligee of the official or employee or of a qualified relative of the official or employee with respect to a thing of economic value; and

[b] In which a creditor or obligee of the official or employee or of a qualified relative of the official or employee is in a position to directly and substantially affect the interest of the official or employee or of a qualified relative of the official or employee.

NEW

(c) A case, contract, or other specific matter, legislative or otherwise, for one (1) calendar year after terminating their lobbyist registration(s) if they previously assisted or represented another party in the matter.

NEW

[1] Does not apply to uncompensated or minimally compensated elected or appointed officials or employees earning less than $4,000 in a twelve month period.

(2) A person who is disqualified from participating under Subsection **A(1)(a)** and **(b)** shall disclose the nature and circumstances of the conflict using a conflict of interest form sufficiently in advance of the action and may participate or act if:

(a) The disqualification leaves a body with less than a quorum capable of acting;

(b) The disqualified official or employee is required by law to act; or

(c) The disqualified official or employee is the only person authorized to act.

(3) The prohibitions of Subsection **A(1)(a)** and **(b)** do not apply if participation is allowed by regulation or opinion of the Board of Ethics.

B. Employment and financial interest restrictions.

(1) Except as permitted by regulation of the Board of Ethics, when the interest is disclosed or when the employment does not create a conflict of interest or appearance of conflict, an official or employee may not:

(a) Be employed by or have a financial interest in an entity: **[Amended 11-5-2012 by Ord. No. 755-12]**

[1] Subject to the authority of the official or employee or the Town agency, board or commission with which the official or employee is affiliated; or

[2] Which is negotiating or has entered a contract with the agency, board or commission with which the official or employee is affiliated; or

(b) Hold any other employment or relationship which would impair the impartiality or independence of judgment of the official or employee.

(2) This prohibition does not apply to:

(a) An official or employee who is appointed to a regulatory or licensing authority pursuant to a statutory requirement that persons subject to the jurisdiction of the authority be represented in appointments to the authority;

(b) Subject to other provisions of law, a member of a board or commission in regard to a financial interest or employment held at the time of appointment, provided the financial interest or employment is publicly disclosed to the appointing authority and the Board of Ethics; **[Amended 11-5-2012 by Ord. No. 755-12]**

(c) An official or employee whose duties are ministerial, if the private employment or financial interest does not create a conflict of interest or the appearance of a conflict of interest, as permitted by and in accordance with regulations adopted by the Board of Ethics; or

(d) Employment or financial interests allowed by regulation of the Board of Ethics if the employment does not create a conflict of interest or the appearance of a conflict of interest or the financial interest is disclosed.

C. Post-employment limitations and restrictions.

(1) A former official or employee may not assist or represent any party other than the Town for compensation in a case, contract, or other specific matter involving the Town if that matter is one in which the former official or employee significantly participated as an official or employee.

(2) Until the conclusion of the next regularly scheduled meeting of the Board of Town Commissioners that begins after the elected official leaves office, a former official or member of the Bel Air Board of Town Commissioners may not assist or represent another party for compensation in a matter that is the subject of legislative action.

(3) Elected or appointed Town officials and employees may not engage in lobbying legislative matters for one calendar year after leaving office or employment with the Town of Bel Air.

NEW

D. Contingent compensation. Except in a judicial or quasi-judicial proceeding, an official or employee may not assist or represent a party for contingent compensation (i.e., dependent or conditioned by something happening) in any matter before or involving the Town.

E. Use of prestige of office.

(1) An official or employee may not intentionally use the prestige of the office or public position for the private gain of that official or employee or the private gain of another.

(2) This subsection does not prohibit the performance of usual and customary constituent services by an elected official without additional compensation.

NEW

(3) An official or employee may not inappropriately influence the award of a government contract to a specific person.

NEW

(4) An official or employee may not initiate a solicitation for a person to retain the compensated services of a particular lobbyist or firm.

NEW

(5) An official or employee may not use public resources or title to solicit a political contribution regulated in accordance with the State of Maryland Election Law Article.

F. Solicitation and acceptance of gifts.

(1) An official or employee may not solicit any gift.

(2) An official or employee may not directly solicit or facilitate the solicitation of a gift, on behalf of another person, from an individual regulated lobbyist.

(3) An official or employee may not knowingly accept a gift, directly or indirectly, from a person that the official or employee knows or has the reason to know:

(a) Is doing business with or seeking to do business with the Town office, agency, board or commission with which the official or employee is affiliated; **[Amended 11-5-2012 by Ord. No. 755-12]**

(b) Has financial interests that may be substantially and materially affected, in a manner distinguishable from the public generally, by the performance or nonperformance of the official duties of the official or employee;

(c) Is engaged in an activity regulated or controlled by the official's or employee's governmental unit; or

(d) Is a lobbyist with respect to matters within the jurisdiction of the official or employee.

(4) Notwithstanding Subsection **F(3)** of this subsection, an official or employee may accept the following:

(a) Meals and beverages consumed in the presence of the donor or sponsoring entity;

(b) Ceremonial gifts or awards that have insignificant monetary value;

(c) Unsolicited gifts of nominal value that do not exceed $20 in cost or trivial items of informational value;

(d) Reasonable expenses for food, travel, lodging, and scheduled entertainment of the official or the employee at a meeting which is given in return for the participation of the official or employee in a panel or speaking engagement at the meeting;

(e) Gifts or tickets or free admission extended to an elected official to attend a charitable, cultural, or political event, if the purpose of this gift or admission is a courtesy or ceremony extended to the elected official's office;

(f) A specific gift or class of gifts that the Board of Ethics exempts from the operation of this subsection upon a finding, in writing, that acceptance of the gift or class of gifts would not be detrimental to the impartial conduct of the business of the Town and that the gift is purely personal and private in nature;

(g) Gifts from a person related to the official or employee by blood or marriage, or any other individual who is a member of the household of the official or employee; or

(h) Honoraria for speaking to or participating in a meeting, provided that the offering of the honorarium is not related in any way to the official's or employee's official position.

(5) Subsection **F(4)** does not apply to a gift:

(a) That would tend to impair the impartiality and the independence of judgment of the official or employee receiving the gift;

(b) Of significant value that would give the appearance of impairing the impartiality and independence of judgment of the official or employee; or

(c) Of significant value that the recipient official or employee believes or has reason to believe is designed to impair the impartiality and independence of judgment of the official or employee.

G. Disclosure of confidential information. Other than in the discharge of official duties, an official or employee may not disclose or use confidential information that the official or employee acquired by reason of the official's or employee's public position and that is not available to the public, for the economic benefit of the official or employee or that of another person.

H. Participation in procurement.

(1) An individual or a person that employs an individual who assists a Town agency in the drafting of specifications, an invitation for bids, or a request for proposals for a procurement may not submit a bid or proposal for that procurement or assist or represent another person, directly or indirectly, who is submitting a bid or proposal for the procurement.

(2) The Board of Ethics may establish exemptions from the requirements of this section for providing descriptive literature, sole-source procurements, and written comments solicited by the procuring agency.

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§ 43-5 **Financial disclosure: elected officials (incumbents) and candidates to be elected officials.** This section applies to all elected officials and candidates to be elected officials.

A. Except as provided in Subsection **C** of this section, an elected official or a candidate to be an elected official shall file the financial disclosure form, provided by the Board of Ethics, required under this section:

(1) Under oath or affirmation; and

(2) With the Board of Ethics.

B. Deadlines for filing financial disclosure forms.

(1) An incumbent elected official shall file a financial disclosure form annually, no later than April 30 of each year for the preceding calendar year.

(2) An individual who is appointed to fill a vacancy in an office for which a financial disclosure form is required and who has not already filed the form shall file a financial disclosure form for the preceding calendar year within 30 days after appointment.

(3) An individual who, other than by reason of death, leaves an office for which a financial disclosure form is required shall file the complete form within 60 days after leaving the office.

C. The statement shall cover:

(1) The calendar year immediately preceding the year in which the individual left office, unless a statement covering that year has already been filed by the individual; and

(2) The portion of the current calendar year during which the individual held the office.

D. Candidates to be elected officials.

(1) Except for an official who has filed a financial disclosure form under another provision of this section for the reporting period, a candidate to be an elected official shall file a financial disclosure form each year beginning with the year in which the certificate of candidacy is filed through the year of the election.

(2) A candidate to be an elected official shall file a financial disclosure form required under this section:

(a) In the year the certificate of candidacy is filed, no later than the filing of the certificate of candidacy; or

(b) If the year of the election if different from the year the certificate of candidacy was filed, on or before April 30; and

(c) In all other years for which a statement is required, on or before April 30.

(3) A candidate to be an elected official:

(a) May file the required financial disclosure form under Subsection **D(2)(a)** of this section with the Town Clerk or Board of Ethics with the certificate of candidacy or prior to filing the certificate of candidacy; and

(b) Shall file the financial disclosure form required under Subsection **D(2)(b)** and **(c)** of this section with the Board of Ethics.

(4) If a candidate fails to file a financial disclosure form required by this section after written notice is provided by the Town Clerk or Board of Ethics, the candidate is deemed to have withdrawn the candidacy.

(5) The Town Clerk and Board of Ethics may not accept any certificate of candidacy unless a financial disclosure form has been filed in proper form.

(6) Within 10 days of the receipt of a financial disclosure form required under this section, the Town Clerk shall forward the statement to the Board of Ethics.

E. Public record.

(1) The Town Clerk's office shall maintain all completed financial disclosure forms filed under this section.

(2) Financial disclosure form shall be made available during normal office hours for examination and copying by the public, subject to administrative procedures and reasonable fees, as established in the Town's Fee Schedule passed by the Board of Town Commissioners.

(3) If an individual examines or copies a financial disclosure form, the Town Clerk shall record:

(a) The name and home address of the individual reviewing or copying the statement; and

(b) The name of the person whose financial disclosure form was examined or copied.

(4) Upon request by the official or employee whose financial disclosure form was examined or copied, the Board of Ethics shall provide the official with a copy of the name and home address of the person who reviewed the official's financial disclosure form.

(5) Retention requirements. The Town Clerk's office shall retain financial disclosure forms for four years from the date of receipt.

NEW

(6) The home address of the elected official or candidate to be an elected official, as identified by the individual, shall be redacted prior to making it publicly available. This applies to all disclosure statements, whether posted on the internet or viewable only in the office.

F. Contents of financial disclosure forms from incumbents and elected officials.

(1) Interests in real property. A financial disclosure form filed under this section shall include a schedule of all interests in real property, wherever located. For each interest in real property, this schedule shall include:

(a) The nature of the property and the location, by street address, mailing address or legal description, of the property.

(b) The nature and extent of the interest held, including any conditions and encumbrances on the interest;

(c) The date when, the manner in which, and the identity of the person from whom the interest was acquired;

(d) The nature and amount of the consideration given in exchange for the interest or, if acquired other than by purchase, the fair market value of the interest at the time acquired;

(e) If any interest was transferred, in whole or in part, at any time during the reporting period, a description of the interest transferred, the nature and amount of the consideration received for the interest, and the identity of the person to whom the interest was transferred; and

(f) The identity of any other person with an interest in the property.

(2) Interest in corporations and partnerships. A financial disclosure form filed under this section shall include a schedule of all interests in any corporation, partnership, limited liability partnership, or limited liability corporation, regardless of whether the corporation or partnership does business with the Town.

(a) Interests reported under this subsection need not include exchange-traded funds (ETF), such as mutual funds.

NEW

(b) For each interest reported under this subsection, the schedule shall include:

[1] The name and address of the principal office of the corporation, partnership, limited liability partnership, or limited liability corporation;

[2] The nature and amount of the interest held, including any conditions and encumbrances on the interest;

[3] With respect to any interest transferred, in whole or in part, at any time during the reporting period, a description of the interest transferred, the nature and amount of the consideration received for the interest and, if known, the identity of the person to whom the interest was transferred; and

[4] With respect to any interest acquired during the reporting period:

[a] The date when, the manner in which and the identity of the person from whom the interest was acquired; and

[b] The nature and the amount of the consideration given in exchange for the interest or, if acquired other than by purchase, the fair market value of the interest at the time acquired.

(b) An individual may satisfy the requirement to report the amount of the interest held by reporting, instead of a dollar amount:

[1] For an equity interest in a corporation, the number of shares held and, unless the corporation's stock is publicly traded, the percentage of equity interest held; or

[2] For an equity interest in a partnership, the percentage of equity interest held.

(3) Interests in business entities doing business with the Town. A financial disclosure form filed under this section shall include a schedule of all interests in any business entity that does business with the Town, other than interests reported under Subsection **F(2)**. For each interest reported under this subsection, the schedule shall include:

(a) The name and address of the principal office of the business entity;

(b) The nature and amount of the interest held, including any conditions to and encumbrances in the interest;

(c) With respect to any interest transferred, in whole or in part, at any time during the reporting period, a description of the interest transferred, the nature and amount of the consideration received in exchange for the interest, and, if known, the identity of the person to whom the interest was transferred; and

(d) With respect to any interest acquired during the reporting period:

[1] The date when, the manner in which, and the identity of the person from whom the interest was acquired; and

[2] The nature and the amount of the consideration given in exchange for the interest or, if acquired other than by purchase, the fair market value of the interest at the time acquired.

(4) Gifts. A gift disclosure form filed annually under this section shall include a schedule of each gift in excess of $20 in value or a series of gifts totaling $100 or more received on or before April 30 of each year from or on behalf of, directly or indirectly, any one person who does business with or is regulated by the Town. For each gift reported, the schedule shall include:

(a) A description of the nature and value of the gift; and

(b) The identity of the person from whom, or on behalf of whom, directly or indirectly, the gift was received.

(5) Employment with or interests in entities doing business with the Town. A financial disclosure form filed under this section shall include a schedule of all offices, directorships, and salaried employment by the individual or member of the immediate family of the individual held at any time during the reporting period with entities doing business with the Town. For each position reported under this subsection, the schedule shall include:

(a) The name and address of the principal office of the entity;

(b) The title and nature of the office, directorship, or salaried employment held and the date it commenced; and

(c) The name of each Town agency with which the entity is involved.

(6) Indebtedness to entities doing business with the Town. A financial disclosure form filed under this section shall include a schedule of all liabilities, excluding retail credit accounts, to persons doing business with the Town owed at any time during the reporting period:

(a) By the individual; or

(b) By a member of the immediate family of the individual if the individual was involved in the transaction giving rise to the liability.

(7) For each liability reported under this subsection, the financial disclosure form shall include:

(a) The identity of the person to whom the liability was owed and the date the liability was incurred;

(b) The amount of the liability owed as of the end of the reporting period;

(c) The terms of payment of the liability and the extent to which the principal amount of the liability was increased or reduced during the year; and

(d) The security given, if any, for the liability.

(8) A financial disclosure form filed under this section shall include a schedule of the immediate family members of the individual employed by the Town in any capacity at any time during the reporting period.

(9) Sources of earned income.

(a) A financial disclosure form filed under this section shall include a schedule of:

[1] The name and address of each place of employment and of each business entity of which the individual or a member of the individual's immediate family was sole or partial owner and from which the individual or a member of the individual's immediate family received earned income, at any time during the reporting period.

(b) A minor child's employment or business ownership need not be disclosed if the Town does not regulate, exercise authority over, or contract with the place of employment or business entity of the minor child.

NEW

(c) An elected or appointed official or employee, or candidate for such position, of the Town of Bel Air, whose spouse is or was a regulated lobbyist, within one (1) calendar year of said position or candidacy, must disclose the entity or entities that engaged the spouse to lobby.

(10) A financial disclosure form filed under this section may also include a schedule of additional interests or information that the individual making the statement wishes to disclose.

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§ 43-6 **Financial disclosure: employees and appointed officials.**

A. This section applies to the following employees: **[Amended 11-5-2012 by Ord. No. 755-12]**

(1) Town Administrator.

(2) All department heads.

(3) All deputy department heads.

(4) All information technology personnel.

(5) Armory Facilities Manager.

(6) Financial Officer.

(7) All planners.

(8) Chief of Operations.

(9) Facilities Manager.

(10) Assistant Chief of Operations.

(11) Shop Supervisor.

(12) Sanitation Supervisor.

B. A financial disclosure form under this section shall be filed with the Board of Ethics under oath or affirmation.

C. On or before April 30 of each year during which an official or employee holds office, an official or employee shall file a gift disclosure form disclosing gifts, as defined in § **43-4**, that were received during the preceding calendar year from any person that contracts with or is regulated by the Town, including the name of the donor of the gift and the approximate retail value at the time of receipt.

D. Submitting a conflict of interest form to the Board of Ethics, an official or employee shall disclose employment and interests that raise conflicts of interest or potential conflicts of interest in connection with a specific proposed action by the employee or official sufficiently in advance of the action to provide adequate disclosure to the public.

E. The Board of Ethics shall maintain all financial disclosure forms filed under this section as public records available for public inspection and copying as provided in § **43-5E**, entitled "Public Records," and § **43-5E(5)**, entitled Retention Requirements, of this chapter.

F. For the purpose of § **43-5F** of this chapter, the following interests are considered to be the interests of the individual completing the financial disclosure form:

(1) An interest held by a member of the individual's immediate family, if the interest was, at any time during the reporting period, directly or indirectly controlled by the individual.

(2) An interest held by a business entity in which the individual held a 30% or greater interest at any time during the reporting period.

(3) An interest held by a trust or an estate in which, at any time during the reporting period:

(a) The individual held a reversionary interest or was a beneficiary; or if a revocable trust, the individual was a settlor.

(4) An interest disclosed under this subsection need not include exchange-traded funds (ETF), such as mutual funds.

NEW

(5) Indebtedness disclosed under this subsection only applies to debts to entities doing business with or regulated by the individual's governmental unit.

NEW

G. The Board of Ethics shall review the financial disclosure forms submitted under this section for compliance with the provisions of this section and shall notify an individual submitting the form of any omissions or deficiencies.

H. The Town Board of Ethics may take appropriate enforcement action to ensure compliance with this section.

I. The home address of the employee or appointed official, as identified by the individual, shall be redacted prior to making it publicly available. This applies to all disclosure statements, whether posted on the internet or viewable only in the office.

NEW

J. An elected or appointed official or employee, or candidate for such position, of the Town of Bel Air, whose spouse is or was a regulated lobbyist, within one (1) calendar year of said position or candidacy, must disclose the entity or entities that engaged the spouse to lobby.

NEW

The following Code does not display images or complicated formatting. Codes should be viewed online. This tool is only meant for editing.

§ 43-7 **Lobbying.**

A. A lobbyist shall file a lobbying registration form with the Board of Ethics on or before the later of January 15 of the calendar year or within five days after first performing an act that requires registration in the calendar year with the Board of Ethics if the person:

(1) Personally appears before a Town official or employee with the intent to influence that person in the performance of the official duties of the official or employee; and

(2) In connection with the intent to influence, expends or reasonably expects to expend in a given calendar year in excess of $100 on food, entertainment, or other gifts for officials or employees of the Town.

B. The lobbying registration form covers a defined registration period, not to exceed one calendar year, and shall identify:

(1) The registrant;

(2) Any other person on whose behalf the registrant acts; and

(3) The subject matter on which the registrant proposes to make appearances specified in this section.

C. Within 30 days after the end of any calendar year during which a person was registered under this section, the person shall file a written report with the Board of Ethics disclosing:

(1) The value, date, and nature of any food, entertainment or other gift provided to a Town official or employee; and

(2) If a gift or series of gifts to a single official or employee exceeds $100 in value, the identity of the official or employee.

D. The Board of Ethics shall maintain the registrations and reports filed under this section as public records available for public inspection and copying at the Town Clerk's office for four years after receipt by the Board of Ethics.

NEW

E. A lobbyist who serves on a Town of Bel Air Board, Commission, or Committee must submit financial disclosure forms that mirror the forms for elected officials.

TOWN OF BEL AIR ETHICS CODE

Financial Disclosure Statement

Board of Town Commissioners and Candidates for Commissioner

Upon completion of your financial disclosure statement, sign and date the lower portion of the page and make the required oath or affirmation before the Town Clerk or a member of the Bel Air Board of Ethics.

☐ **I would like to be notified if someone looks at my form.**

Regular Reporting Period: January 1 through December 31, **2018**

Or

Termination Report: January 1 through _____, 2019

PLEASE PRINT OR TYPE

First Name	Initial	Last Name
Street Address		
City	State	Zip Code
☐ Commissioner - or - ☐ Candidate	Phone Number	Email Address

This financial disclosure statement describes all interests and related transactions and matters required to be disclosed by the Town Code, Chapter 43, Ethics Code, with respect to the period indicated and pertaining to the person filing the statement.

I acknowledge that any information required by the Town Code, Chapter 43, Ethics Code, that becomes reportable after the statement is filed, shall be reported immediately to the Town of Bel Air's Board of Ethics, as required by law.

I hereby make oath or affirm under the penalties of perjury that the contents of this financial disclosure statement, including the Schedules attached hereto, are complete, true and correct to the best of my knowledge, information and belief.

(SEAL) Signature of Person Filing: _____

Date: _____

Sworn to before me this _____ day of _____

_____

Signature of Board of Ethics member or Town Clerk

TOWN OF BEL AIR ETHICS CODE

Financial Disclosure Statement

Board of Town Commissioners and Candidates for Commissioner

January 1 through December 31, 2018

Name: _____

Instructions: Check the proper block to Questions A through K. Do not leave any questions unanswered. If you check "Yes" to any question be sure to complete the corresponding Schedule.

		YES	NO
A.	I held interests during the reporting period in real property located in or outside the Town of Bel Air. (If "Yes", complete Schedule A.)	☐	☐
B.	I held interests during reporting period in corporations, partnerships and similar entities, whether or not the entity did business with the Town. (If "Yes", complete Schedule B.)	☐	☐
C.	I held interests in a non-corporate business entity which did business with the Town of Bel Air other than a partnership. (If "Yes", complete Schedule C.)	☐	☐
D.	I received gifts during reporting period from persons doing business with the Town, regulated by the Town, or registered or required to register as lobbyists. (If "Yes", complete Schedule D.)	☐	☐
E.	I or a member of my immediate family was a partner or held an office, directorship, or salaried employment during reporting period in or with a business entity doing business with the Town. (If "Yes", complete Schedule E.)	☐	☐
F.	I or a member of my immediate family owed debts (excluding retail credit accounts) during reporting period to persons doing business with the Town. (If "Yes", complete Schedule F.)	☐	☐
G.	A member of my immediate family was employed by the Town during reporting period. (If "Yes", complete Schedule G.)	☐	☐
H.	I or a member of my immediate family received a salary or was sole or partial owner of a business entity from which earned income was received, during the reporting period. (If "Yes", complete Schedule H.)	☐	☐
I.	I represented a person for compensation before a Town of Bel Air board, commission, department, or other local government agency other than in a judicial or quasi-judicial proceeding. (If "Yes", complete Schedule I.)	☐	☐
J.	I represented a local government agency for compensation or had a contractual relationship with a local government before the Town or a local government agency, other than in a judicial or quasi-judicial proceeding. (If "Yes", complete Schedule J.)	☐	☐
K.	I, my spouse or dependent children together or separately have either 10% or more of the capital stock or stock worth $25,000 or more in a corporation subject to regulation by the Town of Bel Air or an interest in a partnership, limited liability, partnership or limited liability company subject to regulation by the Town of Bel Air. (If "Yes", complete Schedule K.)	☐	☐

TOWN OF BEL AIR ETHICS CODE

Financial Disclosure Statement

Board of Town Commissioners and Candidates for Commissioner

January 1 through December 31, 2018

Name:_____

Instructions: Read the Code of the Town of Bel Air, Chapter 43 - Code of Ethics. Contact the Director of Administration/Town Clerk if you have any questions or concerns. Sign the acknowledgement of understanding below and proceed to complete the corresponding schedule of questions A – K.

See Attached Document Copies of
Code of the Town of Bel Air - Chapter 43 - Code of Ethics
&
Financial Disclosure Schedule A – K

Acknowledgement

Code of the Town of Bel Air

Chapter 43 - Code of Ethics

I have read and understood the above-mentioned Code of the Town of Bel Air, Chapter 43 - Code of Ethics. I willingly agree to abide by the Town Code and to uphold its standards. I understand that any violation of this regulation perpetrated by me will be subject to review by the Board of Ethics and I may face consequences that may include penalties up to and including disciplinary or other appropriate personnel action, including termination, removal from office, suspension of salary, or other sanctions, both civil and/or criminal.

_____

Name (Please Print)

_____ _____

Signature Date

SCHEDULE A - REAL PROPERTY INTEREST
Members of the Board of Town Commissioners or Candidate for Commissioner
Jan. 1 through Dec. 31, 2018

Name: _____

Do you have any interest (as an owner or a tenant, including interests in time shares) in real property in Maryland or in any other state or country?

Yes ☐ No ☐ (Go to Schedule B)

If Yes: (Answer each question below. A separate Schedule A will be required for each property you need to disclose.)

1. Address or legal description of the property: (Street address, if known, if the property is your primary residence, you may enter the lot and block legal description instead, if you wish.)

   _____

   Street City State Zip

2. What kind of property is it?
   Improved (indicate whether property is residential or commercial, etc.) _____
   Unimproved (vacant lot) _____

3. Is the interest held directly by you or is it attributable to you?
   Direct _____ Attributable _____

4. Are you the owner or tenant? Owner _____ Tenant _____

5. Do you hold the interest solely or is it jointly held with another?
   Solely _____ Jointly _____ Tenants by the Entirety _____
   If held jointly, or by tenants by the entirety, the name(s) of the other joint owner(s):_____
   _____

6. Are there any legal conditions or encumbrances on the property (mortgages, liens, contracts, options, etc.)?
   Yes _____ No _____
   If yes, what is/are the name(s) of the lender(s), creditor(s), lien holder(s), etc.? _____
   _____

7. What date was the property acquired? _____

8. How was the property acquired (purchase, gift, inheritance, etc.)? _____

9. From whom was the property acquired (name of individual or entity from whom you purchased or inherited the property or who gifted the property to you)?_____

10. What consideration was given when the property was acquired (dollar amount paid or, if received as a gift or inherited, the fair market value at the time you acquired your interest in the property)? _____
    _____

11. Have you transferred any interest in this property during the reporting period? Yes ____ No____
    If **Yes**:
    11A. What percentage of interest did you transfer: _____%
    11B. What consideration did you receive for the interest: _____
    11C. To whom did you transfer the interest: _____

If you have any additional interests in real property in Maryland, any other state or any other country, please use additional sheet(s), if necessary, and respond to each above question for each such entry.

SCHEDULE B - INTERESTS IN CORPORATIONS AND PARTNERSHIPS
Members of the Board of Town Commissioners or Candidate for Commissioner
Jan. 1 through Dec. 31, 2018

Name: _____

Did you have any interest in any corporations, partnerships, limited liability partnerships (LLP) or limited liability companies (LLC), excluding exchange-traded funds (like a mutual fund), during the reporting period whether or not the entity did business with the Town?

Yes ☐ No ☐ (Go to Schedule C)

If Yes: (Answer each question below. A separate Schedule B will be required for each interest you need to disclose.)

1. What is the name of the entity? Include the complete name of the entity, do not identify solely by trading symbol: _____

2. Does the stock of the corporation trade on a stock exchange? ☐ Yes ☐ No
   If "**no**," the legal address of the entity's principal office: _____
   _____

3. Is the interest held directly by you or is it attributable to you? ☐ Direct ☐ Attributable

4. Do you hold the interest in your name alone, or is it held jointly?
   ☐ In your name alone ☐ Jointly If jointly, the percentage of your interest: _____%

5. What is the nature of your interest and its dollar value or the number of shares (Example: stock, notes, bonds, puts, calls, straddles, purchase options, etc.)? If in a non-publicly traded entity or LLP or LLC, report the percentage of ownership.
   Type: _____
   Dollar Value of Shares: _____ or Number of Shares: _____
   Percentage of ownership: _____%

6. Are there any legal conditions or encumbrances that apply to your interest in the entity (Example: mortgages, liens, contracts, options, etc.)? ☐ Yes ☐ No
   If **yes**, name of entity holding the encumbrance: _____

7. Did you acquire an interest in the entity during the reporting period? ☐ Yes ☐ No
   If **yes**:
   - 7A. In what month was the interest acquired? _____
   - 7B. How was the interest in the entity acquired (purchase, gift, will, etc.): _____
   - 7C. From whom did you acquire the interest in the entity? (If you purchased it from a brokerage, the name of the brokerage): _____
   - 7D. What consideration was given when the interest was acquired (dollar amount paid, or if you received the property as a gift or inherited it, the fair market value at the time you acquired your interest in the property): _____

8. Have you transferred any interest in this entity during the reporting period? ☐ Yes ☐ No
   If **yes:**
   - 8A. What portion of the interest was transferred? _____
   - 8B. What consideration did you receive for the interest in the entity (dollar amount paid, or if you received the property as a gift or inherited it, the fair market value and terms at the time you transferred your interest in the property)? _____
   - 8C. To whom did you transfer your interest in the entity? _____

If you have additional interests in corporations or partnerships, please use additional sheet(s) if necessary, and answer each of the above questions for each additional entry.

SCHEDULE C - INTERESTS IN NON-CORPORATE BUSINESS ENTITIES DOING BUSINESS WITH THE TOWN
Members of the Board of Town Commissioners or Candidate for Commissioner
Jan. 1 through Dec. 31, 2018

Name: _____

Do you have an interest in any non-corporate business entity (a sole proprietorship) that did business with the Town of Bel Air during the reporting period?

☐ **Yes** ☐ **No** (Go to Schedule D)

If Yes: (Answer each question below. A separate Schedule C will be required for each business entity to be disclosed.)

1. Name and address of the Principal office of the business entity.

   Name: _____

   _____

   Street City State Zip

2. Is the interest held directly by you or is it attributable to you?
   Direct _____ Attributable _____

3. Do you hold the interest solely or is it jointly held with another?
   Solely _____ Jointly _____
   3A. If held jointly, the percentage of your joint interest: _____%.
   3B Dollar value of your interest in the entity: $_____; or percentage of your interest in the entity: _____%.

4. Are there any legal conditions or encumbrances that apply to your interest in the entity (Example: mortgages, liens, contracts, options, etc.)? Yes _____ No _____
   If **yes**, give name of creditor: _____

5. Was any interest <u>acquired</u> during the reporting year? Yes ____ No ____
   If **yes:**
   5A. What month was the interest acquired? _____
   5B. How was the interest in the entity acquired (Example: purchase, gift, will, etc.)? _____
   _____
   5C. From whom did you acquire the interest? _____
   5D. What consideration was given when the interest was acquired? (Dollar amount paid or if you received the property as a gift or inherited it, the fair market value at the time you acquired your interest in the property.) _____

6. Did you transfer any of your interest during the reporting period? Yes _____ No_____
   If **yes**:
   6A. What percentage of interest, if less than all, was transferred? _____%
   6B. What consideration did you receive for the interest in the entity? (Dollar amount paid or if you received the property as a gift or inherited it, the fair market value and terms at the time you transferred your interest in the property.)_____
   6C. To whom did you transfer the interest in the entity? _____

If you have additional interests in sole proprietorship(s) that did business with the Town during the reporting period, please use additional sheet(s) and answer each of the above questions for each entry.

SCHEDULE D - GIFTS DISCLOSURE
Members of the Board of Town Commissioners or Candidate for Commissioner
Jan. 1 through Dec. 31, 2018

Name: _____

During the reporting period did you receive any gift(s), directly or indirectly, in excess of a value of $20 or a series of gifts from the same donor with a cumulative value of $100 or more from a person or entity who: 1) did business with the Town; 2) engaged in an activity that was regulated or controlled by the Town; or 3) was a regulated lobbyist. Gifts received from a member of your immediate family, another child, or parents do not need to be disclosed.

☐ **Yes** ☐ **No** (Go to Schedule E)

If **yes:** (A **separate** gift schedule is required for each gift.)

1. Who gave you the gift? _____

2. What was the nature of the gift (i.e. book, restaurant meal, tickets, etc.)?

   _____

3. What was the value of the gift? _____

4. If the gift was given to someone else at your direction or you gave the gift to someone else, list the identity of the recipient of the gift. _____

   _____

Please use additional sheet(s), if necessary for any additional entries.

SCHEDULE E – OFFICERS, DIRECTORSHIPS, SALARIED EMPLOYMENT AND SIMILAR INTERESTS
Members of the Board of Town Commissioners or Candidate for Commissioner
Jan. 1 through Dec. 31, 2018

Name: _____

During the reporting period, did you or any member of your immediate family (spouse or dependent child) have any salaried employment or hold any office or directorship with an entity that did business with the Town?

☐ **Yes** ☐ **No** (Go to Schedule F)

If yes: (answer each question below. A separate Schedule E will be required for each disclosure.)

1. What is the name and address of the business entity?

   Name: _____

   _____
   Street City State Zip Code

2. Who was the individual who held the position or interest listed above (Example: yourself, spouse, dependent child)? Self ___ Spouse _____ Dependent Child: _____

   2A. Name of spouse of dependent child: _____

3. What is the title of the office you, your spouse or dependent child held (Example: limited partner, director, treasurer, chair of the board of trustees, etc.)? _____

4. What year did the position begin? _____

5. With what department(s) did the business entity do business? _____

6. What was the nature of the business (Example: regulated by your agency, registered under the lobbying law, or involved with sales and contracts with the Town)? _____

   _____

If necessary, please use additional sheet(s) for any additional entries.

SCHEDULE F – DEBTS YOU OWE
Members of the Board of Town Commissioners or Candidate for Commissioner
Jan. 1 through Dec. 31, 2018

Name: _____

During the reporting period, did you owe a debt (excluding a retail credit account) to a financial entity that did business with the Town? **[NOTE: If, on Schedule A, B or C you listed a financial entity that did business with the Town as the holder of your mortgage or other encumbrance, you must complete Schedule F with regard to that indebtedness.]**

☐ **Yes** ☐ **No** (Go to Schedule G)

If **Yes: (Answer each question below. A separate Schedule F will be required for each debt to be disclosed.)**

1. To whom did you owe the debt? (Do not include consumer credit debts.)
   _____

2. When was the debt incurred? _____

3. What are the interest rate and terms of payment of the debt? Interest Rate _____
   Terms (monthly, bimonthly, annually, etc.): _____

4. What was the amount of the debt as of the end of the reporting period? If debt existed during the reporting period but was paid in full at the end of the period, put $0. $_____

5. Did the principal of the debt increase _____ or decrease _____ during the reporting period, and by how much? $_____

6. Was any security given for the debt? Yes _____ No _____
   If **yes;** Please state what type of security was given (home, car, boat, etc.): _____

7. If this is a transaction in which you were involved, but which resulted in a debt being owed by your spouse or dependent child, identify your spouse or child and describe the transaction.
   Relative: _____ Transaction: _____

If necessary, please use additional sheet(s) for any additional entries.

SCHEDULE G – FAMILY MEMBERS EMPLOYED BY THE TOWN
Members of the Board of Town Commissioners or Candidate for Commissioner
Jan. 1 through Dec. 31, 2018

Name: _____

During the reporting period, were any members of your immediate family (spouse or dependent children) employed by the Town in any capacity?

☐ **Yes** ☐ **No** (Go to Schedule H)

If **Yes: (Answer each question below. A separate Schedule G will be required for each member of the immediate family who is employed by the Town.)**

1. What is the name and relation of the immediate family member employed by the Town?

   Name:_____ Relationship:_____

2. What is the name of the department that employed the member of your immediate family?

   _____

3. What was the title of your immediate family member's position in the Town during the reporting period?

   _____

If necessary, please use additional sheet(s) for any additional entries.

SCHEDULE H – EMPLOYMENT/BUSINESS OWNERSHIP
Members of the Board of Town Commissioners or Candidate for Commissioner
Jan. 1 through Dec. 31, 2018

Name: _____

Question Num. 1 of 2
During the reporting period, did you or any member of your immediate family, receive any earned income from any entity, other than the Town of Bel Air? Please note that your dependent child's employment or business ownership does not need to be disclosed unless the place of employment or the business entity is subject to regulation or the authority of the Town or has contracts in excess of $10,000 with the Town.

☐ **Yes** ☐ **No (proceed to Schedule H Question Num. 2)**

If Yes: (Answer each question below. A separate Schedule H Question Num. 1 will be required for each member of the immediate family who had employment or ownership of a business entity.)

1. If, during the reporting period, you or any member of your immediate family, had employment from which you or they earned income, list the name, relationship and address of the employment.

   Name: _____

   Relationship: _____

   Name of Employer: _____

   Address: _____
   Street City State Zip Code

2. If during the reporting period, you or any member of your immediate family wholly or partial owned any business entity from which income was earned, list the name, relationship, business entity and address.

   Name: _____

   Relationship: _____

   Name of Business Entity: _____

   Address: _____
   Street City State Zip Code

If necessary, please use additional sheet(s) for any additional entries.

SCHEDULE H – EMPLOYMENT/BUSINESS OWNERSHIP
Members of the Board of Town Commissioners or Candidate for Commissioner
Jan. 1 through Dec. 31, 2018

Name: _____

Question Num. 2 of 2
During the reporting period, did your spouse, partner, or significant other, act, work, or serve as a regulated lobbyist?

☐ **Yes** ☐ **No (proceed to Schedule I)**

If Yes: (Answer each question below.)

1. If, During the reporting period, your spouse, partner, or significant other, acted, worked, or served as a regulated lobbyist, list the names, relationships and addresses of the entities that were represented.

Name: _____

Relationship: _____

Name of Entity: _____

Address: _____
Street City State Zip Code

Name: _____

Relationship: _____

Name of Entity: _____

Address: _____
Street City State Zip Code

Name: _____

Relationship: _____

Name of Entity: _____

Address: _____
Street City State Zip Code

If necessary, please use additional sheet(s) for any additional entries.

SCHEDULE I - DISCLOSURE OF INTEREST – REPRESENTATION BEFORE THE TOWN OF BEL AIR
Members of the Board of Town Commissioners or Candidate for Commissioner
Jan. 1 through Dec. 31, 2016

Name: _____

Did you represent a person for compensation before a Town of Bel Air board, commission, or local government other than in a judicial or quasi-judicial proceeding?

☐ **Yes** ☐ **No** (Go to Schedule J)

If **Yes:** (**Answer each question below. A separate Schedule I will be required for each interest to be disclosed.)**

I am representing or represented for compensation:

Name: _____

As an: _____

Before: _____

Date: _____

For the following consideration:

_____

_____

If necessary, please use additional sheet(s) for any additional entries.

SCHEDULE J: DISCLOSURE OF INTEREST: FINANCIAL RELATIONSHIP TOWN OR ANOTHER LOCAL GOVERNMENT
Members of the Board of Town Commissioners or Candidate for Commissioner
Jan. 1 through Dec. 31, 2018

Name: _____

Did you represent the Town or another local government for compensation, or have a contractual relationship with the Town or another local government in the State or conducted a transaction with the Town or local government in the State for monetary compensation?

☐ **Yes** ☐ **No** (Go to Schedule K)

If Yes; (Answer each question below. A separate Schedule J will be required for each interest to be disclosed.)

I have entered into a financial relationship with:

Name of Government Agency: _____

to _____(Position of employment, services performed, or details of transaction entered into) for the following consideration: **$ _____

**NOTE: A legislator is prohibited by law from being directly involved in negotiations, discussions, or other contacts with a government entity as to a procurement contract in which the legislator has a financial interest.

If necessary, please use additional sheet(s) for any additional entries.

SCHEDULE K - DISCLOSURE OF INTEREST: INTEREST IN A BUSINESS REGULATED BY THE TOWN
Members of the Board of Town Commissioners or Candidate for Commissioner
Jan. 1 through Dec. 31, 2018

Name: _____

Did you, your spouse or dependent children together or separately have either 10% or more of the capital stock or stock worth $25,000 or more in a corporation, subject to regulation by the Town or any interest in a partnership, limited liability partnership or limited liability company subject to regulation by the Town?

☐ **Yes** ☐ **No**

If yes: (Answer each question below. A separate Schedule K will be required for each interest to be disclosed.)

I hereby report that I and/or Name of Immediate Family Member:

First: _____

Middle: _____

Last: _____

My _____ (spouse, self, dependent child) together or separately own a

reportable interest in:_____.

This Business Entity is subject to regulation by: _____

If necessary, please use additional sheet(s) for any additional entries.

TOWN OF BEL AIR ETHICS CODE

Financial Disclosure Statement - Designated Town Employees

Upon completion of your financial disclosure statement, sign and date the lower portion of the page and make the required oath or affirmation before the Town Clerk or a member of the Bel Air Board of Ethics.

☐ **I would like to be notified if someone looks at my form.**

Regular Reporting Period: January 1 through December 31, **2018**

Or

Termination Report: January 1 through _____, 2019

PLEASE PRINT OT TYPE

First Name	Initial	Last Name
Street Address		
City	State	Zip Code
Job Title	Department	Email Address

This financial disclosure statement describes all interests and related transactions and matters required to be disclosed by the Town Code, Chapter 43, Ethics Code, with respect to the period indicated and pertaining to the person filing the statement.

I acknowledge that any information required by the Town Code, Chapter 43, Ethics Code, that becomes reportable after the statement is filed, shall be reported immediately to the Town of Bel Air's Board of Ethics, as required by law.

I hereby make oath or affirm under the penalties of perjury that the contents of this financial disclosure statement, including the Schedules attached hereto, are complete, true and correct to the best of my knowledge, information and belief.

(SEAL) Signature of Person Filing: _____

Date: _____

Sworn to before me this _____ day of _____

_____

Signature of Board of Ethics member or Town Clerk

TOWN OF BEL AIR ETHICS CODE

Financial Disclosure Statement - Designated Town Employees

January 1 through December 31, 2018

Name: _____

	Instructions: Check the proper block to Questions A through I. Do not leave any questions unanswered. If you check "Yes" to any question be sure to complete the corresponding Schedule.	**YES**	**NO**
A.	I held interests during reporting period in real property located in or outside the Town of Bel Air in Maryland. (If "Yes", complete Schedule A.)	☐	☐
B.	I held interests during reporting period in corporations, partnerships and similar entities, whether or not the entity did business with the Town. (If "Yes", complete Schedule B.)	☐	☐
C.	I held interests in a non-corporate business entity which did business with the Town of Bel Air other than a partnership. (If "Yes", complete Schedule C.)	☐	☐
D.	I received gifts during reporting period from persons doing business with the Town, regulated by the Town, or registered or required to register as lobbyists. (If "Yes", complete Schedule D.)	☐	☐
E.	I or a member of my immediate family was a partner or held an office, directorship, or salaried employment during reporting period in or with a business entity doing business with the Town. (If "Yes", complete Schedule E.)	☐	☐
F.	I or a member of my immediate family owed debts (excluding retail credit accounts) during reporting period to persons doing business with the Town. (If "Yes", complete Schedule F.)	☐	☐
G.	A member of my immediate family was employed by the Town during reporting period. (If "Yes", complete Schedule G.)	☐	☐
H.	I or a member of my immediate family received a salary or was sole or partial owner of a business entity doing business with the Town from which earned income was received, during the reporting period. (If "Yes", complete Schedule H.)	☐	☐
I.	I represented a person for compensation before a Town of Bel Air board and/or commission other than in a judicial or quasi-judicial proceeding. (If "Yes", complete Schedule I.)	☐	☐

TOWN OF BEL AIR ETHICS CODE

Financial Disclosure Statement - Designated Town Employees

January 1 through December 31, 2018

Name: _____

Instructions: Read the Code of the Town of Bel Air, Chapter 43 - Code of Ethics. Contact the Director of Administration/Town Clerk if you have any questions or concerns. Sign the acknowledgement of understanding below and proceed to complete the corresponding schedule of questions A – I.

See Attached Document Copies of
Code of the Town of Bel Air - Chapter 43 - Code of Ethics
&
Financial Disclosure Schedule A – I

Acknowledgement

Code of the Town of Bel Air
Chapter 43 - Code of Ethics

I have read and understood the above-mentioned Code of the Town of Bel Air, Chapter 43 - Code of Ethics. I willingly agree to abide by the Town Code and to uphold its standards. I understand that any violation of this regulation perpetrated by me will be subject to review by the Board of Ethics and I may face consequences that may include penalties up to and including disciplinary or other appropriate personnel action, including termination, removal from office, suspension of salary, or other sanctions, both civil and/or criminal.

_____
Name (Please Print)

_____ _____
Signature Date

SCHEDULE A - REAL PROPERTY INTEREST
Designated Town Employees - Jan. 1 through Dec. 31, 2018

Name: _____

Do you have any interest (as an owner or a tenant, including interests in time shares) in real property in Maryland or in any other state or country?

Yes ☐ No ☐ (Go to Schedule B)

If Yes: (Answer each question below. A separate Schedule A will be required for each property you need to disclose.)

1. Address or legal description of the property: (Street address, if known, if the property is your primary residence, you may enter the lot and block legal description instead, if you wish.)

   _____

   Street City State Zip

2. What kind of property is it?
   Improved (indicate whether property is residential or commercial, etc.) _____
   Unimproved (vacant lot) _____

3. Is the interest held directly by you or is it attributable to you?
   Direct _____ Attributable _____

4. Are you the owner or tenant? Owner _____ Tenant _____

5. Do you hold the interest solely or is it jointly held with another?
   Solely _____ Jointly _____ Tenants by the Entirety _____
   If held jointly, or by tenants by the entirety, the name(s) of the other joint owner(s):_____
   _____

6. Are there any legal conditions or encumbrances on the property (mortgages, liens, contracts, options, etc.)?
   Yes _____ No _____
   If yes, what is/are the name(s) of the lender(s), creditor(s), lien holder(s), etc.? _____
   _____

7. What date was the property acquired? _____

8. How was the property acquired (purchase, gift, inheritance, etc.)? _____

9. From whom was the property acquired (name of individual or entity from whom you purchased or inherited the property or who gifted the property to you)?_____

10. What consideration was given when the property was acquired (dollar amount paid or, if received as a gift or inherited, the fair market value at the time you acquired your interest in the property)? _____
    _____

11. Have you transferred any interest in this property during the reporting period? Yes ____ No____
    If **Yes**:
    11A. What percentage of interest did you transfer: _____%
    11B. What consideration did you receive for the interest: _____
    11C. To whom did you transfer the interest: _____

If you have any additional interests in real property in Maryland, any other state or any other country, please use additional sheet(s), if necessary, and respond to each above question for each such entry.

SCHEDULE B - INTERESTS IN CORPORATIONS AND PARTNERSHIPS
Designated Town Employees - Jan. 1 through Dec. 31, 2018

Name:_____

Did you have any interest in any corporations, partnerships, limited liability partnerships (LLP) or limited liability companies (LLC), excluding exchange-traded funds (like a mutual fund), during the reporting period, whether or not the entity did business with the Town.

Yes ☐ No ☐ (Go to Schedule C)

If Yes: (Answer each question below. A separate Schedule B will be required for each interest you need to disclose.)

1. What is the complete name (do not identify solely by trading symbol) and address of the entity?

   _____

2. Does the stock of the corporation trade on a stock exchange? Yes ☐ No ☐
   If "**no**," the legal address of the entity's principal office._____

   _____

3. Is the interest held directly by you or is it attributable to you?
   Directly _____ Attributable _____

4. Do you hold the interest in your name alone, or is it held jointly?
   In your name alone: _____ Jointly: _____
   If jointly, the percentage of your interest: _____%

5. What is the nature of your interest and its dollar value or the number of shares (stock, notes, bonds, puts, calls, straddles, purchase options, etc.)?
   Type: _____Dollar Value of Shares: _____
   Number of Shares: _____

6. Are there any legal conditions or encumbrances that apply to your interest in the entity?
   (Example: mortgages, liens, contracts, options, etc.) Yes ☐ No ☐
   If yes, name of entity holding the encumbrance: _____.

7. Did you acquire an interest in the entity during the reporting period? Yes ☐ No ☐ If **yes**:
   - 7A. In what month was the interest acquired? _____
   - 7B. How was the interest in the entity acquired? (Example: purchase, gift, will, etc.):_____

     _____
   - 7C. From whom did you acquire the interest in the entity? (If you purchased it from a brokerage, the name of the brokerage): _____
   - 7D. What consideration was given when the interest was acquired? (Dollar amount paid, or if you received the property as a gift or inherited it, the fair market value at the time you acquired your interest in the property): _____

8. Have you transferred all or part of your holdings during the reporting period? Yes ☐ No ☐ If **yes:**
   - 8.A. What portion of the interest was transferred, if less than all? _____%
   - 8.B. Date the interest was transferred: _____
   - 8.C What consideration did you receive for the interest in the entity? (Dollar amount paid, or if you received the property as a gift or inherited it, the fair market value and terms at the time you transferred your interest in the property.) _____
   - 8.D To whom did you transfer your interest in the entity? _____

If you have additional interests in corporations or partnerships, please use additional sheet(s) if necessary, and answer each of the above questions for each additional entry.

SCHEDULE C - INTERESTS HELD IN NON-CORPORATE BUSINESS ENTITIES
DOING BUSINESS WITH THE TOWN OF BEL AIR DURING THE REPORTING PERIOD
Designated Town Employees - Jan. 1 through Dec. 31, 2018

Name:_____

Do you have an interest in any non-corporate business entity (a sole proprietorship) that did business with the Town during the reporting period?

Yes ☐ **No ☐ (Go to Schedule D)**

If Yes: (Answer each question below. A separate Schedule C will be required for each business entity to be disclosed.)

1. Name and address of the principal office of the business entity.

   _____

   Street City State Zip

2. Is the interest held directly by you or is it attributable to you?
   Direct _____ Attributable _____

3. Do you hold the interest solely or is it jointly held with another?
   Solely _____ Jointly _____

4. If held jointly, the percentage of your joint interest: _____%.

5. The dollar value of your the interest in the entity: $_____; or percentage of your interest in the entity: _____%.

6. Are there any legal conditions or encumbrances that apply to your interest in the entity? (Example: mortgages, liens, contracts, options, etc.) Yes ☐ No ☐
   If **Yes:** Give name of creditor: _____

7. Was any interest acquired during the reporting year? Yes ☐ No ☐
   If **Yes:**
   - 7A. What month was the interest acquired? _____
   - 7B. How was the interest in the entity acquired? (Example: purchase, gift, will, etc.)_____
     _____
   - 7C. From whom did you acquire the interest? _____
   - 7D. What consideration was given when the interest was acquired? (Dollar amount paid or if you received the property as a gift or inherited it, the fair market value at the time you acquired your interest in the property.) _____

8. Did you transfer any of your interest during the reporting period? Yes ☐ No ☐
   If **yes**:
   - 8A. What percentage of interest, if less than all, was transferred? _____%
   - 8B. What consideration did you receive for the interest in the entity? (Dollar amount paid or if you received the property as a gift or inherited it, the fair market value and terms at the time you transferred your interest in the property): _____
   - 8C. To whom did you transfer your interest in the entity? _____

If you have additional interests in sole proprietorship(s) that did business with the Town during the reporting period, please use additional sheet(s) and answer each of the above questions for each entry.

SCHEDULE D - GIFTS DISCLOSURE
Designated Town Employees - Jan. 1 through Dec. 31, 2018

Name:_____

During the reporting period (January 1, 2017 through December 31, 2017), did you receive any gift(s), directly or indirectly, in excess of a value of $20 or a series of gifts from the same donor with a cumulative value of $100 or more from a person or entity who: 1) did business with the Town; 2) engaged in an activity that was regulated or controlled by the Town; or 3) was a regulated lobbyist. Gifts received from a member of your immediate family, another child, or parents do not need to be disclosed.

Yes ☐ No ☐ (Go to Schedule E)

If yes: (A **separate** gift schedule is required for each gift.)

1. Who gave you the gift?

2. What was the nature of the gift (i.e. book, restaurant meal, tickets, etc.)?

3. What was the value of the gift?

4. If the gift was given to someone else at your direction or you gave the gift to someone else, list the identity of the recipient of the gift.

Please use additional sheet(s), if necessary, for any additional entries.

SCHEDULE E - OFFICERS, DIRECTORSHIPS, SALARIED EMPLOYMENT AND SIMILAR INTERESTS
Designated Town Employees - Jan. 1 through Dec. 31, 2018

Name:_____

During the reporting period, did you or any member of your immediate family (spouse or dependent child) have any salaried employment or hold any office or directorship with an entity that did business with the Town?

Yes ☐ **No ☐ (Go to Schedule F)**

If Yes: (Answer each question below. A separate Schedule E will be required for each disclosure.)

1. What is the name and address of the business entity?

   Name: _____

   _____

   Street City State Zip Code

2. Who was the individual who held the position or interest listed above (Example: yourself, spouse, dependent child)?

   ☐ Self
   ☐ Spouse
   ☐ **D**ependent Child

   2.A. Name of spouse or dependent child: _____

3. What is the title of the office you, your spouse or dependent child held (Example: limited partner, director, treasurer, chair of the board of trustees, position title, etc.?_____

4. What year did the position begin? _____

5. With what department(s) did the business entity do business? _____

6. What was the nature of the business (regulated by your agency, registered under the lobbying law, or involved with sales and contracts with the Town)? _____

   _____

If necessary, please use additional sheet(s) for any additional entries.

SCHEDULE F - DEBTS YOU OWE
Designated Town Employees - Jan. 1 through Dec. 31, 2018

Name:_____

During the reporting period, did you owe a debt (excluding a retail credit account) to a financial entity that did business with or was regulated by the Town's governmental unit in which you work or used to work? ~~(**NOTE: If, on Schedule A, B or C you listed a financial entity that did business with the Town of Bel Air as the holder of your mortgage or other encumbrance, you must complete Schedule F with regard to that indebtedness.**)~~

Yes ☐ No ☐ (Go to Schedule G)

If Yes: (Answer each question below. A separate Schedule F will be required for each debt to be disclosed.)

1. To whom did you owe the debt? (Do not include consumer credit/debts.)

   _____

2. When was the debt incurred? _____

3. What are the interest rate and terms of payment of the debt? Interest Rate _____
   Terms (monthly, bimonthly, annually, etc.): _____

4. What was the amount of the debt as of the end of the reporting period? (If debt existed during the reporting period but was paid in full at the end of the period, put $0) $_____

5. Did the principal of the debt increase _____ or decrease _____ during the reporting period, and by how much? $_____

6. Was any security given for the debt? Yes ☐ No ☐
   If **yes;** Please state what type of security was given (home, car, boat, etc.): _____

7. If this is a transaction in which you were involved, but which resulted in a debt being owed by your spouse or dependent child, identify your spouse or child and describe the transaction. _____

   _____

   _____

If necessary, please use additional sheet(s) for any additional entries.

SCHEDULE G - FAMILY MEMBERS EMPLOYED BY THE TOWN
Designated Town Employees - Jan. 1 through Dec. 31, 2018

Name:_____

During the reporting period, were any members of your immediate family (spouse or dependent children) employed by the Town in any capacity?

Yes ☐ No ☐ (Go to Schedule H)

If Yes: (Answer each question below. A separate Schedule G will be required for each member of the immediate family who is employed by the Town.)

1. What is the name and relation of the immediate family member employed by the Town?

   Name:_____ Relationship:_____

2. What is the name of the department that employed the member of your immediate family?

   _____

3. What was the title of your immediate family member's position in the Town during the reporting period?

   _____

If necessary, please use additional sheet(s) for any additional entries.

SCHEDULE H - EMPLOYMENT/BUSINESS OWNERSHIP
Designated Town Employees - Jan. 1 through Dec. 31, 2018

Name: _____

Question Num. 1 of 2
During the reporting period, did you or any member of your immediate family, receive any earned income from any entity other than the Town? Please note that your dependent child's employment or business ownership does not need to be disclosed unless the place of employment or the business entity is subject to regulation or the authority of your department or has contracts in excess of $10,000 with the Town.

☐ **Yes** ☐ **No (proceed to Schedule H Question Num. 2)**

If Yes: (Answer each question below. A separate Schedule H Question Num. 1 will be required for each member of the immediate family who had employment or ownership of a business entity.)

1. If, during the reporting period, you or any member of your immediate family, had employment from which you or they earned income, list the name, relationship and address of the employment.

   Name: _____

   Relationship: _____

   Name of Employer: _____

   Address: _____
   Street City State Zip Code

2. If, during the reporting period, you or a member of your immediate family wholly or partially owned any business entity from which income was earned, list the name, relationship, business entity and address.

   Name: _____

   Relationship: _____

   Name of Business Entity: _____

   Address: _____
   Street City State Zip Code

If necessary, please use additional sheet(s) for any additional entries.

SCHEDULE H – EMPLOYMENT/BUSINESS OWNERSHIP
Designated Town Employees - Jan. 1 through Dec. 31, 2018

Name: _____

Question Num. 2 of 2
During the reporting period, did your spouse, partner, or significant other, act, work, or serve as a regulated lobbyist?

☐ **Yes** ☐ **No (proceed to Schedule I)**

If Yes: (Answer each question below.)

1. If, During the reporting period, your spouse, partner, or significant other, acted, worked, or served as a regulated lobbyist, list the names, relationships and addresses of the entities that were represented.

Name: _____

Relationship: _____

Name of Entity: _____

Address: _____
Street City State Zip Code

Name: _____

Relationship: _____

Name of Entity: _____

Address: _____
Street City State Zip Code

Name: _____

Relationship: _____

Name of Entity: _____

Address: _____
Street City State Zip Code

If necessary, please use additional sheet(s) for any additional entries.

SCHEDULE I - DISCLOSURE OF INTEREST – REPRESENTATION BEFORE THE TOWN OF BEL AIR
Designated Town Employees - Jan. 1 through Dec. 31, 2018

Name:_____

Did you represent a person for compensation before a Town of Bel Air board or commission?

Yes ☐ **No ☐**

If Yes: (Answer each question below. A separate Schedule I will be required for each interest to be disclosed.)

I am representing or represented for compensation:

Name: _____

As an: _____

Before: _____

Date(s): _____

For the following consideration:_____

_____

_____